

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

24 November 2011

Fortieth session

Geneva, 28 November – 7 December 2011

Item 3 (c) of the provisional agenda

Electric storage systems : Waste or damaged/defective lithium batteries

Comments on document ST/SG/AC.10/C.3/2011/39

Transmitted by the expert of Switzerland

1. We are concerned with the wording in the special provision SPXXX proposed in document ST/SG/AC.10/C.3/2011/39 because of the following reasons:
2. Under SPXXX (2) (a) the choice is given to use either P903a(1) or P903a(2) or P903b. We wonder if there is a special reasoning which justifies the specific reference only to paragraphs (1) or (2) of P903a. Does this mean that the Experts don't think necessary to guarantee the additional requirement in P903a or did the Experts simply think the paragraph (3) of P903a is not applicable because of the gross mass and exclude it from the possible applicable provisions?
3. The problem is that now the additional requirement of P903a is not applicable in the case of SPXXX (2).
4. By reading carefully the introductory text of SPXXX (2) one observes that it is allowed to carry waste lithium cells alone without the presence of other non-lithium cells and batteries. We cannot believe that the profession will try to do this without ensure that the additional requirement in P903a is fulfilled, that is that " Cells or batteries shall be packaged or designed so as to prevent short circuits that could lead to a dangerous evolution of heat or fire". For some kind of batteries the result of putting together lithium cells or batteries renders the load unsafe and the transport cannot be carried because of the resulting fire.
5. We believe then that the "additional requirement" in P903a has to be always fulfilled and there is no reason to exclude it from the applicable provisions in case of SPXXX (2).
6. We also believe there is no necessity to exclude (3) of P903a because in case of SPXXX (2), that is of lithium cells and batteries with a gross mass of not more than 2 kg, this paragraph (3) will not be applicable and it is then automatically excluded.
7. For these reasons, instead of referring in SPXXX (2) specifically to P903a (1) or P903a (2) we should refer to P903a as a whole. One solution is presented hereafter.

Proposal 1

Change SPXXX (2) (a) as follows:

"(a) The provisions of packing instruction P903a (1), P903a (2) P903a or P903b;"