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**ECONOMIC COMMISSION FOR EUROPE**

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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Bern, 7-11 March 2005)

**NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN**

**Transport of used portable batteries**

**Transmitted by the European Battery Recycling Association (EBRA) \*/**

**1. Introduction**

This document refers to the report of the Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods (Geneva 13 – 17 September 2004), (TRANS/WP.15/AC.1/2004/25, para.44).

EBRA was requested to present:

- further descriptions of the problems regarding the transport of “Used Portable Batteries”
- proposals for further provisions under the ADR to solve the problems.

This document presents a further description of the context of the problems, the problems, the definitions relating to the problems, and proposals for provisions so as to solve the problems.

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\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2005/24.

## **2. Context of the problems**

Legislation throughout the European Union and other countries (for instance Switzerland) requires the collection of used portable batteries for (mandatory) recycling purposes, in that way contributing to a sustainable society.

Used industrial batteries have been collected and recycled already for more than 100 years, and the transport of these types of batteries is well regulated under the ADR.

Used portable batteries generally have been disposed of as household waste.

Under the new European legislation, disposal as household waste is forbidden, and used portable batteries must be collected and recycled. The main part of these used portable batteries originates from private households, and are being collected by way of consumer collection sites in supermarkets, schools, camping sites, recreation grounds, etc.

This (mandatory) collection and recycling of used portable batteries has started around 1975 in, among others, Switzerland, the Netherlands and Germany. It has now proliferated to about all European Countries, the United States of America, Canada, Japan, and many other countries.

The transport of these collected used portable batteries has up to now not been the subject of specific provisions under the ADR.

## **3. The problems**

EBRA has observed in 2004 that the wording of the new provisions P903b and SP 636 for the transport of used lithium batteries in ADR 2005 caused confusion for the authorities in many countries.

Due to the phrase:

“Used lithium cells and batteries collected and presented for carriage for disposal between the consumer collecting point and the intermediate processing facility, together with other non-lithium cells and batteries”

it was considered by many inspectorates that also the “used portable batteries” selection of batteries should be subject to the lithium batteries provision SP 636, and the Packing Instruction P903b.

This is because the “Used Portable Batteries” selection contains up to 1 % of consumer camera types of lithium batteries. This would imply that the total collection infrastructure for “Used Portable Batteries” should be adapted to the requirements of Class 9 requirements, and to the Packing instruction P903b.

Note: It is noted that EBRA proposed at the last ADR/RID Joint Meeting to include in the lithium batteries provisions a clause so as to make the “Used Portable Batteries”-selection

exempt from the lithium batteries provisions. However, the meeting decided to charge EBRA to draft new proposals, to define the problems, and to propose a solution for the problems. (refer to TRANS/WP.15/AC.1/2004/25 (EBRA) and informal document: INF.16 (EBRA), and TRANS/WP.15/AC.1/2004/25, para. 44).

#### **4. Definitions relating to the problem**

**Portable Battery:** a battery for use in a device or appliance which is conveniently hand carried (Reference IEC 62133 ED. 1.0 (2002-10)).

**Used Portable Battery:** a portable battery which has been removed from a device or appliance which is conveniently hand carried, and after removal from the device is offered for collection for recycling at the (consumer) collection sites.  
(Reference: EBRA Working Party for the transport of Used Portable Batteries)

#### **5. Description of the “used portable battery” selection**

The selection consists mainly of alkaline manganese and zinc carbon types of primary batteries (both zinc manganese dioxide system batteries) with a minor portion of nickel cadmium and nickel metal hydride Batteries in the standard shapes of the zinc manganese dioxide (alkaline manganese and zinc carbon ) types of batteries, sealed lead acid system batteries, and for some years some lithium photo camera types of batteries, and miscellaneous types of portable batteries.

Portable Batteries can be described as:

Batteries containing corrosive substances which are fully enclosed in the batteries and which may only be set free upon rupture or in other adverse conditions.

For the storage and transport of the batteries, the recommendations of the International Standard IEC/60086: Primary Batteries apply, however with the exception of the protection against short circuiting.

#### **6. Proposal for provisions for the transport of used portable batteries**

The Working Party for the transport of used portable batteries of EBRA is preparing proposals for provisions for the transport of used portable batteries.

These proposals will be circulated to the members of the Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods.

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