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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**

**Fifty-first session**

Geneva, 3-7 July 2017  
Item 4 (f) of the provisional agenda **Electric storage systems: miscellaneous**

Exemption for lithium battery powered cargo tracking units and data loggers

Transmitted by the expert from Germany and the International Air Transport Association (IATA)[[1]](#footnote-2)

Introduction

1. At the fiftieth session of the Sub-Committee the expert from Germany submitted a proposal to add a new section 5.5.1 to make allowance for cargo transport units (CTU) that were equipped with lithium battery powered tracking devices, (see ST/SG/AC.10/C.3/2016/56).

2. The proposal received mixed views with some concerns that the proposal focussed too narrowly in only making allowance for tracking devices on CTU and not addressing tracking devices attached to the outside of packages or overpacks. There were also concerns expressed that there should be some requirements to address the lithium batteries contained in the tracking devices.

3. This document takes the comments provided at the fiftieth session and instead proposes an addition to the current exemptions from the regulations in 1.1.1.2 to include cargo tracking devices and data loggers that are powered by lithium batteries.

4. To address concerns expressed at the fiftieth session that cargo tracking units may contain large lithium batteries it is proposed to limit the lithium cells or batteries permitted in these devices to those that meet special provision 188 (a) or (b) and the cells and batteries must meet the provisions of 2.9.4 (a) and (e).

5. Recognising that cargo tracking devices and data loggers may not just be attached to CTU as data loggers in particular are widely used by the pharmaceutical industry and may be attached to the outside of packages or overpacks, the text proposed also extend the exemption to devices attached to the outside of packages and overpacks.

Proposal

6. The Sub-Committee is invited to consider revising paragraph 1.1.1.2 to read as follows:

1.1.1 Scope and application

1.1.1.1 These Regulations prescribe detailed requirements applicable to the transport of dangerous goods. Except as otherwise provided in these Regulations, no person may offer or accept dangerous goods for transport unless those goods are properly classified, packaged, marked, labelled, placarded, described and certified on a transport document, and otherwise in a condition for transport as required by these Regulations.

1.1.1.2 These Regulations do not apply to the transport of:

(a) Dangerous goods that are required for the propulsion of the means of transport or the operation of its specialised equipment during transport (e.g. refrigeration units) or that are required in accordance with the operating regulations (e.g. fire extinguishers);

(b) Dangerous goods, packaged for retail sale, that are carried by individuals for their own use; and

(c) Lithium battery powered cargo tracking devices or data loggers attached to packages, overpacks or cargo transport units if they meet the following:

1. Each cell or battery meets the provisions of 2.9.4 (a) and (e);

2. The lithium metal content or Watt-hour rating of cells and batteries shall not exceed the limits specified in Special Provision 188 (a) and (b), as applicable; and

3. The batteries and cells are afforded protection by a strong outer casing of adequate strength and design or by the device in which they are contained to prevent damage under normal conditions of transport.

1. In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, paragraph 14). [↑](#footnote-ref-2)