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**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Fifty-sixth session**

Geneva, 2-11 December 2019

Item 4 (a) of the provisional agenda

Electric storage systems: testing of lithium batteries**Clarification of Packing Instruction P903****Transmitted by PRBA - the Rechargeable Battery Association,
and The Advanced Rechargeable & Lithium Batteries Association
(RECHARGE)*****Introduction**

1. As explained in informal document INF.25 during the fifty-fifth session, the authorization in Packing Instruction P903 to use strong outer packaging for batteries or an assembly of batteries with a gross mass of more than 12 kg has caused some competent authorities to misinterpret the requirements of this packing instruction. In addition, the language in P903 is not consistent with similar language in the ICAO TI, which has caused confusion for some competent authorities issuing approvals under the ICAO TI Packing Instruction 965, Section IA. This document addresses the comments provided by members of the Sub-Committee in response to UN/SCETDG/55/INF.25 and clarifies the use of the provision in P903 for larger lithium batteries or assemblies exceeding 12 kg that have impact resistant outer casings.

2. The general structure of paragraph (2) in P903 is causing most of the confusion for how it can be utilized by battery manufacturers when shipping an assembly of batteries. The industry has always operated under the assumption when battery modules are electrically connected to form an assembly, these modules do not

* In accordance with the programme of work of the Sub-Committee for 2019–2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

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necessarily need to exceed 12 kg or have impact resistant outer casings provided the assembly meets these two criteria.

3. PRBA and RECHARGE understand one competent authority is interpreting paragraph (2) in P903 to require the assembly *and* the battery modules within the assembly to *both* have a gross mass of more than 12 kg and strong, impact-resistant outer casings. The authors do not believe that this is a correct interpretation. To clarify this provision, the authors have propose this minor amendments to paragraph (2) in P903.

Proposal

4. Amend paragraph (2) in P903 as follows:

“In addition, for a cells or batteryies (including an assembly of batteries) with a gross mass of 12 kg or more employing a strong, impact resistant outer casing, ~~and assemblies of such cells or batteries:~~

- (a) Strong outer packaging;
 - (b) Protective enclosures (e.g., fully enclosed or wooden slated crates); or
 - (c) Pallets or other handling devices.”
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