



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

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Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: Marking and labelling

Proposal for the lithium battery mark located on the same surface of the package near the hazard labels

Transmitted by the expert from China*

Introduction

1. The location of lithium battery mark has not been stated explicitly in the Model Regulations. However, if the lithium battery mark is not located on the same surface of the package near the hazard labels, information can be missed or misunderstood during transport.

For example:

Where a package contains cargoes classified as UN 3537 and electronic tracing loggers inside, the cargo handlers can potentially miss the mark or label if the loggers' lithium battery (UN 3481) mark is not on the same surface with the division 2.1 hazard label of UN 3537.

2. For reference, the environmentally hazardous substance mark shall be located adjacent to the marks required by 5.2.1.1 according to 5.2.1.6.2. Furthermore, the hazard labels shall be located on the same surface of the package near the proper shipping name mark if the package dimensions are adequate according to 5.2.2.1.6. Therefore, the environmentally hazardous substance mark and the hazard labels shall be located on the same surface of the package near the proper shipping name mark.

3. To avoid missing or misunderstanding information, the lithium battery mark should be located on the same surface of the package with hazard labels.

Proposal

4. China proposes to add a note at the end of 5.2.1.9.1 to read as follows (new text in **bold and underlined**):

* A/77/6 (Sect. 20), table 20.6



“5.2.1.9.1 Packages containing lithium cells or batteries prepared in accordance with special provision 188 shall be marked as shown in figure 5.2.5.

NOTE: Lithium battery mark shall be located adjacent to the marks required by 5.2.1.1. The requirements of 5.2.1.2 and 5.2.1.4 shall be met.
