

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

4 December 2017

Fifty-second session

Geneva, 27 November-6 December 2017

Item 4 (a) of the provisional agenda

Electric storage systems:

testing and lithium batteries

Lithium battery test summary document

Submitted by the Medical Device Battery Transport Council (MDBTC)

1. The Sub-Committee adopted the requirement for manufacturers and subsequent distributors of lithium battery cells, batteries and products to make available a test summary in 2.9.4 of the Model Regulations. The elements of the test summary were incorporated in 38.3.5 of the Manual of Test and Criteria. The MDBTC suggests that a discussion be held during the session to address specific challenges related to providing the test summary including those that address multiple cells, batteries or products.

2. We don't believe that sufficient consideration has been given to who in the supply chain is responsible for making the test summary available. For instance, if the manufacturer provides it on a publicly available web site then each downstream shipper should not be required to also need to make it available. As an example, if Acme mobile phone company products are reshipped by TopMobile company distributors then there should be no need for TopMobile to publish the test summary on their web site since it is already publicly available. If someone wants the Acme test summary they need to get it from the Acme website, not from TopMobile. Considering companies that offer tens of thousands of different battery-operated products this could be impossible to manage. For example, some companies redistribute 3rd party products. Just because a company ships another company's product are they required to maintain a test summary for every product they ship. This will be challenging enough for medical device companies but will be virtually impossible for e-commerce companies.

3. We have developed a series of questions and answers to be used to guide the discussions and to ensure consensus in interpretation and request that they be reviewed and considered by the Sub-Committee.

Questions and Answers Related to the Test Summary (TS)

Q: Does the TS apply to products and cells or batteries contained within products/parts or just stand alone cells or batteries?

A: The TS applies to the cells and batteries themselves which ship as standalone cells or batteries and subsequently to the cells and batteries contained in equipment at such time when the cell or battery is added to a product.

Q: Can multiple batteries/manufacturers/products be listed on one report?

A: Yes, it is acceptable to have a single document that addresses multiple batteries/manufacturers/products, provided all required information is stated.

Q: Is it acceptable to list the various test houses, tests and range of revisions tested to for the UN 38.3 revision and amendments.

A: Yes, it is acceptable to have multiple test houses and their addresses, email etc. information listed provided all required information is stated. The Test house is not required to be aligned to a specific battery or product on TS when the TS covers multiple batteries/products. It is required to have the test report number and date of test for each cell/battery/product listed on the TS.

Q: What is meant by physical description of cell or battery? (Should read physical description of cell/battery/product.)

A: A physical description is intended to provide a check for the person requesting the TS to know that it applies to the cell/battery/product covered by the TS. i.e. if cell phone, description could be the invoice description or marketing name of the product as the physical description.

Q: What does availability of report mean: "When requested?"

A: Any individual or entity in the supply chain may request the TS. i.e. regulator, consumer, transport provider.

Q: Can the TS provider require a requestor to obtain the document from a website.

A: Yes, it is acceptable for the provider to require the requestor to obtain a document electronically from a provider's website. The provider must ensure that the cell/battery/product has appropriate identifiers to align to the TS.

Q: If a manufacturer considers their suppliers, test house and battery data confidential and competitive information, how would TS compliance be achieved.

A: All 10 data elements and listed subsets of information is required to be on the TS. As indicated above, test house.
