
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

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Item 4 (c) of the provisional agenda

Electric storage systems: transport provisions

Size of the UN number on lithium battery mark

Submitted by the International Air Transport Association (IATA)

Introduction

1. Paragraph 5.2.1.1 in the Model Regulations sets out the provisions for the proper shipping name and UN number marks on packages. For the UN number mark there are minimum sizes specified for letters “UN” and the number based capacity of the packages.
2. Similarly there are clear specifications for the size of certain marks required on packages such as “overpack”, paragraph 5.1.2.1, “salvage”, paragraph 5.2.1.3 and when called for in a special provision, paragraph 3.3.1.
2. With the introduction of the lithium battery mark for packages prepared in accordance with special provision 188 there is a deal of specificity on the size and design of the mark but there is nothing that specifies the size of the UN number mark with the lithium battery mark.
3. Given that the UN number conveys an important piece of information in terms of hazard communication, it is believed that there is benefit in specifying some minimum size for the height of the UN number mark(s) within the lithium battery mark.

Proposal

4. The Subcommittee is invited to consider specifying a minimum height for the UN number mark(s) within the lithium battery mark. Some possible options are:
 - (a) align to the requirements of paragraph 5.2.1.1, i.e. 6 mm, except for packages of 5 kg or less when they shall be of an appropriate size;
 - (b) require the UN number(s) to be of a minimum height of 12 mm as required by paragraph 3.3.1; or
 - (c) require the UN number(s) to be of a minimum height of 12 mm, unless there are multiple UN numbers in the package where the height of the UN number marks may be reduced in size to allow all marks to be applied on one lithium battery mark.
 5. If there is support for this approach, then based on the comments received a formal paper with the proposed changes to the regulatory provisions will be presented at the next session.
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