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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-third session

Geneva, 27 November-6 December 2023

Item 6 (a) of the provisional agenda

#### Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods:

#### Marking and labelling

### Amendments to the location of the lithium battery or sodium ion battery mark

Transmitted by the expert from China\*

## I. Introduction

1. The location of the lithium battery or sodium ion battery mark has not been stated explicitly in the *Model Regulations*. However, information can be missed or misunderstood during transport, if the lithium battery or sodium ion battery mark is not located on the same surface of the package near the hazard labels.
2. In document ST/SG/AC.10/C.3/2023/10, it was proposed to add a note at the end of 5.2.1.9.1 to read as follows: “**NOTE:** *Lithium battery mark shall be located adjacent to the marks required by 5.2.1.1. The requirements of 5.2.1.2 and 5.2.1.4 shall be met.*”.
3. At the sixty-second session, some experts supported in principle the proposal, but preferred to insert the text of the note into the provisions. Others were hesitant to adopt already at that stage the text as proposed and questioned the necessity for such amendments.
4. The expert from China took account of the comments from last session and would like to further explain the necessity of this amendment.
5. Nowadays, more and more lithium batteries or sodium ion batteries are transported in the same packages with other dangerous goods. Electronic tracing loggers with lithium ion batteries have been attached to cargo, such as infectious substances and magnetic resonance imaging (MRI). Furthermore, articles containing dangerous goods transported as UN Nos. 3537, 3538, 3539, 3540, 3541, 3542, 3543, 3544, 3545, 3546, 3547 and 3548 can all contain lithium batteries or sodium ion batteries. Both hazard labels and the lithium battery or sodium ion battery marks shall apply if the batteries installed in these articles comply with special provision (SP) 188, according to 5.2.2.1.13.1.

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



6. The incomplete information of marks and labels will affect cargo handling and emergency response. Take an article classified as UN 3534 containing a lithium battery which complies with SP 188 as an example. The label for Division 4.3 and the lithium or sodium ion battery mark shall apply. When this article is on fire, using water as an extinguishing agent may exacerbate the situation, because dangerous goods of Division 4.3 can emit flammable gases when in contact with water. However, it will be very likely for the cargo handler to use water if the battery mark is not located on the same surface with the hazard label and he unfortunately only notices the battery mark, considering a large amount of water is the recommended fire extinguisher method for lithium batteries.

7. For reference, the environmentally hazardous substance mark shall be located adjacent to the marks required by 5.2.1.1 according to 5.2.1.6.2. Furthermore, the hazard labels shall be located on the same surface of the package near the proper shipping name mark if the package dimensions are adequate according to 5.2.2.1.6. Therefore, the environmentally hazardous substance mark and the hazard labels shall be located on the same surface of the package near the proper shipping name mark.

8. Thus, the expert from China invites the Sub-Committee to consider the following proposal.

## II. Proposal

9. It is proposed to add a new 5.2.1.9.3 to read as follows (new text is **bold and underlined**):

**“5.2.1.9.3 The lithium battery or sodium ion battery mark shall be located on the same surface of the package near the hazard labels, if the package dimensions are adequate.”**

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