

## Economic Commission for Europe

### Inland Transport Committee

Working Party on the Transport of Dangerous Goods

22 September 2015

#### Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 15–25 September 2015

Item 11 of the provisional agenda

Any other business

### Revisions to Special Provision 188

#### Transmitted by the Governments of the United Kingdom and of the United States of America

1. During its present session, the Joint Meeting has considered amendments resulting from harmonization with the United Nations Recommendations on the Transport of Dangerous Goods including the following amendment to Special Provision 1881 regarding the transport of lithium batteries:

SP188 (f) Amend to read as follows:

“(f) Each package shall be marked with the appropriate lithium battery mark, as illustrated in 5.2.1.9; This requirement does not apply to:

- (i) packages containing only button cell batteries installed in equipment (including circuit boards); and
- (ii) packages containing no more than four cells or two batteries installed in equipment, where there are not more than two packages in the consignment.”.

2. This amendment adopted by the UN Sub-Committee of Experts on the Transport of Dangerous Goods at its December 2014 session was based on a late informal document submitted during the session by the Portable Rechargeable Battery Association and RECHARGE<sup>2</sup> in response to a working document from the International Air Transport Association<sup>3</sup> regarding consideration of what constitutes “equipment” for the purposes of Special Provision 188. The amendment adopted however did not directly address the issue raised by IATA (i.e. clarify the meaning of the term “equipment”). Rather, the amendment resulted in a new requirement that all packages containing lithium batteries in equipment be marked in accordance with SP 188 when a consignment includes more than two packages.

3. Under the current RID/ADR/ADN packages containing no more than four cells or two batteries installed in equipment are not required to be marked in accordance with SP 188 irrespective of the number of packages in a consignment. As the amendment adopted by the UN Sub-Committee was based on a late informal document submitted to its December 2014 session, delegations would not have had the prior opportunity to consult with interested parties so as to fully assess impact. Under the normal transition period provided within ADR/RID/ADN, the new requirement will take effect on 1 July 2017. Delegates to the Joint Meeting may wish to consider consulting further with interested parties to assess whether the standard transition period provided is sufficient considering the potentially substantive impact of the amendment.

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1 See ECE/TRANS/WP.15/AC.1/2015/23/Add.1

2 See ST/SG/AC.10/C.3/2014/INF.70

3 See ST/SG/AC.10/C.3/2014/101 (IATA)