



**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/15)**

Montreal, 27 April to 1 May 2015

Agenda Item 5: Development of mitigating measures to address risks associated with the transport of lithium batteries including measures that address recommendations from the Second International Multidisciplinary Lithium Battery Transport Coordination Meeting

5.4: Simplified provisions

LITHIUM BATTERIES IN THE MAIL

(Presented by P. Ros)

REVISED

SUMMARY

Transport of dangerous goods in the mail is regulated in Part 1;2.3 of the Technical Instructions. Reference is made from Part 1;2.3 to Packing Instructions 967 and 970 for the transport of lithium batteries in the mail. The introductory text in the packing instructions gives rise to several different interpretations.

Action by the DGP-WG: The DGP-WG is invited to amend the initial paragraph of Section II to Packing Instructions 967 and 970 as presented in the appendix to this working paper.

1. INTRODUCTION

1.1 The transport of dangerous goods by mail is regulated through Part 1;2.3 of the Technical Instructions. Part 1;2.3.2 specifies the different dangerous goods which are permitted for transport in the mail, including lithium ion and lithium metal batteries contained in equipment (not more than four cells or two batteries) provided they meet the provisions of Section II to 967 and 970 respectively.

1.2 The initial paragraph of Packing Instruction 967, Section II (similar to Packing Instruction 970) is:

“With the exception of Part 1;2.3 (Transport of dangerous goods by post), 7;4.4 (Reporting of dangerous goods accidents and incidents), 8;1.1 (Dangerous goods carried by passengers or crew) and paragraph 2 of this packing instruction, lithium ion cells and batteries contained in equipment offered for transport are not subject to other additional requirements of these Instructions if they meet the requirements of this section.”

1.2.1 It is suggested that this paragraph may be read in two different ways:

- a) Lithium batteries contained in equipment are permitted if the requirements of this section are fulfilled, and nothing else of these Instructions, but not if any of the following conditions apply: dangerous goods by post, dangerous goods carried by passengers or crew, reporting of dangerous goods accidents and incidents, or lithium batteries forbidden for transport.
- b) Lithium batteries contained in equipment are permitted if the requirements of this section are fulfilled, and nothing else of these Instructions, but only if one of the following conditions applies: dangerous goods by post, dangerous goods carried by passengers or crew, reporting of dangerous goods accidents and incidents, or lithium batteries forbidden for transport. The applicable requirements of Part 1;2.3, Part 8;1.1, Part 7;4.4 and paragraph 2 of Packing Instructions 967/970 must be met.

1.2.2 In case of 1.2.1 a), lithium batteries transported by the post would be subject to the full Instructions, and, specifically, be transported according to Section I of Packing Instructions 967 and 970. In case 1.2.1 b), lithium batteries transported by the post only have to meet the requirements of Section II of Packing Instructions 967 and 970.

1.2.3 Recognizing that the correct interpretation is 1.2.1 b), it would be helpful to amend the text to clarify the meaning, making a clear interpretation possible. The unclear text has given rise to several discussions in Spain when undergoing the process of authorising the designated postal operator to carry dangerous goods.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend the initial paragraph in Section II of Packing Instructions 967 and 970 as presented in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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Chapter 11

CLASS 9 — MISCELLANEOUS DANGEROUS GOODS

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Packing Instruction 967
<p>I. SECTION I</p> <p>Each cell or battery must meet all the provisions of 2;9.3.</p> <p>...</p>
<p>II. SECTION II</p> <p>With the exception of Part 1;2.3 (Transport of dangerous goods by post), 7;4.4 (Reporting of dangerous goods accidents and incidents), 8;1.1 (Dangerous goods carried by passengers or crew) and paragraph 2 of this packing instruction, lithium ion cells and batteries contained in equipment offered for transport are not subject to other additional requirements of these Instructions if they meet the requirements of this section. <u>Lithium ion cells and batteries contained in equipment offered for transport as described in this section have only to meet the requirements of this section and of Part 7;4.4 (Reporting of dangerous goods accidents and incidents), if applicable. In case of lithium ion cells and batteries sent by post, additionally the requirements of Part 1;2.3 apply. In case of lithium ion cells and batteries carried by passengers or crew, the requirements of Part 8;1.1 apply. This section cannot be applied to batteries and cells mentioned in paragraph 2 of this packing instruction.</u></p> <p>...</p>

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Packing Instruction 970

I. SECTION I

Each cell or battery must meet all the provisions of 2;9.3.

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II. SECTION II

~~With the exception of Part 1;2.3 (Transport of dangerous goods by post), 7;4.4 (Reporting of dangerous goods accidents and incidents), 8;1.1 (Dangerous goods carried by passengers or crew) and paragraph 2 of this packing instruction, lithium metal cells and batteries contained in equipment offered for transport are not subject to other additional requirements of these Instructions if they meet the requirements of this section. Lithium metal cells and batteries contained in equipment offered for transport as described in this section have only to meet the requirements of this section and of Part 7;4.4 (Reporting of dangerous goods accidents and incidents), if applicable. In case of lithium metal cells and batteries sent by post, additionally the requirements of Part 1;2.3 apply. In case of lithium metal cells and batteries carried by passengers or crew, the requirements of Part 8;1.1 apply. This section cannot be applied to batteries and cells mentioned in paragraph 2 of this packing instruction.~~

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