



WORKING PAPER

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

THIRTEENTH MEETING

Montréal, 15 to 19 April 2013

**Agenda Item 5: Review of provisions for the transport of lithium batteries including
5.2: Simplification and clarification of provisions**

LITHIUM BATTERIES – SECTION IB – GROSS MASS LIMITATION

(Presented by the Global Express Association (GEA))

SUMMARY

This working paper proposes a consequential amendment to Section IB of Packing Instructions 965 and 968 related to the gross mass limitation or the replacement of the Section IB gross mass limit with net quantity limit.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 There is an apparent conflict in the requirements that a user of the Technical Instructions could encounter when seeking to offer a shipment under the provisions of Section IB of Packing Instructions 965 or 968. The previous intention of the Dangerous Goods Panel was that shipments made under the provisions of Section IB of Packing Instructions 965 and 968 be limited to 10 kg gross mass, as shown in the packing instructions for 2013. The associated text for documentation “other than when a full dangerous goods transport document is used” requires that the gross mass be shown.

Extract from ICAO Technical Instructions, Packing Instruction 965, Section IB

Packing Instruction 965

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IB. SECTION IB

Section IB requirements apply to lithium ion cells with a Watt-hour rating not exceeding 20 Wh and lithium ion batteries with a Watt-hour rating not exceeding 100 Wh packed in quantities that exceed the allowance permitted in Section II, Table 965-II.

Quantities of lithium ion cells or batteries that exceed the allowance permitted in Section II, Table 965-II must be

assigned to Class 9 and are subject to all of the applicable provisions of these Instructions (including the requirements in paragraph 2 of this packing instruction and of this section) except for the following:

- the provisions of Part 6; and
- the dangerous goods transport document requirements of 5;4, provided alternative written documentation is provided by the shipper describing the contents of the consignment. Where an agreement exists with the operator, the shipper may provide the information by electronic data processing (EDP) or electronic data interchange (EDI) techniques. The information required is as follows and should be shown in the following order:
 - 1) the name and address of the shipper and consignee;
 - 2) UN 3480;
 - 3) Lithium ion batteries PI 965 IB;
 - 4) the number of packages and the **gross mass of each package.**

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1.2 If a shipper elects not to take advantage of the use of alternative documentation, or if an operator requires the use of a full dangerous goods transport document, then the full provisions of Part 5;4.1.5.1 for documentation apply. Part 5;4.1.5.1 requires that the net quantity be shown for all dangerous goods, with the exception of limited quantities.

Extract from ICAO Technical Instructions, Part 5;4.1.5.1

“4.1.5.1 Quantity of dangerous goods, number and type of packagings

The number of packages, type of packaging (e.g. steel drum, fibreboard box, etc.) and **net quantity** of dangerous goods in each package (by volume or mass, as appropriate) must be indicated for each item of dangerous goods bearing a different proper shipping name, UN number or packing group. Abbreviations may be used to specify the unit of measurement for the quantity. For packages containing the same dangerous goods and quantity per package a multiple of the quantity may be used. For example:

UN 1263, Paint, 3, PG II, 5 fibreboard boxes x 5 L

Consignment comprising packages of different quantities of the same dangerous good must be clearly identified. For example:

UN 1263, Paint, 3, PG II, 5 fibreboard boxes x 5 L, 10 fibreboard boxes x 10 L

UN packaging codes may only be used to supplement the description of the kind of package (e.g. one fibreboard box (4G)). **For limited quantities, where the letter “G” follows the quantity in column 11 of Table 3-1, the gross mass of each package must be indicated, rather than the net quantity** (except when there are different dangerous goods packed together in the same outer packaging which must be described as shown in paragraph e)) and:

...”

1.3 There is we believe an overlooked consequential amendment needed as the Technical Instructions documentation section does not require the gross mass to be shown for Section IB lithium battery shipments.

1.4 It may however be simpler (training, guidance material and communications) if the requirement for showing the gross mass for lithium batteries was removed and replaced with a requirement to show the net weight.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to resolve the apparent conflict between Section IB of Packing Instructions 965 or 968, and Part 5,4.1.5.1 by adopting one of the two proposals for amendment to the Technical Instructions shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 5 OF THE TECHNICAL INSTRUCTIONS

Proposal 1:

Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 4

DOCUMENTATION

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4.1 DANGEROUS GOODS TRANSPORT INFORMATION

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4.1.5 Information required in addition to the dangerous goods description

4.1.5.1 Quantity of dangerous goods, number and type of packagings

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UN packaging codes may only be used to supplement the description of the kind of package (e.g. one fibreboard box (4G)). For limited quantities, where the letter "G" follows the quantity in column 11 of Table 3-1, [and for shipments made under the provisions of Section I.B for lithium ion and metal batteries \(Packing Instructions 965 and 968\)](#), the gross mass of each package must be indicated, rather than the net quantity (except when there are different dangerous goods packed together in the same outer packaging which must be described as shown in paragraph e)) and:

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Proposal 2:

Remove the gross mass limitation for Section IB lithium batteries, replacing with a net quantity requirement.

Packing Instruction 965

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IB. SECTION IB

Section IB requirements apply to lithium ion cells with a Watt-hour rating not exceeding 20 Wh and lithium ion batteries with a Watt-hour rating not exceeding 100 Wh packed in quantities that exceed the allowance permitted in Section II, Table 965-II.

Quantities of lithium ion cells or batteries that exceed the allowance permitted in Section II, Table 965-II must be assigned to Class 9 and are subject to all of the applicable provisions of these Instructions (including the requirements in paragraph 2 of this packing instruction and of this section) except for the following:

- the provisions of Part 6; and
- the dangerous goods transport document requirements of 5;4, provided alternative written documentation is

provided by the shipper describing the contents of the consignment. Where an agreement exists with the operator, the shipper may provide the information by electronic data processing (EDP) or electronic data interchange (EDI) techniques. The information required is as follows and should be shown in the following order:

- 1) the name and address of the shipper and consignee;
- 2) UN 3480;
- 3) Lithium ion batteries PI 965 IB;
- 4) the number of packages and the ~~gross mass of each package~~ net quantity contained in each package.

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Carry out the same amendment for Packing Instruction 968, as shown:

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Packing Instruction 968

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IB. SECTION IB

Section IB requirements apply to lithium metal cells with a lithium metal content not exceeding 1 g and lithium metal batteries with a lithium metal content not exceeding 2 g packed in quantities that exceed the allowance permitted in Section II, Table 968-II.

Quantities of lithium metal cells or batteries that exceed the allowance permitted in Section II, Table 968-II, must be assigned to Class 9 and are subject to all of the applicable provisions of these Instructions (including the requirements in paragraph 2 of this packing instruction and of this section) except for the following:

- the provisions of Part 6; and
- the dangerous goods transport document requirements of 5.4, provided alternative written documentation is provided by the shipper describing the contents of the consignment. Where an agreement exists with the operator, the shipper may provide the information by electronic data processing (EDP) or electronic data interchange (EDI) techniques. The information required is as follows and should be shown in the following order:

- 1) the name and address of the shipper and consignee;
- 2) UN 3090;
- 3) Lithium metal batteries PI 968 IB;
- 4) the number of packages and the ~~gross mass of each package~~ net quantity contained in each package.

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