

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

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Item 6 of the provisional agenda

**HARMONIZATION WITH THE UN MODEL REGULATIONS ON THE
TRANSPORT OF DANGEROUS GOODS**

Watt-hour Marking for Lithium Batteries

Transmitted by the Government of the United States of America

SUMMARY

***Executive
summary:***

This paper proposes to align the text of SP 188 b) concerning the watt hour marking for lithium ion batteries to reflect amendments agreed to by the UN Sub-Committee of Experts on the Transport of Dangerous Goods at its 35th Session.

Action to be taken:

It is proposed that SP 188 be amended to be consistent with the text of SP 188 which will appear in the UN Model Regulations 17th Revised Edition.

***Related
documents:***

Background and Justification

1. Currently Special Provision 188 (b) of the ADR reads as follows:
 - (b) For a lithium metal or lithium alloy battery the aggregate lithium content is not more than 2g, and for a lithium ion battery, the Watt-hour rating is not more than 100 Wh. Lithium batteries subject to this provision shall be marked with the Watt-hour rating on the outside case, except those manufactured before 1 January 2009 which may be carried in accordance with this special provision and without this marking until 31 December 2010;
2. At its 35th Session, the Sub-Committee of Experts on the Transport of Dangerous Goods considered a proposal to amend Special Provision 188 (b) (see UN/SCETDG/35/INF.6) and ultimately agreed that batteries manufactured before 1 January 2009 may continue to be transported without a watt-hour marking after

31 December 2010. The change was made in recognition of problems marking existing batteries would pose to consumers and industry. As a result, the text of Special Provision 188 of the UN Model Regulations was amended accordingly (see ST/SG/AC.10/C.3/2009/CRP.2). The amended text of SP 188 (b) as agreed to by the UN Sub-Committee is as follows:

For a lithium metal or lithium alloy battery the aggregate lithium content is not more than 2 g, and for a lithium ion battery, the Watt-hour rating is not more than 100 Wh. Lithium ion batteries subject to this provision shall be marked with the Watt-hour rating on the outside case, except those manufactured before 1 January 2009;

3. It is recognized that adoption of this amendment would harmonize with a provision that would normally be considered during the upcoming biennium when the Joint Meeting will consider other amendments relevant to the UN Model Regulations, 17th Revised Edition. However as is evident, the current text of SP 188 (b) would require batteries manufactured before 1 January 2009 to be marked by 31 December 2010. As such, deferring consideration of this amendment to the subsequent biennium is not considered practicable. It is understood that similar proposals will be considered by the ICAO Dangerous Goods Panel at its upcoming Dangerous Goods Panel Meeting and by the International Maritime Organization at its upcoming Dangerous Goods and Solid Cargoes Sub-Committee Meeting to ensure that the provision is addressed prior to January 1, 2011 when the revised ICAO Technical Instructions and International Maritime Dangerous Goods Code will take effect.

Proposal

It is proposed that Special Provision 188 (b) of the ADR be amended consistent with Special Provision 188 (b) of the UN Model Regulations as follows:

- (b) For a lithium metal or lithium alloy battery the aggregate lithium content is not more than 2g, and for a lithium ion battery, the Watt-hour rating is not more than 100 Wh. Lithium batteries subject to this provision shall be marked with the Watt-hour rating on the outside case, except those manufactured before 1 January 2009 ~~which may be carried in accordance with this special provision and without this marking until 31 December 2010;~~
