

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

30 October 2018

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

Fifty-fourth session

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 Medical Device Battery Transport Council
(MDBTC)**

Introduction

1. The MDBTC supports the proposal submitted by PRBA and RECHARGE in ST/SG/AC.10/C.3/2018/115, which proposes to amend the dimensions of the lithium battery mark found in 5.2.1.9.2 of the Model Regulations. However, the MDBTC has some comments suggestions to improve the proposal based on discussions with our members.

2. PRBA and RECHARGE proposed to replace the word “rectangle” with the word “square.” As they have noted, this change would obsolete the existing mark effective 1 January 2019. To remedy this situation, PRBA and RECHARGE propose the inclusion of a note to permit a four-year transition period to exhaust existing stock of labels and pre-printed packaging. The MDBTC proposes to remove the reference to a specific shape. By removing this reference shippers will have the flexibility to continue using existing supplies of marks and pre-printed packaging or purchase new inventory of the reduced sized mark at their discretion. Removing the requirement for a specific shape should not result in the use of arbitrarily shaped marks as the text “all features shall be in approximate proportion to those shown” will remain. Further, this proposed text will eliminate the need for a four-year transition period.

3. In figure 5.2.5, referencing the lithium battery mark, the double asterisk refers to a “place for telephone number for additional information.” Through discussion with members, this number is often used for consumer experience purposes rather than for further information related to transport safety. The MDBTC proposes to include text in the note to figure 5.2.5 that expressly permits the use of additional text on the surface of the mark to indicate that the phone number is intended for emergency purposes only. Alternatively, the MDBTC would not be opposed to removing the requirement for a phone number, as the phone number and any additional text may distract attention from the UN number(s) listed.

4. The text in 5.2.1.9.2 requires red hatched edging with a minimum width of five millimetres. The requirement for a minimum width is inconsistent with other references in the Model Regulations where hatched edging is required. The excepted quantities mark, for example, under 3.5.4.2 does not define the minimum width of the hatching. The MDBTC proposes to remove the minimum width requirement for the hatching.

5. The text in 5.2.1.9.2 provides that “the hatching shall be red.” This colour requirement is inconsistent with other references in the Model Regulations where hatched edging is required. The excepted quantities mark, for example, permits the hatching to be either black or red. The MDBTC proposes to amend the text to permit black or red hatching.

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:

~~“The mark shall be in the form of a rectangle with hatched edging. The dimensions shall be a minimum of 120 100 mm wide x 110 100 mm high, and the minimum width of the hatching shall 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 mark shall have black or red hatched edging. The hatching shall be red. If the size of the package so requires, the dimensions/line thickness may be reduced to not less than 105 50 mm wide x 74 50 mm high provided the mark remains clearly visible. Where dimensions are not specified, all features shall be in approximate proportions 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.”~~

7. In Figure 5.2.5, it is proposed that the text following the figure be revised to read as follows:

“Lithium battery mark

* *Place for UN number(s)*

** *Place for telephone number for additional information, the mark may include additional text to indicate that the phone number is intended for emergency purposes only.*”
