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## 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-second session

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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)\*,\*\*

### I. Introduction

1. Special provision 188 includes an exception in subparagraph (f) (i) stating that packages containing only button cell batteries installed in equipment (including circuit boards) are not required to bear the lithium or sodium ion battery mark.
2. The exception from the application of the mark on packages for equipment containing only button cells clearly applies to packages containing small devices such as digital watches, calculators and car key fobs where the power source is a single lithium button cell.
3. However, there has also been an informal practice that packages containing laptop computers that have a lithium ion battery for main power and also have a lithium metal button cell that provides power to the complementary metal oxide semiconductor (CMOS) chip need only show “UN 3481” and there does not need to be any reference to the presence of the lithium metal button cell in the equipment by including “UN 3091” on the mark.
4. Recently, the lack of identification of the presence of the lithium metal button cells when classifying laptops was raised by a member of the IATA Dangerous Goods Board. In the discussion, there was general agreement that consignments of laptop computers would only have the packages marked with “UN 3481” on the lithium battery mark. It was though acknowledged that the exception in the regulations did not provide for this and, technically, the lithium battery mark should show both UN 3481 and UN 3091.
5. Given that it is a well-established practice for consignors of laptop computers to apply the lithium battery mark with just “UN 3481” to packages, and the presence of a lithium metal button cell inside the laptop would not materially alter the risk and the need for

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\* A/77/6 (Sect. 20), table 20.6

\*\* This document was scheduled for publication after the standard publication date owing to circumstances beyond the submitter's control.



additional hazard communication, it is proposed to include an exception for the mark where the equipment contains both a button cell and a lithium battery as the primary power source.

## II. Proposal

6. The Sub-Committee is invited to amend the wording of paragraph 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 or metal) and lithium button cells. The change proposed is as follows (new text is underlined):

“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 cells or batteries and a button cell, there is no requirement for the UN number indicating the button cell to be included on the mark in addition to the UN number(s) for the cells or batteries.”

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