

## 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

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Items 4 (c) of the provisional agenda

Electric storage systems: Transport provisions

### Issues regarding the interpretation of the scope of application of special provision 188

Transmitted by the expert from Germany

#### I. Introduction

1. At the sixty-third session of the Sub-Committee of Experts on the Transport of Dangerous Goods, Germany presented informal document INF.26. In the discussion within the Sub-Committee, partly contrary opinions were voiced on the issues set out in the informal document on the interpretation of the scope of special provision 188 in the *Model Regulations*. It was concluded that the current texts of the special provision are apparently not clear enough and should thus be revised.

2. The volume of batteries transported continues to increase unabated and thus also the number of transport operations carried out in accordance with the provisions of special provision 188. Therefore, Germany is of the opinion that an unambiguous interpretation and wording of the texts of the special provision and also a uniform application of these provisions are of utmost importance.

#### II. Proposal

3. As it has not become clear in the previous discussions at national and international level how the criteria for the applicability of special provision 188 are to be interpreted, Germany would like to ask the Sub-Committee to examine whether the informal working group on lithium batteries could deal with these issues.

4. Against the background of the expected regulations for a hazard-based classification system for lithium batteries, it should initially be clarified to what extent special provision 188 is still needed at all in that case.

5. Should the conclusion be reached that the special provision is still needed, Germany would like to ask that the following questions, which were already set out in informal document INF.26 of the sixty-third session of the Sub-Committee, be discussed in the informal working group on lithium batteries:

(a) Are the limits for the aggregate lithium content of no more than 2 g and for the watt-hour rating of no more than 100 Wh set out in special provision 188 battery design requirements or conditions of transport?

(b) Are two or more batteries that are connected to plugs, switches or a battery management system electrically connected together within the meaning of the definition in 38.3.2.3 of the UN *Manual of Tests and Criteria* or not?

(c) In the cases where cable connections lead out of a battery, is this battery then still considered to be completely enclosed by an inner packaging within the meaning of special provision 188 (d) or not?

6. Germany would appreciate it if the informal working group on lithium batteries could comment on the above questions and would, if necessary, be willing to propose amendments to clarify the wording of special provision 188 accordingly.

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