



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

Sixty-third session

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Item 4 (e) of the provisional agenda

Electric storage systems:

Sodium ion batteries

Inclusion in 5.2.1.9.1 of a reference to special provision 400

Transmitted by the expert from Spain*

I. Introduction

1. During the last biennium amendments were adopted to include sodium ion batteries into the *Model Regulations*. Inter alia, amendments to 5.2.1.9. were adopted, to include here a reference to the sodium ion batteries.
2. Nevertheless, it has been noted that a reference to special provision (SP) 400 should also be included into 5.2.1.9.1, just as there is a reference to SP 188, to ensure that in the cases prescribed in SP 400 for sodium ion batteries, the corresponding mark is included.
3. During the last meeting of the Sub-Committee of Experts on the Transport of Dangerous Goods, when discussing informal document INF.24 from ICAO, opinions were divided on the benefits and drawbacks of including the battery mark on packages for the cases when SP 400 would be applicable and some delegates proposed to remove SP 400 (c) (see report ST/SG/AC.10/C.3/124, paragraphs 62-65).
4. If paragraph (c) of SP 400 would be deleted, the amendment proposed here would not be necessary. But until that discussion is concluded, it would be better to include the reference to SP 400 into 5.2.1.9.1, so that the *Model Regulations* would be complete and coherent.
5. Amendments relating to sodium ion batteries will enter the modal regulations in 2025; to be able to include also this consequential amendment into the modal regulations, it would be good to take a decision on this issue at the present session.

II. Proposal

6. Include in 5.2.1.9.1 of the *Model Regulations* a reference to SP 400 to read as follows (new text **bold and underlined**; text based on the text of 5.2.1.9.1 as modified through informal document INF.13 at the sixty-second session of the Sub-Committee):

* A/77/6 (Sect. 20), table 20.6



“5.2.1.9.1 Packages containing lithium cells or batteries or sodium ion cells or batteries prepared in accordance with special provisions 188 **or 400** shall be marked as shown in figure 5.2.5.”

III. Justification

7. Ensuring a more systematic approach and a better rationale in the *Model Regulations* helps to create clearer legal texts and to avoid different criteria among different countries and inspection services, and thus helps to implement target 16.6 of the 2030 Agenda for sustainable development (*Develop effective, accountable and transparent institutions at all levels*).
