

Re: Global SDS Obligations for Consumer Batteries

Dear Tech Library Visitor:

For Safety Data Sheet (SDS) purposes, consumer batteries fall under the regulatory definition of an “article.” The UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS) is recognized by most countries as the blueprint for authoring a SDS. The GHS exempts “articles” from SDS & labeling requirements that meet the following definition:

Article Definition: [GHS Section 1.3.2.1].

Article means a manufactured item other than a fluid or a particle: (i) which is formed to a specific shape or design during manufacture, (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not pose more than very small quantities (e.g., minute quantities of a hazardous chemical (as determined under paragraph (d) of this section) and does not pose a physical hazard or health to employee.

Duracell batteries meet the GHS definition of an article.

Duracell’s approach to authoring the AIS:

Our authoring approach is explained in each AIS. It is based on the principles set forth in ANSI – Z400-1, GHS, JAMP AIS, and IEC 62474. As “articles,” batteries are standardized consumer products which are classified according to their electro-technical system as defined in the ANSI and IEC battery standards. This approach allows us to author the AIS as a “family” (e.g., Alkaline Manganese Dioxide) and include all of the battery sizes (e.g., AA, AAA, C, D & 9V) in a single document. Duracell’s revision policy is as follows: publish the update within 3 months of our awareness of significant new information. Our document date policy is: AIS Section 1 includes the date of preparation of the document or the last change to it.

Of note, the battery industry standard ANSI C-18.4M-2023 entitled **Portable Cells and Batteries – Environmental** – provides regulatory guidance and a template to author an article information sheet for a portable consumer battery. See informational Annex C.2 Safety Data Sheets and Annex E.2 General (for template). The IEC-60086-6 Standard entitled Primary batteries – Part 6: Guidance on environmental aspects – also provides regulatory guidance for batteries. See information Annex A.5.1 Europe.

Sincerely,



Laura Zadrick
Duracell, NA Regulatory Manager
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