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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

Forty-first session
Geneva, 25 June – 4 July 2012
Item 4 (d) of the provisional agenda
Electric storage systems: packagings for large lithium batteries

Large Packaging (LP) Packing Instruction for Lithium Batteries

Transmitted by the Rechargeable Battery Association (PRBA) and the International Association for the Promotion and Management of Portable Rechargeable Batteries (RECHARGE)[1]

Introduction

1. At the fortieth session PRBA and RECHARGE jointly submitted document ST/SG/AC.10/C.3/2011/41 proposing a new large packaging instruction for lithium cells and batteries. There was general support for the proposal in principle, provided that only a single battery or battery assembly would be permitted in each large packaging, but a number of comments of detail were offered. PRBA withdrew the proposal with a view to preparing a revised document taking account of the comments made by Sub-Committee members.

2. Considerable discussion at the last session focused on the question of whether a large packaging packing instruction was necessary for batteries exceeding 12 kg and employing an impact-resistant outer casing since packing instruction P903 currently permits such batteries to be transported in strong outer packagings, in protective enclosures, on pallets or on other handling devices which are not subject to a 400 kg net mass limitation as prescribed for UN-tested and marked packagings under Chapter 6.1. However, that the 400 kg net mass limit did not apply to such non-UN marked and certified packagings was not entirely clear. In this regard, PRBA and RECHARGE note that a document on the Guiding Principles for packaging submitted to this session by the United Kingdom expert will address this issue, and clarify in the Guiding Principles that to the extent that the "P"

[1] In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

packing instructions permit the use of certain packagings or packing methods that are not subject to the requirements of Chapter 6.1, such packagings and packing methods are not, therefore, subject to the mass or capacity limitations in Chapter 6.1. PRBA and RECHARGE welcome and support this important clarification.

3. At the same time, PRBA and RECHARGE continue to believe that a large packaging packing instruction remains essential to facilitate the safe transport of large lithium batteries not employing a strong, impact-resistant outer casing. In addition, although eligible under packing instruction P903 for transport in non-UN-marked and certified packagings, if a consignor may elect to utilize a large packaging for the transport of a single large lithium battery employing a strong, impact-resistant outer casing, PRBA and RECHARGE believe this practice should be explicitly authorized by the Model Regulations.

Proposal

4. In consideration of the foregoing, PRBA and RECHARGE invite the Sub-Committee to consider the following proposal for a new large packaging packing instruction LP903 for the transport of a single lithium battery or battery assembly.

LP903	**PACKING INSTRUCTION**	**LP903**
This instruction applies to UN Nos. 3090, 3091, 3480 and 3481		
The following large packagings are authorized for a single battery or battery assembly, including a battery or battery assembly contained in equipment, provided that the general provisions of **4.1.1** and **4.1.3** are met: Rigid large packagings conforming to the packing group II performance level, made of: steel (50A); aluminium (50B); metal other than steel or aluminium (50N); rigid plastics (50H); natural wood (50C); plywood (50D); reconstituted wood (50F); rigid fibreboard (50G). The battery or battery assembly shall be packed so that the battery or battery assembly is protected against damage that may be caused by its movement or placement within the large packaging.		
Additional requirements: Batteries and battery assemblies shall be protected against short circuit.		