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**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, 30 November-8 December 2020  
Item 4 (f) of the provisional agenda

**Electric storage systems: miscellaneous**

Clarification on P908 and P910

Transmitted by the expert from Belgium[[1]](#footnote-2)

Introduction

1. Packing instructions P908 and P910 are intended for the transport of UN 3090, UN 3091, UN 3480 and UN 3481. More specifically P908 is intended for the transport of defective or damaged cells and batteries and P910 is intended for the transport of production runs of not more than 100 cells or pre-production prototypes of these cells and batteries.

2. Both P908 and P910 require that the non-combustibility shall be assessed according to a standard recognized in the country where the packaging is designed and manufactured. This requirement is specified in P908 5), P910 1) e) and P910 2) d).

3. As currently written, this requirement can be mis-interpreted. It can be interpreted that the non-combustibility of the packaging as a whole needs to be assessed. However, it is believed that the non-combustibility assessment is only applicable to the used cushioning or insulation material. The proposals 1 to 3 below intend to clarify this requirement in the respective paragraphs.

4. The same incorrect interpretation can also originate from LP904 and LP905, where in LP904 5., LP905 1) e) and LP905 2) d), the same requirement for assessing the non-combustibility can be found. As such similar proposals 4 to 6 below are aimed to clarify this requirement in LP904 and LP905 accordingly.

Proposal 1

5. Amend packing instruction P908 5. to read as follows (new text underlined):

“The non-combustibility of the used thermal insulation material and the used cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed or manufactured.”

Proposal 2

6. Amend P910 (1) (e) to read as follows (new text underlined):

“The non-combustibility of the used thermal insulation material and the used cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed or manufactured;”

Proposal 3

7. Amend P910 (2) (d) to read as follows (new text underlined):

“The non-combustibility of the used cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed or manufactured.”

Proposal 4:

8. Amend LP904 5. to read as follows (new text underlined):

“The non-combustibility of the used thermal insulation material and the used cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed or manufactured.”

Proposal 5:

9. Amend LP905 (1) (e) to read as follows (new text underlined):

“The non-combustibility of the used thermal insulation material and the used cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed or manufactured.”

Proposal 6:

10. Amend LP905 (2) (d) to read as follows (new text underlined):

“The non-combustibility of the used cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed or manufactured.”

1. 2020 (A/74/6 (Sect.20)) and Supplementary, Subprogramme 2.) [↑](#footnote-ref-2)