



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/25)**

Delhi, India, 21 to 25 April 2025

Agenda Item 4: Managing safety risks posed by the carriage of energy storage devices by air (Ref: Job Card DGP.003.05)

**LOW PRODUCTION RUN CELLS AND BATTERIES: HARMONIZATION OF TEXT
BETWEEN 2;0.6.2 AND SPECIAL PROVISION A88**

(Presented by L. Cascardo)

SUMMARY

This working paper identifies a misalignment between the recently revised provision in 2;0.6.2 of the Technical Instructions and Special Provision A88. The discrepancy arises because 2;0.6.2 does not specify that the production limit of 100 cells or batteries applies on an annual basis, as stated in A88. Additionally, 2;0.6.2 does not include sodium-ion batteries, which are explicitly mentioned in A88. To ensure consistency and clarity, a revision to 2;0.6.2 is proposed.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The recently amended provision 2;0.6.2 in the Technical Instructions states:

Part 2

CLASSIFICATION OF DANGEROUS GOODS

INTRODUCTORY CHAPTER

...

6. CLASSIFICATION OF ARTICLES AS ARTICLES CONTAINING DANGEROUS GOODS N.O.S.

...

6.2 Such articles may in addition contain cells or batteries. Lithium cells and batteries that are integral to the article must be of a type proven to meet the testing requirements of the UN Manual of Tests and Criteria, Part III, subsection 38.3. For articles containing pre-production prototype lithium cells or batteries transported for testing, or for articles containing lithium cells or batteries manufactured in production runs of not more than 100 cells or batteries, the requirements of Special Provision

(3 pages)

DGPWG.25.WP.006.2.en.docx

A88 apply.

1.2 Meanwhile, Special Provision A88 contains the following relevant text:

A88 Pre-production prototypes of lithium cells or batteries, or sodium ion cells or batteries, when these prototypes are transported for testing or low production runs (that is, annual production runs consisting of not more than 100 lithium cells or batteries, or sodium ion cells or batteries) of lithium cells or batteries, or sodium ion cells or batteries that have not been tested to the requirements in Part III, subsection 38.3 of the UN *Manual of Tests and Criteria* may be transported aboard cargo aircraft if approved by the appropriate authority of the State of Origin and the State of the Operator and the requirements in Packing Instruction 910 of the Supplement are met.

1.3 A comparison between the two texts reveals two key inconsistencies:

- a) annual production limit: The revised 2;0.6.2 omits the clarification that the 100-unit production cap is calculated on an annual basis, while A88 explicitly states this; and
- b) Sodium-ion batteries: A88 allows for sodium-ion cells or batteries, whereas 2;0.6.2 currently restricts this only to lithium cells or batteries.

1.4 The omission of the annual qualifier in 2;0.6.2 may lead to misinterpretation, where different people in the supply chain could assume that the 100-unit cap applies to a different timeframe (e.g. per shipment or per project). This could result in unintended deviations from regulatory intent.

1.5 The absence of sodium-ion batteries in 2;0.6.2 may create a regulatory gap, as these batteries are explicitly considered under A88. However, this paper will not discuss this topic because the UN Subcommittee of Experts on the Transport of Dangerous Goods has recently approved a change to include sodium ion batteries to an equivalent requirement that will have an impact on ICAO's requirements. We believe these changes will be captured by the DGP Working Group on UN Harmonization.

1.6 To ensure harmonization, it is proposed to modify 2;0.6.2 to clearly state that the 100-unit production cap applies annually.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to discuss the proposed amendments to the Technical Instructions as shown in appendix to modify paragraph 2;0.6.2 to clearly state that the 100-unit production cap applies annually.

APPENDIX

PROPOSED AMMENDMENTS TO THE TECHNICAL INSTRUCTIONS

Part 2

CLASSIFICATION OF DANGEROUS GOODS

INTRODUCTORY CHAPTER

...

6. CLASSIFICATION OF ARTICLES AS ARTICLES CONTAINING DANGEROUS GOODS N.O.S.

...

6.2 Such articles may in addition contain cells or batteries. Lithium cells and batteries that are integral to the article must be of a type proven to meet the testing requirements of the UN Manual of Tests and Criteria, Part III, subsection 38.3. For articles containing pre-production prototypes of lithium cells or batteries transported for testing, or for articles containing lithium cells or batteries manufactured in low production runs ~~of not more than 100 cells or batteries~~ (that is, annual production runs consisting of not more than 100 lithium cells or batteries), the requirements of Special Provision A88 apply.

— END —