

**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

27 June 2024

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Geneva, 24 June-3 July 2024

Item 4 (a) of the provisional agenda

Electric storage systems:

Testing of lithium batteries

**Repairing, refurbishing or remanufacturing of lithium-ion  
cells and batteries and implications on safety and UN 38.3  
testing requirements.**

**Submitted by The Rechargeable Battery Association (PRBA) and  
Advanced Rechargeable and Lithium Batteries Association  
(RECHARGE)**

**Introduction**

1. PRBA and RECHARGE propose the following text as a result of the informal group discussion resulting from a review of document ST/SG/AC.10/C.3/2024/55.

**Proposal**

2. Add a new text below the subparagraph (f) under the NOTE in section 38.3.2.2 of the *Manual of Tests and Criteria*, as follows (new text is underlined):

*“NOTE: The type of change that might be considered to differ from a tested type, such that it might lead to failure of any of the test results, may include, but is not limited to:*

*A change resulting from treatment to a battery, such as repairing, refurbishing or remanufacturing might be considered to differ from a tested type. Any such treatment according to a process defined by the original battery manufacturer, in the sense of restoring a battery in a manner with equivalent safety to the tested type by replacement of defective parts with original spare parts or parts of equal specification and quality, shall not be considered to differ from a tested type. Original battery manufacturers should ensure the relevant repair, maintenance, and diagnostic procedures are accessible to any interested qualified operator.”*