



**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**Review of the meaning of “equipment” for the purposes of
Special Provision 188 and Packing Instruction P903****Transmitted by the International Air Transport Association (IATA)¹****Introduction**

1. At the forty-seventh session of the Sub-Committee, IATA submitted an informal document INF.35 (47th session) proposing a revision to the definition of “equipment” in packing instruction P903 and also proposing the addition of the definition into Special Provision 188.
2. There was overall support for the proposals in the informal paper, although as it was a late paper, IATA was invited to submit a formal paper for this session of the Subcommittee.
3. The term “equipment” and its application for the purposes of determining whether an article should be considered as a “battery” and therefore assigned to UN 3090 or UN 3480, or if it is equipment and assigned to UN 3091 or UN 3481 remains an issue. There is also an issue around whether an article can be deemed to be “equipment” such that lithium batteries can be packed with the article and then assigned to UN 3091 or UN 3481.
4. While there is a definition of “equipment” in packing instruction P903, it is believed that the wording could be improved to make it clear that to be considered “equipment” and

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).

therefore assigned to UN 3481 that the article must be powered by the lithium batteries with which they are being packed.

5. The placement of the current definition, within the provisions for lithium batteries packed with equipment, could imply that the definition does not apply to lithium batteries contained in equipment, notwithstanding that the word clearly states “For the purposes of this packing instruction...”. To ensure there is no ambiguity on the intent of the definition it is proposed to move it to the top of P903.

6. Finally, to ensure a consistent application it is proposed to include the same definition into Special Provision 188.

Proposal

7. The Sub-Committee is invited to consider amending Special Provision 188 as follows:

188 Cells and batteries offered for transport are not subject to other provisions of these Regulations if they meet the following:

...

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

As used above and elsewhere in these Regulations, “lithium content” means the mass of lithium in the anode of a lithium metal or lithium alloy cell. As used in this special provision “equipment” means apparatus for which the lithium cells or batteries will provide electrical power for its operation.

Separate entries exist for lithium metal batteries and lithium ion batteries to facilitate the transport of these batteries for specific modes of transport and to enable the application of different emergency response actions.

8. The Sub-Committee is invited to consider amending packing instruction P903 as follows:

P903	PACKING INSTRUCTION	P903
This instruction applies to UN Nos. 3090, 3091, 3480 and 3481.		
<u>For the purpose of this packing instruction, “equipment” means apparatus for which the lithium cells or batteries will provide electrical power for its operation.</u>		
The following packagings are authorized provided that the general provisions of 4.1.1 and 4.1.3 are met:		
...		
(3) For cells or batteries packed with equipment:		
Packagings conforming to the requirements in paragraph (1) of this packing instruction, then placed with the equipment in an outer packaging; or		
Packagings that completely enclose the cells or batteries, then placed with equipment in a packaging conforming to the requirements in paragraph (1) of this packing instruction.		
The equipment shall be secured against movement within the outer packaging.		
For the purpose of this packing instruction, “equipment” means apparatus requiring the lithium metal or lithium ion cells or batteries with which it is packed for its operation.		
...		