Dear Mr. Fahlbusch,

Concerning your request which arrived at BAM on 9th March 1998 we would like to inform you about the definition of batteries of the type “3028 BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE SOLID, electric storage” as follows:

For batteries, dry, containing potassium hydroxide solid the following entry of Class 8, marginal 2801, item 81 (c) apply:

“3028 BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE SOLID, electric storage”.

Those batteries are filled and carried in the dry state with dry alkalis by the manufacturer and filled up with water before their first use.

Batteries, dry, sealed and gas proof closed like alkali manganese primary batteries, nickel cadmium and nickel metal hydride batteries are not subject of the UN-Number 3028 of Class 8 item 81 (c) because of their seal and gas proof closure they show no corrosion in the sense of Class 8. Thus they are not dangerous goods.
When those batteries mentioned above are carried they should be protected against short-circuits which will cause through moving while transported by using of additional inner packagings, plastic films, etc.

This expert statement is charged. A taxation of costs will be sent by separate mail.

Your sincerely
by Order

Dr. Rennoch
Regierungsdirektor
Head of Section II.21
“Dangerous Goods/Dangerous Substances, Assessment and Coordination”