



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

Sixty-fifth session

Geneva, 25 November-3 December 2024

Item 4 (a) of the provisional agenda

Electric storage systems: testing of lithium batteries

Exception for equipment containing both lithium batteries and lithium button cells

Transmitted by the Rechargeable Battery Association (PRBA) and the Advanced Rechargeable & Lithium Batteries Association (RECHARGE)*

Introduction

1. At the sixty-fourth session of the Sub-Committee, a proposal in document ST/SG/AC.10/C.3/2024/53 from IATA was adopted with the following amendments to special provision 188 and section 5.2.1.9.2 in the *Model Regulations*:

“188 Cells and batteries offered for transport are not subject to other provisions of these Regulations if they meet the following:

...

- (f) Each package shall be marked with the appropriate lithium or sodium ion battery mark, as ~~illustrated~~ described at 5.2.1.9;

NOTE: Packages containing lithium batteries packed in conformity with the provisions of Part 4, Chapter 11, packing instructions 965 or 968, Section IB of the ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air that bear the mark as shown in 5.2.1.9 (lithium battery mark) and the label shown in 5.2.2.2.2, Model No.9A shall be deemed to meet the provisions of this special provision.

This requirement does not apply to:

- (i) packages containing only button cell batteries installed in equipment (including circuit boards); and
- (ii) packages containing no more than four cells or two batteries installed in equipment, where there are not more than two

* A/78/6 (Sect. 20), table 20.5.



packages in the consignment. Where equipment contains a button cell in addition to cells or batteries, the button cell does not count toward package or consignment limits.

When packages are placed in an overpack, the lithium or sodium ion battery mark shall either be clearly visible or be reproduced on the outside of the overpack and the overpack shall be marked with the word “OVERPACK”. The lettering of the “OVERPACK” mark shall be at least 12 mm high.”

“5.2.1.9.2 The mark shall indicate the UN number, preceded by the letters "UN" i.e. "UN 3090" for lithium metal cells or batteries, "UN 3480" for lithium ion cells or batteries or "UN 3551" for sodium ion cells or batteries. Where the cells or batteries are contained in, or packed with, equipment, the UN number, preceded by the letters "UN", i.e. "UN 3091", "UN 3481" or "UN 3552" as appropriate shall be indicated. Where a package contains cells or batteries assigned to different UN numbers, all applicable UN numbers shall be indicated on one or more marks. However, where equipment contains a button cell in addition to cells or batteries there is no requirement for the UN number indicating the button cell to be included on the mark.”

2. Because there can be more than one button cell contained in equipment, very minor edits are needed to the adopted text from IATA’s document ST/SG/AC.10/C.3/2024/53. These proposed edits from PRBA are reflected below.

Proposal

3. The Sub-Committee is invited to amend the wording of special provision 188, subparagraph (f) and the provision in 5.2.1.9.2 as provided below. (The original agreed-upon text from the sixty-fourth session is included. The proposed new text is underlined and deleted text is with ~~strike through~~):

“188 Cells and batteries offered for transport are not subject to other provisions of these Regulations if they meet the following:

...

- (f) Each package shall be marked with the appropriate lithium or sodium ion battery mark, as described-at 5.2.1.9;

***NOTE:** Packages containing lithium batteries packed in conformity with the provisions of Part 4, Chapter 11, packing instructions 965 or 968, Section IB of the ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air that bear the mark as shown in 5.2.1.9 (lithium battery mark) and the label shown in 5.2.2.2.2, Model No.9A shall be deemed to meet the provisions of this special provision.*

This requirement does not apply to:

- (i) packages containing only button cell batteries installed in equipment (including circuit boards); and
- (ii) packages containing no more than four cells or two batteries installed in equipment, where there are not more than two packages in the consignment. Where equipment contains ~~a one or more~~ button cells in addition to cells or batteries, the button cell ~~or cells~~ does not count toward package or consignment limits.

When packages are placed in an overpack, the lithium or sodium ion battery mark shall either be clearly visible or be reproduced on the outside of the overpack and the overpack shall be marked with the word “OVERPACK”. The lettering of the “OVERPACK” mark shall be at least 12 mm high.”

“5.2.1.9.2 The mark shall indicate the UN number, preceded by the letters "UN" i.e. "UN 3090" for lithium metal cells or batteries, "UN 3480" for lithium ion cells or batteries or "UN 3551" for sodium ion cells or batteries. Where the cells or batteries are contained in, or packed with, equipment, the UN number, preceded by the letters "UN", i.e. "UN 3091", "UN 3481" or "UN 3552" as appropriate shall be indicated. Where a package contains cells or batteries assigned to different UN numbers, all applicable UN numbers shall be indicated on one or more marks. However, where equipment contains a one or more button cells in addition to cells or batteries there is no requirement for the UN number indicating the button cell or cells to be included on the mark.”
