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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 (c) of the provisional agenda

**Electric storage systems: transport provisions**

 Use of packagings not required to meet 4.1.1.3 and exceeding 400 kg net mass for the transport of lithium batteries

 Transmitted by the PRBA – The Rechargeable Battery Association and The Advanced Rechargeable and Lithium Batteries Association[[1]](#footnote-2) (RECHARGE)

 Introduction

1. This paper addresses comments received in response to ST/SG/AC.10/C.3/2020/46, ST/SG/AC.10/C.3/2019/34 and informal document INF.17 (fifty-sixth session) on the issue of Packing Instruction P903 and the use of packagings with a net mass exceeding 400 kg.

2. As PRBA explained during the online informal discussion of the Sub-Committee session in June 2020 and at the fifty-fifth and fifty-sixth sessions, some competent authorities, freight forwarders, vessel operators, and other entities in the lithium battery supply chain do not appear to fully understand that if the net mass of a packaging as authorized under P903(2), (4) and (5) exceeds the mass limit generally prescribed in Chapter 6.1, the batteries or equipment do **not** need to be packaged in large packagings in accordance with LP903.

3. In this document, PRBA proposes amendments to the Model Regulations to better clarify this point by the addition of a note that the packagings under P903(2), (4) and (5) may exceed 400 kg net mass and provides for changes in other packing instructions that have similar language as found in P903.

4. The comments and minor edits on ST/SG/AC.10/C.3/2020/46 offered by the Netherlands, Sweden, and OTIF during the online informal discussion in June are also reflected in this document.

 Proposals

5. In 4.1.3.3, add a new last sentence to read:

“4.1.3.3 Each packing instruction shows, where applicable, the acceptable single and combination packagings. For combination packagings, the acceptable outer packagings, inner packagings and when applicable the maximum quantity permitted in each inner or outer packaging are shown. Maximum net mass and maximum capacity are as defined in 1.2.1. Where packagings which need not meet the requirements of 4.1.1.3 (e.g., crates, pallets, etc.) are authorized, these packagings are not subject to the mass or volume limits generally applicable to packagings conforming to the requirements of Chapter 6.1, unless otherwise indicated in the relevant packing instruction.”.

6. In packing instruction P903, add a new note following paragraph (4) to read:

*“****NOTE:*** *The packagings authorized in paragraphs (2) and (4) may exceed a net mass of 400 kg (see 4.1.3.3).”*

7. Amend the following packing instructions by adding a note similar to the one provided in paragraph 6 above (applicable to the packing instruction as a whole, or to the indicated paragraph(s) or special packing provision which authorize packagings not subject to the requirements of 4.1.1.3):

P003(PP32);

P004(2) and (3);

P005;

P006(2);

P130(PP67);

P144(PP77);

P408(2);

P801(1) and (2);

P903(2), (4), and (5);

P905;

P906(2)(b) and last paragraph;

P907;

P909(3) and (4); and

P910(3).

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