



**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****Fifty-third session**

Geneva, 26 November-4 December 2018

Item 2 (d) of the provisional agenda

**Recommendations made by the Sub-Committee on its fifty-first, fifty-second and fifty-third sessions and pending issues:
electric storage systems****Dimensions of the lithium battery mark****Transmitted by The Rechargeable Battery Association (PRBA) and the
Advanced Rechargeable & Lithium Batteries Association*
(RECHARGE)****Introduction**

1. During the fifty-third session of the Sub-Committee, PRBA and RECHARGE explained in informal document INF. 41 the unique challenges the industry has incurred with complying with the dimensions of the lithium battery mark found in 5.2.1.9.2 of the Model Regulations. These challenges can often raise questions on whether companies are fully compliant with the marking requirement. To help mitigate these issues, PRBA and RECHARGE are proposing a change to the dimensions of the lithium battery mark that would make them consistent with the limited quantity and excepted quantity marks.

2. The packages used to ship lithium cells and batteries and products powered by them vary tremendously in size and shape. In many cases, the size of the lithium battery mark drives an increase in the size of the package used for shipping the lithium batteries. This shipping scenario occurs daily at thousands of battery, electronics, e-commerce, and distribution companies. For example, one of PRBA's members ships daily as many as 5,000 individual package consignments requiring the lithium battery mark. This results in a large

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

volume of packaging waste that could be significantly reduced if a smaller mark is authorized.

3. As we noted in informal document INF.41 (fifty-third session), the marking and labelling requirements for a package of lithium batteries varies significantly depending on the mode of transport used. For example, a small package of four 50 Watt-hour lithium ion batteries shipped by road requires a single lithium battery mark. That same package shipped by air requires the lithium battery mark, Class 9 hazard label, Cargo Aircraft Only label, and proper shipping name and UN number. Two labels and the lithium battery mark on a small package often requires the shipper to place the lithium battery mark on an adjacent side of the package from the labels. Reducing the size of the mark would enable the shipper to place both labels and the mark on the same side of the package thus improving the hazard communication and safety.

4. PRBA and RECHARGE initially proposed in INF.41 to eliminate the reference to the larger 120 mm x 110 mm lithium battery mark and allow for the use of the smaller mark of 105 mm x 74 mm on all packages. This change would greatly simplify matters for the battery, electronics, and e-commerce industries and improve compliance for the large network of distributors who ship billions of lithium batteries and electronic devices each year. However, based on the comments received from members of the Sub-Committee and after further consultation with the members of PRBA and RECHARGE, we are proposing changes to the dimensions of the lithium battery mark that would align them with other marking requirements in the Model Regulations.

5. A new NOTE also would be required to provide for a four-year transitional period to use the new mark. This would allow shippers to exhaust stocks of the existing mark and packages that have the mark pre-printed.

Proposal

6. In 5.2.1.9.2, it is proposed that the paragraph following Figure 5.2.5 be revised to read as follows and include an additional “NOTE” for a transitional period:

“The mark must be in the form of a ~~rectangle~~ square with hatched edging. The dimensions shall be a minimum of ~~420~~ 100 mm wide x ~~440~~ 100 mm high and the minimum width of the hatching must be 5 mm. The symbol (group of batteries, one damaged and emitting flame) above the UN number for lithium ion or lithium metal batteries or cells) shall be black on white or suitable contrasting background. The hatching shall be red. If the size of the package so requires, the dimensions/line thickness may be reduced to not less than ~~405~~ 50 mm wide x ~~74~~ 50 mm high provided the mark remains clearly visible. Where dimensions are not specified, all features shall be approximate proportion to those shown.

NOTE: The provisions of 5.2.1.9.2 from the twenty-first revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2024.”.
