

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

25 November 2014

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Item 2 (e) of the provisional agenda

Recommendations made by the Sub-Committee on its forty-third, forty-fourth and forty-fifth sessions and pending issues: miscellaneous pending issues

Lithium batteries and hazard communication – Comments on ST/SG/AC.10/C.3/2014/89

Transmitted by the International Air Transport Association (IATA)

Introduction

1. IATA is grateful for the work by the Expert from the United Kingdom in developing the proposals to the Sub-Committee on hazard communication for Class 9 and in particular for lithium batteries that are now set out in working paper ST/SG/AC.10/C.3/2014/89 and informal document INF.21.
2. IATA believes that the amended Class 9 label shown at paragraph 13 in Proposal 1 of ST/SG/AC.10/C.3/2014/89 and informal document INF.21 will enhance the communication of the hazards posed by lithium batteries shipped in accordance with P903, P908, P909, LP903 and LP904.
3. With respect to the lithium battery marks shown at paragraph 14 in Proposal 1 of ST/SG/AC.10/C.3/2014/89 and as revised in informal document INF.21, IATA supports the overall direction, and in informal document INF.21 the proposal to have the mark with red hatching, but would like to make some additional suggestions.
4. The “lithium battery handling label” shown in the ICAO Technical Instructions has been in effect since 1 January 2009, since that time the use of the “label” has moved beyond air transport with some companies using the label to meet the provisions of subparagraph (f) of Special Provision 188 and even printing the “label” directly on to packagings.
5. In developing the label the ICAO Dangerous Goods Panel considered the visibility of the information provided and determined that the label must be of a specific size, 120 mm wide x 110 mm high, unless the package dimensions are such that they can only bear smaller labels, in which case the label dimensions may be reduced to no less than 105 mm wide x 74 mm high.
6. Based on the decision by the ICAO Dangerous Goods Panel to specify minimum sizes and the widespread use of the air transport “label”, IATA requests that the Subcommittee consider aligning the size of the lithium battery mark with that of the “label” required by the ICAO Technical Instructions.
7. IATA also supports the proposal in informal document INF.28 from PRBA and RECHARGE to include provision for the telephone number on the lithium battery mark to meet the requirements of subparagraph (f) of Special Provision 188.

Proposal

Amend paragraph 5.2.1.9 shown in UN/SCETDG/46/INF.21 as follows:

5.2.1.9 Lithium battery marks

The lithium battery mark to be displayed in accordance with the special provisions of Chapter 3.3 shall be as shown in figures XXX and YYY for lithium metal and lithium ion batteries respectively. In cases of a mixed load of lithium metal and lithium ion batteries, both marks shall be displayed.

5.2.1.9.1 Packages containing lithium batteries prepared in accordance with Special Provision 188 shall be marked as shown in Figure xxx.

5.2.1.9.2 The mark shall indicate the UN number, 'UN 3090' for lithium metal batteries or 'UN 3480' for lithium ion batteries. Where the lithium batteries are contained in, or packed with, equipment, the UN number 'UN 3091' or 'UN 3481' should shall be substituted for the UN numbers shown below indicated. In cases of a mixed load of batteries and batteries in equipment, it is sufficient to display the battery label only all applicable UN numbers shall be indicated.

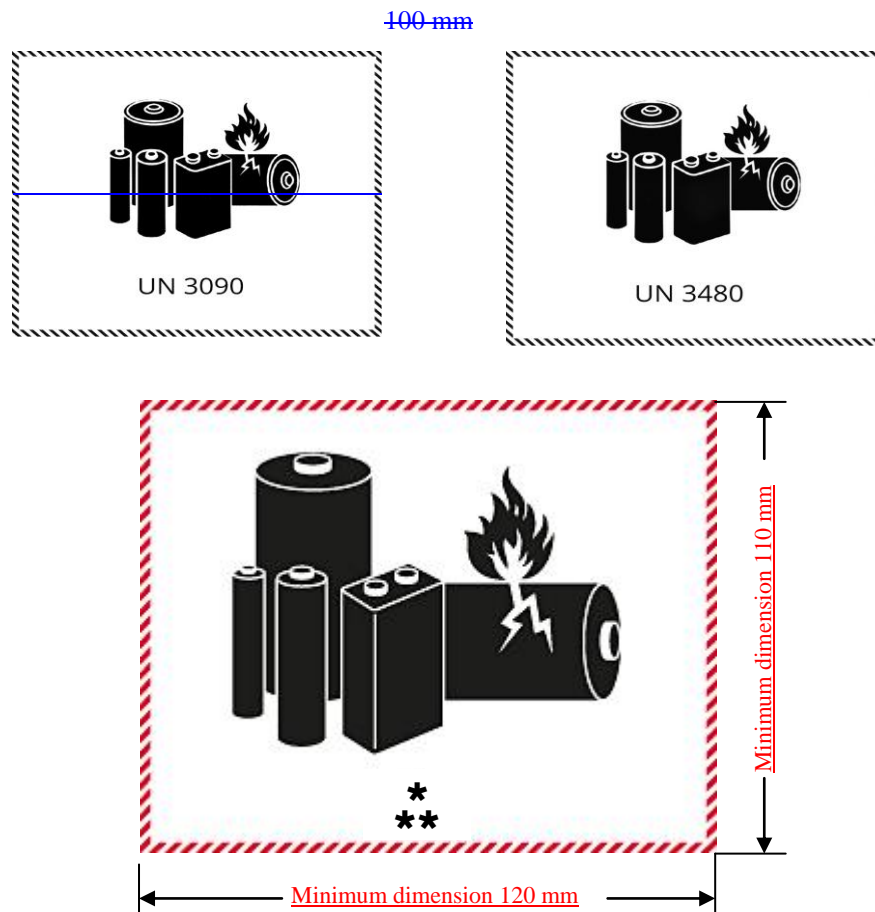


Fig. XXX

Lithium battery mark for lithium metal batteries ————— Lithium battery mark for lithium ion batteries

* Place for UN number

**** Place for telephone number if not shown elsewhere on the package**

The mark shall be in the form of a rectangle with hatched edging. The dimensions shall be ~~[100 mm x 80 mm]~~ a minimum of 120 mm wide x 110 mm high and the minimum width of the hatching shall be 5 mm. The symbol (group of batteries, one damaged and emitting flame, over the UN number for lithium ion or lithium metal batteries or cells) shall be black on white. The hatching shall be red. If the size of the package so requires, the dimensions/line thickness may be reduced to not less than 105 mm wide x 74 mm high, ~~provided the marking remains clearly visible.~~

***NOTE:** The format of the dimension indicators should be standardised with those used elsewhere in the Model Regulations, e.g. Figure 5.5.1.*
