

Special provision 636 (b) in INF.8

Transmitted by the government of Switzerland

1. We are concerned with the new wording in the special provision 636 (b) for the following reasons:
2. Contrary to the old version of this SP, the new wording allows the carriage without applying the other rules of ADR not only of lithium cells and batteries in equipment without other non-lithium cells but also the carriage of lithium cells which are not in equipment without other non-lithium cells.
3. We remember that when this exemption in SP 636 was introduced the reason why this was possible was because as a general rule the lithium cells and batteries were "diluted" between the non-lithium cells in such a way to avoid any dangerous reaction which usually arise when only lithium cells and batteries are put together.
4. However with the new text which was modified in order to permit the disposal directly to intermediate processing facilities of lithium cells and batteries contained in equipment carried alone or not together with other non-lithium cells, we have introduced the same possibility for lithium cells and batteries which are not installed in equipment. This is in total contradiction with the reasons which justify the exemption in SP 636.
5. This was not the intention of the German proposal in document ECE/TRANS/WP.15/AC.1/2011/19.
6. We believe that the carriage of lithium cells and batteries alone should not be exempted of ADR. We would propose to amend the adopted text as follows:

Proposal

The amendment in INF.8 for SP 636 (b) should read:

"Amend the introductory sentence to read as follows:

"Up to the intermediate processing facility, used lithium cells and batteries with a gross mass of not more than 500 g each, whether or not contained in equipment, collected and handed over for carriage for disposal, together ~~with or without~~ other non-lithium cells or batteries, are not subject to the other provisions of ADR if they meet the following conditions:".

Français

DS 636 b) Modifier la phrase introductive pour lire comme suit :

« Les piles et batteries au lithium usagées, dont la masse brute ne dépasse pas 500 g par unité, qu'elles soient contenues ou non dans un équipement, collectées et présentées au transport en vue de leur élimination, en mélange avec des piles ou batteries autres qu'au lithium, ne sont pas soumises, jusqu'aux lieux de traitement intermédiaire, aux autres dispositions de l'ADR si elles satisfont aux conditions suivantes :... ».

| « Les piles et batteries au lithium usagées, dont la masse brute ne dépasse pas 500 g par unité, qu'elles soient contenues ou non dans un équipement, collectées et présentées au transport en vue de leur élimination, en mélange ~~ou non~~ avec des piles ou batteries autres qu'au lithium, ne sont pas soumises, jusqu'aux lieux de traitement intermédiaire, aux autres dispositions de l'ADR si elles satisfont aux conditions suivantes :... ».
