



Checklist for SP 188: Lithium and Sodium Ion Batteries

IMDG Code Amendment 42-24, Special Provision 188 (mandatory from 1 January 2026)

Special Provision 188 (SP 188) of the IMDG Code 42-24 provides that small lithium metal, lithium ion and sodium ion cells and batteries (alone, packed with equipment, or installed in equipment) are **not subject to the other provisions of the Code** if every requirement of SP 188 is met. In practice there is no class 9 label, no dangerous goods transport document under Chapter 5.4 and no placarding. The lithium or sodium ion battery mark is still required (SP 188.6).

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 (UN 3551, 3552).

Damaged or defective cells and batteries, and those offered for disposal or recycling, are not eligible for SP 188: see SP 376 and SP 377.

All items below must be satisfied for a shipment to qualify under SP 188. Reference: IMDG Code Amendment 42-24, SP 188 (paragraphs .1 to .8), sections 2.9.4 and 2.9.5.

☐ 1. Size and energy limits (SP 188.1 and 188.2)

- ☐ **Lithium metal or lithium alloy cell:** lithium content ≤ 1 g
- ☐ **Lithium metal or lithium alloy battery:** aggregate lithium content ≤ 2 g
- ☐ **Lithium ion cell:** watt-hour rating ≤ 20 Wh
- ☐ **Sodium ion cell:** watt-hour rating ≤ 20 Wh
- ☐ **Lithium ion battery:** watt-hour rating ≤ 100 Wh
- ☐ **Sodium ion battery:** watt-hour rating ≤ 100 Wh

Failure to meet any item above means the shipment is fully regulated as class 9. A single-cell battery as defined in UN Manual of Tests and Criteria, Part III, 38.3.2.3, is treated as a cell.

☐ 2. Testing, design and manufacturing (SP 188.3)

- Each cell or battery type has passed all tests of the UN Manual of Tests and Criteria, Part III, subsection 38.3 (UN 38.3 test report available). A battery needs a tested type even if its cells are of a tested type.
- Lithium: meets 2.9.4.1 (tests), 2.9.4.5 (quality management), 2.9.4.6 (if applicable) and 2.9.4.7 (test summary).
- Sodium ion: meets 2.9.5.1, 2.9.5.5 and 2.9.5.6.
- Manufactured under a quality management programme (inspections, process controls, records, training). In-house programmes may be accepted; third-party certification is not required.
- Test summary available on request (cells and batteries manufactured after 30 June 2003; button cells installed in equipment excepted).

☐ 3. Packaging, general (SP 188.4)

- Cells and batteries (except when installed in equipment) are in inner packagings that completely enclose each cell or battery.
- Protected against short circuit, including contact with conductive material in the same packaging.
- Inner packagings are packed in strong outer packagings meeting 4.1.1.1, 4.1.1.2 and 4.1.1.5.

☐ 4. Cells and batteries installed in equipment (SP 188.5)

- Cells and batteries protected from damage and short circuit.
- Equipment has an effective means of preventing accidental activation (devices intentionally active in transport, such as RFID transmitters, watches and sensors, that cannot generate a dangerous evolution of heat are excepted).
- Equipment packed in a strong outer packaging of suitable material, strength and design, unless the equipment itself gives the battery equivalent protection.

☐ 5. Drop test (SP 188.7)

- Except for cells and batteries installed in equipment, each package withstands a 1.2 m drop in any orientation without damage to cells or batteries, without shifting that allows cell-to-cell or battery-to-battery contact, and without release of contents.



☐ **6. Maximum gross mass per package (SP 188.8)**

- Package ≤ 30 kg gross mass, except where cells or batteries are installed in or packed with equipment. ("Equipment" means apparatus for which the cells or batteries provide electrical power.)

☐ **7. Marking (SP 188.2 and 188.6; 5.2.1.10)**

- Lithium ion and sodium ion batteries: watt-hour rating marked on the outside case (lithium ion batteries made before 1 January 2009 excepted).
- Each package bears the lithium or sodium ion battery mark (5.2.1.10), showing the UN number(s) preceded by "UN". Mark at least 100 × 100 mm with red hatching at least 5 mm wide; 100 × 70 mm if package size requires.
- The Amendment 40-20 mark (with telephone number) may still be used until 31 December 2026.
- Mark not required on: packages with only button cell batteries installed in equipment (including circuit boards); packages with no more than four cells or two batteries installed in equipment, where the consignment has no more than two such packages.
- Overpacks: the battery mark is clearly visible or reproduced on the outside, and "OVERPACK" is marked (letters at least 12 mm high).
- Packages prepared to ICAO Technical Instructions Packing Instruction 965 or 968, Section IB, bearing the battery mark and the model 9A label, are deemed to meet SP 188.6.

☐ **8. Documentation and records**

- UN 38.3 test report and test summary (2.9.4.7 or 2.9.5.6) available on request.
- Watt-hour rating or lithium content records support the limits in item 1.
- A package that meets SP 188 is not subject to the other provisions of the Code, including the dangerous goods transport document of Chapter 5.4 (SP 188 opening words).