

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

30 June 2014

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**

**Forty-fifth session**

Geneva, 23 June – 2 July 2014

Item 5 (e) of the provisional agenda

**Electric storage systems: miscellaneous**

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**Hazard communication for lithium batteries and other Class  
9 entries - summary of working group discussion of  
ST/SG/AC.10/C.3/2014/18**

**Transmitted by the expert from the United Kingdom**

1. The lunchtime working discussed the United Kingdom's paper and reached broad consensus on a number of key aspects.
2. The majority of delegates considered that a marking/labelling system providing more specific hazard identification information should be developed for all Class 9 entries, not just for lithium batteries and agreed that:
  - (a) Existing exemptions (LQ, EQ, special provisions) should continue to apply;
  - (b) The best option was likely to be adding a pictogram to the lower half of the existing Class 9 label (as shown in e.g. Figures 4, 12 and 13 of the UK's paper)
  - (c) The alternative, a Class 9 mark with a specific pictogram displayed alongside on a separate label, might also be acceptable (and was preferred by minority);
  - (d) The options given at b) and c) could be run in parallel, as a temporary or permanent measure;
  - (e) Pictograms should probably be black on white;
  - (f) Existing DG and GHS pictograms could be utilised for many Class 9 entries (elevated temperature, GHS, inhalation as fine dust), but some delegates considered that it would not be possible to find suitable pictograms in all cases. It was agreed that new pictograms could in any case be introduced progressively; and
  - (g) Exempt categories should display the same pictogram as that adopted for the corresponding regulated Class 9 entry, probably in a diamond, but possibly in a rectangle, with no language, but without a Class mark.
3. It was also pointed out by some delegates that Class 9 could additionally be split into Divisions.
4. For lithium batteries, delegates generally considered that:
  - (a) An indication of the main risk (fire) was likely to be sufficient (although a minority of delegates saw some merit in an indication of multiple hazards);

- (b) The association of the flammability hazard with damage should be retained;
- (c) It would be possible to differentiate between lithium ion/lithium metal batteries by adding the UN number, or by varying the image (e.g. black batteries against a white background or white batteries outlined in black on a white ground); and
- (d) The battery image used by ICAO had the benefit of familiarity (although one delegate suggested that a simpler image, perhaps two batteries, might be preferable).

For batteries carried under SP188, see g) above.

- 5. A small number of delegates preferred a black pictogram on a red background, but this was not favoured by the majority because of possible confusion with Class 3.
- 6. Some concerns were expressed about the training implications consequent on a change of mark/label.
- 7. It was agreed that the modal bodies should be asked for their views. However, a multimodal solution should be sought.
- 8. The UK agreed to provide a further paper for the 46th session.

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