

## 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

24 June 2019

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Item 4 (c) of the provisional agenda

**Electric storage systems: transport provisions**

## **Lithium battery mark – telephone number for further information**

**Submitted by the International Civil Aviation Organization (ICAO)**

### **Background**

1. The intent of the requirement for a “telephone number for additional information” on the lithium battery mark (Figure 5.2.5 of the Model Regulations; Figure 5-3 Technical Instructions) was discussed at the last Dangerous Goods Panel Working Group of the Whole meetings (DGP-WG/18 and DGP-WG/19). At DGP-WG/18, it was considered vague in that it did not specify the entity for which the number was needed, the circumstances under which additional information would be required, or what additional information might be required. Most considered the telephone number to be one that could be used to contact the shipper for further information regarding a lithium battery consignment during regular working hours. How to handle a damaged shipment was suggested as the type of information the shipper could provide.

### **Discussion**

2. Further discussion at DGP-WG/19 focused on attempting to clarify the entity for which the number was needed i.e. specifying that the number should be that of the consignor remained problematic, since many entities could be considered as the consignor including the cell manufacturer, the battery manufacturer, the device manufacturer, the retailer or the consumer. Not all of these entities would necessarily know how to handle a damaged battery. It was noted that the requirement for a phone number was introduced at a time when there were a number of safety recalls, and the process for handling them was relatively new. Now that there was greater awareness, it was suggested consideration could be given to achieving the original objective in a less ambiguous manner. Some thought requiring a phone number was unnecessary, noting that a number was not required for fully regulated shipments of lithium batteries.

3. For the information of the Sub-Committee, further research has shown that the original marking requirement originated from an amendment to Special Provision 188 of the Model Regulations (ST/SG/AC.10/C.3/2006/97), which in turn was based on IEC 62281:2004 *Safety of primary and secondary lithium cells and batteries during transport*.

4. The Sub-Committee is requested to provide clarification on the requirement so that feedback could be provided to the DGP/27 meeting (16-20 September 2019).

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