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

23 November 2021

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

**Fifty-ninth session**

Geneva, 29 November-8 December 2021

Item 11 of the provisional agenda

**Unified interpretations of the Model Regulations**

**Alternative proposal to document ST/SG/AC.10/C.3/2021/47 -  
Clarification of the wording “transported for testing” in  
special provision 310**

**Transmitted by RECHARGE the Advanced Rechargeable & Lithium  
Batteries Association and PRBA – The Rechargeable Battery  
Association**

## **Introduction**

1. The authors recognize the importance of the clarification requested in the proposal presented in document ST/SG/AC.10/C.3/2021/47 and would like to recommend an alternative proposal for Special Provision 310.
2. The need to transport prototype cells and batteries for the purpose of the qualification testing is essential for the industry. It is particularly necessary to support the process of performance verification or integration testing, as mentioned in the referenced document ST/SG/AC.10/C.3/2021/47, that may lead to product design changes before any supply contract for series production is signed and UN38.3 lithium battery testing commences. But other cases are also requiring the usage of SP310, such as to supply of “low production” batteries uniquely designed for a specific application. SP 310 limits “low production” to not more than 100 batteries per design.
3. Based on the multiple possible cases where the SP310 is rightfully applicable, the authors believe that a list of applicable cases as proposed in ST/SG/AC.10/C.3/2021/47 is not helpful and may be misinterpreted as a limitative list. It is therefore recommended the list of examples in ST/SG/AC.10/C.3/2021/47 be removed. In addition, since the proposed text is explanatory in nature, it is recommended the text be listed as “NOTE” under SP 310.

## **Proposal**

4. Add the following text to Special Provision 310 (new text is underlined):  
"310 The testing requirements in the Manual of Tests and Criteria, part III sub-section 38.3 do not apply to production runs, consisting of not more than 100 cells or batteries, or to pre-production prototypes of cells or batteries when these prototypes are transported for testing when packaged in accordance with packing instruction P910 of 4.1.4.1 or LP905 of 4.1.4.3, as applicable.

*NOTE: “Transported for testing” is not limited to testing defined in the Manual of Tests and Criteria, part III sub-section 38.3.”*\_\_

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