United Nations ST/SG/AC.10/C.3/2020/52

Secretariat

Distr.: General
17 April 2020

Original: English

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

Fifty-seventh session
Geneva, 29 June-8 July 2020
Item 3 of the provisional agenda
Listing, classification and packing

Proposed amendment to packing instruction LP903

Transmitted by the expert from the United Kingdom of Great Britain and Northern Ireland[*] [**]

Introduction

1. The United Kingdom proposes a modification to Large Packing Instruction LP903 to allow multiple batteries or pieces of equipment subject to certain packing conditions.

2. The packaging expert from the United Kingdom was recently presented with a situation that focused attention on Large Packing Instruction LP903. A large packaging had been approved for a single battery comprising of 12 fully integrated battery modules. The manufacturing facility was able to build the batteries (modules) but unable to combine them into the final single item. Since there was no other packaging available, the manufacturer asked if it would be possible for them to pack separately the (module) batteries and then transport them in the large packaging for final assembly elsewhere. This would be in contravention of the restriction in LP903 that the packaging only contains either a single battery or a single piece of equipment.

3. The expert from the United Kingdom believes that this restriction of a single battery in the large packaging came from a fear that large packaging would be used as jumble packs for large numbers of small batteries and cells. However, from a package testing and performance viewpoint the restriction runs counter to the philosophy and principles of UN testing and approval.

4. In addition the expert from the United Kingdom also notes that no such numeric restriction applies in the reciprocal packaging instruction P903 (up to 400 kg net mass) and that for batteries over 12 kg with an impact resistant outer casing under P903 (2) there is no limit on either the number of batteries or the size of the packaging when used.

[*] 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2)

[**] This document was scheduled for publication after the standard publication date owing to circumstances (CORVID-19) beyond the submitter's control.

Proposal

5. Amend LP903 as follows (deleted text ~~struck through~~ new text underlined):

LP903	PACKING INSTRUCTION	LP903
This instruction applies to UN Nos. 3090, 3091, 3480 and 3481		
The following large packagings are authorized for ~~a single~~ batter~~y~~ies and for ~~a single item of~~ equipment containing batteries, provided that the general provisions of **4.1.1** and **4.1.3** are met: Rigid large packagings conforming to the packing group II performance level, made of: steel (50A); aluminium (50B); metal other than steel or aluminium (50N); rigid plastics (50H); natural wood (50C); plywood (50D); reconstituted wood (50F); rigid fibreboard (50G). ~~The~~ Each battery or ~~the~~ piece of equipment shall be wrapped or packed in an inner packaging and the outer packaging provided with dividers or partitions so that each battery or piece of equipment is separated to ensure ~~packed so~~ that the battery or the equipment is protected against damage that may be caused by its movement of placement within the large packaging.		
Additional requirement: Batteries shall be protected against short circuit.		

Justification

6. There is no reduction in safety. Indeed, this may encourage increased use of the certified packaging rather than the open approach of P903 (2). The requirement to wrap or package each battery separately and segregate in the large packaging will help to mitigate the adverse effects should a battery short circuit by slowing or preventing spread to other batteries. The packaging arrangement is such that it prevents the use of these packagings as jumble packs.