
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, 19–23 September 2016

Item 6 of the provisional agenda

Reports of informal working groups**30 August 2016****Comment about the working document
ECE/TRANS/WP.15/AC.1/2016/19: “Report on the informal
working group on the transport of waste electrical and
electronic equipment containing lithium batteries”****Transmitted by RECHARGE****Introduction**

1. In the working document ECE/TRANS/WP.15/AC.1/2016/19 submitted by Germany, it is proposed to distinguish the conditions of transport of Lithium batteries not contained in an equipment from those contained in an equipment when these batteries or equipment containing them are transported for disposal or recycling.
2. Germany is proposing to distinguish these transport conditions via a modification of SP636(b) and a new Special Provision SPXXX.
3. As participant in the working group reported in the document in reference, RECHARGE fully supports the proposal transmitted by Germany.
4. After internal review of the German proposal formulated in ECE/TRANS/WP.15/AC.1/2016/19, RECHARGE would like to introduce a clarification of the “SP636 revised”, para. 29 of the proposal by Germany. .
5. It should be clearly indicated in “SP636 revised, para. 29” that it covers also lithium batteries included in a mix with other non-lithium batteries. As it is written in the proposal, the reader could interpret this revised version of SP636 as addressing only lithium cells and batteries which is obviously not the case. It is RECHARGE’s opinion that it is not sufficient to rely on P909 to supply this very specific information.
6. As indicated in the proposal below, it is suggested to add the reference to the mix of batteries in a sentence introduced in the first paragraph of the modified SP636. This additional sentence is already existing in the current SP636(b) – ADR 2015.

Proposal

7. Add the following sentence in the first paragraph of § 29 of ECE/TRANS/WP.15/AC.1/2016/19.

Up to the intermediate processing facility lithium cells and batteries with a gross mass of not more than 500 g each or lithium ion cells with a Watt-hour rating of not more than 20

Wh, lithium ion batteries with a Watt- hour rating of not more than 100 Wh, lithium metal cells with a lithium content of not more than 1 g and lithium metal cells with an aggregate lithium content of not more than 2 g, not contained in equipment, collected and handed over for carriage for sorting, disposal or recycling, together with or without other non-lithium cells or batteries, are not subject to the other provisions of RID/ADR including special provision 376 and paragraph 2.2.9.1.7, if they meet the following conditions:
