

Lithium Cell / Battery Test Summary

In Accordance with UN Manual of Tests and Criteria (T&C),
Subsection 38.3



Cell / Battery

Name CR-P2
Type Lithium metal cell
Physical description Primary lithium metal cell

Manufacturer

Name VARTA Consumer Batteries GmbH & Co. KGaA
Address Alfred-Krupp-Str 9
73479 Ellwangen, Germany
Phone +49 (0) 7961 830
Email info@eu.spectrumbrands.com
Website https://www.varta-consumer.com

Test laboratory

Name Shanghai Research Institute of Chemical Industry Testing Co., Ltd.
Address No. 345 East Yunling Road, Shanghai, 200062, China
Phone +86 (0) 21 317 65 555
Email zmh@ghs.cn
Website www.ghs.cn

Model number	Mass [g]	Li metal content [g]	Edition of the Manual T&C used	Test report number	Test report date
6204	35,93	0,77	ST/SG/AC.10/11/Rev.6	1118070225	29.08.2018

Test	Result	Test	Result
T1 – Altitude simulation	Passed	T5 – External Short Circuit	Passed
T2 – Thermal Test	Passed	T6 – Impact / Crush	Passed
T3 – Vibration	Passed	T7 – Overcharge	N/A
T4 – Shock	Passed	T8 – Forced Discharge	Passed



Signature
(Uwe Knödler, Manager Quality & NPD)

Primary Lithium cylindrical cell (coiled)

1 Identification of the product and of the company undertaking

Product details

Trade name: Lithium primary cylindrical cell (coiled)
Electrochemical system: Lithium metal | organic electrolyte | manganese dioxide
Anode (negative): Lithium metal
Cathode (positive): Manganese dioxide

This MSDS applies to the following cell and battery types and batteries assembled from these types.

Type	Lithium content	Nominal voltage
CR 1/2 AA H-R	0.3 g	3.0 V
CR 123 A	0.58 g	3.0 V
CR 123 A-R	0.5 g	3.0 V
CR 2	0.26 g	3.0 V
CR 2-R	0.29 g	3.0 V
CR 2/3 AH	0.58 g	3.0 V
CR 2/3 AH-R	0.49 g	3.0 V
CR AH-R	0.74 g	3.0 V
CR P2	1.16 g	6.0 V

Supplier details

Address: VARTA Microbattery GmbH
VARTA-Platz 1
73479 Ellwangen
Germany
Emergency Phone Number: +49 7961 921 110 (VAC)

General remark

This information is provided as a service to our customers. The details presented are in accordance with our present knowledge and experiences. They are no contractual assurances of product attributes.

Legal remark (EU)

These batteries are no "substances" or "mixtures" according to Regulation (EC) No 1907/2006 EC. Instead they have to be regarded as "articles", no substances are intended to be released during handling. Therefore there is no obligation to supply a safety data sheet according to Regulation (EC) 1907/2006, Article 31.

Legal remark (USA)

Safety Data Sheets are a sub-requirement of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, 29 CFR Subpart 1910.1200. This Hazard Communication Standard does not apply to various subcategories including anything defined by OSHA as an "article". According to OSHA, Article means a manufactured item other than a fluid or 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 release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.

Because all of our batteries are defined as "articles", they are exempted from the requirements of the Hazard Communication Standard.

2 Hazards identification

The battery is sealed hermetically. Thus, the ingredients have no hazard potential, except the battery is violated or dismantled.

If in case of mistreatment the ingredients are released, a spontaneously flammable gas mixture may be released under certain circumstances (measures according to sections 4 to 6).

Attention: If batteries are treated wrong the danger of burns or bursts occurs. Batteries must not be heated above 100 °C or incinerated. The battery contents must not get in contact with water. If the negative electrode gets in contact with water or humidity hydrogen gas is formed, which may inflame spontaneously.

3 Composition/information on ingredients

Ingredients

Content	CAS no.	EC no.	Material	Hazard Categories	Hazard Statements
33 – 74 %	confidential	confidential	Steel and nickel		
13 – 45 %	1313-13-9	215-202-6	Manganese dioxide	Acute Tox. 4	H302, H332
3 – 10 %	confidential	confidential	Polymers		
< 10 %	108-32-7	203-572-1	Propylene carbonate	Eye Irrit. 2	H319
< 10 %	110-71-4	203-794-9	1,2-Dimethoxy ethane	Flam. Liq. 2, Repr. 1B, Acute Tox. 4	H225, H332, H360-FD
2 – 5 %	7439-93-2	231-102-5	Lithium	Water-react. 1, Skin Corr. 1B	H260, H314
< 5 %	646-06-0	211-463-5	1,3-Dioxolane	Flam. Liq. 2	H225
< 5 %	7791-03-9	232-237-2	Lithium perchlorate (-R types only)	Ox. Sol. 2, Skin Irrit. 2, Eye Irrit. 2, STOT SE 3	H272, H315, H319, H335

For full text of hazard statements see section 16.

Substances relevant for Battery Directive 2006/66/EC

Content	CAS no.	EC no.	Material
< 10 mg/kg	7439-92-1	231-100-4	Lead
< 1 mg/kg	7440-43-9	231-152-8	Cadmium
< 0.1 mg/kg	7439-97-6	231-106-7	Mercury (none intentionally introduced, see section 12)

SVHC substances according to REACH (Article 33)

Content	CAS no.	EC no.	Material
> 0.1 %	110-71-4	203-794-9	1,2-Dimethoxy ethane

For information to allow safe use: see section 7.

4 First-aid measures

After inhalation:	Fresh air. Seek for medical assistance.
After skin contact:	Remove solid particles immediately. Flush affected areas with plenty of water (at least 15 min). Remove contaminated cloth immediately. Seek for medical assistance.
After eye contact:	Flush the eye gently with plenty of water (at least 15 min). Seek for medical assistance.
After ingestion of battery components:	Drink plenty of water. Avoid vomiting. Seek for medical assistance. No trials for neutralization.
After ingestion of battery:	In the event of battery ingestion, seek immediate medical attention at a hospital emergency room. Do not let the person who ingested the battery eat or drink until an X-ray can determine if a battery is present. If you still have the battery packaging or the device containing the battery take this with you to help the physician identify the battery type and chemistry. Warning: Swallowing may lead to burns, perforation of soft tissue, and death. Severe burns can occur within 2 h of ingestion. In case of ingestion of a cell or battery, seek medical assistance promptly. See also section 7.

5 Fire-fighting measures

Suitable extinguishing media:	Metal fire extinction powder, rock salt or dry sand shall be used. In case only water is available, it can be used in large amounts.
Extinguishing media with limited suitability:	Carbon dioxide (CO ₂) is not suitable. Water in small quantities may have adverse effects.
Special protection equipment during fire-fighting:	Contamination cloth including breathing apparatus.
Special hazard:	Cells may explode and release metal parts. At contact of electrolyte with water traces of hydrofluoric acid may be formed. In this case avoid contact and take care for good ventilation. At contact of charged anode material with water extremely flammable hydrogen gas is generated.
Attention:	Do not let used extinguishing media penetrate into surface water or ground water. If necessary, thicken water or foam with suitable solids. Dispose of properly.

6 Accidental release measures

Person related measures:	Wear personal protective equipment adapted to the situation (protection gloves, face protection, breathing protection).
Environment protection measures:	In the event of battery rupture, prevent skin contact and collect all released material in a plastic lined container. Bind released ingredients with powder (rock salt, sand). Dispose of according to the local law and rules. Avoid leached substances to penetrate into the earth, canalization or water.
Treatment for cleaning:	If battery casing is dismantled, small amounts of electrolyte may leak. Package the battery tightly including ingredients together with lime, sand or rock salt. Then clean with water.

7 Handling and storage

Guideline for safe handling:	<ul style="list-style-type: none">• Always follow the warning information on the batteries and in the manuals of devices. Only use the recommended battery types.• Keep batteries away from children. Keep small cells and batteries which are considered swallowable out of the reach of children.• For devices to be used by children, the battery casing should be protected against unauthorized access.• Unpacked batteries shall not lie about in bulk.• In case of battery change always replace all batteries by new ones of identical type and brand.• Do not swallow batteries. Swallowing may lead to burns, perforation of soft tissue, and death. Severe burns can occur within 2 h of ingestion. In case of ingestion of a cell or battery, seek medical assistance promptly.• Do not throw batteries into water.• Do not throw batteries into fire.• Avoid deep discharge.• Do not short-circuit batteries.• Do not recharge primary batteries.• Do not open or disassemble batteries.
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Storage:	Storage preferably at room temperature (approx. 20 °C). Avoid large temperature changes. Do not store close to heating devices. Avoid direct sunlight. At higher temperature the electrical performance may be reduced. Storage of unpacked batteries can cause short circuit and heat generation.
Storage category according to TRGS 510:	It is recommended to consider the "Technical Rule for Hazardous Substances TRGS 510 - Storage of hazardous substances in nonstationary containers" and to handle lithium primary cells and batteries according to storage category 11 ("combustible solids").
Storage of large amounts:	Follow the recommendations of the German Insurance Association (GDV - "Gesamtverband der Deutschen Versicherungswirtschaft e.V.") concerning lithium batteries: https://vds.de/fileadmin/vds_publikationen/vds.3103en_web.pdf In case of storage of large amounts (used storage volume > 7 m ³ and/or more than 6 pallets) batteries shall be stored in fire-resistant or separated rooms or areas (e.g. warehouse or container for hazardous materials). Mixed storage with other products is not allowed. The storage area shall be monitored by an automatic fire detection system, connected to a permanently manned place. A fire-extinguishing system shall reflect the extinguishing agents mentioned in section 5.

8 Exposure controls/personal protection

Under normal conditions (discharge) release of ingredients does not occur. Avoid prolonged deep discharge.

9 Physical and chemical properties

Not applicable if closed.

10 Stability and reactivity

Dangerous reactions: When heated above 100 °C the risk of rupture occurs.

11 Toxicological information

Under normal conditions (during discharge) release of ingredients does not occur. In case of accidental release see information in sections 2 to 4 and 6.

Swallowing of a battery can be harmful. Call the local Poison Control Centre for advice and follow-up. See section 4.

12 Ecological information

VARTA primary Lithium cylindrical coiled cells do not contain heavy metals as defined by the European directives 2006/66/EC Article 21; they comply with the chemical composition requirements of this Directive.

Mercury has not been "intentionally introduced (as distinguished from mercury that may be incidentally present in other materials)" in the sense of the U.S.A. "Mercury-Containing and Rechargeable Battery Management Act" (May 13 1996).

The Regulation on Mercury Content Limitation for Batteries promulgated on 1997-12-31 by the China authorities including the State Administration of Light Industry and the State Environmental Protection Administration defines "low mercury" as "mercury content by weight in battery as less than 0.025 %", and "mercury free" as "mercury content by weight in battery as less than

0.0001 %". And therefore: VARTA primary Lithium cylindrical coiled cells belong to the category of mercury-free battery (mercury content lower than 0.0001 %).

For the state of California the batteries CR 2/3 AH, CR 123 A, CR 2 and CR P2 are considered as "free of perchlorate".

13 Disposal considerations

In order to avoid short circuit and heating, used VARTA primary Lithium cylindrical coiled cells should never be stored or transported in bulk. Proper measures against short circuit are:

- Storage of batteries in original packaging
- Coverage of the terminals
- Embedding in dry sand

European Union

In the European Union, manufacturing, handling and disposal of batteries is regulated on the basis of the DIRECTIVE 2006/66/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 6 September 2006 on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC. Customers find detailed information on disposal in their specific countries using the web site of the European Portable Batteries Association (www.epbaeurope.net/legislation_national.html).

Importers and users outside EU should consider the local law and rules.

USA

VARTA primary Lithium cylindrical coiled cells are classified by the federal government as non-hazardous waste and are safe for disposal in the normal municipal waste stream. These batteries, however, do contain recyclable materials and are accepted for recycling by Call2Recycle, Inc. Please go to their website at www.call2recycle.org for additional information.

14 Transport information

General considerations

VARTA primary Lithium cylindrical coiled cells are considered to be UN 3090 Lithium Metal Batteries and are tested according to subsection 38.3 of the "UN Manual of Tests and Criteria" for compliance with the requirements of special provisions ADR 188, IMDG 188, as well as the requirements of DOT / 49 CFR § 173.185, and the requirements of IATA DGR packing instruction 968. Test results as well as other relevant information required for transportation are given in dedicated "Supplier's Test Summaries".

Transportations of cells or batteries packed with equipment or contained in equipment have to follow the appropriate regulations for UN 3091.

During the transportation of large amounts of batteries by ship, trailer or railway, do not store them in places of high temperature and do not allow them to be exposed to condensation. During the transportation do not allow the packaging to be damaged, as a damage of the packaging may cause fire. In the event packaging is damaged, special procedures must be used including inspection and repackaging if necessary and handle with care.

Compilations of transport requirements for Lithium batteries can be found in:

<https://www.lithium-batterie-service.de/en/>

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

Each cell or battery is manufactured under a quality management program according to IATA DGR clause 3.9.2.6, ADR clause 2.2.9.1.7 e), and IMDG code clause 2.9.4.5.

IEC 60086-1

Code of practice for packaging and shipment of primary batteries given in IEC 60086-1:

"The packaging shall be adequate to avoid mechanical damage during transport, handling and stacking. The materials and pack design shall be chosen so as to prevent the development of unintentional electrical conduction, corrosion of the terminals and ingress of moisture."

"Shock and vibration shall be kept to a minimum. For instance, boxes should not be thrown off trucks, slammed into position or piled so high as to overload battery containers below. Protection from inclement weather should be provided."

15 Regulatory information

Marking consideration

European Union: According to "DIRECTIVE 2006/66/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 6 September 2006 on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC" the batteries have to be marked with the crossed bin.

For the state of California the -R battery types have to be marked as "containing perchlorate".

International safety standards

For UL recognition of the basis cells according to UL 1642 see: [BBCV2.MH13654](#)

Water hazard class

The regulations of the German Federal Water Management Act (WHG) are not applicable as VARTA primary Lithium cylindrical coiled cells are articles and not substances, thus there is no risk of water pollution, except the batteries are violated or dismantled.

16 Other information

Full text of Hazard Statements referred to under section 3

H225	Highly flammable liquid and vapour.
H228	Flammable solid.
H250	Catches fire spontaneously if exposed to air.
H260	In contact with water releases flammable gases which may ignite spontaneously.
H271	May cause fire or explosion; strong oxidiser.
H272	May intensify fire; oxidiser.
H301	Toxic if swallowed.
H302	Harmful if swallowed.
H312	Harmful in contact with skin.
H314	Causes severe skin burns and eye damage.
H315	Causes skin irritation.
H317	May cause an allergic skin reaction.
H318	Causes serious eye damage.

continued on next page

Full text of Hazard Statements referred to under section 3 (continued)

H319	Causes serious eye irritation.
H330	Fatal if inhaled.
H332	Harmful if inhaled.
H334	May cause allergy or asthma symptoms or breathing difficulties if inhaled.
H335	May cause respiratory irritation.
H341	Suspected of causing genetic defects.
H350	May cause cancer
H350i	May cause cancer by inhalation.
H351	Suspected of causing cancer.
H360D	May damage the unborn child.
H360FD	May damage fertility. May damage the unborn child.
H372	Causes damage to organs through prolonged or repeated exposure.
H373	May cause damage to organs through prolonged or repeated exposure.
H400	Very toxic to aquatic life.
H410	Very toxic to aquatic life with long lasting effects.
H411	Toxic to aquatic life with long lasting effects.
H412	Harmful to aquatic life with long lasting effects.

Note:	Date of issue of the transport regulations: ADR 2019, RID 2019, IATA DGR 2020 (61 st edition), IMDG Code 2018, DOT / 49 CFR 2019. Latest covered modification of the European Battery Directive 2006/66/EC: Directive (EU) 2018/849.
RoHS:	See special Declaration
REACH:	See special Declaration
Issued by:	VARTA Microbattery GmbH Quality / Environmental Management
Contact:	https://www.varta-microbattery.com/contact/?lang=en
Updates:	Current SDS can be downloaded from VARTA's web page https://products.varta-microbattery.com/en/news-downloads/document-search.html (select Document Type "MATERIAL SAFETY DATA SHEET").



Ellwangen, 6th June 2025

REACH Regulation (EC) No. 1907/2006

Dear Sir or Madam,

As a manufacturer of commodities VARTA Consumer Batteries GmbH & Co. KGaA is, according to the REACH-regulation, considered as a “downstream user”. As such “downstream user” VARTA Consumer Batteries GmbH & Co. KGaA underlies no compulsory registration subject to REACH.

In our own interest and in order to guarantee high product availability we pursue the implementation of REACH and the resulting requirements intensively. In this respect we contacted our sub-suppliers of chemical materials and preparations, which we use in our products and packaging materials processes, in order to ensure a registration.

Our articles (commodities) underlie the reporting requirements in accordance with article 33. This applies to commodities fulfilling the criteria's of article 57 and identified by article 59 and published by the agency ECHA on the Internet.

We are going to inform our customer within 45 days, if there are substances of very high concern (SVHC-substance) in the commodities in a concentration > 0,1 mass percentage.

According to the current REACH Regulation (EC) No 1907/2006 different lithium batteries are affected by information requirements regarding SVHC substance. Our primary lithium manganese dioxide batteries contain > 0.1 weight percent 1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)

There are no restrictions on distribution or use of the affected products.

This is an ongoing process and we are willing to take all required measures in order to continue to provide our products with the usual high quality and security.

If you have any further questions concerning the implementation of the REACH- regulation in our company, please do not hesitate to contact me.

Yours faithfully

Jürgen Balle

- REACH Representative -

Juergen.Balle2@varta-ag.com