

## **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 (e) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third, forty-fourth and forty-fifth sessions and pending issues: miscellaneous pending issues**

## **Lithium batteries and hazard communication – Comments on ST/SG/AC.10/C.3/2014/89**

**Transmitted by the Rechargeable Battery Association (PRBA) and the  
European Association for Advanced Rechargeable Batteries  
(RECHARGE)**

### **Introduction**

1. PRBA and RECHARGE generally support the UK's proposal ST/SG/AC.10/C.3/2014/89 to amend the Class 9 label for use with lithium batteries shipped as fully-regulated Class 9 dangerous goods and adopting a new "lithium battery marks" for use when lithium batteries are shipped in accordance with Special Provision 188. We believe the amended Class 9 label and new marks in Proposal 1 of ST/SG/AC.10/C.3/2014/89 will provide for improved hazard communication and benefit entities involved in the transport of lithium batteries (e.g., shippers, carriers, ground handling agents, freight forwarders) as well as emergency responders.

2. Because the proposed marks are similar to the lithium battery handling label found in the ICAO Technical Instructions, the marks also provide the additional benefit of aligning the UN Model Regulations with the ICAO Technical Instructions. However, we recommend that a telephone number be included in the marks, which would be consistent with the ICAO Technical Instructions and the requirements of Special Provision 188.

3. The United Kingdom has proposed to amend Special Provisions 376 by requiring the lithium battery mark when transporting damaged or defective lithium batteries. In addition, the UK has proposed to amend Special Provisions 377 by requiring the marks for lithium batteries transported for disposal or recycling. PRBA and RECHARGE do not believe the marks should be included in Special Provisions 376 and 377 because lithium batteries transported in accordance with these Special Provisions would be subject to the amended Class 9 label proposed in ST/SG/AC.10/C.3/2014/89, which provides the necessary hazard communication.

4. PRBA and RECHARGE also believe that the improved hazard communication provided by the proposed lithium battery marks alleviates the need for documentation currently required under Special Provision 188, paragraph (g). The proposed marks will indicate the package contains lithium batteries and that a flammability hazard exists if the battery is damaged. If a telephone number is added as we recommended, the mark will contain the information currently required on the documentation under Special Provision 188, paragraph (g).

5. The documentation requirement in Special Provision 188 that was adopted approximately 12 years ago was initially intended to provide a redundant hazard communication component for shipments of small, excepted lithium cells and batteries. Because the presence of lithium batteries and the risk they pose in transport is now well understood and recognized and the new marks proposed in ST/SG/AC.10/C.3/2014/89 will help to improve the visibility of these shipments, PRBA and RECHARGE believe the redundancy provided by the documentation requirement in Special Provision 188 is no longer necessary.

6. In addition, shipments of lithium batteries packaged in accordance with Special Provision 188 are often paperless transactions between shippers and companies transporting dangerous goods. That is, the information regarding the lithium batteries may be conveyed electronically to carriers. To comply with the documentation requirement in Special Provision 188, shippers often place a document in a pouch attached to the side of a package. Under this scenario, the documentation is never seen by any of the entities in the logistics chain and offers no safety benefit. This fact was confirmed at a recent lithium battery workshop hosted by IATA that included freight forwarders, ground handling agents and carriers. All of these entities confirmed this documentation provides no additional safety benefit and is not utilized for any practical purpose.

7. PRBA and RECHARGE propose to remove the documentation requirement in Special Provision 188, paragraph (g) as shown below.

## Proposal

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.

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