



ORGANISATION INTERGOUVERNEMENTALE POUR LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTERNATIONAL CARRIAGE BY RAIL

OTIF/RID/CE/GTP/2014/12

4 April 2014

Original: French

RID: 3rd Session of the RID Committee of Experts' standing working group

(Berne, 20 and 21 May 2014)

Subject: Exemption of electric energy storage and generation systems for vehicles and

their equipment

Proposal transmitted by Switzerland

Reference document: ECE/TRANS/WP.15/AC.1/2014/27 (Switzerland) – Exemption of

electric energy storage systems for vehicles and their equipment

Introduction

- 1. The following proposal was submitted to the RID/ADR/ADN Joint Meeting (Berne, 17 to 21 March 2014). However, it could not be dealt with at the Joint Meeting owing to the lack of time. In order that the proposed amendments, if adopted, can still be taken into account in the 2015 editions of RID and ADR, Switzerland has decided to submit this proposal simultaneously to the meetings of WP.15 and the RID Committee of Experts' standing working group in May 2014. The following text contains the substantial parts of document ECE/TRANS/WP.15/AC.1/2014/27, but comments received in the interim have also been taken into account.
- 2. Generally speaking, 1.1.3 exempts vehicle equipment components containing dangerous goods from the requirements of RID. These are mainly (fuel) tanks, lithium batteries and receptacles containing gas explicitly referred to in RID.
- 3. Unlike those mentioned above, other such energy storage systems are not covered by these exemptions. These are most notably metal hydride storage systems installed in vehicles, wagons, boats and aircraft and corresponding to UN No. 3468 HYDROGEN IN A METAL HYDRIDE STORAGE SYSTEM CONTAINED IN EQUIPMENT or HYDROGEN IN A METAL HYDRIDE STORAGE SYSTEM

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PACKED WITH EQUIPMENT. Moreover, under special provision 356 of Chapter 3.3, such systems must always be approved by the competent authority in the country of manufacture before being accepted for transport.

- 4. There are other similar systems in vehicles and their equipment, for example electric double layer capacitors of UN No. 3499 and fuel cells (UN No. 3473 and UN Nos. 3476 to 3479). Asymmetric capacitors (UN No. 3508) are also to be introduced into the 2015 edition of RID. None of these systems are exempt from the provisions when they form part of the equipment of a means of transport.
- 5. In order to allow for these various energy sources, which are becoming ever more common, Switzerland considers that it is appropriate to establish an exemption in 1.1.3 covering electric energy storage systems of any kind installed in a means of transport and destined for its propulsion or for the operation of any of its equipment. To this end, the current 1.1.3.7 could be reworded as follows.

Proposal

5. Amend 1.1.3.7 to read as follows:

"1.1.3.7 Exemptions related to dangerous goods used in electric energy storage and generation systems

The provisions of RID do not apply to <u>electric energy storage and generation</u> <u>systems (e.g. lithium batteries, electric capacitors, asymmetric capacitors, metal hydride storage systems, fuel cells)</u>

- (a) installed in a means of transport performing a transport operation and destined for its propulsion or for the operation of any of its equipment:
- (b) contained in equipment for the operation of this equipment used or intended for use during carriage (e.g. a laptop)."