

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

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Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Transition Period for New Watt-Hour Marking Required on Lithium ion Batteries

Transmitted by the Portable Rechargeable Battery Association (PRBA) and RECHARGE

INTRODUCTION

1. Amendments to Special Provision 188 of the UN Model Regulations adopted during the 30th session of the UN Subcommittee of Experts require that lithium ion batteries be marked with the watt-hour rating. The battery and electronics industry commonly hold supplies of lithium ion batteries in inventory so that on the January 1, 2009 effective date of the UN Model Regulations there will be existing stocks of batteries that will not have been marked in accordance with the new watt-hour marking requirement.
2. Batteries are typically marked with appropriate information at the time of manufacture so that without a transition period for existing batteries, transportation of these items would be disrupted. Previous changes to lithium battery requirements such as adoption of new UN lithium battery testing requirements were only applied to new batteries made after the effective date of Model Regulations.
3. To avoid disruption with industry battery marking practices and consistent with the UN Subcommittee's past practices, PRBA and RECHARGE propose that the lithium ion watt-hour marking provision be made applicable to new batteries manufactured after 31 December 2008.

Proposal

PRBA and RECHARGE propose the following change to Special Provision 188:

188 Cells and batteries offered for transport are not subject to other provisions of these Regulations if they meet the following:

- (a) ...
 - (b) For a lithium metal or lithium alloy battery the aggregate lithium content is not more than 2 g, and for a lithium ion battery, the Watt-hour rating is not more than 100 Wh. Lithium ion batteries manufactured after 31 December 2008 and subject to this provision shall be marked with the Watt-hour rating on the outside case;
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