

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

Bern, 22–26 March 2010

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Waste lithium batteries – SP636 (b) and P903b (3) Interpretation

Transmitted by the Government of the United Kingdom

1. Special provision 636 allows some relaxations from packing instruction P903 for used lithium cells and batteries.
2. Two issues have arisen recently regarding the interpretation of this special provision and packing instruction and the United Kingdom would like to seek the views of the Joint Meeting to resolve these issues.
3. Issue 1: In P903b (3) “collecting trays” are permitted. There is no definition of this term and the definition of “tray” in Chapter 1.2 is limited to Class 1 articles.

Is this term aimed at a specific form of tray for example a vacuum formed tray with slots for each cell/battery or is a general box shape but without a lid?

The section also states that the tray should be made of a non conductive material. This permits the use of fibreboard which is non conductive but considering the fire risk with these batteries this material will burn easily, should the construction of these trays be limited to metal with a plastic liner and plastic which offer rather more protection in a fire.

4. Issue 2: SP636(b) incorporates the phrase “are not subject to the other provisions of ADR” it will be recalled that this phrase was removed from the revised Chapter 3.4 and replaced by the new 3.4.1 (see ECE/TRANS/WP.15/AC.1/116/Add.1 OTIF/RID/RC/2009-B/Add.1).

Should the phrase in 636 read “are only subject to the relevant provisions for limited quantities listed in 3.4.1”?

5. It has been raised by some organisations that no other provisions apply and therefore the obligations in Chapter 1.4 for example are not relevant. The United Kingdom is of the view that some provisions of ADR should apply.
6. Extracts from SP636 and P903b are listed below:
 - 636 (a) Cells contained in equipment shall not be capable of being discharged during carriage to the extent that the open circuit voltage falls below 2 volts or two thirds of the voltage of the undischarged cell, whichever is the lower.
 - (b) Used lithium cells and batteries with a gross mass of not more than 500 g each collected and presented for carriage for disposal between the consumer collecting point and the intermediate processing facility, together with other non-lithium cells or batteries, are not subject to the other provisions of ADR if they meet the following conditions:

- (i) The provisions of packing instruction P903b are complied with;
- (ii) A quality assurance system is in place to ensure that the total amount of lithium cells or batteries per transport unit does not exceed 333 kg;
- (iii) Packages shall bear the inscription: "USED LITHIUM CELLS".

7. Extract from P903b

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| (3) In collecting trays with a gross mass of less than 30 kg made from non-conducting material meeting the general conditions of 4.1.1.1, 4.1.1.2 and 4.1.1.5 to 4.1.1.8. |
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Additional requirements:

The empty space in the packaging shall be filled with cushioning material. The cushioning material may be dispensed with when the packaging is entirely fitted with a polyethylene bag and the bag is closed.

Hermetically sealed packagings shall be fitted with a venting device according to 4.1.1.8. The venting device shall be so designed that an overpressure caused by gases does not exceed 10 kPa.