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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-seventh session**

Geneva, 30 November-8 December 2020

Item 4 (c) of the provisional agenda

**Electric storage systems: transport provisions**

Inner packagings for lithium cells and batteries – Clarification of requirements in Packing Instruction P903

Submitted by the expert from the United States of America[[1]](#footnote-2)

Revision

Introduction

1. Commenters to ST/SG/AC.10/C.3/2020/56 noted that the phrase “completely enclose” is confusing, common shipping configurations such as trays and dividers are not inner packagings and the proposal reduces the flexibility for shippers to select a suitable packaging solution.

2. Subsequent discussions indicated that the requirements in P903 (1) aim to protect lithium cells or batteries from damage and two compliant options emerged. First an option to place cells or batteries into an inner packaging followed by placement of the inner packaging into the outer packaging and second arranging the cells or batteries in the packaging such that they are separate from each other using cushioning material or dividers.

Proposal

In packing instruction P903, amend paragraph (1) as follows (new text is underlined):

“(1) For cells and batteries:

Drums (1A2, 1B2, 1N2, 1H2, 1D, 1G);

Boxes (4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G, 4H1, 4H2);

Jerricans (3A2, 3B2, 3H2).

Cells or batteries shall be packed in inner packagings or placed in the outer packaging with cushioning material or divider(s) so that the cells or batteries are protected against damage that may be caused by the movement or placement of the contents within the outer packaging.

Packagings shall conform to the packing group II performance level.”

1. 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2) [↑](#footnote-ref-2)