

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 5 (e) of the provisional agenda

Electric storage systems: miscellaneous

Comments on ST/SG/AC.10/C.3/2014/12

Transmitted by the expert from Sweden

1. The expert from Sweden agrees with the proposal in 2014/12 in principle, and we have some further comments which also should be taken into consideration during the discussions.
2. The text in SP 310 currently stated in the regulations seems to be open for interpretation and we have received questions on the text.
3. Firstly, it is stated that the packagings must meet the criteria for packing group I, but it is not clear whether the packagings need type approval or not. In our opinion we think it would be appropriate to clarify this and we find it reasonable to require that the packagings must be type approved since the batteries and cells are not tested in accordance with 38.3 of the Manual of Tests and Criteria. We suggest inserting a requirement that the provisions of 4.1.1.3 must be met for these packagings.
4. Secondly, there seems to be some uncertainty to what type of box is actually meant by the word “wooden”. If the wording “wooden“ includes natural wood (C), plywood (D) and reconstituted wood (F), we believe it would be wise to state these types in the special provision. In Sweden, there have been some requests to use plywood boxes, but due to the uncertainty of how to interpret “wooden” there is some reluctance to use the plywood boxes. In order to clarify, we propose to add the material codes in parenthesis after “wooden” and after the other materials.
5. Lastly, there is an increasing demand to use large batteries in the automotive industry and these batteries are also transported for further testing. There are at the moment no suitable packagings to transport larger batteries in accordance with SP310, since 6.1.1.1(d) excludes packages having a net mass above 400 kg. Therefore, there is a need to be able to use large packagings. For this reason, we propose to add large packagings as a mean of containment for the larger batteries. These large packagings shall meet the criteria for packing group I, which is in line with what is required for packagings, and we propose that they shall be type approved in accordance with 4.1.1.3.

Proposal

6. Our proposals are shown in bold and are below inserted in the text suggested for SP310 by Germany in 2014/12.

Amend special provision 310 as follows:

310 The testing requirements in Chapter 38.3 of the Manual of Tests and Criteria do not apply to production runs consisting of not more than 100 cells and batteries,

or to pre-production prototypes of cells and batteries when these prototypes are transported for testing, if the following conditions are met:

- (a) Cells and batteries:
 - (i) The cells and batteries are transported in an outer packaging that is a metal **(1A, 1B, 1N)**, plastics **(1H)** or plywood **(1D)** drum or a metal **(4A, 4B, 4N)**, plastics **(4H)** or wooden **(4C, 4D, 4F)** box **or a metal (50A, 50B, 50N), plastics (50H) or wooden (50C, 50D, 50F) large packaging** and that meets the criteria for packing group I packagings **and comply with 4.1.1.3**; and
 - (ii) Each cell and battery is individually packed in an inner packaging inside an outer packaging and is surrounded by cushioning material that is non-combustible, and non-conductive.
- (b) Cells and batteries contained in equipment:
 - (i) The cells and batteries contained in equipment are transported in an outer packaging that is a metal **(1A, 1B, 1N)**, plastics **(1H)** or plywood **(1D)** drum or a metal **(4A, 4B, 4N)**, plastics **(4H)** or wooden **(4C, 4D, 4F)** box **or a metal (50A, 50B, 50N), plastics (50H) or wooden (50C, 50D, 50F) large packaging** and that meets the criteria for packing group I packagings **and comply with 4.1.1.3**; and
 - (ii) The cells and batteries are protected against short circuit.

Large equipment may be transported unpackaged under conditions specified by the competent authority.
- (c) Identified damaged or defective cells and batteries shall be transported in accordance with special provision 376 and packaged in accordance with P908 of 4.1.4.1 or LP904 of 4.1.4.3, as applicable.
