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Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Bern, 21–25 March 2011

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals**Carriage of used lithium batteries contained in equipment
assigned to UN Nos. 3091 and 3481****Transmitted by the Government of Germany^{1, 2}***Summary*

Executive summary: This proposal suggests authorising consumers to carry equipment with used lithium batteries not only to consumer collecting points according to special provision 636 but also directly to the intermediate processing facility.

Action to be taken: Amend special provision 636.

Related documents: -

Introduction

1. Special provision 636 (b) facilitates carriage of lithium cells and batteries along with other cells or batteries from consumer collecting points to intermediate processing facilities. There is, however, no special requirement for the carriage of used lithium batteries contained in equipment, which is why this issue often raises questions.

¹ In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2011/19.

2. In the form of small electric appliances, consumers usually carry lithium batteries contained in equipment to consumer collecting points. Bigger appliances or large quantities of appliances, however, are directly carried to intermediate processing facilities in order to be properly disposed.
3. Recently, Germany had to deal with the question, how an information and communication technology company could not only deliver new appliances but also collect used ones from its clients (especially telephone systems).
4. Type and quantity of batteries contained in appliances as well as the lithium content or the watt-hour rating of lithium batteries usually cannot be determined before dismantling. Especially difficult to access batteries inside the appliance cannot or should not be dismantled on the spot.
5. Due inter alia to the fact that it is not possible to indicate the quantity of dangerous goods contained in machinery or equipment according to 5.4.1.1.1 (f), Note 2 in the transport document, regular carriage as dangerous good of Class 9, UN No. 3091 and/or UN No. 3481 is excluded.
6. Germany is of the opinion that such carriage should be authorised by special provision 636 and proposes, though, to amend it accordingly.

Proposal

7. Germany suggests amending the first sentence of special provision 636 (b) to read as follows (new text is underlined):

"Used lithium cells and batteries with a gross mass of not more than 500 g each collected and presented for carriage for disposal between the consumer collecting point and the intermediate processing facility or in the case of lithium batteries contained in equipment also between the consumer and the intermediate processing facility, together with other non-lithium cells or batteries, are not subject to the other provisions of RID/ADR if they meet the following conditions: ...".

Justification

8. Special provision 636 concerns carriage of small consumer batteries from collecting points; these battery collections include also lithium batteries. Collections of appliances with unspecifiable batteries present a similar situation and therefore special provision 636 has been allocated also to the relevant entries for lithium batteries contained in equipment. In these cases, however, carriage is not always done from collecting points, to which consumers have carried their used appliances. This is why the wording of special provision 636 should be amended.
