



The Advanced Rechargeable & Lithium Batteries Association

Lithium Battery Test Summary: Questions, Answers, and Examples

Beginning January 1, 2020, the UN Model Regulations, IMDG Code, ICAO Technical Instructions, IATA Dangerous Goods Regulations and other related national and international dangerous goods regulations will require manufacturers and distributors of lithium cells and batteries and equipment powered by cells and batteries make available a “Test Summary” as specified in the UN Manual of Tests and Criteria, [Sixth Revised Edition, Amend 1](#), Part III, sub-section 38.3, paragraph 38.3.5.

PRBA – The Rechargeable Battery Association, RECHARGE the Advanced Rechargeable & Lithium Batteries Association, and the Medical Device Battery Transport Council have prepared this document to provide information on the Test Summary and answer frequently asked questions regarding this new regulatory requirement. The information in this document also was filed with the UN Sub-Committee of Experts on the Transport of Dangerous Goods in June 2018. The official document is available on the UN Sub-Committee’s [website](#).

We expect this document to be updated on a regular basis as companies prepare for the January 1, 2020 compliance deadline and dangerous goods transport authorities develop regulations to enforce this new requirement. For more information, contact PRBA at 202.719.4978 or prbatt@gmail.com.

Questions and Answers Related to Lithium Battery Test Summary

1. Does the test summary apply to products and cells or batteries contained within products/parts or just standalone cells or batteries?

The test summary applies to the cells and batteries themselves which ship as standalone cells or batteries and subsequently to the cells and batteries contained in equipment at such time when the cell or battery is added to a product.

2. Can multiple batteries/manufacturers/products be listed on one report?

Yes, it is acceptable to have a single document that addresses multiple batteries/manufacturers/products, provided all required information is stated. For example, a tablet manufacturer may purchase lithium ion batteries from three different battery manufacturers. The test summary for the product will therefore list batteries and all related information (*e.g.*, Watt-hours, test labs) from the three battery manufacturers without naming the manufacturer due to confidentiality issues.

3. Is it acceptable to list the various test houses, tests and range of revisions tested to for the UN 38.3 revision and amendments?

Yes, it is acceptable to have multiple test houses and their addresses, email information, etc. listed provided all required information is stated. The test house is not required to be aligned to a specific battery or product on the test summary when the test summary covers multiple batteries/products. It is required to have the test report number and date of test for each cell/battery/product listed on the test summary.

4. What is meant by physical description of cell or battery?

A physical description is intended to provide a check for the person requesting the test summary to know that it applies to the cell/battery/product covered by the test summary. *i.e.* if a cellular phone is the product being shipped, the invoice description or marketing name of the product as the physical description could be used on the test summary.

5. What does availability of report mean: “When requested?”

Any individual or entity in the supply chain may request the test summary *i.e.* regulator, consumer, or transport provider.

6. Can the test summary provider require a requestor to obtain the document from a website?

Yes, it is acceptable for the provider to require the requestor to obtain a document electronically from a provider's website. The provider must ensure that the cell/battery/product has appropriate identifiers to align to the test summary.

7. If a manufacturer considers their suppliers, test house and battery data confidential and competitive information, how would test summary compliance be achieved?

All 10 data elements and listed subsets of information is required to be on the test summary. As indicated above, the test house information may be listed to cover a range of products.

8. Is there a mandated format for the test summary that manufacturers and distributors must follow?

No. Manufacturers and distributors may compile the information required in the test summary using any format.

9. If a test summary is requested by a dangerous goods enforcement agency, how quickly must the test summary be made available? For example, would a manufacturer be expected to immediately produce a test summary or provide it within a certain amount of time (e.g., 72 hours)

Due to the large volume of lithium batteries and lithium battery powered products that are shipped daily, manufacturers and distributors should not be expected to immediately provide a test summary for every product they ship. Manufacturers and distributors should be provided a reasonable amount of time to provide the required test summary.

10. Would manufacturers and distributors of battery powered vehicles (UN3171) and hybrid vehicles containing a lithium battery (UN3166) be expected to provide a test summary?

Yes. The test summary requirement applies to manufacturers and distributors of lithium battery powered vehicles and other vehicles containing lithium batteries.