



## SP 188 Checklist for lithium and sodium batteries

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**Special Provision 188 (SP 188)** of the IMDG Code 42-24 provides conditional exemptions/reduced requirements for small lithium metal, lithium ion, and sodium ion cells and batteries (including those installed in equipment, packed with equipment, or alone). These shipments are **not subject to full Class 9 dangerous goods provisions** (e.g., no Class 9 label, no Shipper's Declaration, no placarding) if all applicable requirements below are met.

**Lithium batteries** follow section 2.9.4 (classification, testing, design safety, quality management, and test summaries for UN 3090, 3091, 3480, 3481). **Sodium ion** batteries follow section 2.9.5 (analogous provisions, cross-referencing 2.9.4 where applicable, for UN 3551, UN 3552).

Damaged, defective, or recycling/disposal batteries: Not eligible for SP 188, refer to SP 376, SP 377.

**All items below must be satisfied for the shipment to qualify under SP 188.** Reference: IMDG Code Amendment 42-24, Special Provision 188; sections 2.9.4 (Lithium batteries) & 2.9.5 (Sodium ion batteries). This checklist is based on the provisions effective under Amendment 42-24 (mandatory from 1 January 2026).

### 1. Size/Energy Limits (SP 188.1 & 188.2)

- Lithium Metal/Alloy Cells:** Lithium content  $\leq$  1 g per cell
- Lithium Metal/Alloy Batteries:** Aggregate lithium content  $\leq$  2 g per battery
- Lithium Ion Cells:** Watt-hour (Wh) rating  $\leq$  20 Wh per cell
- Sodium Ion Cells:** Watt-hour (Wh) rating  $\leq$  20 Wh per cell
- Lithium Ion Batteries:** Watt-hour (Wh) rating  $\leq$  100 Wh per battery
- Sodium Ion Batteries:** Watt-hour (Wh) rating  $\leq$  100 Wh per battery

**Failure to meet any item above means the shipment is fully regulated as Class 9.**



**□2. Testing, Design, and Manufacturing Requirements (SP 188.3; ref. 2.9.4 for lithium, 2.9.5 for sodium ion)**

- Each cell/battery type has passed all tests in UN Manual of Tests and Criteria, Part III, subsection 38.3 (UN 38.3 test report available)
- For lithium: Meets 2.9.4.1 (general), 2.9.4.5 (quality management), 2.9.4.6 (hybrids if applicable), 2.9.4.7 (test summary)
- For sodium ion: Meets 2.9.5.1 (general/testing), 2.9.5.5 (quality management, references 2.9.4.5), 2.9.5.6 (test summary)
- Cells/batteries manufactured under a quality management program (including inspections, process controls, records, training, etc.)
- Test summary document available upon request (for cells/batteries manufactured after 30 June 2003, except button cells in equipment) – ref. 2.9.4.7 / 2.9.5.6
- Protected against short circuit, reverse current flow, overcharge/over-discharge, and unsafe temperature/pressure (design requirements in 2.9.4/2.9.5)

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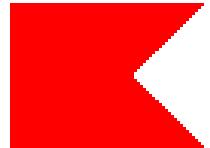
**□3. Packaging Requirements – General (SP 188.4)**

- Cells/batteries (except when installed in equipment) packed in inner packagings that **completely enclose** each cell/battery
- Protected against short circuit (including contact with conductive material in the same packaging)
- Packed in strong rigid outer packagings meeting 4.1.1.1, 4.1.1.2, and 4.1.1.5 (general packing requirements)

**□4. Packaging/Protection when Installed in Equipment (SP 188.5)**

- Cells/batteries protected from damage and short circuit
- Equipment has effective means to prevent accidental activation (exception: devices intentionally active in transport – e.g., RFID, watches, sensors – that cannot generate dangerous heat)
- Equipment packed in strong outer packaging (or battery afforded equivalent protection by the equipment itself)

**□5. Package Drop Test (SP 188.7)**



- Each package (except cells/batteries installed in equipment) capable of withstanding a **1.2 m drop test** in any orientation without: – Damage to cells/batteries – Shifting allowing cell-to-cell or battery-to-battery contact – Release of contents

**6. Maximum Gross Mass per Package (SP 188.8)**

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- **≤ 30 kg gross mass** per package (except for packages containing cells/batteries installed in or packed with equipment)

**7. Marking and Labelling (SP 188.2, 188.6)**

- **Lithium ion/Sodium ion batteries:** Wh rating marked on the battery case (except lithium ion batteries manufactured before 1 January 2009)
- **Each package** marked with the **appropriate Lithium Battery Mark or Sodium Ion Battery Mark** (as illustrated in IMDG 5.2.1.10) – Includes UN number(s)
- **Exceptions to marking requirement:** – Packages containing only button cells installed in equipment (including circuit boards) – Packages containing ≤ 4 cells or ≤ 2 batteries installed in equipment, and ≤ 2 such packages in the consignment
- **For overpacks:** Lithium/Sodium Ion Battery Mark visible or reproduced on overpack exterior + "OVERPACK" marked (minimum 12 mm high lettering)

**8. Documentation**

- Test Summary available