

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

28 November 2014

Forty-sixth session

Geneva, 1 – 9 December 2014

Item 2 (e) of the provisional agenda

Recommendations made by the Sub-Committee on its forty-third, forty-fourth and forty-fifth sessions and pending issues: miscellaneous pending issues

Lithium batteries and hazard communication – Comments on ST/SG/AC.10/C.3/2014/89

Transmitted by the International Civil Aviation Organization (ICAO)

Introduction

1. The Dangerous Goods Panel Working Group of the Whole Meeting (DGP-WG/14) was held in Rio de Janeiro from 20 to 24 October 2014. The working group was asked to provide comments to the ICAO Secretariat on the proposals to the Sub-Committee contained in working paper ST/SG/AC.10/C.3/2014/89 on hazard communication for Class 9 and in particular for lithium batteries.

2. The lack of appropriate hazard communication for lithium batteries has been a concern for the DGP for some time. The working group expressed its appreciation for the work done by the Expert from the United Kingdom in drafting the proposed amendments in ST/SG/AC.10/C.3/2014/89. The working group agreed that the amendments addressed many of the DGP's concerns with the lack of clear communication in relation to lithium batteries, but a number of comments were raised which are provided below.

Class 9 hazard label

3. The DGP supported the development of a specific Class 9 label for lithium batteries, but raised concerns in relation to the pictograms proposed to appear on the lower half of the existing Class 9 label. It was thought that the lithium battery pictogram being one of nine possible pictograms would detract from clear hazard communication for lithium batteries. It was also thought that some of the other pictograms were too detailed. It was suggested that some of them conveyed information on what article or substance was contained in the package when the main objective of the pictogram should be to communicate the actual hazard posed.

Lithium battery handling label

4. The Technical Instructions currently require a lithium battery handling label for most excepted batteries; the working group therefore supported a handling label for all modes of transport. Recognizing that the handling label had been a requirement for the air mode for several years, the DGP suggested that the Sub-Committee consider harmonizing more closely with the label in the Technical Instructions. This would include:

- a) Minimum dimensions of 120 mm wide × 110 mm high;
- b) Provisions for a minimum dimension of 105 mm wide × 74 mm high to appear on packages containing lithium batteries where the packages are of dimensions such that they can only bear smaller labels;
- c) The colour red to be specified in relation to the rectangular hatching required; and
- d) An indication of the telephone number required by SP 188 to appear on the label.

Report of the DGP Working Group of the Whole Meeting (DGP-WG/14)

5. The report of DGP-WG/14 can be downloaded from <http://www.icao.int/safety/DangerousGoods/Pages/WG14.aspx>.
