

Comments

“Shipping Batteries Safely By Air: What You Need To Know”

July 9, 2008

Name: Darren Lenox

Organization: ACCO Brands

Comments: The vast majority of the publication addresses batteries shipped separately, and only briefly mentions batteries contained or installed in equipment or devices. Slews of consumer product companies can be affected by battery requirements, merely because their products contain a small battery. This is especially so with air shipments, as proposed IATA requirements for 2009 will require certain marking and document statements even if a product containing a battery meets the exemption.

Thank you.

Name: Darren Lenox

Organization: ACCO Brands

Comments: In addition to my previous comments, it would be helpful to elaborate on what is considered contained or installed in equipment or a device. Many consumer electronic products containing batteries, such as chargers or similar products, may fall into a grey area. They are used to power/charge devices (laptops, ipods, etc), but are they "devices" themselves because the battery is contained in housings with ports, indicators, cables and other functions? The general understanding is yes, because they are not separate, stand-alone, exposed batteries. However, there has been little clarification of this.

Name: Frits Wybenga

Organization: DGAC

Comments: Beginning in 2009 the international regs (and US regs if the next HM-215 gets out on time) will no longer use ELC - they will use watt-hours for lithium ion batteries Your use of small, medium and large batteries is out of sync with the regulatory definitions of small and large batteries - see UN manual of test and criteria ICAO (page 5) doesn't regulate anything - governments do by adopting the ICAO TI into their national regs page 13 - number of batteries permitted in this configuration will change on 1 January 2009