

## **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**

**25 November 2010**

### **Thirty-eighth session**

Geneva, 29 November – 7 December 2010

Item 5 of the provisional agenda

**Electric storage systems**

## **Comments on ST/SG/AC.10/C.3/2010/80 (France)**

### **Transmitted by the Expert from the United States of America**

1. The expert from the United States welcomes the proposal from France regarding the implementation of a quality management program for the manufacturing of lithium batteries (see ST/SG/AC.10/C.3/2010/80). The inclusion of provisions within the Model Regulations for lithium batteries to be manufactured under a quality management system will help to ensure batteries conform to the tested design type and ultimately enhance transport safety. It is noted that the Model Regulations currently apply requirements similar to those proposed by France in other instances where quality management is critical to ensuring conformance for example with respect to pressure receptacles (see 6.2.2.5.3) and aerosols (see 6.2.4.2.2.1).

2. In conjunction with considering suitable text to address requirements for a quality management program, the Sub-Committee is invited to consider appropriate ways to ensure that batteries meeting the requirements of the Model Regulations can be verified visibly such as by the application of a corresponding marking. Additionally, the Sub-Committee is requested to consider whether the Model Regulations should require retention of the documentation corresponding to the successful completion of the design type testing required to be performed in accordance with the UN Manual of Tests and Criteria. The implementation of such requirements will help to ensure that those involved in the transport of such batteries can readily verify that batteries have passed the required design type testing as well as enable the accessibility of supporting testing documentation so that such testing can be verified.

3. The Sub-Committee is invited to discuss these potential enhancements to the Model Regulations, and if there is agreement in principle a detailed proposal will be prepared for consideration at the following session.

---