



## **DANGEROUS GOODS PANEL (DGP)**

### **TWENTY-THIRD MEETING**

**Montréal, 11 to 21 October 2011**

**Agenda Item 5: Resolution, where possible, of the non-recurrent work items identified by the Air Navigation Commission or the panel:**

**5.1: Review of provisions for the transport of lithium batteries**

### **USE OF “NOT RESTRICTED” IN SECTION II OF LITHIUM BATTERY PACKING INSTRUCTIONS**

(Presented by D. Brennan)

#### **SUMMARY**

This working paper proposes a revision to Section II of the lithium battery packing instructions to remove the use of the term “not restricted” on the air waybill.

**DGP Action:** The DGP is invited to revise Section II of the lithium battery packing instructions (PI 965 to PI 970) to replace the term “not restricted” with “Section II”.

## **1. INTRODUCTION**

1.1 At DGP/22 text was adopted into Section II of the packing instructions applicable to lithium batteries (Packing Instruction 965 to Packing Instruction 970) to specify information that must be shown on the air waybill for consignments of articles being shipped in accordance with those provisions (DGP/22-WP/100, paragraph 5.4.4 refers).

1.2 The text adopted was that the shipper must indicate on the air waybill the type(s) of lithium batteries in the consignment, lithium ion and/or lithium metal, the applicable packing instruction number and the term “not restricted”.

1.3 This requirement has now been in place for a little over eight months and has not only been implemented into the information shown on the air waybill, but has also been adopted into information shown on product and safety data sheets provided by some manufacturers of lithium batteries.

1.4 In interpreting the meaning of this information some shippers and manufacturers have taken “not restricted” to mean non-dangerous goods and have put a statement to this effect in information provided to their customers.

1.5 The text “not restricted” adopted into the lithium battery packing instructions was based on text that had been previously adopted into the Technical Instructions against a number of special provisions, such as Special Provision A70, A98, etc. to provide an indication to freight forwarders, ground handling agents and operators that the shipper had complied with the provisions of the special provision and therefore the substance or article was therefore “not subject to the provisions of the Technical Instructions”.

1.6 However, as indicated by working paper DGP/23-WP/54 there is a view that while compliance with the a special provision may release the shipper from most if not all of the normal provisions applicable to the transport of dangerous goods by air, that the substances or articles in question still remain dangerous goods.

1.7 The same applies to lithium batteries being shipped in accordance with Section II of the applicable packing instructions. The packages containing the lithium batteries, and equipment, while excepted from most of the provisions of the Technical Instructions remain dangerous goods and therefore the term “not restricted” perhaps sends the wrong message.

1.8 It is therefore proposed to replace “not restricted” in PI 965 to PI 970 with simply the term “Section II”.

— — — — —

## APPENDIX

### AMENDMENTS TO THE TECHNICAL INSTRUCTIONS

#### Part 4 PACKING INSTRUCTIONS

##### Packing Instruction 965

Passenger and cargo aircraft for UN 3480

...

##### SECTION II

...

##### ADDITIONAL PACKING REQUIREMENTS

...

- Each package must be labelled with a lithium battery handling label (Figure 5-31).
- Each consignment must be accompanied with a document with an indication that:
  - the package contains lithium ion cells or batteries;
  - the package must be handled with care and that a flammability hazard exists if the package is damaged;
  - special procedures must be followed in the event the package is damaged, to include inspection and repacking if necessary;
  - a telephone number for additional information; and
  - the words "lithium ion batteries", "~~not restricted~~[complies with] Section II" and "PI965" must be placed on the air waybill, when an air waybill is used.
- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

##### Packing Instruction 966

Passenger and cargo aircraft for UN 3481 (packed with equipment) only

...

##### SECTION II

...

##### ADDITIONAL PACKING REQUIREMENTS

...

- Each package must be labelled with a lithium battery handling label (Figure 5-31).
- Each consignment must be accompanied with a document with an indication that:
  - the package contains lithium ion cells or batteries;
  - the package must be handled with care and that a flammability hazard exists if the package is damaged;
  - special procedures must be followed in the event the package is damaged, to include inspection and repacking if necessary;
  - a telephone number for additional information; and

- the words “lithium ion batteries”, “~~not restricted~~[complies with] Section II” and “PI966” must be placed on the air waybill, when an air waybill is used.
  - Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.
- ...

### Packing Instruction 967

Passenger and cargo aircraft for UN 3481 (contained in equipment) only

...

#### SECTION II

...

#### ADDITIONAL PACKING REQUIREMENTS

...

- Each consignment with packages bearing the lithium battery handling label must be accompanied with a document with an indication that:
  - the package contains lithium ion cells or batteries;
  - the package must be handled with care and that a flammability hazard exists if the package is damaged;
  - special procedures must be followed in the event the package is damaged, to include inspection and repacking if necessary;
  - a telephone number for additional information; and
  - the words “lithium ion batteries”, “~~not restricted~~[complies with] Section II” and “PI967” must be placed on the air waybill, when an air waybill is used.
- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

### Packing Instruction 968

Passenger and cargo aircraft for UN 3090

...

#### SECTION II

...

#### ADDITIONAL PACKING REQUIREMENTS

...

- Each package must be labelled with a lithium battery handling label (Figure 5-31).
- Each consignment must be accompanied with a document with an indication that:
  - the package contains lithium metal cells or batteries;
  - the package must be handled with care and that a flammability hazard exists if the package is damaged;
  - special procedures must be followed in the event the package is damaged, to include inspection and repacking if necessary;
  - a telephone number for additional information; and
  - the words “lithium metal batteries”, “~~not restricted~~[complies with] Section II” and “PI968” must be placed on the air waybill, when an air waybill is used.
- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

### Packing Instruction 969

Passenger and cargo aircraft for UN 3091 (packed with equipment) only

...

#### SECTION II

...

#### ADDITIONAL PACKING REQUIREMENTS

...

- Each package must be labelled with a lithium battery handling label (Figure 5-31).
- Each consignment must be accompanied with a document with an indication that:
  - the package contains lithium metal cells or batteries;
  - the package must be handled with care and that a flammability hazard exists if the package is damaged;
  - special procedures must be followed in the event the package is damaged, to include inspection and repacking if necessary;
  - a telephone number for additional information; and
- the words “lithium metal batteries”, “~~not restricted~~[complies with Section II]” and “PI969” must be placed on the air waybill, when an air waybill is used.
- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

### Packing Instruction 970

Passenger and cargo aircraft for UN 3091 (contained in equipment) only

...

#### SECTION II

...

#### ADDITIONAL PACKING REQUIREMENTS

...

- Each consignment with packages bearing the lithium battery handling label must be accompanied with a document with an indication that:
  - the package contains lithium metal cells or batteries;
  - the package must be handled with care and that a flammability hazard exists if the package is damaged;
  - special procedures must be followed in the event the package is damaged, to include inspection and repacking if necessary;
  - a telephone number for additional information; and
  - the words “lithium metal batteries”, “~~not restricted~~[complies with Section II]” and “PI970” must be placed on the air waybill, when an air waybill is used.
- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

— END —