



INF. 26

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RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Berne, 14 - 18 March 2016)

Agenda item 5 (a): Proposals for amendments to RID/ADR/ADN – Pending issues

Special provision 636 – Carriage of lithium batteries together with other batteries

Transmitted by the Government of Germany

Introduction

- 1 At its session in September 2015, the Joint Meeting noted the results of the informal working group on the transport of waste electrical and electronic equipment and adopted the programme for the continuation of its work. In addition, the Joint Meeting provisionally accepted the proposals drawn up by the working group for the amendment of special provision 636, see also paragraph 72 of the report of the last Joint Meeting (Document OTIF/RID/RC/2015-B (ECE/TRANS/WP.15/AC.1/140)).
2. With a view to the continuation of the work of the informal working group, these amendments have only been adopted provisionally and, for this reason, have not been incorporated into the texts for ADR 2017 by WP.15, see paragraph 20 of the report of WP.15 (ECE/TRANS/WP.15/230). The continuation of the work of the informal working group depends on further information from the concerned industry sectors on the type and quantities of lithium batteries in waste electrical and electronic equipment. This information is currently being compiled. In the meantime, Germany has issued an invitation to a further meeting of the informal working group on 27 and 28 April 2016 (see also informal document INF.8). The results of this meeting of the working group cannot therefore be considered for the amendments to the 2017 regulations.

3. Irrespective of the further discussions and future amendments, the amendments to special provision 636 prepared by the informal working group so far should, however, be adopted for the regulations applicable as from 2017, since they provide solutions to various specific practical problems and issues:
 - Intermediate processing facility: The interpretation of the term "intermediate processing facility" raises questions time and again. The intermediate processing facilities for waste electrical and electronic equipment are different facilities in which different treatment processes also take place. This is taken account of by naming the different treatments.
 - Size of the batteries in waste electrical and electronic equipment: The weight or Watt-hour rating or lithium content of a contained battery or cell cannot be verified within the framework of the collection of equipment. For this reason, the threshold of 500 g or 2 g/1 g lithium content or 100 Wh/20 Wh will not apply for the collection of equipment. Instead, an explicit restriction on equipment from private households is introduced, and a corresponding explanation of what is meant by that is inserted.
 - Marking: As lithium batteries in equipment may also be carried unpackaged in accordance with packing instruction P 909 (3), it is not clear how the required marking of the package can be applied in this case. Therefore, an alternative for marking the cargo transport unit is proposed.
4. The adopted amended text no longer contains the wording "together with or without other non-lithium cells or batteries". This text was deleted for editorial reasons. The amendment does not entail a prohibition of the carriage of lithium cells and batteries together with other household batteries. The other batteries contained in battery collections are usually batteries that are not subject to RID/ADR/ADN, and it is not prohibited to carry dangerous goods together with non-dangerous goods. Germany is of the opinion that the current text regarding battery mixtures is only for clarification and that the new text does not result in any changes in this regard.

Proposal

5. Delete the square brackets around the text of amended special provision 636 (b) (see OTIF/RID/RC/2015-B/Add.1 or ECE/TRANS/WP:15/AC.1/140/Add.1) and thus incorporate the amendments into the amendments to the regulations applicable as from 2017.
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