

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

21 June 2024

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Item 3 of the provisional agenda

Listing, classification and packing

Reuse, repair and repurposing of lithium-ion cells and batteries and implications on safety and UN 38.3 testing requirements, alternative proposal to the working document ST/SG/AC.10/C.3/2024/55

Submitted by The Rechargeable Battery Association and Advanced Rechargeable and Lithium Batteries Association (RECHARGE)

1. RECHARGE has received several feedback from its members, supportive of the intention of the document ST/SG/AC.10/C.3/2024/55 presented in this session, but concerned that some criticism may be raised about the format and wording of the proposal.
2. RECHARGE propose an alternative text to avoid the ambiguity around the usage of the word “authorized” in the present version and replace it by the wording “defined”.
3. In the case a concern is raised that the proposed addition of a point (g) in the list is considered as not relevant and not belonging to this list, an alternative approach is considered here to propose the text as a plain text in the note.

Proposal

4. Add a new text below the subparagraph (f) under the NOTE in section 38.3.2.2 of the *Manual of Tests and Criteria*, as follows (new text is underlined):

“NOTE: The type of change that might be considered to differ from a tested type, such that it might lead to failure of any of the test results, may include, but is not limited to:

...

A change resulting from treatment to batteries such as repurposing, remanufacturing or repairing might be considered to differ from a tested type. A repair operation, according to a process defined by the original battery manufacturer, in the sense of restoring a battery in a manner equivalent to the tested type by replacement of defective parts with original spare parts or parts of equal specification and quality, shall not be considered to differ from a tested type.”