

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

22 November 2019

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-sixth session

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Item 4 (c) of the provisional agenda

Electric storage systems: transport provisions

Availability of the manufacturer's quality management programme for consignors of lithium batteries

Submitted by the International Air Transport Association (IATA)

Introduction

1. The provisions on classification of lithium cells and batteries in paragraph 2.9.4 include in subparagraph (e) a requirement that cells, and batteries shall be manufactured under a quality management programme.
2. Special provisions 188 and 230 set out conditions under which lithium cells and batteries may be offered for transport, SP 188, or transported, SP 230. In both of these special provisions there is a requirement that each cell or battery must meet the provisions of 2.9.4, which includes subparagraph (e).
3. The inclusion of reference to 2.9.4 (e) to the conditions under which lithium cells and batteries may be offered for transport and transported is being taken by some entities in the supply chain, including some regulatory authorities, to mean the consignor of lithium cells and batteries that is not the manufacturer of the cells or batteries must have evidence of the manufacturer's quality management programme.
4. The second sentence in the note under 2.9.4, subparagraph (e), which states that "A copy of the quality management programme shall be made available to the competent authority upon request.", implies that the manufacturer is only obligated to provide evidence on their quality management programme to the competent authority and not to other parties.
5. The Sub-Committee is invited to consider if indeed the manufacturer's quality management programme is only to be shared with their competent authority and if so whether there should be some recognition of this in the provisions in 2.9.4.

Proposal

6. Based on comments provided by the Sub-Committee a proposal may be submitted to the next session to clarify the requirements with respect to access to the manufacturer's quality management programme.
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