Used Lithium Batteries

Guidance on Safe Packaging and Transport by Road and Rail

June 2026

Acknowledgements

Used Lithium Batteries – Guidance on Safe Packaging and Transport by Road and Rail (the Guide) has been developed through collaboration with a broad range of independent stakeholders from across the lithium battery sector. It incorporates valuable input from battery recycling industry experts, researchers, government, and dangerous goods regulators. This includes contributions from the following organisations as well as other experts to the development of the Guide.

This Guide is open to use by all commercial organisations involved in the collection, packaging, and land transport of used lithium batteries for recycling, disposal, reuse, or repair.

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Disclaimer: This Guide has been developed by individuals with current knowledge and experience in lithium battery logistics, dangerous goods transport, and associated regulatory frameworks. However, it does not claim to address all safety, environmental, or compliance issues across all battery types, transport scenarios, or jurisdictions.

The information provided is for general guidance only and does not override any legislative obligations or duties of individuals or organisations involved in the used lithium battery supply chain. Users of this Guide are responsible for obtaining their own legal, professional, and safety advice to ensure compliance with all applicable legal and commercial responsibilities.

To the extent permitted by law, the authors disclaim all liability (including liability in negligence) for any loss, damage, cost, or expense incurred due to reliance on this Guide or from any failure to meet legal, contractual, or regulatory obligations.

This information is current as at June 2026. This document has drawn together information available at this date and is designed to provide an accessible starting point. Users should be aware that this is a rapidly evolving area of practice, and requirements may change as OEMs, recyclers, and regulatory frameworks update to support continuous improvement and industry learnings.

Supporting Safe and Sustainable Used Lithium Battery Transport

This Guide is an industry-led initiative designed to support the safe, compliant, and sustainable transport of used lithium batteries across Australian road and rail networks. It provides foundational guidance on the regulatory requirements, packaging obligations, documentation procedures, and safety practices that apply across all eight Australian jurisdictions.

Developed in collaboration with an expert advisory panel, the Guide benefits from the input of professionals with deep knowledge of battery logistics, dangerous goods regulation, and practical operational experience.

Like any document in a developing area, this initial edition will need to be reviewed and updated as the regulatory environment evolves, as industry practice matures, and as new battery technologies and logistics models emerge.

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Section 1 Target Audience

This Guide is written for commercial organisations proactively involved in the collection, packaging, and land transport of used lithium batteries for recycling, disposal, reuse, or repair. It is not written for residential consumers. This Guide is not intended to apply to batteries incorrectly or inappropriately disposed of in another wastestream.

The principal audience segments and their primary responsibilities are as follows:

- **Collection point operators:** battery triage, initial packaging, and labelling.
- **Logistics coordinators and dispatchers:** dangerous goods documentation, waste tracking, and carrier engagement.
- **Transport operators and drivers:** vehicle requirements, placarding, load restraint, and emergency response.
- **Consolidation hub operators:** storage obligations, WHS thresholds, and intermodal handover.
- **Compliance managers:** legal compliance across all regulatory layers.

Section 2 Scope and General

This Guide has been developed to support the safe, consistent, and legally compliant packaging and land transport of used lithium batteries across Australian road and rail networks.

Note: Battery Chemistry Scope
This Guide covers lithium-ion rechargeable batteries (UN 3480 and UN 3481) and lithium-metal batteries (UN 3090 and UN 3091). Sodium-ion batteries (UN 3551/3552) and all other chemistries are outside the scope.

Throughout this Guide, Australian Dangerous Goods (ADG) Code requirements are presented as mandatory obligations. Where the Guide recommends practices above the ADG Code minimum, advisory language is used.

2.1 Scope

- **UN 3480** – Lithium Ion Batteries, standalone.
- **UN 3481** – Lithium Ion Batteries Contained in Equipment or Packed with Equipment.
- **UN 3090** – Lithium Metal Batteries, standalone.
- **UN 3091** – Lithium Metal Batteries Contained in Equipment or Packed with Equipment.

2.1.1 Size and Form Factor Scope

Size Category	Wh Threshold	ADG Code Pathway	Common Examples
Small (SP188)	Cell: ≤20 Wh; Pack: ≤100 Wh. For lithium metal: cell lithium content <1 g; battery lithium content <2 g.	Reduced DG requirements. Strong outer packaging up to 30 kg. Lithium battery mark required.	Button cells, smartphone batteries, and small portable chargers
Medium (UN-certified)	Cell: >20 Wh; Pack: >100 Wh	UN-certified packaging to PG II for disposal/ recycling under SP377.	Laptop batteries; cordless power tool packs; e-bike packs (250 to 700 Wh)

Size Category	Wh Threshold	ADG Code Pathway	Common Examples
Large (12 kg exception)	≥12 kg net mass; impact-resistant casing	May rely on equipment casing, or use strong outer packaging without UN specification. Refer P909.	Large e-bike packs; household energy storage modules; commercial BESS modules
Very Large	10 to 100 kWh +; 100 to 600+ kg	May rely on equipment casing or use strong outer packaging without UN specification. Refer P909.	EV traction packs; commercial energy storage modules

Note: The Competent Authorities Panel (CAP) is a separate process for seeking a variance from, or an interpretation of, the ADG Code. It applies regardless of battery size or mass and is not tied to any of the size categories above (see Section 16).

Supplementary guidance specifically addressing very large format systems may be produced separately if stakeholder needs require it.

Very large systems, such as battery energy storage systems with a mass of 1 tonne or more, may require engagement with the competent authority and specialist transport arrangements that are beyond the scope of this Guide (refer to CAP decision CA2025-137).

These systems typically operate at high voltage (800V to 1400V), require specialist electrical qualification for decommissioning, and are managed under separate regulatory and operational frameworks.

This Guide covers all lithium battery sizes, from small consumer cells through to electric vehicle traction packs and commercial energy storage system modules. There is no upper size limit.

2.1.2 Purpose and End Destination

The table below sets out the different pathways a used lithium battery may follow depending on its intended destination. Batteries intended for reuse or repair are treated as a standard DG consignment under the ADG Code, meaning they follow the same rules as any other Class 9 shipment. Batteries intended for recycling or disposal are subject to additional packing requirements under Special Provisions 377 and 376, which specify the use of P909 and P908, respectively. The ‘Standard DG rules apply’ column indicates that no additional special provisions beyond the base ADG Code requirements are triggered for that pathway.

Purpose	ADG Code Pathway	Waste Tracking	Guide Consideration
Reuse / second life	Standard DG rules. SP377/P909 do not apply.	Not waste. Waste tracking generally does not apply.	Standard DG rules apply. This Guide does not define waste. Check waste requirements in both origin and destination jurisdictions.
Repair	Standard DG rules. SP377 does not apply.	Not waste.	Warranty returns, fleet maintenance.

Purpose	ADG Code Pathway	Waste Tracking	Guide Consideration
Recycling	SP377 and P909. Damaged batteries still require SP376/P908.	Waste. Each state and territory has different intra and interstate waste tracking requirements. There may also be other requirements, such as only sending to authorised locations.	Primary scope of most logistics programmes.
Disposal	SP377 and P909.	Waste. Landfill bans in VIC and WA.	Landfill is not a default destination.
Disaster/accident recovery	Likely P908 or P911. May require CAP approval.	Potentially controlled waste.	Assess battery condition, then determine route.

This Guide applies the ADG Code framework for transport classification and packaging. The ADG Code does not define waste. The ADG Code cannot be used to satisfy waste obligations under other regulations. It addresses batteries that are intended for disposal or recycling (SP377/P909) and batteries that are damaged or defective (SP376/P908). These classifications determine the packaging and documentation requirements regardless of the battery's end-use destination.

For waste tracking obligations, users must confirm the requirements that apply in each jurisdiction along the transport route. Depending on where the batteries are located, where they are being sent, and whether they are intended for disposal or recycling, state and territory EPA waste-tracking requirements may be triggered. Users should confirm with the relevant EPA in both the origin and destination jurisdictions before transport commences. The NEPM applies to interstate movements of controlled waste (see Section 14).

Note: A battery shipped for repair or reuse that is subsequently found to be unrepairable does not retroactively change its DG classification for the transport leg already completed. However, the onward movement of that battery (now intended for recycling or disposal) will be subject to SP377/P909 and the applicable waste tracking framework.

2.2 Application

This Guide applies to the commercial land transport of used lithium batteries by road or rail within and between Australian states and territories.

Air transport is explicitly outside the scope of this Guide. Used lithium batteries of any condition classification (conforming, damaged or defective, or dangerously damaged) require specialist air transport training and acceptance processes before they can be carried by air.

If there is any possibility that the consignment may be transported by air at any point in the logistics chain, including at a depot, the consignor must ensure compliance with the ICAO Technical Instructions and the IATA Dangerous Goods Regulations.

This Guide does not provide guidance on air transport.

Note: Tasmania and the Maritime Interface
Any Tasmania/mainland consignment involves a Bass Strait sea crossing governed by the IMDG Code under AMSA Marine Order 41. This Guide does not address maritime transport. Users should obtain separate advice on the IMDG Code.

Section 3 Regulatory Framework Overview

The rules governing the packaging, storage, and transport of used lithium batteries span multiple regulatory frameworks. These can appear complex and overlapping. This section provides a summary of each framework and how they interact.

3.1 The Four Regulatory Layers

1. **Dangerous Goods Transport Law** – The ADG Code, implemented through state and territory DG transport regulations, governs classification, packaging, consignment procedures (labelling, marking, placarding), stowage/restraint, transport documentation, and safety equipment for vehicles.
2. **Work Health and Safety** – Protects workers and anyone who may come into contact with used lithium batteries, as well as the environment, from exposure to toxic chemicals, especially in fire scenarios. Safe Work Australia provides tools for identifying, assessing, and controlling hazards.
3. **Environmental Protection and Waste Tracking** – State and territory environmental regulator frameworks for intrastate movements; the NEPM for interstate controlled waste. Each state and territory implements its own rules, which may vary. Provisions in your jurisdiction may include duties such as classification of waste, applying risk controls, depositing at authorised locations and other requirements. References in this Guide to an EPA should be read as references to the relevant environmental regulator in the applicable jurisdiction, noting that not every jurisdiction has a body titled “EPA”. For consignments being exported offshore, the Commonwealth Hazardous Waste (Regulation of Exports and Imports) Act 1989 also applies.
4. **Product Stewardship** – Schemes such as B-cycle, Mobile Muster, and National Television and Computer Recycling Scheme (NTCRS) may impose additional requirements beyond the regulatory minimum. These are beyond the scope of this Guide; users should check with scheme operators.

Hazardous Waste Export Permits

If used lithium batteries are being exported offshore for processing, a hazardous waste export permit is required under the Hazardous Waste (Regulation of Exports and Imports) Act 1989 (Cth). This applies regardless of the battery condition classification. Users intending to export should contact the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for current permit requirements and application processes.

3.2 Summary of Labelling, Placarding, and Waste Tracking Requirements

The following table provides a consolidated summary of the key marking, placarding, and tracking obligations that apply at different points in the logistics chain. It is a summary only and does not replace the detailed requirements of the ADG Code and the relevant state and territory regulations, which should be consulted directly and checked for updates. Vehicle-level dangerous goods requirements, such as placarding, apply where a load meets the placard load threshold (generally more than 1,000 kg or 1,000 L of dangerous goods).

WHS Labelling (Storage)	DG Transport Packaging	DG Vehicle Placarding	Waste Tracking
GHS labelling based on the product's SDS. If chemistry is unknown (e.g. mixed batteries), label with all potential hazard symbols as a precaution. GHS labelling is for workplace safety; it is not the same as transport labelling.	Class 9 lithium battery mark/label. Must include UN number (e.g. UN 3480). Mark as LITHIUM BATTERIES FOR DISPOSAL or FOR RECYCLING. DAMAGED/DEFECTIVE where applicable. Where a package contains batteries assigned to different UN numbers, all must be indicated.	Class 9 diamond on vehicle when the aggregate quantity of dangerous goods exceeds 1000 kg or 1000 L. Display on two sides. Emergency Information Panels are not required for lithium batteries.	Varies by jurisdiction. Only WA currently tracks lithium batteries explicitly under the controlled waste category E-120. Other jurisdictions are exploring changes. Operators must verify their obligations in each jurisdiction. There may also be other requirements in addition to waste tracking, such as only sending to authorised locations.

3.3 State and Territory Implementation

Each state and territory implements the ADG Code and associated updates separately through its own DG transport regulations. Businesses must comply with their state- or territory-specific acts and regulations alongside the ADG Code.

Note: Training Obligations
ADG Code Edition 7.9 shows Chapters 1.3 (Training) and 1.4 (Security) as Reserved, that is, not applicable. Whilst the ADG Code does not explicitly address training, training and licensing duties are regulated under each state and territory's DG transport regulations, which adopt the Model Subordinate Instrument.

Section 4 Terms and Definitions

The terms below are defined as they are used in this Guide. They are intended to assist readers and are not a substitute for the formal definitions in the ADG Code and other applicable legislation. Detailed placarding thresholds are addressed in Section 3.2 and are otherwise outside the scope of this Guide. Users transporting used lithium batteries are transporting dangerous goods and must adhere to the ADG Code and other applicable regulations; nothing in this Guide overrides those obligations.

Term	Definition
ADG Code	Australian Code for the Transport of Dangerous Goods by Road and Rail. Edition 7.9 mandatory from 1 October 2025.
CAP	Competent Authorities Panel. Mechanism for nationally consistent exemptions and determinations at variance to the ADG Code.

Term	Definition
Class 9A Label	The Class 9A label is a lithium battery-specific hazard label (a diamond with the battery group symbol and the number 9A). It is distinct from the generic Class 9 miscellaneous dangerous goods label. The Class 9A label is required on packages containing lithium batteries that exceed the SP188 thresholds (cells exceeding 20 Wh or batteries exceeding 100 Wh). The lithium battery mark (a rectangle with the battery group symbol) is required for smaller batteries under SP188 and has different triggers. The two markings serve different purposes and are not interchangeable.
Conforming Used Battery	No defects, damage, leakage, venting, or thermal event can be diagnosed before transport. Conforming used batteries destined for disposal or recycling are eligible for P909 under SP377.
Consignor	Person or organisation consigning DG for transport with primary responsibility for classification, packaging, marking, and documentation.
Damaged or Defective Battery	Has leaked, vented, sustained damage, cannot be diagnosed, or identified as defective. Does not conform to type tested per UN 38.3 (SP376). Requires P908/LP904. Recalled: Cells or batteries identified as being defective for safety reasons; AND/OR [has a] significant impact on the safety of the cell or battery
Dangerously Damaged Battery	Liable to rapidly disassemble, react dangerously, produce flame/heat, or emit toxic gases. Requires P911/LP906 and CAP approval.
Lithium Battery Mark	Package marking for small lithium batteries under SP188. Distinct from the Class 9A label. Transition deadline 31 December 2026.
NEPM	National Environmental Protection Measure for interstate controlled waste.
ONRSR	Office of the National Rail Safety Regulator.
P908/P909/P911	Packing instructions for damaged/defective (P908), disposal/recycling (P909), and dangerously damaged (P911) lithium batteries.
Recycling	Recycling includes the recovery and reprocessing of materials from used batteries. For the purposes of this Guide, recycling also covers the ‘re-’ processes, that is, reusing, repurposing, and remanufacturing batteries. A battery collected for reuse, repurposing, or remanufacturing is therefore treated in the same way as a battery collected for recycling. This is consistent with the meaning of recycling in the United Nations Glossary of Environmental Statistics.
SP376/SP377	Special Provisions for damaged/defective (376) and disposal/recycling (377) batteries. SP377 is exempt from section 2.9.4 (UN 38.3 testing).
UN 3480	Lithium Ion Batteries (standalone).
UN 3481	Lithium Ion Batteries Contained in or Packed with Equipment.
UN 3090	Lithium Metal Batteries (standalone). Primary (non-rechargeable) lithium batteries.
UN 3091	Lithium Metal Batteries Contained in or Packed with Equipment.

4.1 Mixed Batteries

When a consignment contains lithium-ion batteries alongside other chemistries, the presence of any lithium-ion battery subjects the entire consignment to lithium-battery DG requirements. Lead-acid batteries cannot be transported with lithium batteries. At community drop-off points for small consumer batteries (such as B-cycle collection points), lead-acid batteries are unlikely to be present. However, other non-lithium chemistries (such as nickel-cadmium, nickel-metal

hydride, and silver oxide button cells) may be mixed in. These chemistries do not present the same incompatibility risk as lead-acid.

Where batteries are collected at public or commercial drop-off points operating in accordance with an accredited scheme's inspection and safety protocols (such as the B-cycle Drop-off Point Code of Practice), and regular visual inspections confirm that no damaged or defective batteries are present, mixed battery consignments from those collection points may be considered undamaged for transport purposes, subject to applicable regulatory requirements. The consignment must still be assigned as lithium for classification and documentation purposes.

4.1.1 New Proposed Rules for Mixed Batteries (SP636)

The proposed new comprehensive ADG Code is expected to introduce Special Provision 636, which would improve the practical arrangements for packing and transporting loads of mixed batteries containing up to 250 kg of lithium cells and batteries. This applies only to smaller lithium batteries (cells ≤20 Wh, batteries ≤100 Wh, each with a gross mass ≤500 g) mixed with or without other non-lithium cells or batteries, not contained in equipment.

Key parameters of the proposed provision include: packing in accordance with P909 (note: additional requirements 1 and 2 of P909, which relate to individual inner packaging of each cell or battery and the separation of batteries from other dangerous goods, are not required under SP636); a quality assurance system to ensure that the total lithium battery content per transport unit (a transport unit is the vehicle or container used to transport the goods, including the entire load carried on a single vehicle) does not exceed 250 kg; and statistical assessment methods may be used. Formal commencement is expected in 2027, although it could occur in 2026.

4.2 Damaged and Defective Batteries

As an additional risk mitigation measure, operators of community battery drop-off points should communicate to the public that damaged batteries should not be placed into collection bins. Clear signage should advise consumers to notify staff or contact their local council or recycler for safe disposal of damaged batteries. This reduces the likelihood of damaged batteries entering the collection stream and minimises fire risk at collection points.

4.2.1 Identifying a Damaged or Defective Battery

Unless a suitably qualified person has undertaken a technical diagnosis that indicates otherwise, the following visual cues are considered practical indicators for identifying a damaged or defective battery under SP376.

The indicators are grouped into two tiers: dangerously damaged indicators, which require an immediate safety response, and damaged or defective indicators, which require the battery to be classified and packed under P908.

Where a more advanced technical diagnosis is available (for example, interrogation of the battery management system or electrical testing by qualified personnel), that diagnosis may be used to inform the classification decision. However, the person making that determination bears responsibility for the assessment, and, in the absence of a qualified diagnosis, the default position is to apply these visual indicators.

Users should also be aware that state and territory environmental regulators (e.g. EPA or government department) may have their own protocols or guidelines for identifying and managing damaged batteries; these may impose additional requirements beyond the transport obligations addressed in this Guide. Users should check the current published position of the relevant environmental regulators in their jurisdictions of operation.

Dangerously damaged indicators (immediate safety action required):

If any of the following indicators are actively occurring, the battery presents an **immediate safety risk**. The priority is to protect people.

Follow the emergency response procedures in Section 7.4.3:

- evacuate the area,
- call 000, and
- establish separation from the battery where it is safe to do so.

Do not handle the battery directly. Once the immediate risk is managed, the battery should be classified as dangerously damaged (P911) and must not be transported without competent authority approval.

a) Off-gassing or smoke from the battery or its casing.

b) Leaking fluid or electrolyte.

c) Unusual smell (chemical, acrid, or sweet odour).

d) Overheating (the battery is hot to the touch or rising in temperature).

e) Hissing sounds.

f) Rapid or active change in shape, such as a battery that is observed to be swelling or bulging in real time.

Damaged or defective indicators (classification for transport):

If any of the following indicators are present but the battery is not in an active emergency state, the battery must be classified as damaged or defective and packed under P908.

g) Casing that is opened, disassembled, deformed, swollen, discoloured, or showing burn marks or charring.

h) Visible crystallisation or white powder formation on terminals or casing.

i) Signs of water damage (water stains, corrosion) or fire damage (char marks, melted components).

j) Presence of cracks in the casing or corrosion on terminals.

Additional indicators for large-format batteries (EV traction packs and energy storage systems):

If any of the additional indicators (k) or (l) are present, the battery must be assessed for damage.

Where no further visual indicators of damage are identified, a battery diagnostic by a competent, trained technician may be used to determine the condition.

k) The battery has been removed from an energy storage system in a building damaged by fire or earthquake.

l) The battery has been dropped or subjected to significant mechanical impact.

If any of the additional indicators (k) or (l) are present, the battery must be assessed for damage. Where no further visual indicators of damage are identified, a battery diagnostic by a competent, trained technician may be used to determine the condition.

For automotive batteries, SAE (Society of Automotive Engineers) J2950_202006, *Recommended Practices for Shipping Transport and Handling of Automotive-Type Battery System – Lithium Ion*, provides a structured assessment process.

The level of impact from a collision is not, by itself, a determining factor; a battery may survive severe crash testing intact, or may be punctured by a minor kerb impact.

Recalled batteries:

Where a battery is subject to a manufacturer or distributor recall that has been identified as being defective for safety reasons, or where the recall has a significant impact on the safety of the cell or battery, the battery should be treated as damaged or defective for transport purposes.

Not all recalls require the battery to be treated as damaged. Users should check the specific recall notice to determine whether the safety of the cell or battery is affected. Recall has been included in the definitions table.

Collection point inspections:

Where batteries are collected at public or commercial drop-off points (such as those operated under the B-cycle Battery Stewardship Scheme), regular visual inspections of collection bins should be conducted in accordance with applicable scheme protocols, including the B-cycle Drop-off Point Code of Practice.

Section 5 Battery Condition Classification

5.1 Simplified Triage Flowchart

Step 1: External visual inspection

Inspect the battery for the following indicators:

- Off-gassing, smoke, unusual smell, leaking fluid, swelling, bulging, deformation, discolouration, burn marks, hissing, crystallisation or white powder, cracks, corrosion, water or fire damage.
- For large format batteries (EV/BESS): also assess whether the battery was removed from a vehicle involved in a collision, removed from an ESS in a building damaged by fire or earthquake, or subjected to significant mechanical impact.

If ANY indicator is present: classify as Damaged or Defective. Pack under P908.

If actively off-gassing, smoking, or heating: classify as Dangerously Damaged. Do not transport. Segregate immediately.

For lithium-ion batteries, submerge in water where safe to do so. Refer to Section 7.4.3 for detailed incident response procedures.

WARNING: Do NOT submerge lithium metal batteries in water. If the battery chemistry is unknown, do not submerge in water. **Lithium metal reacts violently with water.** For larger batteries with a higher risk profile, contact the competent authority (P911) and the fire authority. Where there is an immediate risk of fire involving any battery size, contact the fire authority (call 000).

If NO indicators are present: proceed to Step 2.

If the battery is suspected to be damaged or defective despite no visible indicator being present (e.g., based on history, provenance, or professional judgement), it should be treated as such and packed under P908.

Step 2: Provenance and history check

For large-format batteries, has the person who disconnected the battery provided written confirmation that it is safe for transport?

If NO confirmation is available: treat as Damaged or Defective (P908).

If YES: proceed to Step 3.

For small-format consumer batteries: if visual inspection in Step 1 reveals no indicators, proceed to Step 3.

Step 3: Conforming classification

If no visual indicators of damage, no adverse history, and the battery can be confirmed as conforming, classify as Conforming Used.

Pack under P909 (recycling/disposal) or standard DG rules (reuse/repair).

State of Charge (SoC) note:

Where a qualified person has access to appropriate equipment, a SoC reading may be taken. It is sensible to reduce the SoC before transport, where safe and practicable. The appropriate level will depend on the battery type, chemistry, and OEM recommendations.

Unqualified persons should not attempt to discharge batteries. Where SoC is unknown, assume 100% State of Charge (fully charged).

The ADG Code establishes a three-tier classification of conditions. The tier determines the packing instruction, markings, documentation, and whether competent authority approval is needed. These pathways are not interchangeable.

Condition Tier	ADG Code Trigger	Packing Instruction	Key Consideration
Conforming Used	No defects, damage, leakage, venting, or thermal event. It can be diagnosed before transport.	P909 or LP905 under SP377	Most cost-effective pathway. Available for recycling/disposal.
Damaged or Defective	Has leaked, vented, sustained damage, cannot be diagnosed, or identified as defective (SP376).	P908 or LP904 under SP376	Individual inner packaging, leak-proof containment, thermal insulation. Substantially higher freight cost.
Dangerously Damaged	Liable to rapidly disassemble, react, flame, heat, or emit toxic gases.	P911 or LP906	CAP conditions are mandatory.

5.2 State of Charge Guidance

The ADG Code does not require a specific State of Charge (SoC) for the land transport of used lithium batteries. SoC management is not a dangerous goods requirement.

However, a lower SoC reduces the energy available for a thermal runaway event and is a sensible risk-reduction measure when it can be achieved safely. Where a qualified person has access to appropriate equipment, reducing the SoC before transport is a sensible risk reduction measure. The appropriate target level will depend on the battery type, chemistry, and any applicable OEM recommendations. Users should follow manufacturer guidance where available.

Unqualified persons should not attempt to discharge batteries. Incorrect discharge procedures can damage the battery, cause instability, or create a safety hazard. Discharge should only be performed by trained personnel using equipment appropriate to the battery type and chemistry.

Batteries should not be discharged to 0% SoC, as over-discharge can cause irreversible damage and instability in some lithium chemistries.

When the SoC is unknown, the battery should be assumed fully charged and handled accordingly.

This guidance is particularly relevant for large-format batteries, including household and commercial energy storage modules and electric vehicle traction packs, where the energy content is substantial. For commingled small-format consumer batteries at collection points, individual SoC management is generally not practicable.

The treatment of State of Charge for the land transport of used lithium batteries is an area of ongoing development, including at the UN level. The State of Charge thresholds that apply to air transport are set for a different risk environment and are not directly transferable to land transport. Users should monitor for changes to the ADG Code and underlying UN provisions.

Note: Undiagnosed Batteries Default to P908
Under SP376, a battery that cannot be diagnosed before transport must be treated as damaged or defective and packed in accordance with P908. This is a mandatory ADG Code requirement.

Section 6 UN 38.3 Testing Requirements

The following summarises the UN 38.3 testing position for each category of used lithium battery addressed by this Guide. The testing requirement applies differently depending on the battery's condition classification and intended destination.

- **Batteries for disposal or recycling (SP377)**: (note this includes batteries for reuse or repurposing, per the definitions in Section 4) Exempt from section 2.9.4. UN 38.3 test summary not required.
- **Damaged or defective batteries (SP376)**: Do not meet UN 38.3 by definition. P908 packaging applies.

For small mixed battery consignments at collection points, SP636 (when commenced) will provide a pathway for transporting lithium batteries mixed with other chemistries under simplified requirements, subject to the quality management and quantity limits set out in Section 4.1.1.

Section 7 First Steps: Early Preparation and Safety

This section outlines recommended actions for collecting used lithium batteries to ensure smooth, safe transport. Use it to start mapping business processes and compliance checks.

Packing and transport requirements will vary depending on the receiving recycler, potential changes in government rules, and the volume and size of the lithium batteries.

7.1 Engage Your Transport Chain

Talk to the company receiving the batteries and your transport company to check:

- Any specific packaging requirements
- Advice on the latest rules and current requirements
- Required approvals to transport
- That they have the required environmental licences or permissions

7.2 Battery Preparation

Protect from short circuits. Batteries with exposed terminals should have the terminals taped to prevent fire risk from terminals touching and sparking.

Remove damaged and/or defective batteries. These present a higher risk and are subject to more stringent packing requirements (P908).

Remove contaminants. Only batteries or products containing batteries should be packed.

Remove non-lithium batteries. All batteries except alkaline, which are not lithium, should be removed. Lithium batteries often include the words 'Lithium' or 'Lithium-ion'. Lead-acid batteries (Pb symbol) cannot be transported with lithium batteries. If the chemistry is not clear, the battery should be removed. This does not apply to small mixed loads per Section 4.1.

7.3 Prepare Documentation

Two types of documentation may be required: dangerous goods transport documentation under the ADG Code, and waste tracking documentation under state and territory EPA frameworks. These are addressed in detail in Sections 9 and 13.

7.4 Safety Throughout the Logistics Process

7.4.1 Safe Handling and Transport

Appropriate PPE should be worn when handling used lithium batteries, including chemically resistant gloves and eye protection. Where a Safety Data Sheet or equivalent product information is available, follow the PPE specified.

Batteries should not be dropped, crushed, thrown, or subjected to unnecessary impact. Handling practices should minimise shock and vibration. Use mechanical lifting aids for large or heavy packs.

Batteries should be packaged, stored, and transported in a way that preserves packaging integrity and prevents short circuiting, thermal damage, or movement during transit, consistent with the ADG Code and relevant state and territory requirements.

7.4.2 Fire Risk and Suppression Limitations

Fire suppression equipment should be available at handling, consolidation, and storage locations in accordance with site-specific risk assessments and WHS obligations.

At the time of publication, there is no Australian Standard and no independently certified extinguisher proven to effectively suppress lithium-ion battery fires. The AFAC, CSIRO, and FPA Australia reference materials support this position (see section 7.4.6). Class E ratings pertain only to electrical non-conductivity and do not indicate fire-suppression effectiveness. There is no agreed independent view on the effectiveness of fire extinguishers for lithium-ion battery fires.

Emergency planning should not be based on extinguisher selection as a primary control. Lithium-ion battery fire risk should be managed through early detection, separation, cooling, isolation, and escalation, rather than relying on non-standard or proprietary suppression products.

7.4.3 What to Do in an Incident

Battery on fire or in thermal runaway. Do not attempt to fight the fire. Evacuate the area, establish separation where possible, and call 000. Only undertake evacuation if it is safe to do so.

Battery damaged, swollen, leaking, or overheating, but not yet on fire. Act immediately. Remove the battery to an isolated outdoor area away from other batteries, combustible materials, and structures. Do not handle damaged batteries directly, even when wearing PPE. Use tools that provide distance (e.g. a shovel or tongs). For lithium-ion batteries, submersion in water may be used where safe and practicable to limit escalation and heat generation. Manage re-ignition risk and environmental containment. If the battery chemistry is unknown, do not submerge in water.

Note: Water used to submerge or cool a lithium-ion battery should be treated as contaminated and disposed of in accordance with applicable local environmental regulations. As noted above, batteries of unknown chemistry and lithium metal batteries should not be submerged.

Nearby fire not yet involving the battery. It may be appropriate to control the adjacent fire source to prevent heat from reaching the battery, provided this can be done safely and without exposing personnel to undue risk.

In all cases, responders should act in accordance with any site-specific emergency response procedures and applicable work health and safety obligations, and should defer to the directions of attending fire and emergency services.

7.4.4 Emergency Response Planning

Organisations involved in the transport and handling of lithium batteries should refer to the ADG Code and the Australia and New Zealand Emergency Response Guidebook (ANZERG) 2024 for guidance on emergency response planning.

Emergency response planning should prioritise early detection of overheating, damage, or battery failure; rapid separation and isolation of affected batteries; maintenance of packaging integrity; and clear interfaces with local fire and emergency service authorities.

For placarded loads, the ADG Code requires a Transport Emergency Response Plan (TERP). The TERP must not rely on non-standard or unverified lithium-ion battery extinguishers. TERPs should reflect accepted national positions on the limitations of extinguishment for lithium-ion battery fires, the role of cooling, separation, and isolation as primary controls, the risk of re-ignition following initial involvement, and the potential for prolonged incident management requiring sustained exclusion zones and fire authority response.

7.4.5 Storage and Staging Prior to Collection

Lithium batteries awaiting transport or recycling should be stored in cool, dry locations under cover, protected from weather and direct sunlight, physically separated from other batteries and incompatible or flammable materials, and positioned to allow early identification and safe isolation if a battery shows signs of failure.

Damaged or defective lithium batteries and end-of-life batteries of uncertain condition should be handled with care: while a battery retains charge, there remains a risk of thermal runaway, and such batteries can fail without warning during storage or transport.

7.4.6 Further Guidance

For additional detail, refer to:

- Safe Work Australia guidance on hazardous chemicals and dangerous goods
- Relevant state and territory EPA guidance on end-of-life lithium battery management
- AFAC community messaging and advisory material
- CSIRO Advisory Note AN 004 (2023)
- FPA Australia TAN 09, Version 3 (2026)
- AFAC Advisory Note on fire extinguishers and fire blankets marketed for lithium-ion battery fires
- ADG Code and ANZERG 2024.
- SAE J2950:2020 Recommended Practices for Shipping, Transport and Handling of Automotive-Type Battery System, Lithium-Ion.
- B-cycle Drop-off Point Code of Practice, Battery Stewardship Council, September 2023.
- US EPA Battery Collection Practices Toolkit, 2025.

There is no universally accepted methodology for suppressing lithium battery fires. Users should consult their local fire authority for current endorsed guidance. The guidance in this section

focuses on risk reduction, escalation controls, and system-level safety, not fire suppression activities to be undertaken by transport or waste personnel.

Section 8 Packaging

Packaging is the primary means by which transport risks are controlled. The requirements, derived from the ADG Code, are mandatory. Always check with the receiving recycler as to what packaging they will accept.

Users should familiarise themselves with the relevant sections of the ADG Code, including general requirements on quality (4.1.1.1), design (4.1.1.2), compatibility (4.1.1.6), and other safety controls (4.1.3).

8.1 Conforming Batteries for Recycling or Disposal (P909)

The following requirements apply to the packaging of conforming used lithium batteries under P909:

- **Outer packaging:** Authorised packaging tested to Packing Group II performance level, or strong outer packaging where gross weight <30 kg, battery ≥12 kg with impact-resistant casing, or batteries in equipment.
- **Inner packaging:** To prevent short circuits, minimise fire risk, and prevent contact between cells and batteries. Inner packaging with cushioning material should be used. Tightly wrapped plastic bags that prevent movement may be used to achieve this. Fire-resistant liners are one example of additional protection.
- **Terminal management:** Exposed terminals must be taped, capped, or otherwise protected.
- **Movement minimisation:** Vermiculite or other fire-resistant fill to minimise movement.

8.2 Damaged or Defective Batteries (P908)

Damaged or defective batteries require more stringent packaging under P908. The following requirements apply:

- **Outer packaging:** PG II performance level.
- **Individual packaging:** Each cell/battery is individually packaged in inner packaging that conforms to PG II performance level. Leak-proof.
- **Thermal insulation:** Non-combustible, electrically non-conductive.
- **Venting:** Venting device where appropriate.
- **Vibration and shock:** Cushioning material (e.g. vermiculite).
- **Leaking batteries:** Sufficient absorbent material.
- **Batteries over 30 kg:** Must be packed individually.

8.3 Dangerously Damaged Batteries (P911 / LP906)

PG I performance level. Competent authority conditions are mandatory. No flames or projectiles outside the package; gas management; outside temperature below 100°C; structural integrity maintained. Protection against short circuit.

8.4 Large Batteries (LP904 / LP905)

Including household/commercial energy storage modules and EV traction packs. May use strong outer packaging, protective enclosures, pallets, or original new-battery packaging. Terminals must be disconnected or capped. The battery must be secured.

8.5 Batteries in Equipment (P909)

Strong outer packaging may be used without certification. Equipment must be packed in strong outer packaging of suitable material, strength, and design. Where the equipment provides equivalent protection, it may be transported unpackaged or on pallets.

8.6 Consolidation and Palletisation

When consolidating packages onto pallets for transport, the following practices should be applied:

- **Stacking:** Heaviest/largest on bottom.
- **Crush prevention:**- Corner protectors where boxes are used.
- **Strapping:** Horizontally, then vertically.
- **Pallet condition:** Good condition. Maximum weight depends on pallet quality and recycler requirements.

Section 9 Marking, Labelling, and Placarding

Correct marking, labelling, and placarding are mandatory obligations under the ADG Code. Two distinct markings apply to lithium battery packages (the lithium battery mark and the Class 9A label), and they are frequently confused in practice. This section sets out the requirements for package marking during transport, workplace labelling during storage, and vehicle placarding.

9.1 Package Marking for Transport

Packages must display:

- the applicable UN number (UN 3480 or UN 3481);
- LITHIUM BATTERIES FOR DISPOSAL or FOR RECYCLING;
- DAMAGED/DEFECTIVE where applicable;
- name and address of the consignor;
- Class 9 marker sticker (minimum 100 mm x 100 mm, lettering ≥7 mm) on at least two opposing sides.

9.2 Labelling for Storage (WHS)

Prior to transport, packages in the workplace should be labelled in accordance with the GHS for workplace safety. There is no specific GHS requirement for labelling lithium batteries; however, given the risks, it is prudent to label for storage. The storage label is not to be used for transport.

9.3 Vehicle Placarding

Class 9 diamond on the vehicle when the aggregate quantity of dangerous goods being transported exceeds 1000 kg or 1000 L. Display on two sides. Emergency Information Panels are not required for lithium batteries. The presence of other dangerous goods on the vehicle may trigger different placarding requirements under the ADG Code.

Section 10 Transport Documentation

10.1 Dangerous Goods Transport Documentation

The consignor is responsible for documentation, including the proper shipping name, UN number, class, packing group, total quantity, and emergency contact information. For SP376 batteries, a specific transport document statement is required.

10.2 Waste Tracking Documentation

- **Interstate:** Where used lithium batteries are classified as controlled waste, the NEPM regime may apply. Lithium batteries are not a discrete category in the NEPM controlled waste list, so whether interstate tracking applies depends on how the waste is classified in the relevant jurisdictions. Where it applies, a waste transport certificate and consignment authorisation from the receiving environmental regulator are required before movement, with five-year record retention. Users should confirm the position with the receiving environmental regulator before any interstate movement.
- **Intrastate:** Each state/territory's own instruments. NEPM does not apply.

Note: NEPM Classification
Lithium-ion batteries are not listed as a discrete controlled waste category in NEPM Schedule A. Classification is by each jurisdiction's waste coding. Operators must confirm with the receiving environmental regulator before interstate movement.

Section 11 Transport and Vehicle Requirements

Anyone undertaking transport must be trained and instructed in carrying used lithium batteries and supervised. If engaging a third party, verify their training and supervision.

11.1 Vehicle and Driver Licensing

The Competent Authorities Panel (CAP) interpretation, combined with the packaging provisions governing lithium battery transport, means that there is essentially no battery transport situation that requires a DG driver licence or a DG vehicle licence. Users should confirm with their state or territory DG transport regulator if uncertain. Refer to the CAP interpretation at ntc.gov.au.

While dangerous goods licensing may not be required, this does not remove other obligations. Operators should ensure full compliance with placard load safety requirements, transport documentation, and any relevant state environmental regulator waste-tracking or vehicle-permission requirements, particularly when moving bulk or heavy consignments.

11.2 Vehicle Pre-Departure Checklist

Before transport, undertake a pre-start check for all applicable items:

Item	Non-Placard Load	Placard Load
Emergency Information Folder (including relevant extracts from the Australia and New Zealand Emergency Response Guide Book 2024)	Required (cabin)	Required
Battery Manifest	Required	Required

Item	Non-Placard Load	Placard Load
Class 9 Placards (two sides of vehicle)	Not required	Required
3 x double-sided reflective portable warning triangles	Required	Required
Fire extinguisher: 1 x 30B (per vehicle/trailer)	Not required	Required
First-aid kit (traveller), in date, maintained and tagged	Required	Required
PPE: eyewash, chemically-resistant gloves, electric torch	Required	Required

The safety equipment requirements in Chapter 12 of the ADG Code apply to placard loads. For non-placard (sub-manifest) loads, the items listed above are recommended as sensible risk controls rather than mandatory ADG requirements. For further details, refer to Chapter 12 (Safety Equipment) of the ADG Code.

11.3 Load Restraint

The stowage and restraint requirements of the ADG Code must be complied with, including requirements for rigid gates or sides for the transport of DG in packages. Load restraint should also comply with the NHVR Load Restraint Guide (heavy vehicles) and the NTC Load Restraint Guide (light vehicles).

Pallet stacking is generally permitted in DG transport, provided the goods and pallets will not be damaged. Users should confirm stacking limitations with the receiving recycler.

11.4 Emergency Response

Where lithium batteries are transported as Class 9 dangerous goods in placard quantities, a Transport Emergency Response Plan (TERP) is required by the ADG Code. The TERP must identify the dangerous goods being transported, assess what can go wrong during transport, set out procedures for responding to incidents, identify resources, contacts and specialist support, and be available to drivers and relevant parties.

The TERP should not rely on non-standardised lithium battery extinguishers. It should reflect accepted national positions on cooling and isolation, re-ignition risk, and prolonged incident management. AFAC recommends that emergency response planning for lithium battery consignments focus on detection, separation, packaging integrity, and emergency response interfaces, rather than extinguisher selection alone.

Refer to the ADG Code and the Australia and New Zealand Emergency Response Guide Book 2024 (ANZERG 2024) for detailed requirements.

11.5 Rail Transport

The ADG Code and additional requirements govern rail transport. Individual rail operators impose their own DG acceptance policies, which may be more restrictive than the ADG Code. They typically use centralised booking systems and Network Access Agreements. Advance engagement and written acceptance confirmation should be treated as prerequisites.

11.5.1 Typical Steps for Securing Rail Operator Acceptance

Users planning to transport used lithium batteries by rail should allow sufficient lead time and follow these typical steps:

a) Contact the rail operator early. Rail operators have their own dangerous goods acceptance policies, which may be more restrictive than the ADG Code. Contact the operator before finalising logistics arrangements to confirm whether the consignment will be accepted.

b) Provide advance notification. The rail operator will typically require advance notification of the DG class, UN number, quantity, packaging type, and any special provisions applicable to the consignment. Provide this information in writing.

c) Confirm acceptance in writing. Obtain written confirmation from the rail operator that the consignment has been accepted for carriage before dispatching the goods. Verbal acceptance should not be relied upon.

d) Comply with operator-specific requirements. Individual rail operators may impose conditions that go above and beyond the ADG Code, including additional documentation, packaging, or loading requirements specified in their Network Access Agreements or booking systems.

e) Allow time for ONRSR engagement. The Rail Safety National Law requires rail operators to manage risks through Safety Management Systems administered by ONRSR. For high-energy or damaged lithium battery consignments, the operator may need to consult ONRSR before granting acceptance.

Section 12 Chain of Responsibility

If used lithium batteries are transported in a vehicle with a gross vehicle mass exceeding 4.5 tonnes, the Heavy Vehicle National Law (HVNL) applies. All parties in the chain have an obligation to ensure safe practices and protect public safety. This includes packers, schedulers, dispatchers (consignors), receivers (consignees), loaders, and unloaders.

The chain of responsibility makes parties other than drivers responsible for heavy vehicle safety. A party cannot transfer their duty. The primary duty is to eliminate public risks (or minimise so far as reasonably practicable) and to ensure conduct does not cause drivers to breach the law.

The HVNL applies in all states and territories except Western Australia (Road Traffic (Vehicles) Act 2012, which is broadly similar) and the Northern Territory (no specific CoR requirement, but operators consigning interstate may be liable in the receiving jurisdictions).

Executives of all organisations in the transport chain should exercise due diligence. The NHVR has published a Master Code of Practice and a Waste and Recycling Industry Code of Practice.

The NHVR Master Code of Practice and the Waste and Recycling Industry Code of Practice provide additional guidance on chain-of-responsibility obligations.

Section 13 Work Health and Safety

WHS obligations attach to storage, handling, loading, and unloading at every point in the logistics chain. These are parallel to, and legally distinct from, DG transport obligations.

13.1 NSW 25,000 kg Storage Threshold

Under the NSW WHS Regulation 2017 (effective 22 August 2025), operators storing lithium-ion batteries with an aggregate mass exceeding 25,000 kg must submit an Emergency Plan to Fire and Rescue NSW.

13.2 WHS Obligations at Collection Points and Consolidation Hubs

The following WHS obligations apply at collection points and consolidation hubs to the extent that they interact with DG transport preparation:

Battery triage. Persons conducting battery condition assessment and triage must be provided with appropriate training, PPE, and documented procedures. The triage process involves direct physical interaction with batteries and exposes workers to the risk of electrolyte exposure, thermal events, and chemical hazards.

Packaging. Workers packing batteries for transport must be trained in the applicable ADG Code packing instructions (P908, P909, P911) and provided with PPE appropriate to the battery condition being handled. Damaged or defective batteries present higher risks during packaging.

Storage of packed consignments. Packed consignments awaiting dispatch should be stored in accordance with WHS Regulations and any applicable GHS labelling requirements. The storage area should be cool, dry, well-ventilated, and separated from incompatible materials.

NSW 25,000 kg threshold. Under the NSW WHS Regulation 2017 (effective 22 August 2025), operators storing lithium-ion batteries with an aggregate mass exceeding 25,000 kg must submit an Emergency Plan to Fire and Rescue NSW. The threshold applies to the combined total weight of all lithium-ion batteries on site.

Emergency procedures. Documented emergency procedures should be in place at all collection and consolidation sites, covering battery fire response (evacuate, call 000), damaged battery isolation, and electrolyte spill management.

Note: Site design, planning approvals, and ongoing storage facility management are outside the scope of this Guide.

Section 14 Environmental Protection and Waste Tracking

14.1 Interstate: NEPM

A consignment crossing a state or territory border may enter the NEPM regime where the used lithium batteries are classified as controlled waste. Because lithium batteries are not a discrete category in the NEPM-controlled waste list, whether the regime applies depends on how the waste is classified in the relevant jurisdictions. Where applicable, a waste transport certificate and consignment authorisation from the receiving environmental regulator are required, with a 5-year record retention period. Users should confirm the position with the receiving environmental regulator before any interstate movement.

14.2 Intrastate

Each state/territory's own instruments. NEPM does not apply.

14.3 Landfill Bans

The disposal of lithium-ion batteries to landfill is banned or restricted in a number of jurisdictions. Victoria banned e-waste (including lithium batteries) from landfill from 1 July 2019 under the Environment Protection Act 2017 (Vic). Western Australia banned e-waste from landfill from 1 January 2024 under the Waste Avoidance and Resource Recovery Act 2007 (WA).

In South Australia, lead-acid batteries are currently the only batteries expressly prohibited from landfill disposal under Schedule 4 of the Environment Protection (Waste to Resources) Policy 2010 (SA); a review of that Policy is underway, which is intended to extend the prohibition to all batteries. Other jurisdictions are considering similar measures.

Landfill should not be treated as a default destination for used lithium batteries.

14.4 Collection and Storage: Planning and Environmental Licensing

Requirements for storage and waste management facilities are informed by planning and environmental legislation in each state or territory. A business that uses lithium battery collection and storage may need to apply for an environmental licence or permission. Detailed discussion of planning and environmental approvals is not within the scope of this Guide.

Section 15 Product Stewardship

Product stewardship is a framework in which producers, importers, and distributors share responsibility for reducing the environmental, health, and safety impacts of their products throughout the product lifecycle, including at end of life. They can be voluntary or mandatory and generally require producers and importers to pay for the cost of end of life management.

In the context of lithium batteries, product stewardship schemes coordinate the collection, transport, and recycling of used batteries, standardise processes across the sector, bring together participants while respecting competition rules, and may provide financial support for the recovery process.

Multiple product stewardship schemes operate in Australia, including B-cycle (Battery Stewardship Council), Mobile Muster (Australian Mobile Telecommunications Association), and the National Television and Computer Recycling Scheme (NTCRS). Each scheme may impose its own transport, documentation, and chain-of-custody requirements in addition to the regulatory minimum covered by this Guide. Users participating in or servicing a product stewardship scheme should check with the relevant scheme operator and their jurisdiction's EPA for any additional requirements.

In NSW, there is a mandatory product stewardship scheme for small and removable batteries weighing less than five kilograms. It also covers batteries in e-bikes and e-scooters, whether removable or not. NSW and all other jurisdictions are working towards nationally consistent frameworks. Users of this Guide should check for policy developments in relevant jurisdictions.

Note: Track-and-trace requirements do not currently affect lithium battery transport in Australia. However, this is an area of developing international practice and may become relevant to future revisions of this Guide.

Section 16 The Competent Authorities Panel

The CAP is the mechanism for nationally consistent exemptions, approvals, and determinations that are at variance with the ADG Code and is administered through the Department of Infrastructure. For unusual consignments, recalled batteries, unknown provenance, mixed loads, or novel battery types, CAP engagement may be necessary.

In practice, CAP engagement is rarely required and is generally only relevant where a variance from the ADG Code is being sought. Contact details for the CAP are available at https://www.ntc.gov.au/competent-authorities-panel-contact-details.

Section 17 Lithium Battery Recyclers

For further information on lithium battery recycling and recycler contact details, visit the Association for Battery Recycling Industry (ABRI) at www.batteryrecycling.org.au.

Section 18 Guide Maintenance and Currency

The regulatory environment governing the transport of used lithium batteries in Australia is evolving rapidly. Users of this Guide should monitor for the trigger events listed below. Each may indicate that regulation or practice has moved on, and that users should check for an updated edition of this Guide, or seek current advice, before relying on it.

- 31 December 2026 – Lithium battery mark transition deadline.
- Release of any new ADG Code edition.
- Commencement of new state or territory battery stewardship or product lifecycle regulations or supporting scheme rules and requirements.
- Changes to state/territory DG transport, EPA, or WHS regulations.
- Publication of the DCCEEW fact sheet on waste and used product definitions (noting that the requirements applying to dangerous goods transport may differ from those applying to export permits).
- Commencement of SP636 (mixed battery provision).

Section 19 Bibliography

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8. NHVR Master Code of Practice.
9. NHVR Waste and Recycling Industry Code of Practice.
10. NHVR Load Restraint Guide.
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13. Fire Protection Association Australia (2026) Technical Advisory Note TAN 09 (Version 3): Lithium ion battery fires.
14. AFAC Advisory Note: Fire extinguishers and fire blankets marketed for lithium-ion battery fires.
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16. AFAC (2024) Community Safety Messages and Considerations for Lithium-ion Batteries and Emerging Energy Risks (AFAC Publication No. 3100).
17. Austroads (2025) AP-R746-25.
18. Competent Authorities Panel Decision CA2025-137: BESS Interpretation, 12 June 2025.

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