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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

#### Fifty-ninth session

Geneva, 29 November – 8 December 2021

Item 11 of the provisional agenda

#### Unified interpretations of the Model Regulations

### Clarification of the wording “transported for testing” in special provision 310

Transmitted by the expert from Belgium\*

#### Introduction

1. Special provision 310 is assigned to UN Nos. 3090, 3091, 3480 and 3481. The first paragraph of this special provision 310 states the following:

*"310 The testing requirements in the Manual of Tests and Criteria, part III sub-section 38.3 do not apply to production runs, consisting of not more than 100 cells or batteries, or to pre-production prototypes of cells or batteries when these prototypes are transported for testing when packaged in accordance with packing instruction P910 of 4.1.4.1 or LP905 of 4.1.4.3, as applicable."*

2. During discussions related to the transport by air in a working group of the dangerous goods expert group (Dangerous Goods European Liaison Group) of the European Union Aviation Safety Agency (EASA) and a working group of the dangerous goods panel of the International Civil Aviation Organisation (ICAO), it became clear that the wording "transported for testing" in the second last line of special provision 310 is interpreted differently by competent authorities.

3. Some authorities define it as transported for testing only in accordance with the Manual of Tests and Criteria, part III sub-section 38.3. Others believe that the wording "transported for testing" has a much broader scope. It would include the testing in accordance with the Manual of Tests and Criteria, part III sub-section 38.3, but also other kinds of testing such as integration tests to evaluate the suitability of a prototype cell or battery in a particular application and product performance testing in connection with product development programs.

4. The Sub-Committee is requested to formulate an internationally harmonized interpretation of the wording "transported for testing" in the second last line of special provision 310. Additionally, it is proposed to add text to special provision 310.

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\* A/75/6 (Sect.20), para. 20.51.

## Proposal

5. Depending on the interpretation of the Sub-Committee the new text in paragraph 6 or 7 of this document is proposed to be added to special provision 310.

6. Add the following text to special provision 310 (new text is underlined):

"310 The testing requirements in the Manual of Tests and Criteria, part III sub-section 38.3 do not apply to production runs, consisting of not more than 100 cells or batteries, or to pre-production prototypes of cells or batteries when these prototypes are transported for testing when packaged in accordance with packing instruction P910 of 4.1.4.1 or LP905 of 4.1.4.3, as applicable.

"Transported for testing" refers only to the testing that is defined in the Manual of Tests and Criteria, part III sub-section 38.3."

7. Add the following text to special provision 310 (new text is underlined):

"310 The testing requirements in the Manual of Tests and Criteria, part III sub-section 38.3 do not apply to production runs, consisting of not more than 100 cells or batteries, or to pre-production prototypes of cells or batteries when these prototypes are transported for testing when packaged in accordance with packing instruction P910 of 4.1.4.1 or LP905 of 4.1.4.3, as applicable.

"Transported for testing" includes, but is not limited to the testing that is defined in the Manual of Tests and Criteria, part III sub-section 38.3, integration testing, product performance testing, etc."

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