

## 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

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Item 4 (f) of the provisional agenda

Electric storage systems: miscellaneous

## Parties Subject to Requirements for Provision of the UN 38.3 Test Summary

Submitted by the International Air Transport Association (IATA)

### Introduction

1. Over the last biennium the Sub-Committee considered how information could be made available to consignors of lithium cells or batteries such that the consignor could be able to satisfy themselves that the lithium cell or battery type had passed the applicable tests set out in sub-section 38.3 of the Manual of Tests and Criteria.
2. To address this, the following text was adopted as a new item (g) of 2.9.4 of the 20<sup>th</sup> revised edition of the Model Regulations:
  - (g) Manufacturers and subsequent distributors of cells or batteries shall make available the test summary as specified in the Manual of Tests and Criteria, Part III, sub-section 38.3, paragraph 38.3.5.
3. However, the text adopted into Amendment 1 to the sixth revised edition of the Manual of Tests and Criteria in sub-section 38.3, paragraph 38.3.5, the information required in the test summary items (a) and (b) is as follows:
  - “(a) Name of cell, battery, or product manufacturer, as applicable;
  - (b) Cell, battery, or product manufacturer’s contact information to include address, phone number, email address and website for more information;”
4. So, while the Model Regulations only requires the manufacturers and subsequent distributors of lithium cells and batteries to make the test summary available, the Manual of Tests and Criteria appears to require that product manufacturer of devices containing lithium cells or batteries have a similar obligation.
5. The sodium-ion battery (figure 1) is a development of lithium-ion technology in which the active ion, lithium, is replaced by sodium. Sodium-ion cells are manufactured in the same way as lithium-ion cells and they have comparable performance.

## **Proposal**

6. The Sub-Committee is invited to discuss this apparent anomaly to consider if there should be an amendment to 2.9.4 (g) to include reference to equipment manufacturers being required make available the test summary. If the Sub-Committee agrees that the provision of the test summary is also applicable to device manufacturers then this should be brought to the attention of the modal bodies such that this could be included as an amendment to the edition of the modal regulations that are currently being finalised for implementation commencing 1 January 2019.

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