



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-fourth session

Geneva, 24 June-3 July 2024

Item 4 (f) of the provisional agenda

Electric storage systems:

Miscellaneous

Exception for equipment containing both lithium batteries and lithium button cells

Transmitted by the International Air Transport Association (IATA)*,

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I. Introduction

1. A document was presented to the sixty-third session of the Sub-Committee (ST/SG/AC.10/C.3/2023/24) proposing that the wording of paragraph 5.2.1.9.2 be revised to identify that the UN number for lithium button cells not be required on the lithium battery mark where the equipment contains both a button cell and a lithium battery as the primary power source.

2. In the discussion of the proposal, there was support in principle for the proposed amendments, but the experts who commented preferred that subparagraph (f) of special provision 188 be amended accordingly.

3. A review of the wording of special provision 188 identified that subparagraph (f) specifies the requirement for the mark to be applied to packages, with then two exceptions. For the second exception, being the limit of four cells or two batteries installed in equipment provided that there are no more than two packages in the consignment, it is proposed to clarify that the presence of button cells with cells or batteries contained in equipment that the presence of button cells does not count toward these limits.

II. Proposal

4. The Sub-Committee is invited to amend the wording of special provision 188, subparagraph (f) and the provision in 5.2.1.9.2 to provide for an exception from the addition of the UN number for button cells where the equipment contains both lithium batteries (ion

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

** The document was submitted late to the conference services for processing without the explanation required under paragraph 8 of General Assembly resolution 53/208 B.

or metal) and lithium button cells. The changes proposed are as follows (new text is underlined):

“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 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.”
