



## Product Notification:

**CSB #106** 5April2022

To: Sensitech Inc. Customers and Distributors  
From: Client Services  
Date: 5 April 2022  
Re: IATA/ICAO Dangerous Goods Regulations, U.S. Department of Transportation (DOT) 49 CFR Parts 171-180, International Maritime Dangerous Goods (IMDG) Regulations 38-16 – Lithium Ion Batteries

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**Sensitech Products (Formerly FreightWatch International Products)**  
**Real-Time Products Containing Lithium Ion Batteries**

TempTale® GEO, VizComm™ F4, VizComm™ F5, VizComm™ Prime, VizComm™ Prime Extended.

**Instruments of International Traffic**

Instruments of International Traffic (IIT) are articles that are used in the conveyance/transportation of goods from one point to another (country to country), suitable for repeated use (pallets, trailers). In alignment with the World Customs Organization (WCO) – Customs Convention on Containers (CCC) (1972), a ‘Container’ is an article for the transport of equipment and materials; A ‘Container’ shall include the ‘Accessories’ and equipment of the container, provided that such accessories and equipment are carried with the container itself; In countries where IITs are accepted, they become exempt from import, export and other regulatory procedures. Cargo tracking devices monitors which when installed or placed is used to collect, analyze and report data as to the temperature, condition and/or location of the container and its contents can be considered an accessory of ‘Container’. However, per Customs Convention on Containers, 1972, Ch. 1, Art. 1(c) “the term "container" shall include the accessories and equipment of the container, appropriate for the type concerned, provided that such accessories and equipment are carried with the container.

**Reason for Notification**

Sensitech has updated its information related to Instruments of International Traffic.

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## **Addendum to 62<sup>nd</sup> Edition (2021) of IATA Dangerous Goods Regulations Related to Lithium Batteries**

IATA had issued an addendum effective 23 February 2021 to the 62<sup>nd</sup> Edition (2021) of the IATA Dangerous Goods Regulations lithium battery dangerous goods marks. This addendum is lessening the IATA Dangerous Goods mark requirements for COVID pharmaceutical shipments, going beyond COVID-19 shipments. This only affects air transportation.

IATA had published an Addendum to the current 62<sup>nd</sup> Edition of the IATA Dangerous Goods Regulations that may have an effect on companies who manufacture and transport COVID-19 vaccines, relaxing lithium dangerous goods labeling requirements. The Addendum changes became effective on 23 February 2021. See Section 4.4 Special Provisions of the IATA Dangerous Goods Regulations, which has added SP A220 to UN 3091, PI 970, and UN 3481, PI 967.

### **Published 1 January 2021**

- A220 Packages containing COVID-19 vaccines accompanied by data loggers and/or cargo tracking devices containing lithium batteries are not subject to the marking and documentation requirements of Section II of Packing Instruction 967 or 970, as applicable.

### **Amendment Effective on 23 February 2021**

- Packages containing COVID-19 pharmaceuticals accompanied by data loggers and/or cargo tracking devices containing lithium batteries are not subject to the marking and documentation requirements of Section II of Packing Instruction 967 or 970, as applicable. This same package configuration, when consigned without the COVID-19 pharmaceutical for the purposes of use or re-use, is also not subject to the marking and documentation requirements of Section II of Packing Instruction 967 or 970, provided prior arrangements have been made with the operator.

The Sensitech Inc. products identified above can be shipped via **air, ground, and vessel** in accordance with UN 3481, PI 967, Section II – Lithium Ion Batteries Contained in Equipment, IMDG – Special Provision 188 and U.S. DOT 49 CFR Part 171-180.

All Sensitech products comply with the current documented requirements as follows:

- DOT – Lithium Battery - Hazardous Material Regulations (HMR; 49 CFR Parts 171-180)
- IATA – Current IATA Dangerous Goods Regulations
- IMDG –International Maritime Dangerous Goods Regulations

Sensitech does not recommend using the above devices, except the TempTale GEO Ultra and the VizComm View Ultra, in an operating format for tracking air transport shipments unless the cell signal on the device has been turned off prior to loading on the aircraft. Please see CSB 99 for more regulatory information for these devices <https://www.sensitech.com/en/support/iata-regulatory-bulletins/> . Sensitech recommends using the TempTale GEO Ultra / VizComm View Ultra for air shipments that are Sensitech “airline approved.” If the above devices (except for the TempTale GEO Ultra / VizComm View Ultra) are being shipped via air, they must be shipped in a non-operating mode. Bulk shipments of used devices being consolidated and returned to Sensitech and FreightWatch International for recycling must be in a non-operating mode prior to shipment.

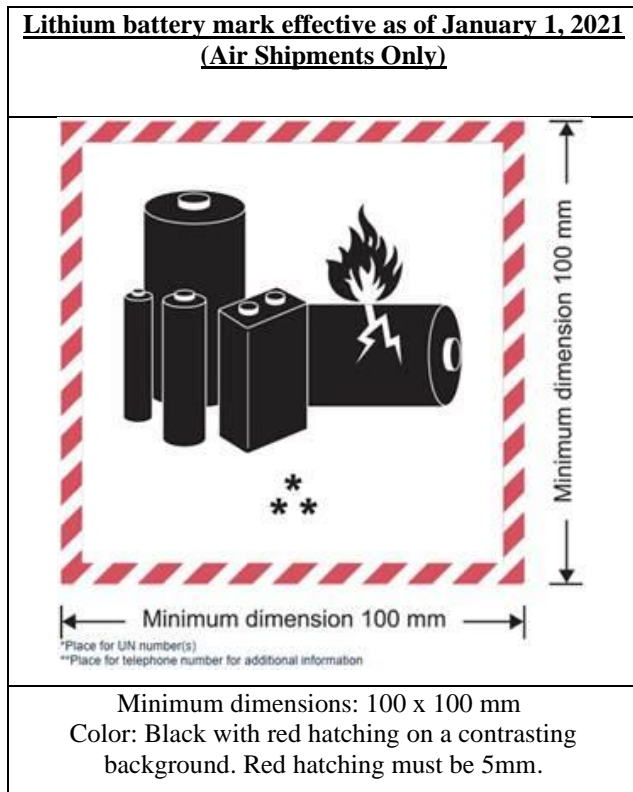
NOTE: Sensitech has performed all necessary testing and can provide documentation supporting our compliance at your request.

### **Requirements for Packages Containing Lithium Ion Batteries**

- Lithium-ion batteries (sometimes abbreviated Li-ion batteries) are defined as a secondary (rechargeable) battery where the lithium is only present in an ionic form in the electrolyte. Also included within the category of lithium-ion batteries are lithium polymer batteries. (IATA, Lithium Battery Guidance Document, Revised 15 December 2016).
- PI 967 (Lithium Ion Batteries Contained in Equipment) Additional Requirements Section II: Applicable air shipments require a mark. NOTE: see below Product Breakdown for Sensitech specific products that may require a label depending on the number of devices per package for consignments (e.g., with two packages or less or for consignments that contain three or more packages). Air label examples are also shown below.
  - Labeled shipments must contain the words “**Lithium ion batteries in compliance with Section II of PI 967**” included on the air waybill, when an air waybill is used. The information should be shown in the “Nature and Quantity of Goods” box of the air waybill. The package must be of such size that there is adequate space to affix the “Mark” on one side of the package without the “Mark” being folded.
- \*\* An IATA Shipper's Declaration for Dangerous Goods \*\* is not required.

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- Special procedures must be followed in the event the package is damaged, that should include inspection and repacking if necessary.
  - No transportation via air services allows for damaged packages or contents.



### **Covid-19 Addendum**



IATA has recently published an ‘addendum’ to the 62<sup>nd</sup> Edition of the IATA Dangerous Goods Regulations that may have an effect on companies who manufacture and transport COVID-19 vaccines. These changes became effective on the 1 January 2021. Section 4.4 Special Provisions of the IATA Dangerous Goods Regulations has added SP A220 to UN3481, PI 967, Section II and UN 3091, PI 970, Section II. To summarize aspects of the addendum that pertain to this customer service bulletin regarding UN 3481, PI 967 Section II:





- **Special Provision: A220** Packages containing COVID-19 vaccines accompanied by dataloggers and/or cargo tracking devices containing lithium batteries are not subject to the marking and documentation requirements of Section II of Packing Instruction 967 or 970, as applicable.
  - This pertains to the following:
    - This is only related to air shipments of COVID-19 vaccines.
    - This applies to both UN 3481 (Lithium Ion Batteries CONTAINED in Equipment) and UN 3091 (Lithium Metal Batteries CONTAINED in Equipment).
    - This applies to ALL Sensitech type monitors regardless of the type of battery (coin cell, cylindrical cell, lithium ION, etc.)
    - Consignments containing monitors where there was a specified limit to the number of devices per package / per consignment that required IATA Lithium Battery Dangerous Goods labeling or a (mark) plus a statement on the Air





Waybill, is no longer required so long as the shipment(s) contains COVID-19 vaccines.

- Please see the Product Breakdown table with for **Covid-19 Vaccine shipments = No Label Required** for specific devices this new relaxed IATA Lithium Battery Dangerous Goods mark or label for air shipments only.



**Product Breakdown**

Sensitech Device	Maximum Number of Devices per Package without IATA Labeling Requirements:	Battery Watt Hour Rating Watt Hours (Wh)	Comments Consignment Level Specifications	IATA (Air) Labeling Requirement(s)
<p>Consignment: Is the equivalent to the term “shipment”, means one or more pieces of goods accepted by the airline from one shipper at one time and to one address, receipted for in one lot, and moving on one air waybill or one shipment record to one consignee at one destination address.</p> <ul style="list-style-type: none"> <li>• (1) Shipper &amp; (1) shipment/consignment to (1) airlines to (1) consignee</li> </ul>				
<p><b>NOTE: Each individual Sensitech device noted below contains Lithium Ion Batteries.</b></p>				
<p><b>TempTale® GEO</b></p> 	<p>2 devices or less per package = No Label Required</p> <p>More than 2 devices per package requires labeling</p> <p><b>COVID-19 Pharmaceutical I shipments = No Label Required</b></p>	<p>Single Battery 9.6 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 2 devices <b>= No Label Required</b></p> <ul style="list-style-type: none"> <li>• Consignments with more than two packages where each package contains at least one TempTale GEO device = Label Required</li> <li>• See: PI 967, Section II (additional requirements)</li> </ul> <p><b>COVID-19 Pharmaceutical shipments = No Label Required</b></p>	<p>≤ 2 Devices = No Label Required</p> <p>&gt; 2 Devices = Label Required</p> 

<p><b>TempTale® GEO (60 Day Model)</b></p> 	<p>2 devices or less per package = No Label Required</p> <p>More than 2 devices per package requires labeling</p> <p><b>COVID-19 Pharmaceutical shipments = No Label Required</b></p>	<p>Dual Battery 19.24 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 2 devices = <b>No Label Required</b></p> <ul style="list-style-type: none"> <li>• Consignments with more than two packages where each package contains at least one TempTale GEO (60 Day Monitor) = Label Required</li> <li>• See: PI 967, Section II (additional requirements)</li> </ul> <p><b>COVID-19 Pharmaceutical shipments = No Label Required</b></p>	<p>≤ 2 Devices = No Label Required</p> <p>&gt; 2 Devices = Label Required</p> 
<p><b>VizComm™ F4</b></p> 	<p>2 devices or less per package = No Label Required</p> <p>More than 2 devices per package requires labeling</p>	<p>14.8 Wh 37 Wh 74 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 2 devices = <b>No Label Required</b></p> <ul style="list-style-type: none"> <li>• Consignments with more than two packages where each package contains at least one VizComm F4 = Label Required</li> <li>• SEE: PI967, Section II (additional requirements)</li> </ul>	<p>≤ 2 Devices = No Label Required</p> <p>&gt; 2 Devices = Label Required</p> 

<p><b>VizComm™ F5</b></p> 	<p>2 devices or less per package = No Label Required</p> <p>More than 2 devices per package requires labeling</p>	<p>14.8 Wh 37 Wh 74 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 2 devices = <b>No Label Required</b></p> <ul style="list-style-type: none"> <li>• Consignments with more than two packages where each package contains at least one VizComm F5 = Label Required</li> <li>• See: PI 967, Section II (additional requirements)</li> </ul>	<p>≤ 2 Devices = No Label Required</p> <p>&gt; 2 Devices = Label required</p> 
<p><b>VizComm™ Prime</b></p> 	<p>2 devices or less per package = No Label Required</p> <p>More than 2 devices per package requires labeling</p>	<p>Single Battery 38.48 Wh.</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 2 devices = <b>No Label Required</b></p> <ul style="list-style-type: none"> <li>• Consignments with more than two packages where each package contains at least one VizComm Prime = Label Required</li> <li>• See: PI967, Section II (additional requirements)</li> </ul>	<p>≤ 2 Device = No Label Required</p> <p>&gt; 2 Device = Label Required</p> 



<p><b>VizComm™ Prime Extended</b></p> 	<p>1 device or less per package = No Label Required</p> <p>More than 1 device per package requires labeling</p>	<p>Single Battery</p> <p>79.96 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 2 devices = <b>No Label Required</b></p> <ul style="list-style-type: none"> <li>• Consignments with more than two packages where each package contains at least one VizComm Prime Extended device = Label Required</li> <li>• See: PI 967, Section II (additional requirements)</li> </ul>	<p>≤ 1 Device = No Label Required &gt; 1 Device = Label Required</p> 
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**IMPORTANT MESSAGE:**

- The presence of the Lithium Battery Handling Mark on the package(s) triggers the requirement for the following statement to be included on the Air Waybill “Lithium Ion Batteries in compliance with Section II of PI 967”
- For vessel (ocean) shipments, all devices that require labeling above based on current IATA DG Regulations, also require the old 120 mm x 110mm lithium mark lithium Mark UN 3481 when the consignment contains more than two packages per IMDG Special Provision 188.1. (Example: A consignment containing the TempTale® GEO units would require the UN3481 Mark if the consignment contained 3 or more packages with this device. In other words, the labeling requirements outlined in IMDG Special Provision 188.1 regulations mirror current IATA DG Regulations.)
- For ground shipments, all devices that require labeling above based on current IATA DG Regulations, also require the old 120 mm x 110mm lithium mark lithium Mark UN 3481 when the consignment contains more than two packages for W. Europe per ADR Special Provision 188(a) and 188(f)(i); for the United States per 49CFR§173.185(c.); and for Canada per TDG Special Provision 34(1) labeling follows current IATA DG for the number of devices per Package without IATA labeling requirements: (However – for Canada TDG the consignment-level specification does not apply).

**Reference: IATA, Dangerous Goods Regulations, Packing Instruction 967 Section II (Additional Requirements)**

*Note: Supporting documentation available upon request are Material Safety Datasheets (MSDS) and UN 38.3 compliance from the specific battery manufacturers. Additionally, we can provide upon request, compliance certifications relative to drop and vibration testing, CE testing, IP Code Testing, and RTCA/DO160 G testing.*

**Customer Support**

If you have any questions about this information, please contact your local Client Services Representative at one of our Regional Headquarters listed below.

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