

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

10 June 2014

Forty-fifth session

Geneva, 23 June – 2 July 2014

Item 5 (e) of the provisional agenda

Electric storage systems: miscellaneous

Comments on ST/SG/AC.10/C.3/2014/18 – Lithium Batteries and Hazard Communication

Transmitted by PRBA – The Rechargeable Battery Association and
RECHARGE, the European Association for Advanced Rechargeable
Batteries

Introduction

1. ST/SG/AC.10/C.3/2014/18 from the United Kingdom provides an excellent overview of the issues associated with improving the hazard communication for lithium batteries (UN3480, UN3481, UN3090 and UN3091) and other Class 9 dangerous goods. In addition, ST/SG/AC.10/C.3/2014/18 includes several options for improving the labels and markings for packages containing lithium batteries for consideration by the Sub-Committee.

2. PRBA and RECHARGE fully support improving the hazard communication labels and markings for lithium batteries and other Class 9 dangerous goods. However, we strongly oppose the UK's proposal to require a Class 9 label or any diamond-shaped label or marking for lithium batteries shipped in accordance with Special Provision 188. This would cause a significant amount of confusion for the lithium battery industry and carriers. We believe the most effective way to improve the hazard communication and harmonize the dangerous goods regulations for lithium batteries shipped in accordance with Special Provision 188 is for the UN Sub-Committee to incorporate into the Model Regulations a simplified version of the lithium battery handling label from the ICAO Technical Instructions. Suggestions are provided below. They include the same pictograms from the lithium battery handling label and a limited amount of text.



3. ST/SG/AC.10/C.3/2014/18 includes several modified Class 9 labels to improve the hazard communication for lithium batteries that are not transported in accordance with Special Provision 188. PRBA and RECHARGE are generally supportive of the label shown in Figure 4.3 of ST/SG/AC.10/C.3/2014/18. The label is shown below for reference.

