
ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern/Geneva, 8-18 September 2009)

USED BATTERIES

Transmitted by the Government of Portugal

1. Introduction

Referring to doc. ECE/TRANS/WP.15/AC.1/2009/7 presented by Sweden we present some comments about this subject, which it is somehow controversial, and it was recently treated by Sub-Committee of Experts on the Transport of Dangerous Goods, on its thirty-fifth session.

2. Problem

Sweden in the referred document put on the table among other things the question of transport “used household batteries” (e.g. alkaline batteries, NiCad’s, zinc-carbon, etc.). As explained by SE this kind of batteries “is commonly used in several consumer products such as radios, cameras, flashlights, remote controls, smoke detectors, etc.”. In fact, these batteries are everywhere and large amounts are produced, used and collected (at public collection points) for recycling purposes.

As defended by SE we could consider that “for used household batteries no exemption from regulations is possible, since it is difficult to protect them against short-circuits”.

However, as pointed out in paragraph 28 of the report of the thirty-fifth session of Sub-Committee of Experts on the Transport of Dangerous Goods, “several experts considered that other dry batteries containing dry potassium hydroxide meaning most common batteries found in retail outlets, posed no particular danger during transport either when conditioned for distribution or when used and collected for recycling or disposal” (we quoted).

This last opinion goes in line with letter from Dr. Rennoch, Head of Section II.21 “Dangerous Goods/Dangerous Substances, Assessment and Coordination”, dated 20 March 1998 to the German Industry Association, ZVEI (this letter constitutes annex 2B of the inf. doc. 21 containing the position of the European Batteries Industry on the proposal made by SE (doc ECE/TRANS/WP.15/AC.1/2009/7).

As presented by US in doc. UN/SCETDG/35/INF.62 about “electric storage systems” it is important “accessing the risk posed by these articles in transport and how current regulatory provisions address the risks” (chemical hazard, electric hazard, or both).

The importance of this matter is emphasized by US “Electronic Code of Federal Regulations” since “large quantity handler of universal waste must manage universal waste batteries in a way that prevents releases of any universal waste or component of a universal waste to the environment” (EPA web-site).

3. Draft proposal

Depending on the kind of batteries (used batteries in this case) which are transported in large amounts it should be clear for consignor and for carrier in what cases we are bonded to RID/ADR/ADN. Certainly it is not the same situation to have a shipment exclusively of used alkaline batteries or for example, a case where we have used NiCad batteries which contain cadmium (a metal which is toxic to human beings).

Since according to doc. UN/SCETDG/35/INF.62 presented by US, the European Rechargeable Battery Association (RECHARGE) agreed to develop a matrix that identifies the consequences of mechanical damage and/or electrical short circuit in relation to the three categories of hazards” we propose that this matrix could include the case of used “household batteries” if RECHARGE or others are kindly enough to embrace this task.

The following types of batteries could be considered in this analysis:

- Alkali-manganese;
- Zinc-carbon;
- Nickel-metal hydride;
- Nickel-cadmium;
- Nickel-zinc, and
- Silver-Zink.

PT proposal envisages analysing technically this problem and finally to find out a good solution for the problem of transport of used household batteries in large quantities.

4. Justification

This proposal is justifiable because around the world millions of batteries are produced each year, and it is important to handlers of used batteries to know what the situations are where the transport operations are bonded to RID/ADR/ADN, and those where it is not the case. Depending of the conclusions of such analysis we should trace clearly the border line between the two situations.
