

Information Sheet

- applicable till 30.06.2025 -

Articles containing other dangerous goods plus lithium cells and batteries according to ADR 2023

You have an article that contains a lithium cell or battery plus other dangerous goods as integral part of the article which cannot be removed for transport purposes.

In this case the lithium cells / batteries are subordinate and the classification is according to the other dangerous good contained in the article.

Since ADR 2019 such articles have been assigned to specific UN numbers depending on which dangerous good they contain. The general principles hereto can be found in the ADR under Section 2.1.5.

UN 3537 ARTICLES CONTAINING FLAMMABLE GAS, N.O.S.

UN 3538 ARTICLES CONTAINING NON-FLAMMABLE, NON-TOXIC GAS, N.O.S.

UN 3539 ARTICLES CONTAINING TOXIC GAS, N.O.S.

UN 3540 ARTICLES CONTAINING FLAMMABLE LIQUID, N.O.S.

UN 3541 ARTICLES CONTAINING FLAMMABLE SOLID, N.O.S.

UN 3542 ARTICLES CONTAINING A SUBSTANCE LIABLE TO SPONTANEOUS COMBUSTION, N.O.S.

UN 3543 ARTICLES CONTAINING A SUBSTANCE WHICH IN CONTACT WITH WATER EMITS FLAMMABLE GASES, N.O.S.

UN 3544 ARTICLES CONTAINING OXIDIZING SUBSTANCE, N.O.S.

UN 3545 ARTICLES CONTAINING ORGANIC PEROXIDE, N.O.S.

UN 3546 ARTICLES CONTAINING TOXIC SUBSTANCE, N.O.S.

UN 3547 ARTICLES CONTAINING CORROSIVE SUBSTANCE, N.O.S.

UN 3548 ARTICLES CONTAINING MISCELLANEOUS DANGEROUS GOODS N.O.S.

mans that as per SP274 the technical name needs to be added in brackets.

Assignment to UN 3373

When those articles contain the maximum amount of dangerous goods which is permitted as limited quantity as per column 7a of the ADR Dangerous Goods List, the article may be classified as UN number

UN 3363 DANGEROUS GOODS IN APPARATUS

or

UN 3363 DANGEROUS GOODS IN ARTICLES

or

UN 3363 DANGEROUS GOODS IN MACHINERY

Such articles may also contain lithium cells/batteries.

For such lithium cells/batteries the following provision of ADR 2.1.5.2 applies:

Such articles may in addition contain batteries. Lithium batteries that are integral to the article shall be of a type proven to meet the testing requirements of the Manual of Tests and Criteria, part III, subsection 38.3, except when otherwise specified by ADR (e.g. for pre-production prototype articles containing lithium batteries or for a small production run, consisting of not more than 100 such articles).

Note 1: In this ADR provision only a reference to the UN 38.3 Test is made, but of course the other requirements for lithium cells and batteries stated in 2.2.9.1.7 b) to g) are to be fulfilled in practice also.

Note 2: In the text of the regulations only lithium batteries are mentioned. Of course lithium cells may also be contained in such articles.

Regarding the Marking of such articles the ADR determines the following:

5.2.2.1.12.1 Packages containing articles or articles carried unpackaged shall bear labels according to 5.2.2.1 reflecting the hazards established according to 2.1.5, except that for articles that in addition contain lithium batteries, a lithium battery mark or a label conforming to model No. 9A is not required.

In Short: Lithium cells or batteries in articles that also contain other dangerous goods must fulfill all requirements of 2.2.9.1.7 b) bis g), but neither need they be marked on the package nor is any documentation required.

Until 31. December 2022 due to the transitional period according to ADR 1.6.1.46 such articles are not subject to the ADR.



Example Package Marking and Labelling
(no Lithium Battery label model number 9A or Lithium Battery Mark required)

**This information we present to you free of charge.
We're glad that we could be of help to you!**

Your Lithium Battery Service Team