



INFORMATION PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-EIGHTH MEETING

Virtual, 15 to 19 November 2021

Agenda Item 4: Managing safety risks posed by the carriage of lithium batteries by air (Ref: Job Card DGP.003.03)

**DELETION OF SECTION II OF PACKING INSTRUCTIONS 965 AND 968
(related to DGP/28-WP/4)**

(Presented by the Dangerous Goods Advisory Council (DGAC))

SUMMARY

In light of the proposal in DGP/28-WP/4 to delete Section II in Packing Instructions 965 and 968, and should the DGP agree to take such action, this information paper proposes amendments to those packing instructions intended to mitigate the impact of that deletion on shippers of Section II lithium batteries.

1. INTRODUCTION

1.1 Whilst the need for operators to take account of lithium batteries in their safety risk assessments is recognized, the proposal in DGP28-WP/4 to delete the Section II provisions of Packing Instructions 965 and 968, and requiring application of the IB provisions, has significant implications for shippers of small quantities of small lithium batteries:

- a) Training — provisions of “adequate instruction” to shippers would no longer be sufficient, instead the requirements of Part 1, Chapter 4 of the Technical Instructions would apply; whilst it is accepted that shippers would not have to undergo “full” training, the training would, nonetheless, be subject to formal assessment etc. and in many States will be subject to review and approval by the appropriate national authority, thus inadvertently imposing an additional burden on those authorities. It should be borne in mind that this measured approach was a conscious decision taken by the DGP, recognizing that the full training requirements of Part 1; Chapter 4 would be disproportionate for the shipper of, say, a single button cell.
- b) Package size — packages containing Section II batteries are required to bear the lithium battery mark and the “cargo aircraft only” handling label. These are not required to be on the same surface of the package. However, packages containing batteries shipped in accordance with the IB provisions must bear the “cargo aircraft

only” handling label and the Class 9 hazard warning label on the same surface (Part 5;3.2.12 a) 3) refers), meaning the package must be at least double the size of a Section II package (see photograph below — the required lithium battery mark may be on a different surface).



- c) Handling — Section IB packages are subject to additional handling requirements, particularly acceptance checks, for which operators will invariably (and understandably) levy a charge.

1.2 These three aspects will significantly increase the costs for shippers of small quantities of small lithium batteries, which will inevitably result in an increased risk of lithium batteries being shipped undeclared. It is essential to consider measures that would mitigate against this risk and it is suggested the existing quantities of lithium batteries which may currently be shipped under the Section II provisions could be added to Section IB but with the following easements:

- a) “Adequate instruction” in lieu of the requirements of Part 1;4 of the Technical Instructions would continue to be permitted; and
- b) The Class 9 hazard warning label need only be on the same surface as the “cargo aircraft only” handling label if package dimensions permit.

1.3 The appendix to this paper includes suggested text for inclusion in Section IB of Packing Instructions 965 and 968, which would provide these alleviations. The objective of the proposal in DGP/28-WP/4 to delete the Section II provisions of Packing Instruction 965 and 968 was to ensure appropriate declaration of lithium batteries to the operator, which would in turn enable them to take the batteries into account in their safety risk assessment. The proposals in this information paper would achieve that goal but at the same time provide mitigation against the adverse effects on shippers of small quantities of small lithium batteries, which will in turn reduce the risk of them being shipped undeclared.

APPENDIX

PROPOSED TEXT FOR PACKING INSTRUCTIONS 965 AND 968

Proposed text for Packing Instruction 965

IB.4 Exceptions for small quantities of lithium ion cells and batteries

Lithium ion cells and batteries in quantities not exceeding those in Table 965-IBX are not subject to the following requirements in these Instructions:

- Part 1; Chapter 4, providing any person preparing or offering cells or batteries for transport has received adequate instruction on these requirements commensurate with the functions for which they are responsible; and
- Part 5; 3.2.12 a) 3), if the package dimensions are inadequate.

Table 965-IBX

<i>Contents</i>	<i>Lithium ion cells and/or batteries with a Watt-hour rating not more than 2.7 Wh</i>	<i>Lithium ion cells with a Watt-hour rating more than 2.7 Wh, but not more than 20 Wh</i>	<i>Lithium ion batteries with a Watt-hour rating more than 2.7 Wh, but not more than 100 Wh</i>
<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>
Maximum number of cells / batteries per package	No limit	8 cells	2 batteries
Maximum net quantity (mass) per package	2.5 kg	n/a	n/a

The limits specified in columns 2, 3 and 4 of Table 965-II must not be combined in the same package.

Proposed text for Packing Instruction 968

IB.4 Exceptions for small quantities of lithium metal cells and batteries

Lithium metal cells and batteries in quantities not exceeding those in Table 965-IBX are not subject to the following requirements in these Instructions:

- Part 1; Chapter 4, providing any person preparing or offering cells or batteries for transport has received adequate instruction on these requirements commensurate with the functions for which they are responsible; and
- Part 5; 3.2.12 a) 3) if the package dimensions are inadequate.

Table 968-IBX

<i>Contents</i>	<i>Lithium metal cells and/or batteries with a lithium content not more than 0.3g</i>	<i>Lithium metal cells with a lithium content more than 0.3g, but not more than 1g</i>	<i>Lithium metal batteries with a Watt-hour rating more than 0.3g, but not more than 2g</i>
<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>
Maximum number of cells / batteries per package	No limit	8 cells	2 batteries
Maximum net quantity (mass) per package	2.5 kg	n/a	n/a

The limits specified in columns 2, 3 and 4 of Table 968-IBX must not be combined in the same package.

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