



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-FOURTH MEETING

Montréal, 28 October to 8 November 2013

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2015-2016 Edition

PACKING INSTRUCTIONS 966 AND 969

(Presented by G A Leach)

SUMMARY

This working paper proposes an alignment with the UN Model Regulations in respect of lithium batteries which may be packed with equipment.

Action by the DGP: The DGP is invited to amend Section II of Packing Instructions 966 and 969 as shown in the appendix of this working paper.

1. INTRODUCTION

1.1 A question was received in the United Kingdom from a shipper of lithium battery chargers which they wanted to ship with the corresponding lithium batteries. It became apparent that the wording of the applicable packing instruction (Section II, paragraph II.2, fourth bullet of Packing Instructions 966 and 969) is ambiguous in that it suggests only batteries which are to power a piece of equipment are addressed, i.e.:

"The maximum number of batteries in each package must be the minimum number required to power the equipment, plus two spares."

There seems no reason why Packing Instruction 966 shouldn't be the applicable packing instruction, but clearly, batteries do not *power* a charger. However, the same problem does not exist in the Model Regulations where the equivalent text (Packing Instruction 903 (3)) refers to the batteries as being "for its operation". It is suggested alignment with the Model Regulations would address the issue; this would also require deleting reference to the minimum number of batteries permitted as to retain it would only allow for items such as chargers to have, say, one battery with it when it is capable of charging more.

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 966

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II.2 Additional requirements

- Lithium ion cells and batteries must:
 - be placed in inner packagings that completely enclose the cell or battery, then placed in a strong outer packaging; or
 - be placed in inner packagings that completely enclose the cell or battery, then placed with the equipment in a strong outer packaging.
- Cells and batteries must be protected so as to prevent short circuits. This includes protection against contact with conductive materials within the same packaging that could lead to a short circuit.
- The equipment must be secured against movement within the outer packaging and must be equipped with an effective means of preventing accidental activation.
- The maximum number of batteries in each package ~~must be~~ is the ~~minimum~~ number appropriate for the equipment's operation required to power the equipment, plus two spares.
- Each package of cells or batteries, or the completed package, must be capable of withstanding a 1.2 m drop test in any orientation without:
 - damage to cells or batteries contained therein;
 - shifting of the contents so as to allow battery to battery (or cell to cell) contact;
 - release of contents.
- 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; and
 - a telephone number for additional information.
- The words "lithium ion batteries, in compliance with Section II of 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.

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Packing Instruction 969

II.2 Additional requirements

- Lithium metal cells or batteries must:
 - be placed in inner packagings that completely enclose the cell or battery, then placed in a strong outer packaging; or
 - be placed in inner packagings that completely enclose the cell or battery, then placed with the equipment in a strong outer packaging.
- Cells and batteries must be protected so as to prevent short circuits. This includes protection against contact with conductive materials within the same packaging that could lead to a short circuit.
- The equipment must be secured against movement within the outer packaging and must be equipped with an effective means of preventing accidental activation.
- The maximum number of batteries in each package ~~must be~~ is the ~~minimum~~ number appropriate for the equipment's operation required to power the equipment, plus two spares.
- Each package of cells or batteries, or the completed package, must be capable of withstanding a 1.2 m drop test in any orientation without:
 - damage to cells or batteries contained therein;
 - shifting of the contents so as to allow battery to battery (or cell to cell) contact;
 - release of contents.
- 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; and
 - a telephone number for additional information.
- The words "lithium metal batteries, in compliance with Section II of 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.

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