



Organisation intergouvernementale pour les transports internationaux ferroviaires  
Zwischenstaatliche Organisation für den internationalen Eisenbahnverkehr  
Intergovernmental Organisation for International Carriage by Rail

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**RID/ADR/ADN**

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods  
(Berne, 14 - 18 March 2016)

**Agenda item 5 (a): Proposals for amendments to RID/ADR/ADN – Pending issues**

**Competent authority in accordance with packing instruction P 910**

**Transmitted by the Government of Germany**

**SUMMARY**

<b><i>Executive Summary:</i></b>	Clarification of competence for specifying conditions of carriage for lithium batteries in accordance with special provision 310 in conjunction with packing instruction P 910.
<b><i>Action to be taken:</i></b>	Amendment to P 910.
<b><i>Related documents:</i></b>	ECE/TRANS/WP.15/AC.1/2015/23/Add.1 ECE/TRANS/WP.15/AC.1/140 (Paragraph 42) and Add.1

## Introduction

1. In the context of harmonisation with Rev. 19 of the UN Model Regulations, the amended provisions on the carriage of small production runs and prototypes for testing are to be incorporated too.
2. In accordance with special provision 310, the testing requirements in sub-section 38.3 of the Manual of Tests and Criteria do not apply to production runs consisting of not more than 100 cells and batteries, or to pre-production prototypes of cells and batteries if these prototypes are carried for testing, provided the other conditions of special provision 310 are met. These conditions include the cells and batteries being packed in accordance with packing instruction P 910. The provision applicable to prototypes and small production runs will in the future also apply to lithium batteries in equipment; in the case of large devices, this might lead to there not being available an adequate type-approved packaging. For this reason, in accordance with the decision of the UN Sub-Committee of Experts on the Transport of Dangerous Goods, paragraph 3 of packing instruction P 910 provides for the possibility of unpackaged carriage with the approval of the competent authority. The wording of packing instruction P 910 (as in document ECE/TRANS/WP.15/AC.1/2015/23/Add.1) corresponds to the text of the UN Model Regulations without further clarification with regard to the competent authority.
3. Germany is of the opinion that the competent authority should be clarified further in packing instruction P 910. As with newly worded special provision 376 (see also document ECE/TRANS/WP.15/AC.1/140/Add.1), it should be possible in the case of cross-border carriage operations for a single authority to lay down the required conditions for the entire transport route.

## Proposal

4. It is therefore proposed to amend the wording of the first sentence of packing instruction P 910 (3) (see also ECE/TRANS/WP.15/AC.1/2015/23/Add.1) to read as follows:

"The equipment or the batteries may be carried unpackaged under conditions specified by the competent authority of any RID Contracting State/Contracting Party to ADR/ADN, which may also recognize an approval granted by the competent authority of a country which is not an RID Contracting State/a Contracting Party to ADR/ADN, provided that this approval has been granted in accordance with the procedures applicable according to RID, ADR, ADN, the IMDG Code or the ICAO Technical Instructions."

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