



Transportation Development group

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FAQ Version 2.0 Regarding Lithium Battery Rules

Q&A and Misconceptions about the Lithium Battery Rules by Air under IATA/ICAO and DOT rules (this list published by Jim Powell from dgtraining.com, email jim@dgtraining.com)

Batteries	Misconception	Fact
<p>Cell phone batteries, laptop batteries and other rechargeable lithium ion batteries.</p> <p><i>Please note that there is a proposed DOT rule change that could change all this... they are considering dropping the threshold for regulated lithium ion batteries from 100 Wh to 3.7 Wh per battery... this is a HUGE reduction and will pose many issues for shippers forwarders and carriers. At the moment (July 23, 2010) there is no official word on the status of this rulemaking so this FAQ sheet does NOT take that info consideration and is based on existing rules.</i></p>	<p><i>Misconception: As of Jan 1 last year these are now "DG" and require a DG form and hazmat label.</i></p>	<p>Well, if they're over 100 Wh per battery (or 20 Wh per cell) they are DG, but only a small percentage of batteries for <u>consumer products</u> would be over the 100 or 20 Wh limit.</p> <p>If the batteries qualify under Section II of the IATA/ICAO packing instruction they are NOT DG¹.</p> <ul style="list-style-type: none"> • No training certification is required for employees (however they must be "INFORMED" of the requirements) • No red and white DG certification or diamond shaped hazard label is required (though you <i>may</i> need a handling label and possibly documentation on an air waybill).
<p>Primary Metal (non-rechargeable) batteries such as the "coin type" backup batteries, excepted from the regulations by Section II of the IATA/ICAO packing instructions...</p>	<p><i>All of these are forbidden on passenger aircraft by DOT/FAA and USG-02 in ICAO/IATA.</i></p>	<p>Not true. You have to read USG-02 and US DOT Special provision A101 to get to the truth, but in short, many primary batteries <i>are</i> allowed on a passenger aircraft when <u>packed with</u> or <u>contained in equipment</u>.</p>

¹ The term "DG" in this sense is used to refer to those items that are covered by the entire IATA regulations and need a candy-striped form and diamond-shaped label.

Batteries	Misconception	Fact
Primary Metal (non-rechargeable) batteries such as the "coin type" backup batteries	<i>Primary metal batteries shipped by ground do NOT need the "Forbidden Aboard Passenger Aircraft" marking</i>	Not true. Even when shipped by ground, primary metal batteries qualifying under DOT Special Provision 188 STILL have to be marked with this warning (unless excepted by another SP or in the example in the previous question about small batteries in or with equipment and DOT SP A101)
All lithium batteries	<i>All must have the "Lithium Battery Handling Label"</i>	Not true. If the battery is excepted by Section II of the packing instruction it <i>usually</i> needs the handling label, <u>but not always</u> (for example packing instruction 967 doesn't require it unless you have more than 2 batteries or 4 cells in the equipment).
All lithium batteries	<i>Whether excepted or not they should be identified by their UN number and proper shipping name.</i>	Not true. If the battery is excepted by Section II of the IATA/ICAO packing instruction it is NOT identified by UN number or Proper Shipping Name (this would connote that a DG form and hazard label is required). <i>Where does it say that in the IATA book?</i> It doesn't. So if someone wants to argue the point, they could; but an airline requiring a forwarder or shipper to identify excepted items as UN 3481, 3480, 3090 or 3091 is missing the spirit of the exception which is to make these things excepted from all requirements of the DGR save those listed in Section II of the relevant packing instruction.

The problem that shippers and forwarders are running into with the airlines is that everyone is trying to simplify the rules in an overly restrictive; one-size fits all policy. While that may be a laudable goal from an operational and arguably from a safety standpoint, it falls short of our duty to the customer as logistics professionals.

Customers should be able to get the straight story about what they need to do to ship their goods as safely and economically as possible.

If you want more information on our training programs for lithium batteries or other DG items email jim@dgtraining.com or call us at 1-800-949-4834.

Would you like to add more questions to the FAQ? Email jim@dgtraining.com