
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 4 (a) of the provisional agenda

Electric storage systems: testing of lithium batteries

Use of packagings not required to meet 4.1.1.3 and exceeding 400 kg net mass for the transport of lithium batteries

**Transmitted by the The Rechargeable Battery Association (PRBA) and
The Advanced Rechargeable & Lithium Batteries Association
(RECHARGE)**

Introduction

1. This paper addresses comments received in response to ST/SG/AC.10/C.3/2019/34 on the issue of Packing Instruction P903 and the use of packagings with a net mass exceeding 400 kg.
2. As PRBA explained at the fifty-fifth session, some competent authorities, freight forwarders, vessel operators, and other entities in the logistics chain do not appear to fully understand that if the net mass of a packaging as authorized under P903(2) or (4) exceeds the mass limit generally prescribed in Chapter 6.1, the batteries or equipment do not need to be packaged in large packagings in accordance with LP903.
3. In this document, PRBA proposes amendments to the Model Regulations to better clarify this point by the addition of a note that the packagings under P903(2) and (4) may exceed 400 kg net mass and provides for changes in other packing instructions that have similar language as found in P903.
4. As explained in ST/SG/AC.10/C.3/2019/34, the Guiding Principles for the nineteenth revised edition of the Model Regulations specifically address this issue. On page 20 of those Guiding Principles, in explaining the packagings as authorized in the “P” packing instructions, it is stated that these instructions include: “Packagings in accordance with Chapter 6.1 (up to 450 l and/or 400 kg net, as appropriate)” as well as “Packagings or packing methods not subject to the provisions of Chapters 6.1, 6.2, 6.3, 6.5 or 6.6.” Thus, packagings not required to meet 4.1.1.3 when authorized under a “P” packing instruction (e.g. P903), are not subject to a 400 kg limit as provided in Chapter 6.1, nor, indeed, to any mass limit at all. Unfortunately, the Guiding Principles are not read or fully understood by freight forwarders, vessel operators, and others in the logistics chain who question the use of these large packagings when shipped in accordance with packing instruction P903.
5. The proposed amendments to the Model Regulations provided below address the comments from the Sub-Committee received in response to ST/SG/AC.10/C.3/2019/34 by clearly articulating the Guiding Principles, includes a new note for P903, and provides for similar changes to other packing instructions that will help facilitate the movement of dangerous goods consistent with the Guiding Principles.

Proposals

6. In 4.1.3.3, add a new last sentence to read:

“4.1.3.3 Each packing instruction shows, where applicable, the acceptable single and combination packagings. For combination packagings, the acceptable outer packagings, inner packagings and when applicable the maximum quantity permitted in each inner or outer packaging, are shown. Maximum net mass and maximum capacity are as defined in 1.2.1. Where packagings which need not meet the requirements of 4.1.1.3 (e.g., crates, pallets, etc.) are authorized in a “P” packing instruction, unless otherwise indicated in the relevant packing instruction these packages are not subject to the mass limits generally applicable to packagings conforming to the requirements of Chapter 6.1.”
 7. In packing instruction P903, add a new note following paragraph (4) to read:

“NOTE: The packagings authorized in paragraphs (2) and (4) may exceed a net mass of 400 kg (see 4.1.3.3).”
 8. Amend the following packing instructions by adding a note similar to the one provided in paragraph 7 above (applicable to the packing instruction as a whole, or to the indicated paragraphs which authorize packagings not subject to the requirements of 4.1.1.3):
 - P003;
 - P003(2) and (3);
 - P005;
 - P006(2);
 - P801(1) and (2);
 - P903(2) and (4);
 - P905;
 - P907;
 - P909(3) and (4); and
 - P910(3).
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