



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

Fifty-eighth session

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Item 6 (b) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations

on the Transport of Dangerous Goods: packagings including the use of recycled plastics material

Testing the non-combustibility related to packages for lithium batteries

Transmitted by the expert from Belgium*

Introduction

1. At the fifty-seventh session of this Sub-Committee, Belgium presented document [ST/SG/AC.10/C.3/2020/71](#). In the document, an interpretation issue was identified on the requirement to test the non-combustibility related to packages intended for the transport of defective cells and batteries under packing instructions P908 and LP904 or the transport of production runs of not more than 100 cells or pre-production prototypes of these cells and batteries under P910 and LP905.
2. More specifically, it was explained that the text in instructions P908 5., P910 (1)(e), P910 (2)(d), LP904 5., LP905 (1)(e) and LP905 (2)(d) was not clear. Some read these provisions as indicating that the non-combustibility of the packaging as a whole needs to be assessed according to a standard approved by the competent authority.
3. However, as pointed out during the discussions on this topic within Belgium, the correct interpretation is that the non-combustibility of the thermal insulation material and the cushioning material that are used in the packaging need be assessed according to a standard approved by the competent authority. This interpretation was confirmed by the Sub-Committee during its fifty-seventh session (see report [ST/SG/AC.10/C.3/114](#), para. 101).
4. Our proposal at the fifty-seventh session of the Sub-Committee received several comments for improvement through the online work platform and during the virtual discussions on this topic. Most of the comments were of an editorial nature and are taken into account in the adapted proposals underneath. Additionally, it was suggested to also insert an example of such a standard into the current texts. This was also reflected in the proposals below.

* A/75/6 (Sect.20), para. 20.51.

5. During the progress of work an additional aspect was identified to be considered. Currently it is not foreseen that the country where the inspection body (performing the tests and certification of the packaging) is located could be different from the country where the packaging is designed or manufactured. Thus, it is proposed to add the country that certified the packaging as a country that can recognize standards for testing the non-combustibility.

Proposal 1

6. Amend packing instruction P908 5. to read as follows (new text underlined, deleted text stricken through):

“The non-combustibility of the thermal insulation material and the cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed, ~~or~~ manufactured or certified.

NOTE: An example of a standard for assessing the non-combustibility is ISO 1182.”

Proposal 2

7. Amend P910 (1)(e) to read as follows:

“The non-combustibility of the thermal insulation material and the cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed, ~~or~~ manufactured or certified;

NOTE: An example of a standard for assessing the non-combustibility is ISO 1182.”

Proposal 3

8. Amend P910 (2)(d) to read as follows:

“The non-combustibility of the cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed, ~~or~~ manufactured or certified.

NOTE: An example of a standard for assessing the non-combustibility is ISO 1182.”

Proposal 4

9. Amend LP904 5. to read as follows:

“The non-combustibility of the thermal insulation material and the cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed, ~~or~~ manufactured or certified.

NOTE: An example of a standard for assessing the non-combustibility is ISO 1182.”

Proposal 5

10. Amend LP905 (1)(e) to read as follows:

“The non-combustibility of the thermal insulation material and the cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed, ~~or~~ manufactured or certified.

NOTE: An example of a standard for assessing the non-combustibility is ISO 1182.”

Proposal 6

11. Amend LP905 (2)(d) to read as follows (new text underlined):

“The non-combustibility of the cushioning material shall be assessed according to a standard recognized in the country where the packaging is designed, ~~or~~ manufactured or certified.”

NOTE: An example of a standard for assessing the non-combustibility is ISO 1182.
