

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 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Comments on ST/SG/AC.10/C.3/2008/37 - Transport of Nickel-Metal Hydride Batteries

Transmitted by the Portable Rechargeable Battery Association (PRBA), RECHARGE (European rechargeable battery association), Battery Association of Japan (BAJ), European Portable Battery Association (EPBA), and Zentralverband Elektrotechnik-und Elektronikindustrie (ZVEI – German Battery Association))

1. PRBA, RECHARGE, BAJ, EPBA, and ZVEI appreciate the issues raised by the expert from Germany regarding large consignments of nickel metal hydride (NiMH) batteries transported by cargo vessel pursuant to Special Provision 304 of the Model Regulations. Our members represent approximately 90% of the world's manufacturers of nickel metal hydride batteries and have safely shipped billions of these batteries over the past ten years. We support the changes to Special Provision 304 submitted by the Expert from Germany and offer the following comments and minor amendments to the proposed text in ST/SG/AC.10/C.3/2008/37.
2. The concerns expressed by the expert from Germany regarding the transport of nickel metal hydride batteries center around larger consignments like cargo transport units (CTUs) and full pallet loads rather than small, individual packages. Therefore, we have offered minor amendments to the proposed text to clarify that the new requirements apply only to CTUs and pallet loads of nickel metal hydride batteries.
3. In addition, it appears the new documentation requirement proposed by Expert from Germany is intended to be consistent with the requirement found in Special Provision 188 of the Model Regulations for lithium batteries. We therefore have amended that part of the proposed text by removing the word "transport."

Proposal

Amend the proposed changes as follows:

“Nevertheless, in the case of application of this exemption to sea transport of full pallet loads and cargo transport units of nickel metal hydride batteries, other than button cells, the following requirements apply:

- (1) The consignment shall be accompanied by a ~~transport~~ document describing the batteries as “Nickel-Metal Hydride batteries” including a declaration signed by the consignor that the batteries are securely packed and protected against short circuits and that stowage away from sources of heat is required;
 - (2) Pallet Unit ~~Unit~~ loads and cargo transport units shall be marked “Stow away from sources of heat” in capital letters not less than 65mm high.”
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