



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)

REQUIREMENTS FOR OVERPACKS FOR SECTION II LITHIUM BATTERIES

(Presented by D. Brennan)

SUMMARY

This working paper proposes that the provisions for overpacks for Section II of the lithium battery packing instructions (Packing Instructions 966, 967, 969, 970) be revised to include the requirement that packages must be secured within the overpack and that the overpack must not impair the intended function of the package.

Action by the DGP: The DGP is invited to consider the amendments to Section II of Packing Instructions 966, 967, 969 and 970 as shown in the appendix to this working paper. The same amendments to Section II of Packing Instructions 965 and 968 are proposed if the amendment to remove Section II from Packing Instructions 965 and 968 proposed in DGP/28-WP/4 is not agreed.

1. INTRODUCTION

1.1 Packages of lithium batteries packed with equipment and contained in equipment meeting the provisions of Section II of Packing Instructions 966, 967, 969 and 970 are not subject to the provisions of the Technical Instructions, other than as specifically referenced in the start of Section II of the applicable packing instruction or as specified in the provisions contained in Section II.

1.2 Currently Section II.4 of the lithium battery packing instructions specifies the requirements for marking of overpacks but includes no other requirements where packages prepared in accordance with Section II are assembled into an overpack. However, Part 5;1.1 f) requires that packages must be secured within the overpack and Part 5;1.1 i) requires that the intended function of the package must not be impaired by the overpack. These requirements are not included directly or by reference in Section II of the lithium battery packing instructions, which could lead to packages being unsecured or even damaged by being unrestrained within an overpack.

1.3 This issue has been raised as there have been concerns raised by operators and some regulatory authorities where, predominantly e-commerce packages, are being placed into nylon or other bags with the outside of the bag marked with “overpack” and the lithium battery mark. In many of these cases it is likely that what is being offered is not an “overpack”, but rather is being assembled by the e-commerce provider who is not the true “shipper” of the packages.

1.4 Regardless of whether the bags being offered are an overpack, as defined, the lack of protection for the packages has raised concerns at the potential for these packages to be damaged by not being properly secured in the overpack as is required by Part 5;1.1 f) and i).

1.5 Accordingly, it is proposed to add a requirement into Section II of the lithium battery packing instructions requiring that where packages are placed into an overpack that the packages must be secured within the overpack and that the intended function of each package must not be impaired by the overpack.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider the amendments to Section II of Packing Instructions 966, 967, 969 and 970 as shown in the appendix to this working paper. The same amendments to Section II of Packing Instructions 965 and 968 are proposed if the amendment to remove Section II from Packing Instructions 965 and 968 proposed in DGP/28-WP/4 is not agreed.

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APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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<p style="text-align: center;">Packing Instruction 966</p> <p style="text-align: center;">Passenger and cargo aircraft for UN 3481 (packed with equipment) only</p> <p>...</p> <p>II. SECTION II</p> <p>...</p> <p>II.4 Overpacks</p> <p>When packages are placed in an overpack,:</p> <ul style="list-style-type: none">a) <u>the packages must be secured within the overpack;</u>b) <u>the intended function of each package must not be impaired by the overpack; and</u>c) the lithium battery mark (Figure 5-3) required by this packing instruction must either be clearly visible or the mark must be reproduced on the outside of the overpack and the overpack must be marked with the word "Overpack" in lettering of at least 12 mm high.
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<p style="text-align: center;">Packing Instruction 967</p> <p style="text-align: center;">Passenger and cargo aircraft for UN 3481 (contained in equipment) only</p> <p>...</p> <p>II. SECTION II</p> <p>...</p> <p>II.4 Overpacks</p> <p>When packages are placed in an overpack,:</p> <ul style="list-style-type: none">a) <u>the packages must be secured within the overpack;</u>b) <u>the intended function of each package must not be impaired by the overpack; and</u>c) the lithium battery mark (Figure 5-3) required by this packing instruction must either be clearly visible or the mark must be reproduced on the outside of the overpack and the overpack must be marked with the word "Overpack" in lettering of at least 12 mm high.

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Packing Instruction 969

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

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II. SECTION II

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II.4 Overpacks

When packages are placed in an overpack,:

- a) the packages must be secured within the overpack;
- b) the intended function of each package must not be impaired by the overpack; and
- c) the lithium battery mark (Figure 5-3) required by this packing instruction must either be clearly visible or the mark must be reproduced on the outside of the overpack and the overpack must be marked with the word "Overpack" in lettering of at least 12 mm high.

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Packing Instruction 970

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

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II. SECTION II

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II.4 Overpacks

When packages are placed in an overpack,:

- a) the packages must be secured within the overpack;
- b) the intended function of each package must not be impaired by the overpack; and
- c) the lithium battery mark (Figure 5-3) required by this packing instruction must either be clearly visible or the mark must be reproduced on the outside of the overpack and the overpack must be marked with the word "Overpack" in lettering of at least 12 mm high.

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