

**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

Thirty-sixth session
Geneva, 30 November – 9 December 2009
Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Comments on ST/SG/AC.10/C.3/2009/47 (ICAO)
Clarification of text related to classification of lithium cells and batteries
in the Manual of Tests and Criteria

Transmitted by the expert from Sweden

1. Sweden appreciates this proposal and we support the suggested change. As the competent authority in Sweden we receive questions about the interpretation concerning tests of lithium batteries and cells and the proposed note will clarify the situation.
2. However, we would like to suggest an amendment to the proposal. We propose that the note shall mention that units such as battery packs, modules and battery assemblies are subject to the test required by special provision 188 and 230 irrespective of whether the cells they are composed of have been tested. We think it is user-friendly to explicitly mention these different types of units.
3. Therefore, Sweden proposes to delete the word battery and replace this with “Units such as battery packs, modules and battery assemblies.”

Proposal

4. Amend the proposed note under paragraph 38.3.2.1 to read as follows (new text is bold and underlined):

*“NOTE: ~~Batteries~~ **Units such as battery packs, modules and battery assemblies** are subject to the tests required by special provisions 188 and 230 of Chapter 3.3 of the Model Regulations irrespective of whether the cells of which they are composed have been so tested.”.*