

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 7 (b) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations

on the Transport of Dangerous Goods: articles containing small quantities of dangerous goods

Comments on ST/SG/AC.10/C.3/2014/44 - Articles containing small quantities of dangerous goods

Transmitted by the European Association for Advanced Rechargeable Batteries (RECHARGE) and the Rechargeable Battery Association (PRBA)

Background

1. ST/SG/AC.10/C.3/2014/44 from the United Kingdom addresses the regulation of articles containing small quantities of dangerous goods within the Model Regulations. In particular, the UK is proposing to amend the proper shipping name for UN3363 in the Dangerous Goods List of Chapter 3.2 and Special Provision 301 in order to cover “articles” under Dangerous goods in machinery or dangerous goods in apparatus.
2. Batteries are generally considered articles. A number of dry cell batteries (*e.g.*, alkaline, carbon zinc) are not regulated as dangerous goods but are considered articles and may contain extremely small quantities of dangerous goods. PRBA and RECHARGE therefore are concerned that the UK’s proposal to reference “articles” in Special Provision 301 will unnecessarily subject these dry cell batteries to the dangerous goods regulations as articles or when they are installed in machinery or apparatus.
3. As noted in § 6 of ST/SG/AC.10/C.3/2014/44, the proposed amended version of Special Provision 301 shall not be used for machinery, articles or apparatus for which a proper shipping name already exists in the Dangerous Goods List of Chapter 3.2. There are a number of battery chemistries covered by a UN number and we recognize these batteries would not be subject to the proposed changes as described under the amended Special Provision 301.
4. Nickel-metal hydride batteries (UN3496) present a unique situation in that they are only regulated in sea transport and the IMDG Code exempts nickel metal hydride batteries contained in equipment. Therefore, it is unclear how the UK’s proposal would impact nickel metal hydride batteries.

Conclusion

5. RECHARGE and PRBA invite the Sub-Committee to clarify these questions raised indirectly by the proposal to introduce “articles” under UN3363.

