



Product Notification:

CSB #106 17December2019

To: Sensitech Inc. Customers and Distributors
From: Client Services
Date: 17 December 2019
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

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

TempTale® GEO, VizComm™ F4, VizComm™ F5, VizComm™ VizComm™ Prime, VizComm™ Prime Extended, Sentry 500 Air Cargo Tracker, ILC2000 FlightSmart® Air Cargo Tracker

Reason for Notification

This update provides information that is effective in 2020 from IATA related to Dangerous Goods for Lithium Metal Cells and Batteries. The only significant update from IATA for 2019 related to Dangerous Goods Lithium Metal Cell and Battery regulations is the Lithium Battery Test Summary: effective 1 January 2020, manufacturers and subsequent distributors of cells or batteries and equipment powered by cells and batteries manufactured after 30 June 2003 must make available the **test summary** as specified in the UN Manual of Tests and Criteria, Revision and amend. 1, Part III, sub-section 38.3, paragraph 38.3.5.

Note: The requirement is for the manufacturer and subsequent distributors to make this test summary available. There are numerous ways this can be achieved, such as by listing the applicable summary document on the company website. There is no expectation for the shipper/distributor to provide paper copies with each consignment containing lithium batteries. The supply chain partners are encouraged to make use of technology to facilitate the availability of these test summary reports.

See the 2019 IATA Battery Test Summary as specified in the UN Manual of Tests and Criteria 38.3.5, effective 1 January 2020, in this link.

<https://www.iata.org/whatwedo/cargo/dgr/Documents/lithium-battery-shipping-guidelines.pdf>

Sensitech will have available upon request the specific Lithium Battery Test Summary report with a turnaround of 48 hours.

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 38-16

Sensitech does not recommend using the above data loggers, except the Sentry 500 and ILC 2000, 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. Sensitech recommends using the Sentry 500 and the ILC 2000 for air shipments that are Sensitech “airline approved.” If the above devices (except for the Sentry 500 and ILC 2000) 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.

Lithium battery mark effective since January 1, 2017







Minimum dimensions: 120 x 110 mm
 Color: Black with red hatching on a contrasting background
 Red hatching must be 5mm





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"> • (1) Shipper & (1) shipment/consignment to (1) airlines to (1) consignee 				
<p>NOTE: Each individual Sensitech device noted below contains Lithium Ion Batteries.</p>				





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<p>TempTale® GEO</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 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 = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one TempTale GEO device = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 2 Devices = No Label Required</p> <p>> 2 Devices = Label Required</p> 
<p>TempTale® GEO (60 Day Model)</p> 	<p>2 devices or less per package = No Label Required</p> <p>More than 2 devices per package requires labeling</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 = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one TempTale GEO (60 Day Monitor) = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 2 Devices = No Label Required</p> <p>> 2 Devices = Label Required</p> 





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<p>VizComm™ F4</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 = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one VizComm F4 = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 2 Devices = No Label Required</p> <p>> 2 Devices = Label Required</p> 
<p>VizComm™ F5</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 = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one VizComm F5 = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 2 Devices = No Label Required</p> <p>> 2 Devices = Label required</p> 



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<p>VizComm™ Prime</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</p> <p>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 = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one VizComm Prime = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 2 Device = No Label Required</p> <p>> 2 Device = Label Required</p> 
<p>VizComm™ Prime Extended</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 = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one VizComm Prime Extended device = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 1 Device = No Label Required</p> <p>> 1 Device = Label Required</p> 

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<p>SENTRY 500 Air Cargo Tracker (Single Battery)</p> 	<p>5 devices or less per package - No Label Required</p> <p>More than 5 devices per package requires labeling</p>	<p>Lithium-ion Rechargeable Battery (internal)</p> <p>19.3 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 4 devices = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one Sentry 500 = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 5 Devices = No Label Required</p> <p>> 5 Devices = Label Required</p>  <p>UN 3481 For more information, call XXX.XXX.XXXX</p>
<p>SENTRY 500 Air Cargo Tracker (includes with Extended Battery)</p> 	<p>2 devices or less per package - No Label Required</p> <p>More than 2 devices per package requires labeling</p>	<p>Lithium-ion Rechargeable Battery (internal)</p> <p>38.6 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 4 devices = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one Sentry 500 = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 2 Devices = No Label Required</p> <p>> 2 Devices = Label Required</p>  <p>UN 3481 For more information, call XXX.XXX.XXXX</p>

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<p>ILC2000 FlightSmart® Air Cargo Tracker</p> 	<p>4 devices or less per package = No Label Required</p> <p>More than 4 devices per package requires labeling</p>	<p>Lithium-ion Rechargeable Battery (internal)</p> <p>6.96 Wh</p>	<p>Labeling requirements do not apply to consignments of 2 packages or less where each package contains no more than 4 devices = No Label Required</p> <ul style="list-style-type: none"> • Consignments with more than two packages where each package contains at least one ILC2000 FlightSmart Air Cargo Tracker = Label Required • SEE: PI967, Section II (additional requirements) 	<p>≤ 4 Devices = No Label Required</p> <p>> 4 Devices = 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 same 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 same 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.

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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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