



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/22)**

Montréal, 21 to 25 November 2022

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2025)**
2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2025-2026 Edition

REMOVAL OF SPECIAL PROVISION A185 FROM UN 3481 AND UN 3091

(Presented by P. Guo)

SUMMARY

This working paper proposes the removing the assignment of Special Provision A185 to UN 3481 — **Lithium ion batteries packed with equipment** and UN 3091 — **Lithium metal batteries packed with equipment**.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Packaging Instruction 952, assigned to of UN 3171 — **Battery-powered equipment and Battery-powered vehicle**, was revised to specify that lithium batteries packed separately with vehicles must be assigned to UN 3481 — **Lithium ion batteries packed with equipment** or UN 3091 — **Lithium metal batteries packed with equipment** in the 2019-2020 Edition of the *Technical Instructions for the Safe Transport of Dangerous Goods by Air*:

- 2) if lithium batteries are installed in a vehicle, they must meet the provisions of Part 2;9.3, unless otherwise approved by the appropriate authority of the State of Origin. Where the lithium battery is removed from the vehicle and is packed separate from the vehicle in the same outer packaging, the package must be consigned as UN 3481 — **Lithium ion batteries packed with equipment** or UN 3091 — **Lithium metal batteries packed with equipment** and packed according to Packing Instruction 966 or 969, as applicable

1.2 According to the requirements of the Special Provision A185, vehicles only powered by lithium metal batteries or lithium ion batteries must be consigned under the entry UN 3171 — **Battery-powered vehicle**. Powered means that the lithium batteries are attached to the vehicle, rather than packaged separate together.

1.3 UN 3481 — **Lithium ion batteries packed with equipment** and UN 3091 — **Lithium metal batteries packed with equipment** still have Special Provision A185 assigned. When the users view Special Provision A185, they will be directed to UN 3171. The users further look at Packing Instruction 952. Unfortunately, they will be directed to UN 3481 and UN 3091. They enter a cycle of weirdness. To solve this problem, it is proposed to remove the assignment of Special Provision A185 from UN 3481 — **Lithium ion batteries packed with equipment** and UN 3091 — **Lithium metal batteries packed with equipment**.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the removal of the assignment of Special Provision A185 from UN 3481 — **Lithium ion batteries packed with equipment** and UN 3091 — **Lithium metal batteries packed with equipment** as shown in the appendix.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

**DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES**

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Chapter 2

**ARRANGEMENT OF THE
DANGEROUS GOODS LIST (TABLE 3-1)**

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Table 3-1. Dangerous Goods List

Name	UN No.	Class or division	Subsidiary risk	Labels	State variations	Special provisions	UN packing group	Excepted quantity	Passenger aircraft		Cargo aircraft	
									Packing instruction	Max. net quantity per package	Packing instruction	Max. net quantity per package
1	2	3	4	5	6	7	8	9	10	11	12	13
Lithium ion batteries packed with equipment (including lithium ion polymer batteries)	3481	9		Miscellaneous — Lithium batteries	US 3	A88 A99 A154 A164 A181 A185 A213		E0	966	5kg	966	35kg
Lithium metal batteries packed with equipment (including lithium alloy batteries)	3091	9		Miscellaneous — Lithium batteries	US 2 US 3	A88 A99 A154 A164 A181 A185 A213		E0	969	5kg	969	35kg
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