



DANGEROUS GOODS PANEL (DGP) MEETING OF THE WORKING GROUP OF THE WHOLE

Memphis, 30 April to 4 May 2007

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 2009/2010 Edition

COMMENTS ON DGP-WG/07-WP/19 AMENDMENT OF SPECIAL PROVISION A45

(Presented by R. Richards)

SUMMARY

The Panel is invited to establish an informal working group to discuss any Technical Instruction amendments and non-regulatory actions necessary to ensure lithium battery transport safety across the entire scope of the passenger and transport community.

1. INTRODUCTION

1.1 In DGP-WG/07-WP/19 *Amendment of Special Provision A45*, The International Federation of Airline Pilots Association (IFALPA) proposes to eliminate SP A45 from the application to both lithium ion and lithium metal batteries when transported in packaged form (not installed in equipment). SP A45 applies to small, mostly consumer use type lithium batteries, and provides requirements designed to ensure cells and batteries are design tested, packaged commensurate with transportation risk, and accompanied by appropriate hazard communication information.

1.2 We share in IFALPA's concerns with the safety of lithium battery shipments. We have been collecting incident data and have shared that data with the Panel at previous meetings. Lithium batteries contain both a chemical and electrical hazard. It is the electrical hazard, and potential for a dangerous evolution of heat when the battery is incorrectly prepared and packaged for transport or abused, that has resulted in numerous regulatory amendments in the last two years. Specifically, the UN Sub-Committee of Experts on the Transport of Dangerous Goods recently amended SP 188 (the UN counterpart to SP A45) to enhance the level of packaging, protection against short-circuit and accidental activation, package markings, and documentation. During this biennium of the Dangerous Goods Panel, the member nominated by the United States has additionally proposed a prohibition for the transport of

lithium metal batteries on passenger carrying aircraft, specific package marking for lithium metal batteries, incident reporting clarifications, and a requirement that the consignor declare on an airway bill or other transport document that they have met the conditions of SP A45 when offering lithium batteries in accordance with the special provision. All of these recent amendments should lead to enhanced identification, preparation, packaging, and safety in transport.

2. INCIDENT DATA AND RISK ANALYSIS

2.1 We maintain a listing of battery-related incidents that have occurred during air transport. To date, this list includes 79 reported incidents involving batteries of all types in air transport from March 20, 1991 to March 22, 2007. Of these incidents, 22 are reported to involve lithium ion and lithium metal batteries. When we further review the data, the majority of these incidents involved batteries in carry-on or checked baggage and shipments by second-tier consignors (not the original battery or equipment manufacturer). While the incidents clearly indicate the potential hazard of these articles in transport, the data does not support removing the SP A45 exception at this time. The primary impact from this proposal will be placed on the original manufacturer. The incident data does not indicate that the original manufacturer is improperly preparing battery consignments. It is not apparent from DGP-WG/07-WP/19 that the amendment proposed will result in improved handling by consumers or preparation by consignors other than the original manufacturer. As stated, we share IFAPLA's concerns. However, we want to confirm that this proposal, or any amendments we support, will produce the desired affects and reach the target audience. Incident data and risk analysis should be linked to actions which will decrease the likelihood of future incidents from occurring.

2.2 The U.S. DOT has initiated a comprehensive strategy aimed at reducing the transportation risks posed by batteries of all types. This strategy brings together public and private sector stakeholders to identify and advance governmental and private sector solutions. Together we identified a series of immediate and longer-term actions that will enhance lithium battery transport safety. These actions include comprehensive reporting and investigation of battery-related incidents; improved battery, consumer product, and software design; development and implementation of a technical standards agenda; consideration and implementation of improved regulatory standards; focused enforcement; and development and implementation of a public outreach and education campaign. We are confident the results of this multi-faceted approach will lead to significantly enhanced safety results.

3. ACTION BY THE DGP-WG

3.1 While we are not prepared to support the IFALPA proposal at this time, we do strongly believe the issue as a whole warrants further consideration. The DGP-WG is invited to establish an informal working group to fully consider all of the appropriate amendments and non-regulatory actions to ensure that we address lithium battery safety across the entire scope of the passenger and transport community.

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