

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

21 November 2014

Forty-sixth session

Geneva, 1 – 9 December 2014

Item 2 (c) of the provisional agenda

Recommendations made by the Sub-Committee on its forty-third, forty-fourth and forty-fifth sessions and pending issues: electric storage systems

Comments on ST/SG/AC.10/C.3/2014/101 – Consideration of what constitutes “Equipment”

**Transmitted by PRBA – The Rechargeable Battery Association and
RECHARGE, the European Association for Advanced Rechargeable
Batteries**

Introduction

1. In ST/SG/AC.10/C.3/2014/101, IATA proposes to require a certain type of equipment known as “power packs” be classified as lithium ion batteries rather than lithium ion batteries contained in equipment. PRBA and RECHARGE believe power packs are lithium ion batteries contained in equipment and should not be classified as lithium ion batteries.
2. Power packs are designed to recharge batteries inside various types of equipment such as mobile phones, tablets and notebooks. They do not provide a direct source of power for the equipment.
3. Power packs are often comprised of batteries, plus charge-in/charge-out regulator circuit, connectors, fuel gauge, etc. In some cases the batteries contained in power packs also are used in other host articles such as cellular phones. (See EXHIBIT 4 on page 5.) Power packs also are generally shipped as consumer retail items that include a retail box with manual and accessories. Pictures of these various articles associated with power packs are shown in EXHIBIT 5 on page 6.
4. To be classified as lithium ion batteries, power packs would need to be tested in accordance with the UN Manual of Tests and Criteria. Power packs are generally not subjected to the UN testing scheme. Instead, the cell or battery inside the power pack is submitted separately for testing and then incorporated into the power pack after testing is completed. A picture of a stand-alone battery that has been subjected to UN testing and designed to power a power pack is shown in EXHIBITS 3 and 4 on pages 4 and 5.
5. For the reasons noted above, PRBA and RECHARGE believe power packs should be classified and packaged in accordance with requirements associated with lithium ion batteries contained in equipment.

EXHIBIT 1 -



Flexible power-out

Portable



Fuel gauge button and

EXHIBIT 2 - INTERIOR

Flexible power-out



Device operation circuitry

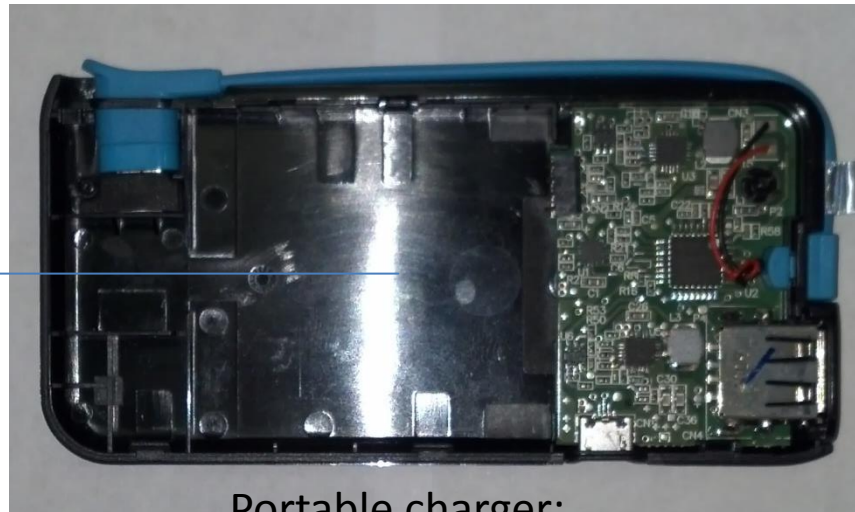
Battery

Battery Pack protection circuit and connector

Power-in connector

EXHIBIT 3 - INTERIOR WITH BATTERY

Battery pack pocket



Portable charger:
~10 x 56 x 109 mm

Battery Pack
(flip side from
previous picture)



Battery: ~5.8 x 46 x 50 mm

EXHIBIT 4 - COMPARISON WITH

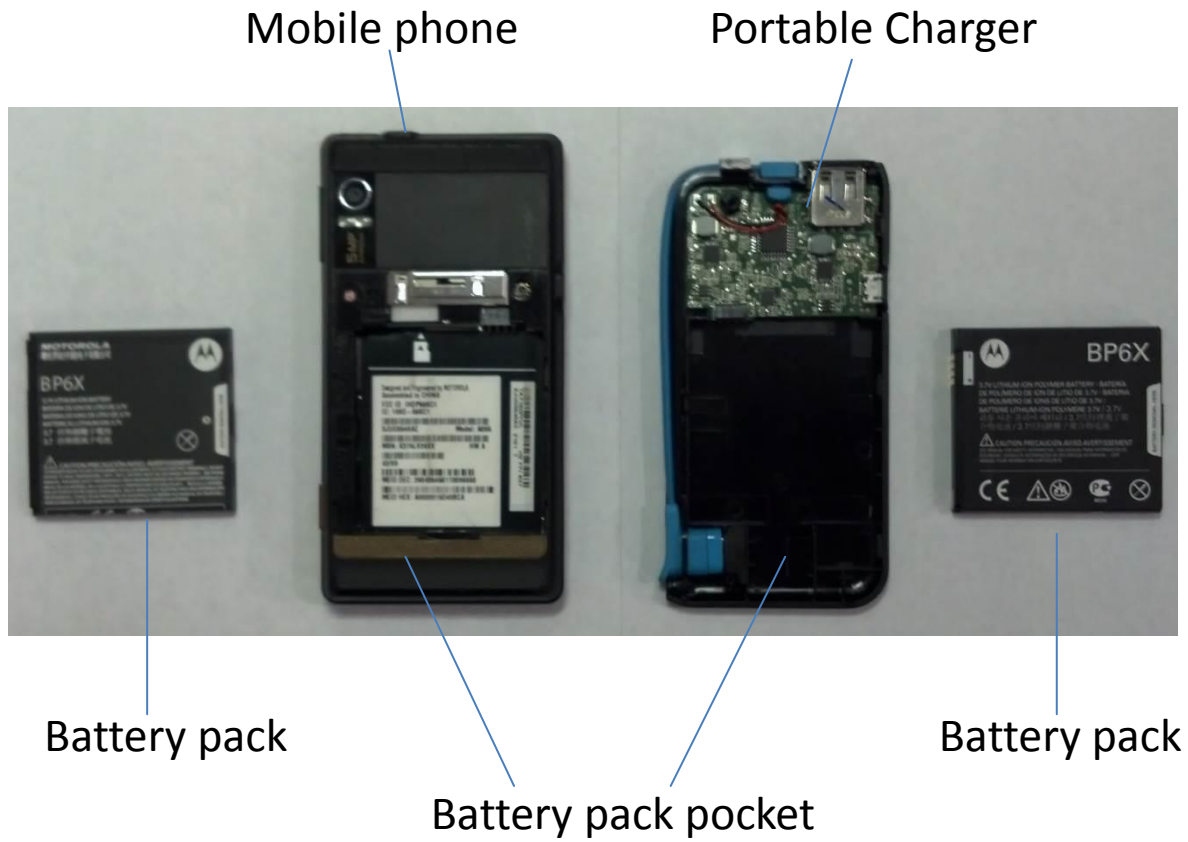


EXHIBIT 5 - RETAIL KIT
Very similar to mobile phone or other device
with rechargeable battery

