



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/16)**

Montreal, 17 to 21 October 2016

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2019-2020 Edition

2.4: Part 4 — Packing Instructions

APPLICABILITY OF SECTION IA

(Presented by B. Carrara)

SUMMARY

This working paper invites the DGP-WG to amend the actual introduction paragraph related to Packing Instructions 965 and 968 as shown in the appendix to this working paper.

Action by the DGP-WG: The DGP is invited to review the applicability of Section IA in the introduction part of Packing Instructions 965 and 968.

1. INTRODUCTION

1.1 Section IB of Packing Instruction 965 applies 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.

1.2 Despite not being explicitly stated in Section IA text, paragraph 1 (Introduction) of Packing Instruction 965 establishes that Section IA applies to lithium ion cells with a Watt-hour rating in excess of 20 Wh and lithium ion batteries with a Watt-hour rating in excess of 100 Wh.

1.3 Considering that the weight limit for Section IB is 10 kg and for Section IA is 35 kg, it is possible to figure out that a package containing lithium ion batteries with a Watt-hour rating not exceeding 100 Wh but weighing more than 10 kg should be prepared in accordance with Section IA. However, the introductory text of Packing Instruction 965 does not allow this when it determines Section IA applies to lithium ion batteries with a Watt-hour rating in excess of 100 Wh.

1.4 The only way a shipper could comply with Packing Instruction 965 in the situation explained above would be through an exemption. There would be no sense in conducting an exemption process rather than shipping in accordance to Section IA though.

1.5 The same foregoing explanation is applicable to lithium metal cells and batteries prepared in accordance with Packing Instruction 968.

1.6 For this reason, we believe the introduction paragraph of Packing Instructions 965 and 968 should be change to reflect situations where the weight limits for Section IB have been exceeded.

2. **ACTION BY THE DGP-WG**

2.1 The DGP-WG is invited to amend the actual introduction paragraph related to Packing Instructions 965 and 968 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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Chapter 11

CLASS 9 — MISCELLANEOUS DANGEROUS GOODS

11.1 PACKING INSTRUCTIONS

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Packing Instruction 965

Cargo aircraft only for UN 3480

1. Introduction

This entry applies to lithium ion or lithium polymer batteries. This packing instruction is structured as follows:

- Section IA applies to lithium ion cells with a Watt-hour rating in excess of 20 Wh and lithium ion batteries with a Watt-hour rating in excess of 100 Wh or lithium ion cells and batteries packed in quantities that exceed the allowance permitted in Section IB, Table 965-IB, which must be assigned to Class 9 and are subject to all of the applicable requirements of these Instructions;
- Section IB applies 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; and
- Section II applies 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 not exceeding the allowance permitted in Section II, Table 965-II.

A single cell battery as defined in Part III, sub-section 38.3.2.3 of the UN *Manual of Tests and Criteria* is considered a "cell" and must be transported according to the requirements for "cells" for the purpose of this packing instruction.

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Packing Instruction 968

Cargo aircraft only for UN 3090

1. Introduction

This entry applies to lithium metal or lithium alloy batteries. This packing instruction is structured as follows:

- Section IA applies to lithium metal cells with a lithium metal content in excess of 1 g and lithium metal batteries with a lithium metal content in excess of 2 g or lithium metal cells and batteries packed in quantities that exceed the allowance permitted in Section IB, Table 968-IB, which must be assigned to Class 9 and are subject to all of the applicable requirements of these Instructions;
- Section IB applies 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; and
- Section II applies 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 not exceeding the allowance permitted in Section II, Table 968-II.

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