



Lithium Cell and Battery Test Summary

New Rule and long transition

There is a new requirement for lithium cells and batteries that has the potential of creating a huge wave within the dangerous goods community within the next 2 years. This requirement is known as the "UN 38.3.5 Lithium cell and battery summary" that can be found in the "Recommendations on the Transport of Dangerous Goods Modal Regulations Volume II twentieth revised edition".

In paragraph 38.3.5 it states, "the following test summary shall be made available". The question becomes "made available to whom"? The intent of the paragraph was meant to mean that the 38.3 test summary be made available by manufacturers and subsequent distributors of lithium cells and batteries to regulatory enforcements officials. The test summary refers to the UN 38.3 testing that is conducted on all new lithium batteries. The testing on these batteries ensures that batteries are in a condition for transport that ensures that the batteries travel safely through the logistics chain. The testing and subsequent documentation also ensures that counterfeit batteries that have not been tested stay out of the logistics chain.

According to 38.3.5 the information that "shall" be provided in the test summary include:

- Name of cell, battery or product manufacturer, as applicable;
- Cell, battery or product manufacturers contact information to include address, phone number, email address and website for more information
- Name of test laboratory to include address, phone number, email address and website for more information
- A unique test report identification number
- Date of test report
- Description of cell or battery to include at a minimum;
 - Lithium ion or lithium metal cell or battery
 - Mass;
 - Watt-hour rating or lithium content
 - Physical description of the cell/battery; and
 - Model numbers
 - List of tests conducted and results (i.e., pass/fail)
- Reference to the assembled battery or testing requirements, if applicable (i.e. 38.3.3 (f) and 38.3.3 (g));
- Reference to the revised edition of the Manual of Tests and Criteria used and to amendments thereto, if any; and
- Signature with name and title of signatory as an indication of the validity of information provided.



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Challenge with change

As with most changes that occur with the regulations, the challenge will be communicating the correct application of this rule to shippers, freight forwarders to ensure that there is an understanding that this document is not necessary for transport. Comprehensive and consistent training is an easy way to ensure that the requirement for this document is understood and implemented correctly. Remember, the document is meant to be made available to enforcement officials that need to refer to it should there be an incident involving a lithium battery shipment.

Could this document ever be required by carriers of lithium batteries? It depends, carriers and or freight forwarders could at some point require the test summary if the carriers' insurance companies require confirmation that batteries are tested and have passed 38.3 before being carried aboard their transport vehicle. The document could also be required for those 3PL's engaged in contractual packaging and shipping activities on behalf of their customers. Either way, this would be a separate requirement outside of required dangerous goods documentation.

What can organizations do now?

Organizations can start planning, training and implementing these requirements now. The planning process should include auditing current battery inventories and manufacturers so that the organization can implement a document control system. The planning process should also include a requirement for the procurement of new batteries that would involve assigning responsibility to those involved in the procurement process for ensuring that the test document is delivered with the batteries being purchased. Once identified and received the test summary documents should be sent to those responsible for record retention for other dangerous goods related documentation to ensure the information is readily available to those that request it. As of now, there is no record retention requirement for this document which means that the document should be available at all times. Lastly, training and implementation should involve an understanding of what the document is and when it is required to be supplied to the officials requesting it.

As with all of the other requirements for lithium batteries over the years this requirement for lithium cell and battery test summary is sure to create some confusion and misapplication over course of the next few months and up until the mandatory date of January 2020. That is why it is imperative to ensure that correct and timely information is available to all stake holders involved in the safe and legal transportation of lithium cells and batteries.

*-Written by Michael Bowen
President/CEO of BDG*