

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

Thirty-first session
Geneva, 2-6 July 2007
Item 6 of the provisional agenda

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Reclassification of UN3090 and UN3091, Lithium Metal Batteries

Transmitted by the International Federation of Air Line Pilots Associations (IFALPA)

1. At its thirtieth session, the Sub-Committee adopted an IFALPA proposal to adopt new entries for lithium ion batteries and lithium ion batteries packed in or with equipment. Although this paper contains no proposals, IFALPA would like input from the Sub-Committee concerning the reclassification of lithium metal batteries, including lithium metal batteries packed in or with equipment, from Class 9 to Division 4.3. Based on this input, IFALPA would bring a working paper to the thirty-second session for consideration by the Sub-Committee.
 2. The primary basis for reclassification is the reactivity and characteristics of lithium metal batteries in a fire environment. Testing by the U.S. Federal Aviation Administration's (FAA) Technical Center found that lithium metal batteries acted like a flammable metal when exposed to fire, and that Halon was ineffective at extinguishing a lithium metal battery fire. Material Data Safety Sheets for lithium metal batteries reinforce the concept that water can be dangerous on a lithium metal battery fire, and that special fire fighting procedures should be employed.
 3. IFALPA therefore believes that inclusion in Division 4.3 is more appropriate for lithium metal batteries. Such a classification would allow emergency responders to be adequately informed of the danger presented when responding to a fire involving lithium metal batteries. A Division 4.3 label would also be a visual indication to anyone encountering the shipment that special fire fighting procedures would be necessary should an emergency occur. Additionally, inclusion in Division 4.3 would result in different handling by some operators, including individual handling outside of the general package sort at several express package carriers, which would be appropriate considering the danger lithium metal batteries pose when damaged. Furthermore, a Division 4.3 classification would result in lower overall quantity limits aboard aircraft, as well as restrictions on where the shipments could be loaded, as opposed to unlimited quantities of Class 9 material with no loading restrictions.
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