

Transport Classification Statement – Non-Spillable VRLA Batteries

UN Model Regulations Special Provision 238 · IMDG Code · IATA DGR Special Provision A67 · ADR/RID Special Provisions 238 and 598 · 49 CFR § 173.159a

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1 Products covered

ATB valve-regulated lead-acid (VRLA) batteries, AGM and GEL ranges: the AGM ranges GP, DC, FT, HR, LC, 2V and SSL and the GEL ranges 2VG and DCG, as identified by the model designation, production date code and ATB Power name marked on each battery.

RANGE	CONSTRUCTION / DUTY	NOMINAL VOLTAGE	MODEL DESIGNATIONS	BATTERY CATEGORY
GP	AGM, general purpose standby	6 V, 12 V	GP6-1.3 to GP6-12; GP12-1.3 to GP12-260	Industrial
DC	AGM, deep cycle	6 V, 8 V, 12 V	DC6-220 to DC6-400; DC8-180, DC8-200; DC12-24 to DC12-260	Industrial
FT	AGM, front terminal	12 V	FT12-55 to FT12-200	Industrial
HR	AGM, high rate	12 V	HR12-37 to HR12-520	Industrial
LC	AGM, lead-carbon long-life cyclic	6 V, 12 V	LC6-300, LC6-400; LC12-12 to LC12-230	Industrial
2V	AGM, 2 V long-life cells	2 V	2V-100 to 2V-3000	Industrial
SSL	AGM, start-stop automotive	12 V	SSL1 to SSL6	SLI
2VG	GEL, 2 V cells	2 V	2VG-200 to 2VG-3000	Industrial
DCG	GEL, deep cycle	12 V	DCG12-24 to DCG12-240; DCG12-200T	Industrial

In every range the electrolyte is immobilised – absorbed in glass-mat separators (AGM) or set as a gel (GEL) – so that there is no free liquid in the battery.

2 Classification

UN number / proper shipping name	UN 2800, BATTERIES, WET, NON-SPILLABLE, electric storage , Class 8
Applicable special provisions	UN Model Regulations (ST/SG/AC.10/1/Rev.22), Chapter 3.3, Special Provision 238; IMDG Code SP 238; ADR/RID SP 238 and SP 598; IATA DGR Special Provision A67 (Packing Instruction 872 where regulated); US 49 CFR § 173.159a
Status	Not subject to the dangerous goods regulations when the conditions in Section 4 are met. The batteries pass the vibration and pressure-differential tests of SP 238(a) and satisfy the SP 238(b) criteria: no electrolyte escapes from a ruptured or cracked case at 55 °C, the battery holds no free liquid, and the terminals are protected against short circuit in the transport packaging.

3 Basis of the classification

EVIDENCE	SCOPE	RESULT	TECHNICAL FILE REF.
SP 238 test report: vibration test, pressure-differential test and leakage test at 55 °C, to UN Model Regulations ST/SG/AC.10/1/Rev.22, 3.3, SP 238	Representative AGM model (12 V 7 Ah)	Passed – no leakage of electrolyte, no free liquid at 55 °C	TF-VRLA-04

EVIDENCE	SCOPE	RESULT	TECHNICAL FILE REF.
Hazard classification and identification report for transport by sea – IMDG Code, 2024 edition	Representative AGM model	Not subject to the IMDG Code according to Special Provision 238	TF-VRLA-05
Hazard classification and identification report for transport by air – IATA DGR, 67th edition	Representative AGM model	Not subject to the IATA DGR according to Special Provision A67	TF-VRLA-05
Hazard classification and identification report for transport by road	Representative AGM model	Not subject to road dangerous goods regulations according to Special Provision 238	TF-VRLA-05

All ranges share the valve-regulated, immobilised-electrolyte construction, sealing system and one-way pressure-relief valves of the tested representative model; ranges differ in plate design, case size and capacity. The technical file records the basis on which the test results are extended across the ranges (TF-VRLA-01, TF-VRLA-11); additional representative tests are added to the file as the ranges are extended.

4 Conditions of shipment (shipper's confirmation)

- Batteries are shipped upright, fully charged, in their original packaging, with terminals protected against short circuit (insulating caps or separation) and secured against slipping, falling or damage.
- The battery and its outer packaging are marked **"NON-SPILLABLE"** or **"NON-SPILLABLE BATTERY"**.
- For air consignments the air waybill carries the statement "Not restricted, as per Special Provision A67".
- The outside of the batteries is free of acid residue; batteries are not packed in sealed enclosures.
- Damaged, leaking or cracked batteries fall outside this statement and travel as fully regulated Class 8 goods.

5 Standing of this document

This statement is issued by **ATB Power Limited** as the manufacturer of the products it covers, from the records in its technical file: type tests and material screening on representative models, the production site's material declarations, the label specifications and ATB Power's own evaluations. Transport regulations change with each edition; the shipper and the carrier apply the edition in force on the day of shipment. No laboratory or certification body has assessed the document itself, and it does not stand in for the reports behind it. It describes the products as built at the date printed above; ATB Power re-issues it when a design, a material, a production site, a legal requirement or a piece of evidence changes, and the version reachable through the QR code on the battery is the current one. Market surveillance authorities receive the underlying technical documentation on reasoned request (Article 38(10) of Regulation (EU) 2023/1542); customers who need extracts for their own compliance records can obtain them under a confidentiality agreement by writing to info@atbpower.com.

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