



**WORKING PAPER**

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

**Auckland, New Zealand, 4 to 8 May 2009**

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

**Agenda Item 5.3: Review of provisions for dangerous goods relating to batteries**

- a) **lithium batteries**
- b) **battery-powered devices**
- c) **battery-powered mobility aids**

**PROPOSED CHANGES TO DIMENSION OF LITHIUM BATTERY HANDLING LABEL**

(Presented by PRBA – The Rechargeable Battery Association)

**SUMMARY**

This working paper proposes amending the lithium battery handling label requirements to allow for smaller dimensions.

Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 At the November 2008 DGP Working Group of the Whole Meeting (DGP-WG/08), a proposal was made in DGP-WG/08-WP/9 for a new minimum dimension for the lithium battery handling label to accommodate small packages used for transporting consumer-type lithium ion and lithium metal cells and batteries. The working group agreed that consideration should be given to reducing the dimensions of the label for packages that may not be large enough to accommodate the current 120 x 110 mm label.

1.2 One alternative that was discussed during the DGP-WG/08 included a minimum area for the label rather than reducing the dimensions of the label. After evaluating the various options for reducing the label dimension to accommodate small packages of lithium batteries, PRBA believes this would not be appropriate but rather that it should be allowable to reduce the dimension of the label dimension by up to 50%. This would also be consistent with previous actions taken by DGP.

1.3 In the appendix to this working paper are pictures showing how the current lithium battery handling label appears next to standard packages of batteries being prepared for transport. The

pictures clearly show that the label often is too large for typical packages used for small lithium metal batteries that cannot exceed 2.5 kg gross weight, packages used for small lithium ion batteries that cannot exceed 10 kg gross weight, and electronic equipment containing lithium ion batteries and packaged for retail sale. Often the only option available to shippers is to place the label on the top of the package, which reduces the visibility and effectiveness of the label when packages are stacked on pallets or in transport vehicles. In addition, certain airlines are prohibiting shippers from placing the label on the top of packages resulting in a difficult situation for PRBA members. Placing the label on the side of the package clearly improves the visibility of the handling label. However, this can only be accomplished with a reduction in the dimensions of the label by approximately one-half.

1.4 PRBA is not aware of any labelling provisions in the Technical Instructions that authorize the dimension of the label to be based on a minimum area. However, the Technical Instructions authorize a reduction in the dimension of the infectious substance label by half when the packages are of dimensions such that they can only bear smaller labels. The Technical Instructions also authorizes smaller labels for certain radioactive material (74 x 105 mm) and “Keep away from heat” labels (74 a 105 mm label). In addition, the Dangerous Goods Panel Working Group of the Whole recently supported a reduction in the new limited quantity marking should a package dimension be such that only a smaller mark are possible. The minimum dimension recommended by ICAO is 50 mm x 50 mm.

## 2. ACTION BY THE DGP-WG

2.1 Based on the information herein, the DGP-WG is invited to consider the amendments to Part 5;3.5.2.2 of the Technical Instructions as noted below. In addition, to eliminate the safety risks that lithium batteries may not be properly labelled and identified in transport in accordance with the Technical Instructions, PRBA recommends that the changes set forth below be added to the 2009-2010 Edition of the Technical Instructions in an addendum.

### 3.5.2.2 Lithium battery handling label

Packages containing lithium batteries packed according to Packing Instructions 965 to 970 that are not subject to other additional requirements of these Instructions must bear a “Lithium battery” handling label (Figure 5-31). Labels having dimensions not smaller than 60 x 55 mm may be used on packages when the packages are of the dimensions such that they can only bear smaller labels or when a product’s retail package serves as the outer package. The label must show “Lithium metal batteries” or “Lithium ion batteries”, as applicable. Where the package contains both types of batteries, the label must show “Lithium metal and lithium ion batteries”.

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APPENDIX

LITHIUM BATTERY HANDLING LABELS NEXT TO STANDARD PACKAGES OF BATTERIES BEING PREPARED FOR TRANSPORT

1



Package Dimensions  
W: 245 mm, L:290 mm, H:80 mm

2



Package Dimensions  
W: 245 mm, L:290 mm, H:80 mm

3



Package Dimensions  
W: 228 mm, L:102 mm, H:76 mm

4

