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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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 4 (d) of the provisional agenda

**Electric storage systems: packagings for large batteries****Lithium batteries: clarification of P903****Transmitted by the Rechargeable Battery Association  
(PRBA) and the International Association for the Promotion  
and Management of Portable Rechargeable Batteries  
(RECHARGE)<sup>1</sup>****Introduction**

1. It has come to PRBA and RECHARGE's attention that there may be some misinterpretation of one of the packing provisions in lithium battery packing instruction P903. Specifically, P903(2)(a) allows lithium batteries with a mass of 12 kg or more employing a strong, impact-resistant outer casing to be packed in "Strong outer packagings, in protective enclosures (e.g., in fully enclosed or wooden slatted crates)." This provision is followed by the word "or" and the subsequent paragraph P903(2)(b) further authorizes, "Pallets or other handling devices." The difficulty that has arisen is that some may incorrectly interpret P903 (2)(a) to require that the "strong outer packagings" be further packed in "protective enclosures (e.g., in fully enclosed or wooden slatted crates)" rather than, as PRBA understands is intended, that "strong outer packagings" and "protective enclosures (e.g., in fully enclosed or wooden slatted crates)" are two independent packing alternatives.

2. PRBA and RECHARGE believe the intent of this packing provision is clear when one reviews the wording as it existed prior to the editorial restructuring of P903 now appearing in the seventeenth revised edition of the United Nations Recommendations on

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

the Transport of Dangerous goods, Model Regulations. For example, in the sixteenth revised edition, the corresponding text in P903 read: "...may be packed in strong outer packagings, in protective enclosures (e.g., in fully enclosed or wooden slatted crates) unpackaged or on pallets" (emphasis supplied). Clearly, the four packing methods specified are independent of one another. Moreover, it is illogical that if such batteries are allowed to be transported on pallets alone, it is the intent under the current P903 (2)(a) that when "strong outer packagings" are employed, such packagings must be further packed "in protective enclosures (e.g., in fully enclosed or wooden slatted crates)."

## Proposal

3. In consideration of the foregoing, PRBA and RECHARGE propose that the Sub-Committee clarify the intent of P903 (2)(a) by inserting the word "or" before the words "in protective enclosures" so that the full text will read:

"(a) Strong outer packagings, or ~~in~~ protective enclosures (e.g., ~~in~~ fully enclosed or wooden slatted crates); or"

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