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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-ninth session**

Geneva, 27 June – 6 July 2016

Item 3 of the provisional agenda

**Listing, classification and packing****Revision of packing instruction P801****Transmitted by the expert from Canada<sup>1</sup>****Objective**

1. To modify packing instruction P801 to clarify the packing requirements relating to used storage batteries (UN Nos. 2794, 2795 or 3028) which are transported loose.

**Introduction**

2. The expert from Canada recommends modifying packing instruction P801 to define what is meant by "battery boxes". The expert also recommends indicating that the four (4) additional requirements do not apply when used storage batteries are transported loose in rigid and leakproof packagings made of materials compatible with the content of the batteries.

**Context**

3. This packing instruction states that used storage batteries may be transported loose in "battery boxes". However, as this term is not defined in the instruction and the box does

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<sup>1</sup> 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).

not constitute a UN standardized packaging it is difficult to determine what type of plastic or stainless steel box is acceptable as a "battery box".

4. According to this instruction, when used storage batteries are transported loose, only plastic and stainless steel boxes may be used. However, if the objective of the second paragraph of the packing instruction is to allow the use of rigid and leakproof packagings that are compatible with the contents of the used batteries, then it would be important to clarify the instruction.

**Proposal**

5. The expert from Canada proposes to replace the word "box" with "packaging" and to add the terms "rigid", "leakproof" and "compatible with the contents of the batteries" to allow the use of other types packagings which meet the objective of the instruction.

6. Packing instruction P801 requires that the four (4) additional requirements be met regardless of the type of packaging used. However, the four (4) additional requirements should not need to be met when used storage batteries are transported loose in rigid and leakproof packagings that are compatible with the contents of the used batteries. The expert proposes to clarify it in the instruction.

Packing instruction P801 would read as follows:

P801	PACKING INSTRUCTION	P801
This instruction applies to new and used batteries assigned to UN Nos. 2794, 2795 or 3028.		
<p>The following packagings are authorized, provided that the general provisions of <b>4.1.1</b>, except <b>4.1.1.3</b>, and <b>4.1.3</b> are met:</p> <ol style="list-style-type: none"> <li>1) Rigid outer packagings;</li> <li>2) Wooden slatted crates;</li> <li>3) Pallets.</li> </ol> <p>Used storage batteries may also be transported loose <del>in stainless steel or plastics battery boxes capable of containing any free liquid</del> <u>in rigid and leakproof packagings made of materials compatible with the contents of the batteries.</u> <u>When used storage batteries are transported loose under these conditions, the additional requirements below do not apply.</u></p>		
<p><b>Additional requirements:</b></p> <ol style="list-style-type: none"> <li>1) Batteries shall be protected against short circuits.</li> <li>2) Batteries stacked shall be adequately secured in tiers separated by a layer of non-conductive material.</li> <li>3) Battery terminals shall not support the weight of other superimposed elements.</li> <li>4) Batteries shall be packaged or secured to prevent inadvertent movement.</li> </ol>		