



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Geneva, 13–17 September 2010

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN**Waste lithium batteries – Special Provision 636 (b) and
P903b (3) Interpretation****Transmitted by the Government of the United Kingdom**

1. Special Provision (SP) 636 allows some relaxations from packing instruction P903 for used lithium cells and batteries.
2. Two issues have arisen recently regarding the interpretation of this special provision and packing instruction and the United Kingdom would like to seek the views of the Joint Meeting to resolve these issues.

Issue 1: In P903b (3) “collecting trays” are permitted. There is no definition of this term and the definition of “tray” in Chapter 1.2 is limited to Class 1 articles.

Is this term aimed at a specific form of tray for example a vacuum formed tray with slots for each cell/battery or is it a general box shape but without a lid?

3. The section also states that the tray should be made of a non conductive material. This permits the use of fibreboard which is non conductive but considering the fire risk with these batteries, this material will burn easily. Should the construction of these trays be limited to metal with a plastic liner or to plastics which offer rather more protection in a fire?

Issue 2: SP636(b) incorporates the phrase “ **are not subject to the other provisions of ADR**”.

4. It has been argued by some organisations that the current wording of SP636(b) implies that no other provisions of ADR apply except for those presented in (i) to (iii) of the Special Provision. The United Kingdom is of the view that some other provisions of ADR

should also apply to the carriage of used lithium cells and batteries. For example, we believe that the obligations in Chapter 1.4 should apply.

5. It will be recalled that the phrase “**are not subject to the other provisions of ADR**” was removed from the revised Chapter 3.4 and replaced by the new 3.4.1 which reads “are not subject to any other provisions of ADR except the relevant provisions of...” (see ECE/TRANS/WP.15/AC.1/116/Add.1 OTIF/RID/RC/2009-B/Add.1).

6. The second question the United Kingdom would like to ask the Joint Meeting is should the phrase in SP636(b) refer to the applicable provisions for limited quantities as listed in 3.4.1 together with the three conditions currently stipulated in SP636(b) (i) to (iii)?

7. Depending upon the outcome of the September Joint Meeting discussions, the United Kingdom may make a formal proposal regarding this issue for the March 2011 Joint Meeting.
