

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

11 June 2019

**Sub-Committee of Experts on the Transport of
Dangerous Goods**

Fifty-fifth session

Geneva, 1-5 July 2019

Item 4 (a) of the provisional agenda

Electric storage systems: testing of lithium batteries

Lithium battery test summary (TS) document

**Transmitted by the Medical Device Battery Transport Council
(MDBTC)**

1. Since the adoption of the requirement in 2.9.4 (g) of the Model Regulations to require cell and battery manufacturers and downstream distributors to make available the test summary (TS) as specified in the Manual of Tests and Criteria, Part III, sub-section 38.3, paragraph 38.3.5, MDBTC members have been working to implement appropriate systems for complying with the new requirement. Members have experienced challenges complying with the requirements and wish to clarify key concerns with the Sub-Committee.
2. It is critical to note that the TS is not intended to be used as a shipping document, or to accompany each shipment and should not be requested as one. We are concerned that some carriers, freight forwarders and others in the supply chain will demand copies of the TS and we think that the Model Regulations should explicitly indicate that the document is not intended to be a transport document.
3. We have prepared some additional questions and answers that are intended to be reviewed and discussed by the Sub-Committee and shared with companies that are required to comply with the test summary requirement. The questions and answers are provided in the appendix of this paper.

Proposal

4. It is proposed to revise 2.9.4 (g) to read: “Manufacturers and subsequent distributors of cells or batteries shall make available the test summary as specified in the Manual of Tests and Criteria, Part III, sub-section 38.3, paragraph 38.3.5. *The test summary is not intended to accompany the transport document.*”

Appendix: Additional test summary questions

The Sub-Committee is invited to consider the following questions and answers.

Q1: Who can make a request for the TS document.

A1: Any person or organization that has a need to verify that the cell or battery has undergone and successfully passed the 38.3 testing. It is not intended for persons that are attempting to collect information not related to transport. It is not intended, nor required to accompany shipments. This is especially critical with respect to new product development and protecting proprietary information.

Q2: If a company chooses to publish the UN 38.3 Test Report in full, would that meet the Test Summary requirement?

A2: A 38.3 test report may be used to fulfill the test summary requirement if it contains each of the elements required according to 38.3.5 of the UN Test Manual.

Q3. What responsibility does a private individual (consumer) have to ensure that a lithium cell or battery manufacturer has made the Test Summary available?

A3: There is no validation or confirmation required on the part of the consumer.
