



**Economic and Social  
Council**

Distr.  
GENERAL

TRANS/WP.15/AC.1/2004/25  
2 July 2004

Original: ENGLISH

---

**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Geneva, 13-17 September 2004,  
agenda item 5)

**NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN**

**Comments on provisions for the transport of lithium cells and batteries, UN 3090**

**Transmitted by the European Battery Recycling Association (EBRA) \*/**

This document concerns provision 636 on the transport of “used lithium cells and batteries together with other non-lithium cells or batteries or alone”, as amended by the Joint Meeting in Bonn from 13 to 17 October 2003 (refer to TRANS/WP.15/AC.1/94/Add.3 and the related packing instruction P903 b).

Due to the wording of the special provision and the packing instruction and the decision of the meeting, the provision and the instruction are interpreted by National Authorities as being applicable to used household batteries as are commonly collected as a result of the implementation of the relevant European Directives and National Legislation resulting from the EU-Directive or further National and International Regulations and treaties.

Used household batteries collected from consumers are currently not subject to ADR.

---

\* / Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2004/25.

The mandatory collection systems for used household batteries have been developed accordingly. For example used batteries are collected throughout Europe at schools, supermarkets and other public facilities.

The special provision 636 requires that all these collection systems must be revised, because also consumers dispose of consumer Lithium batteries at these collection points (schools, supermarkets, further public facilities). Most of the systems will have to be terminated, and totally new systems have to be developed.

The EBRA, after widespread consultation with its members, wishes to bring forward as its opinion, that the present day situation does not seem to have created hazardous situations or is liable to create such situations.

This opinion is based upon the experience that no incidents involving major damage to goods and/or people have been observed over the last 10 years in a number of countries.

Based on this experience EBRA wishes to propose that the meeting reviews this situation and take action to the effect that also from 2005 on used household batteries may be collected and transported to the sorting facility or other in between facility following the existing collection systems. This has been the case since collection of used household batteries was started (in a number of countries from 1975 onwards).

By respecting the present-day situation for the collection of used household batteries, the carefully designed, approved and implemented collecting systems need not to be revised. Especially in view of the growing need for improving the collection rate (refer to the new EU battery directive) it would be a tremendous advantage when the present-day household battery collection could also be continued from 2005 on.

Proposal for Amendment of SP 636 :

The Special Provision 636 shall not apply to the collection of used household batteries from consumers and the transport of these used household batteries from the consumer collection points for used household batteries to the first intermediate facility.

Notes:

1. It is noted that ADR does not recognize the different types of Lithium batteries as requiring different provisions for safeguarding the transport thereof. Especially this is the case for the consumer types of Lithium batteries ("B" and "C"-types), as widespread in use for cameras, and a further multitude of electronic devices, next to and in competition with the well known zinc-carbon and Alkaline batteries (R and LR-types).

2. Lithium batteries exist in a number of types, the solid cathode types "B" and "C" (according to International Standard IEC 60086) being in circulation mainly for Consumer applications and consumer use. Consequently these are the Lithium batteries that are disposed of by consumers under the mandatory consumer collection systems.

3. The professional types of Lithium batteries, such as the liquid cathode types “E” (according to International Standard IEC 60086) are used in professional applications and are disposed of under the, also mandatory, industrial collection systems together with other industrial batteries.
  4. The military types of Lithium batteries are always collected in the specially dedicated military collection systems, together with other specifically military batteries.
  5. The Lithium Ion and Lithium Polymer types of batteries, although used in many consumer applications, are also disposed of in the industrial collection systems (Computer shops, photoshops, electronic repair facilities).
  6. Incidents involving Lithium batteries have been recorded. In these incidents the incidents were induced by Industrial batteries, mainly Lead acid and Nickel cadmium batteries. These types of batteries, which induced the incidents, were in all cases Industrial batteries, and made contact with the Lithium batteries at the sorting facility, or other intermediate industrial facility, only.
-