

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

1 July 2022

Sub-Committee of Experts on the Transport of Dangerous Goods

Sixtieth session

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Item 4 (c) of the provisional agenda

Electric storage systems: transport provisions

Provisions of 2.9.4 for lithium batteries transported under special provision 310

Transmitted by the expert from Belgium

Introduction

1. Document ST/SG/AC.10/C.3/2022/30 lists the relevant texts of the Model Regulations, the conclusions of the previous session and a proposal for clarification of special provision 310, which incorporates the comments that were received. This document clarifies the used wording and proposes a solution to improve the text of special provision 310.

Discussion

2. Special provision 310 is assigned to UN Nos. 3090, 3091, 3480 and 3481. The first paragraph of special provision 310 states the following:

"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."

3. A discussion was held on the used wording "prototypes" in the third line of Special Provision 310. It was not clear if the wording "prototypes" in "...when these **prototypes** are transported for testing..." was correct.

4. Special Provision 310 describes two possibilities. The first one are production runs, consisting of not more than 100 cells or batteries. The second one are pre-production prototypes of cells or batteries.

5. For the production runs, consisting of not more than 100 cells or batteries, Belgium believes it was the original intention to make the transport of these cells and batteries possible for any reason, not limited to testing only. This because the tests for batteries are destructive and therefore would not be useful for production runs, consisting of not more than 100 cells or batteries.

6. However, for the pre-production prototypes of cells or batteries, Belgium believes it was the original intention to make the transport of these cells and batteries possible only when these prototypes are transported for testing purposes.

7. With regards to the quality management program for untested batteries a separate proposal was introduced that needed more consideration. For that reason it has not been included in this proposal.

8. With regards to the listing of the provisions, Belgium aligned the format with the format of special provision 188. As a list of provisions that needs to be met, would make the list significantly longer, it was decided to keep the list with provisions that do not need to be met.

9. Belgium proposes to improve special provision 310 as suggested below. Both proposals are based on the proposal 3 of the initial document. The Sub-Committee is invited to consider one of the following proposals.

Proposal 1

10. It is proposed to clarify special provision 310 as follows (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~~ Cells and batteries from 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~~ shall be packaged in accordance with packing instruction P910 of 4.1.4.1 or LP905 of 4.1.4.3, as applicable.

These cells and batteries shall meet the provisions of 2.9.4 with the exception of 2.9.4 (a), (e) (vii), (f) (iii) if applicable, f (iv) if applicable and (g).

The transport document shall include the following statement: "Transport in accordance with special provision 310"."

Proposal 2

11. This proposal is a reformatted version of proposal 1 but reformatted. It is proposed to clarify special provision 310 as follows:

"310 When packaged in accordance with packing instruction P910 of 4.1.4.1 or LP905 of 4.1.4.3, as applicable:

- Cells and batteries from production runs, consisting of not more than 100 cells or batteries; or
- pre-production prototypes of cells or batteries when these prototypes are transported for testing;

shall meet the provisions of 2.9.4 with the exception of 2.9.4 (a), (e) (vii), (f) (iii) if applicable, f (iv) if applicable and (g).

The transport document shall include the following statement: "Transport in accordance with special provision 310"."
