

## 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

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Geneva, 30 November - 9 December 2009  
Item 4 of the provisional agenda

### ELECTRIC STORAGE SYSTEMS

#### Amendment of Special Provision 240 – E-bikes

Transmitted by RECHARGE, PRBA and ZVEI (Battery Association Division)

#### **Introduction**

1. During the thirty-fifth session of the Sub-Committee, it was agreed that Special Provision 240 on the classification of Battery powered vehicles and Battery powered equipment fitted with lithium ion and lithium metal batteries under UN Nos. 3171, 3091 and 3481 was not sufficiently clear. Of particular concern was the classification of electric bicycles (E-Bikes) fitted with lithium batteries.
2. Working paper ST/SG/AC.10/C.3/2009/35 is an attempt by Germany to amend Special Provision 240 and clarify this issue by removing “lithium batteries” from this provision. We oppose this proposal. We do not believe Germany’s proposal to remove “lithium batteries” from Special Provision 240 is the most appropriate approach to address the classification of E-Bikes or similar products. Germany’s proposal has the unintended consequence of creating an inconsistent regulatory scheme for electric and hybrid electric vehicles, which will create a more confusing regulatory scheme for shippers of these products.
2. In particular, ST/SG/AC.10/C.3/2009/35 has the following consequences.
  - (a) Full Electric Vehicles powered by a lithium battery (installed) will not be classified under UN 3171. This is inconsistent with how other Full Electric Vehicles powered by a lead-acid or a sodium battery will be classified under UN 3171. Therefore, it seems appropriate to maintain the classification of Full Electric Vehicle powered by lithium batteries under UN 3171.

- (b) Hybrid Electric Vehicles equipped with a lithium battery (installed) will remain under Classification UN 3166. Therefore, it would be inconsistent to remove lithium batteries from Special Provision 240 for Full Electric Vehicles.
- (c) In addition, we would like to bring to the attention of the Sub-Committee that under European Union Regulation electric power-assisted bicycles (pedelec or EPAC) are not considered as electric bicycles (but only as bicycle) when the maximum electrical power is below 250 W and the speed is limited to 25 km/h.

**Conclusion.**

3. For the reasons explained above, we believe it is appropriate to have a lunchtime working group meeting looking at the various aspects of the classification of E-bikes, equipment, and vehicles powered by lithium batteries and their classification under the UN Model Regulations. This working group could then make a final proposal on this subject at the next meeting of the UNSCTDG.

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