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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****Forty-third session**

Geneva, 24–28 June 2013

Item 4 (e) of the provisional agenda

**Electric storage systems: miscellaneous****Documentation requirement for lithium batteries in Special  
Provision 188****Transmitted by The Rechargeable Battery Association (PRBA)<sup>1</sup>****Introduction**

1. Special Provision 188 of the Model Regulations contains the following documentation requirement in paragraph (g):

(g) Each consignment of one or more packages marked in accordance with paragraph (f) shall be accompanied with a document including the following:

- (i) an indication that the package contains “lithium metal” or “lithium ion” cells or batteries, as appropriate;
- (ii) an indication that the package shall be handled with care and that a flammability hazard exists if the package is damaged;
- (iii) an indication that special procedures shall be followed in the event the package is damaged, to include inspection and repacking if necessary; and
- (iv) a telephone number for additional information;

2. Paragraph (f) in Special Provision 188 requires each package carry a marking with the exact same information that is required in the documentation listed above.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

3. The documentation and marking requirements in Special Provision 188 went into effect in 2009. Over the past 4 years, it has become apparent that the documentation prepared in accordance with Special Provision 188 provides very little benefit from a safety standpoint. Because many consignments are now paperless transactions between the person offering the package and the carrier, it has increasingly become necessary to convey the required lithium battery documentation with the package itself, rendering it an ineffective means of communicating information.

4. The marking on packages of lithium batteries required by Special Provision 188 effectively conveys the safety and hazard information associated with lithium batteries in transportation. The documentation requirement in Special Provision 188 is redundant and provides very little, if any, safety benefit. Therefore PRBA proposes to remove the documentation requirement in Special Provision 188, paragraph (g).

## Proposal

5. Amend Special Provision 188 by deleting paragraph (g) and make the necessary changes to subsequent paragraphs as shown below.

~~(g) Each consignment of one or more packages marked in accordance with paragraph (f) shall be accompanied with a document including the following:~~

~~(i) an indication that the package contains "lithium metal" or "lithium ion" cells or batteries, as appropriate;~~

~~(ii) an indication that the package shall be handled with care and that a flammability hazard exists if the package is damaged;~~

~~(iii) an indication that special procedures shall be followed in the event the package is damaged, to include inspection and repacking if necessary; and~~

~~(iv) a telephone number for additional information;~~

~~(hg) Except when lithium batteries are installed in equipment, each package shall be capable of withstanding a 1.2 m drop test in any orientation without damage to cells or batteries contained therein, without shifting of the contents so as to allow battery to battery (or cell to cell) contact and without release of contents; and~~

~~(ih) Except when lithium batteries are installed in or packed with equipment, packages shall not exceed 30 kg gross mass.~~