



**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 4 (c) of the provisional agenda

Electric storage systems: transport provisions**Inner packagings for lithium cells and batteries –
Clarification of requirements in Packing Instruction P903****Submitted by the expert from the United States of America*,******Introduction**

1. Recent stakeholder outreach initiatives have indicated varying interpretations in the application of P903 as it relates to inner packaging and protection of lithium cells and batteries. Packing instruction P903 indicates the need for cells and batteries to be protected from short circuits and damage caused by the movement or placement of the cells or batteries within the packaging. However, there are no requirements in packing instruction P903 for the use of inner packagings, or other indication of how the cells or batteries are intended to be protected from short circuits. A clear indication of appropriate inner packaging or other protection is critical to ensure safety related to handling in transport.
2. Providing for greater detail on how lithium cells or batteries should be packed in P903 will improve safety while keeping the packing instruction sufficiently flexible and performance based. The expert from the United States of America believes this proposal is consistent with the original intention during the development of packing instruction P903 and reflects current best packaging practices.
3. This proposal only seeks to clarify the existing provisions in packing instruction P903, it does not introduce new packaging requirements. While this proposal includes only a small change, we believe this is a helpful clarification to the existing text in packing instruction P903. We recognize the importance of other on-going safety initiatives to improve the safe transport of lithium cells and batteries and do not anticipate this proposal will impact that work.

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

Proposal

4. In packing instruction P903, amend paragraph (1) as follows (new text is underlined):

“(1) For cells and batteries:

Drums (1A2, 1B2, 1N2, 1H2, 1D, 1G);

Boxes (4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G, 4H1, 4H2);

Jerricans (3A2, 3B2, 3H2).

Cells or batteries shall be packed in packagings so that the cells or batteries are protected against damage that may be caused by the movement or placement of the cells or batteries within the packaging. Cells or batteries shall be placed in inner packagings that completely enclose the cells or batteries (e.g. poly bags, shrink wrap, trays, fibreboard dividers, etc.) and be separated from contact with equipment, other devices, and conductive material.

Packagings shall conform to the packing group II performance level.”
