



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-fourth session

Geneva, 24 June -3 July 2024

Item 6 (a) of the provisional agenda

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

Marking and labelling

Clarification of the battery mark requirements under special provision 188

Transmitted by the experts from Canada and China*

I. Introduction

1. The quantity of lithium batteries being transported around the world is increasing. Their potential hazards in transport are well known and the need to label these batteries is well supported. However, the current text in special provision (SP) 188 on the marking requirements for lithium batteries presents a regulatory gap that seems to be a simple oversight that occurred when it was incorporated into the *Model Regulations*.
2. This proposal builds on comments provided by Canada during plenary on document ST/SG/AC.10/C.3/2023/52 submitted by China at the sixty-third session.

II. Explanation

3. Currently, the text in SP 188 (f) only refers to the battery mark illustration found in 5.2.1.9 as opposed to the text in SP 400 (c) which refers to all the requirements related to the battery mark found in 5.2.1.9:

SP 188 (f): “Each package shall be marked **with the appropriate battery mark, as illustrated at 5.2.1.9;**”

SP 400 (c): “Each package shall be marked **according to 5.2.1.9;**”

4. The marking requirements found in 5.2.1.9 contain not only the illustration of the battery mark, but also size requirements for the battery mark and the need for UN numbers. Thus, without a reference to all the requirements under 5.2.1.9, there is a regulatory gap for the marking of lithium batteries.

* A/78/6 (Sect. 20), table 20.5.



5. Following a review of the archives, it is our understanding that the original intent, as presented at the forty-sixth session of the Sub-Committee in informal documents INF.41¹ and INF.73² by the International Air Transport Association (IATA), was that all the requirements under 5.2.1.9 should apply, and that the reference to the illustration alone was simply an oversight.

6. Therefore, we believe that SP 188 (f) should be amended to align with the text in SP 400 (c) to ensure a consistent approach to the marking of lithium and sodium ion batteries.

7. This proposal supports sustainable development goal 6, “peace, justice, and strong institutions”. Specifically, having uniformity in marking requirements enables the creation of more consistent regulations, thus contributing to the implementation of target 16.6 to “develop effective, accountable and transparent institutions at all levels”.

III. Proposal

8. To ensure in 3.3 the marking requirements under SP 188 (f) are clear and interpreted the same way, the following changes are proposed (with deleted text in ~~strike through~~ and new text in **bold underline**):

“(f) Each package shall be marked ~~with the appropriate battery mark, as illustrated~~ **at according to** 5.2.1.9;”

¹ <https://unece.org/DAM/trans/doc/2014/dgac10c3/UN-SCETDG-46-INF41e.pdf>

² <https://unece.org/DAM/trans/doc/2014/dgac10c3/UN-SCETDG-46-INF73e.pdf>