



**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****Fifty-fifth session**

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Item 4 (f) of the provisional agenda

Electric storage systems: miscellaneous**Use of packagings not required to meet 4.1.1.3 and exceeding
400 kg net mass for the transport of lithium batteries****Transmitted by the Rechargeable Battery Association (PRBA)*****Introduction**

1. PRBA believes there is confusion, including on the part of some transport authorities, with regard to the use under packing Instruction P903 of packagings with a net mass exceeding 400 kg and which need not meet the requirements of 4.1.1.3 (e.g., wooden crates, pallets, etc., as authorized under P903(2) and (4)). In this connection, there appears to be a misunderstanding that if the net mass of a packaging as authorized under P903(2) or (4) exceeds the 400 kg net mass limit generally prescribed in Chapter 6.1, the batteries or equipment must be packaged in large packagings in accordance with LP903. In this document PRBA proposes amendments to the Model Regulations to clarify that this is not the intent, and that the packagings as authorized under P903(2) and (4) may exceed 400 kg net mass.

2. The Guiding Principles for the nineteenth revised edition of the Model Regulations specifically address this matter. On page 20 of those Guiding Principles, in explaining the packagings as authorized in the “P” packing instructions, it is stated that these instructions include “Packagings in accordance with Chapter 6.1 (up to 450 l and/or 400 kg net, as appropriate)” as well as “Packagings or packing methods not subject to the provisions of Chapters 6.1, 6.2, 6.3, 6.5 or 6.6.” Thus, packagings not required to meet 4.1.1.3 when authorized under a “P” packing instruction (e.g. P903), are not subject to a 450 L/400 kg limit

* In accordance with the programme of work of the Sub-Committee for 2019–2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, para. 14).

as provided in Chapter 6.1, nor, indeed, to any mass limit at all. Unfortunately, however, nowhere in the Model Regulations is this principle clearly stated, which, in PRBA's opinion, gives rise to the confusion described above. PRBA, therefore, proposes the following amendments to the Model Regulations with a view to clearly articulating this principle and providing the clarification necessary to avoid continuing confusion in this connection.

Proposals

3. In 4.1.3.3, add a new last sentence to read:

“4.1.3.3 Each packing instruction shows, where applicable, the acceptable single and combination packagings. For combination packagings, the acceptable outer packagings, inner packagings and when applicable the maximum quantity permitted in each inner or outer packaging, are shown. Maximum net mass and maximum capacity are as defined in 1.2.1. Where packagings which need not meet the requirements of 4.1.1.3 (e.g., crates, pallets, etc.) are authorized in a “P” packing instruction, unless otherwise indicated in the relevant packing instruction these packages are not subject to the 450L/400 kg (net) mass limits generally applicable to packagings conforming to the requirements of Chapter 6.1.”
 4. In packing instruction P903, add a new note following paragraph (4) to read:

“NOTE: The packages authorized in paragraphs (2) and (4) may exceed a net mass of 400 kg (see 4.1.3.3).”
 5. In large packing instruction LP903, add a new note following “rigid fibreboard 50G.” to read:

“NOTE: For cells and batteries employing a strong, impact resistant outer casing, and equipment, see P903.”
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