



**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-eighth session**

Geneva, 30 November – 9 December 2015

Item 4 (d) of the provisional agenda

Electric storage systems: miscellaneous**Use of overpacks in the context of Special Provision 188****Transmitted by the expert from Germany ¹****Introduction**

1. In the 19th revised edition of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations, new provisions on the marking of lithium batteries have been introduced. Packages containing lithium batteries that are transported in accordance with special provision 188 are to be marked with a lithium battery mark. This mark is specified in 5.2.1.9 of the Model Regulations.
2. However, the marking to be applied when overpacks are used is not clearly specified. The provisions of 5.1.2.1 refer to all marks to be applied in accordance with Chapter 5.2, but these provisions are not applicable according to special provision 188. For certain users, the fact that overpacks are not addressed in special provision 188 is understood as if overpacks could not be used at all for transport operations in accordance with special provision 188.
3. The ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air address this situation in ICAO TI packing instructions 965, 966, 967 and 968. This should also be clarified for the other modes of transport.

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

Proposal

4. Insert the following new sentence at the end of special provision 188 (f):

“When packages are placed in an overpack, the lithium battery mark shall either be clearly visible or be reproduced on the outside of the overpack and the overpack shall be marked with the word “OVERPACK”. The lettering of the “OVERPACK” mark shall be at least 12 mm high.”
