



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 3 (a) of the provisional agenda

Listing, classification and packing:**proposals of amendments to the list of dangerous goods of Chapter 3.2****Packing group of UN 3316****Transmitted by the expert from Germany¹****Introduction**

1. The dangerous goods list does not provide any information on the packing group of UN 3316 CHEMICAL KIT or FIRST AID KIT. This is due to the fact that the packing group has to be determined according to the most stringent packing group assigned to any individual substance in the kit, see Special provision 251 of Chapter 3.3. Nevertheless many users are not aware of the necessity to determine the packing group, as column 5 of the dangerous goods list does not contain any information.

2. Furthermore, the information “0” and “E0” in columns 7a and 7b is often misinterpreted in a way that there is no possibility to consign these articles as limited or excepted quantities.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

Proposal

3. It is proposed to include two separate entries for UN 3316 in the dangerous goods list, one for packing group II and another one for packing group III. In column 7a and 7b a reference to special provisions 251 and 340 should be inserted, as appropriate. It is presented in the same way as in the International Maritime Dangerous Goods Code.

4. This would lead to the following entries:

UN No	Name and description	Class or division	Subsidiary risk	UN PG	Limited and excepted quantities		Packagings and IBCs		Portable tanks and bulk containers	
					LQ	EQ	PI	Special packing provisions	Instructions	Special provisions.
3316	CHEMICAL KIT or FIRST AID KIT	9		II	See SP251	See SP340	P901			
3316	CHEMICAL KIT or FIRST AID KIT	9		III	See SP251	See SP340	P901			