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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**

Bern, 16–20 March 2020

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN**Waste batteries / used storage batteries, carriage in bulk
(AP8)****Transmitted by the Government of Finland^{*, **}***Summary*

Executive summary:	The purpose of this document is to clarify the meaning of AP8 and its requirement to take account of any residual currents.
Action to be taken:	Gather experiences of the carriage of batteries in bulk. Submit the issue to the informal working group on the transport of hazardous waste.
Related documents:	Informal document INF.12 (November 2019 session of the Working Party on the Transport of Dangerous Goods (WP.15)).

Introduction

1. The provision AP8 for carriage of bulk concerns UN 2794 Batteries, wet, filled with acid (and also for UN 2795 Batteries, wet, filled with alkali, UN 2800 Batteries, wet, non-spillable, UN 3028 Batteries, dry, containing potassium hydroxide solid).
2. The requirements in AP8 require that the design of the load compartment of vehicles/wagons or containers shall take account of any residual currents and impacts from the batteries.

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2020/2.

3. The special provision 598 gives the conditions when new and used storage batteries of these UN numbers are not subject to the requirements of ADR/RID. One of the conditions is that they are protected against short circuits.

4. Also, for carriage in packaging, the packing instruction P801 (ADR/RID 2021) for the same UN numbers includes a requirement to protect batteries against short circuits or, for used batteries, take measures to prevent short circuits.

5. Finland invites the Joint Meeting to exchange views on the interpretation of the protection against short circuits in bulk carriage as regards the following aspects:

(a) Are batteries required to be protected against short circuits in bulk carriage in accordance with AP8?

Does the sentence “The design of the load compartment of vehicle or containers shall take account of any residual currents and impacts from the batteries” mean that batteries need to be protected against short circuits?

(b) Can used storage (waste) batteries be carried safely in bulk without protection against short circuits?

(c) What does the following requirement mean in practice: “The design of the load compartment of vehicles/wagon or containers shall take account of any residual currents and impacts from the batteries”?

Is it possible to meet the requirement of safe transport in any other way than by protecting batteries against short circuits? How?

(d) Is carriage in bulk forbidden under 7.3.1.12 if the possibility of short circuits cannot be ruled out in the bulk carriage of batteries? According to 7.3.1.12, the mixing of goods in the same bulk container, container or vehicle/wagon is forbidden if dangerous reactions such as combustion may occur.

6. Would the Joint Meeting recommend submitting the issue to the informal working group on the transport of hazardous waste?
