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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

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Item 2(a)(ii) of the provisional agenda

Special provision 188 concerning lithium batteries

Comments on ST/SG/AC.10/C.3/2006/97

Transmitted by the Portable Rechargeable Battery Association

The Portable Rechargeable Battery Association (PRBA) generally supports proposal ST/SG/AC.10/C.3/2006/97 submitted by the United States of America. However, PRBA believes several changes should be made to ST/SG/AC.10/C.3/2006/97 that will provide a more practical regulatory framework for shippers of lithium metal and lithium ion cells and batteries and equipment powered by them.

The USA's proposed amendments to Special Provision 188 would require *every* package containing a lithium metal or lithium ion cell or battery and equipment packed with or containing a cell or battery to be marked to indicate the package contains cells or batteries, the package shall be handled with care, a flammability hazard exists if the package is damaged; special procedures should be followed in the event the package is damaged, and a telephone number for additional information. For the reasons explained below, PRBA does not believe it is realistic to require small cell and battery shipments electronic products packed with or containing the cells and batteries to comply with the marking and documentation requirements noted above.

Small consumer electronic products powered by lithium metal or lithium ion batteries include such items as cellular phones, MP3 players, notebook computers, "Bluetooth" headsets, PDA's, flashlights, compact disc players, and radios. These products may contain one to four lithium metal or lithium ion cells or batteries. For example, a cellular phone is powered by a lithium ion battery and also contains a small lithium metal button cell for back-up power; notebook computers may have two lithium ion batteries and two lithium metal button cells; and flashlights and compact disc players may contain up to 4 individual lithium metal cells. It is quite common for consumers and Internet retailers to place one of these electronic products or a single replacement battery in one small package and offer it for transport. The risk that these small shipments pose in transport is very limited. In addition, when cells and batteries are shipped packed with or contained in equipment the packaging scheme and equipment provides a significant amount of protection for the cells and batteries.

PRBA believes it would be more practical to provide an exception from the marking and documentation requirements contained in /SG/AC.10/C.3/2006/97 for packages containing no more than 4 individual cells or 4 individual batteries, including equipment packed with or containing these cells or batteries. PRBA therefore

offers the amendments noted below to address these issues along with several other minor editorial amendments to help clarify the provisions contained SG/AC.10/C.3/2006/97:

188 Lithium cells and batteries offered for transport are not subject to other provisions of these Regulations if they meet the following:

- (d) Cells and batteries, except when installed in equipment, shall be packed in inner packagings or trays that completely enclose the cell or battery. Cells and batteries shall be protected so as to prevent short circuits.
 - (e) Cells and batteries when installed in equipment shall be protected from damage and short circuit, and the equipment shall be equipped with an effective means of preventing accidental activation.
 - (f) Each package, except those containing not more than 4 individual cells or 4 individual batteries including equipment packed with or containing not more than 4 individual cells or 4 individual batteries shall be marked to indicate that:
 - (g) Each shipment, except those containing not more than 4 individual cells or 4 individual batteries including equipment packed with or containing not more than 4 individual cells or 4 individual batteries, shall be accompanied with a document indicating that:
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