



DG Shipping Guide #38 – 49 CFR  
**MEDIUM LITHIUM METAL BATTERIES  
CONTAINED IN EQUIPMENT**  
(Exempted Class 9 Shipment per § 173.185(c))

Revision Date: 10/24/2025

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**49 CFR Shipping Instructions for GROUND Transportation**  
**UN3091, LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT, 9**  
**(§ 173.185(c) → Medium, exempted lithium cells & batteries)**

**ONLY TRAINED HAZMAT EMPLOYEES MAY SHIP LITHIUM BATTERIES USING THIS GUIDE.**

Some batteries are regulated when shipped or offered for transportation. If the battery is restricted, then all applicable hazardous materials regulations must be met. This guide provides information to assist you in how to ship the battery by road.



**How can I tell if the battery is regulated?**

Batteries normally have the size listed directly on the battery case which will help you identify whether or not it can be shipped without special packaging and package marking; in other words, shipped as non-restricted in transportation.



These instructions have been specifically prepared for the shipment of **medium-sized lithium metal batteries contained in equipment** (i.e., containing no more than 25 g of lithium metal) prepared in accordance with the provisions of the exemption found in § 173.185(c) of the 49 CFR (revised as of October 1, 2025).

**DO NOT USE THESE SHIPPING INSTRUCTIONS FOR OTHER BATTERY TYPES.**

*All employees are responsible for compliance with applicable domestic and international dangerous goods transport regulations. All employees must be dangerous goods trained prior to using this shipping template. All information in this shipping template is accurate through the date of revision and must be validated against the regulations yearly and updated as regulations change.*



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**DESCRIPTION**

**Items**

*(Identify and insert the description of items that may be shipped utilizing this template in this section.)*

**SHIPPING BY GROUND (49 CFR)**

**Shipping Location**

Transport by Road / Motor Carrier

**Shipping Company**

*(Identify in this section the carriers used and carrier requirements.)*  
(i.e., Motor carriers such as ...)

**NOTE**

Damaged, defective or recalled cells or batteries, that have the potential of producing a dangerous evolution of heat, fire, or short circuit (including those being returned to the manufacturer for safety reasons) and are offered for road or rail transport must be prepared in accordance with the provisions detailed in §173.185(f).  
Batteries meant for disposal or recycling must be prepared in accordance with the provisions in § 173.185(d).

**CLASSIFICATION**

**UN Number & Proper Shipping Name**

UN3091, LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT

**Battery Testing Data**

LITHIUM CELLS OR BATTERIES MUST MEET THE REQUIREMENTS OF EACH TEST IN THE *UN Manual of Tests and Criteria, Part III, subsection 38.3*.  
A cell or battery and equipment containing a cell or battery that was first transported prior to January 1, 2006, and is of a type proven to meet the criteria of Class 9 by testing in accordance with the tests in the UN Manual of Tests and Criteria, Third Revised Edition, 2003, need not be retested.

**Battery Test Summary**

A battery test summary complying with the requirements of the UN Manual of Tests and Criteria, Part III, Subsection 38.3, Paragraph 38.3.3.5 is required to prove all cells/batteries have been properly tested.

*Battery test summary NOT required for button cells installed in equipment.*

The battery test summary is not a transport document and is not required to be provided as a transport document. However, some carriers may request a copy be provided.

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**CLASSIFICATION**

**Site Testing Data**

*(Insert the location of battery testing documentation and/or attach to the shipping instructions.)*

**Special Provisions**

181, 360, 388, 422, A54, A101

**PACKAGING**

**Packing Requirements**

§ 173.185(c)(1)(iv)

**Lithium Content**

Lithium metal cell > 1 g, but ≤ 5 grams  
Lithium metal battery > 2 g, but ≤ 25 g

**Short Circuit Prevention**

*The site must identify and insert information on how this will be done for applicable shipments.*

Secure cell or battery in the equipment to ensure it doesn't separate from the equipment during transport. Protect cells and batteries against short circuits (e.g., using tape or other means to secure cell or battery).

THE CELLS OR BATTERIES MUST INCORPORATE A SAFETY VENTING DEVICE OR BE DESIGNED NOT TO RUPTURE UNDER THE NORMAL CONDITIONS OF TRANSPORT.

Each battery containing cells or a series of cells connected in parallel must be equipped with an effective means, as necessary, to prevent dangerous reverse current flow (e.g., diodes, fuses).

**Packaging**

EQUIPMENT CONTAINING LITHIUM CELLS AND BATTERIES MUST BE PACKED IN STRONG OUTER PACKAGING.

- The equipment must be secured within the outer packaging and be packed to prevent movement, short circuits, and accidental operation during transport.
- Spare batteries are not permitted to be packed with equipment using this guide (*see applicable guide for shipping lithium metal batteries packed with equipment*).

**Type of Packaging**

*(Insert the type of packagings to be used. In addition, insert closure instructions or location of the closure instructions to be used.)*

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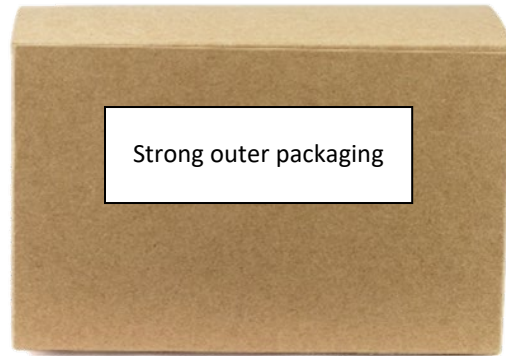
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**PACKAGING**



**Disposal or Recycling**  
(see § 173.185(d))

A lithium cell or battery offered for transportation or transported by motor vehicle to a permitted storage facility, disposal site, or for purposes of recycling is not required to meet the testing in the UN Manual of Tests and Criteria, is not required to incorporate a safety venting device, and is not required to be packed in UN Specification packaging if it is protected against short circuits and packed in a strong outer packaging conforming to the requirements of §§ 173.24 (General Requirements for packagings and packages) and 173.24a (Additional General Requirements for non-bulk packagings and packages).

**MARKING / LABELING**

**Marking & Labeling**

Mark the package with the battery mark, as well as the name and address of the shipper or consignee. If not already displayed, add “UN3091” to the mark.

*Note: A telephone number may remain on the mark through December 31, 2026, but is no longer required.*



Packages containing medium-sized lithium cells or batteries must also be marked with the following statement:

**LITHIUM BATTERIES -  
FORBIDDEN FOR TRANSPORT  
ABOARD AIRCRAFT AND VESSEL**

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**Example of completed package for transportation by road:**



<b>DOCUMENTATION</b>	
<b>Document Type</b>	Document not required
<b>Reporting Requirements</b>	A written report submitted, retained, and updated in accordance with § 171.16 is required if a fire, violent rupture, explosion or dangerous evolution of heat occurs as a direct result of a lithium battery or battery-powered device.

<b>TRAINING REQUIREMENTS</b>	
<b>Training Requirements</b>	Employees must be informed of the requirements of this shipping guide before offering small lithium batteries for transport.  It is recommended that employees receive hazardous material general awareness training as well prior to preparing and offering lithium batteries for transport.

<b>STORAGE</b>	
<b>Storage Location &amp; Special Considerations</b>	<i>(Insert storage requirements or special considerations.)</i>

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**REFERENCES**

<b>Code of Federal Regulations</b>	49 CFR Parts 100 to 185; October 1, 2025.
<b>Packing Requirements</b>	§ 173.185(c)
<b>UN Specification Packaging</b>	Part 178 subparts L and M
<b>Marking</b>	§ 172.301
<b>Labeling</b>	§ 172.400(a)
<b>Documentation</b>	§172.202
<b>Exemptions</b>	§ 173.185(c)
<b>Training Requirements</b>	§ 172.704

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