

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

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Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Special provision 636 – Carriage of lithium batteries together with other batteries – Comments on document INF.26

Transmitted by the Government of Switzerland

Introduction

1. The document INF.26 from Germany proposes the adoption of the text of SP636 (b) put into square brackets during the Joint Meeting of September 2015. We feel that this text cannot be adopted as it is for the reasons explained below and would like to propose some additional modifications.

Discussion

2. We believe that the original intent of the special provision would be lost by deleting the wording “together with or without other non-lithium cells or batteries“. Firstly, this wording relates to the NOTE under b) ii) prescribing that “The total quantity of lithium cells and batteries **in the mix** may be assessed by means of a statistical method included in the quality assurance system“. Secondly, the reasons behind the requirement for statistical methods, assessment and quality assurance are not only to guarantee the correct weighing of 333 kg, for which only a weighing machine is needed. The requirement is also meant to guarantee the safe transport of lithium batteries and cells through a “dilution” of their content in a mix with non-lithium cells and batteries, with this content not exceeding 30% of the total load. The limit of 333 kg was chosen to avoid, in case of wastes, quantities of lithium batteries and cells exceeding the maximum allowed quantity for regular carriage laid down in 1.1.3.6. This quantity implies a total mass of 1000 kg of a mix of batteries which apparently is enough in practice.

3. It seems that in practice the 333 kg limit is not a problem for equipment. The maximum percentage of 30% of lithium cells and batteries would also probably be easily achieved. We could therefore introduce the percentage of 30% of lithium cell and batteries in the new text without consequences for the carriage of equipment. In any case the quality insurance system would ensure the respect of such limits. We believe that these limits correspond to the current conditions in 636 (b) and have no consequences for those involved in the carriage.

4. Furthermore, we believe it is a mistake from the point of view of safety to carry as waste a full load of lithium cells and batteries without other non-lithium cells and batteries. Because the presence of other non-lithium cells and batteries has the effect of cushioning and inert material reducing the possibility of transfer of heat between lithium cells and batteries even in case that one single lithium cell or battery would produce a dangerous

evolution of heat. Even if it is possible under the 2015 provisions to carry lithium cells and batteries without other non-lithium cells and batteries, we think it should not happen. In case of disposal and in the way they are collected, lithium cells and batteries should only be carried **together with other cells and batteries not containing lithium**. Therefore we propose to delete the words “or without” and maintain only “**together with other non-lithium cells and batteries**”.

Proposal

5. SP636 (b) would read as follows (the whole text of SP 636 (b) including the modifications for 2017 as in ECE/TRANS/WP.15/AC.1/140/Add.1 with our proposed modifications in bold are reproduced hereafter):

"(b) Up to the intermediate processing facility:

- lithium cells and batteries with a gross mass of not more than 500 g each or lithium ion cells with a Watt-hour rating of not more than 20 Wh, lithium ion batteries with a Watt- hour rating of not more than 100 Wh, lithium metal cells with a lithium content of not more than 1 g and lithium metal cells with an aggregate lithium content of not more than 2 g, not contained in equipment, collected and handed over for carriage for sorting, disposal or recycling, **together with other non-lithium cells or batteries**; as well as
- lithium cells and batteries contained in equipment from private households collected and handed over for carriage for depollution, dismantling, recycling or disposal.

NOTE: “Equipment from private households” means equipment which comes from private households and equipment which comes from commercial, industrial, institutional and other sources which, because of its nature and quantity, is similar to that from private households. Equipment likely to be used by both private households and users other than private households shall in any event be considered to be equipment from private households.

are not subject to the other provisions of ADR including special provision 376 and paragraph 2.2.9.1.7, if they meet the following conditions:

- (i) The provisions of packing instruction P909 of 4.1.4.1 apply except for the additional requirements 1 and 2;
- (ii) A quality assurance system is in place to ensure that the total amount of lithium cells or batteries per transport unit does not exceed **30% of the total load and** 333 kg;

*NOTE: The total quantity **and maximum percentage of 30%** of lithium cells and batteries in the mix may be assessed by means of a statistical method included in the quality assurance system. A copy of the quality assurance records shall be made available to the competent authority upon request.*

- (iii) Packages are marked "LITHIUM BATTERIES FOR DISPOSAL" or "LITHIUM BATTERIES FOR RECYCLING" as appropriate.

If equipment containing lithium cells or batteries is carried unpackaged or on pallets in accordance with packing instruction P 909 (3) of 4.1.4.1, this mark may alternatively be affixed to the external surface of the wagons/vehicles or containers."