

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

7 December 2012

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Geneva, 3 – 11 December 2012

Item 2 (c) of the provisional agenda

**Recommendations made by the Sub-Committee on its
thirty-ninth, fortieth and forty-first sessions and pending issues:
electric storage systems**

Comments to INF.64: Special Provision and Packing Instructions for the transport of waste lithium batteries

Transmitted by the United States of America

Introduction

We are proposing to clarify the provisions in the additional requirements for waste batteries proposed in INF.64.

Proposal

Additional requirements:

Cells and batteries shall be designed or packaged to prevent short circuits and the dangerous evolution of heat.

Protection against short circuits and the dangerous evolution of heat includes, but is not limited to,

- individual protection of the battery terminals, or
- inner packaging to prevent contact between cells and batteries,
- batteries with recessed terminals ~~or internal device designed to protect against short circuits,~~
- ~~or~~
- ~~the use of cushioning material to fill empty space in the packaging.~~

Batteries must be secured within the outer package through the use of non-combustible, non-conductive cushioning material to fill the empty space or through the use of a tightly closed polyethylene bag. ~~The cushioning material may be dispensed with when the packaging is entirely fitted with a polyethylene bag and the bag is tightly closed.~~