



香港特別行政區政府
民航處

Civil Aviation Department

The Government of the Hong Kong Special Administrative Region

Dangerous Goods Advisory Circular DGAC 1/2020

Undeclared lithium batteries and other dangerous goods

Lithium batteries

With the dominance of lithium batteries being the choice of power supply to everyday electronic products and the ever more convenience to consumers offered by e-commerce platforms, lithium batteries continue to be the most frequently undeclared or misdeclared dangerous goods found in air cargo from Hong Kong International Airport. In many cases, occurrences arising from e-commerce shipments were related to the following circumstances -

- i. declared with generic commodity names such as “**CLOTHES, SHOES, HAIRPIN**” and “**WITHOUT BATTERY**”, but was later found to contain lithium battery powered equipment; or
- ii. having loose or spare lithium batteries or power banks misdeclared as “lithium ion batteries in compliance with Section II of PI967”, and thus not meeting the more stringent requirements of PI965 for packing, marking, labelling and declaration of the shipment containing those lithium batteries.

Alcohol-based sanitizers

2. In addition, the demand for alcohol-based sanitizers around the world have significantly increased due to COVID-19 outbreak. This Department has observed recent occurrences where undeclared alcohol-based sanitizers were found in shipments declared with generic terms such as “**CLEANING SOLUTION**” and “**NOT RESTRICTED**”. It is important to highlight those cleaning or sanitizing solution products with main ingredients being either Ethanol or Isopropanol, are classified as Class 3 dangerous goods, flammable liquids. Such commodities **must be properly classified, packed, marked, labelled and declared** in accordance with regulatory requirements prior to being offered for air transport.

Reminder to industry

3. The carriage of non-compliant, undeclared or misdeclared dangerous goods are potential threats to aviation safety that may result in serious consequences. In this connection, this Department hereby reminds the air cargo industry that cargo operation and acceptance personnel of airlines, handling agents and freight forwarders must remain vigilant and exercise caution during the cargo acceptance process, especially when handling or accepting e-commerce shipments or generic commodity names declared on transport documents to ensure aviation safety. In case of doubt, documented clarification from the shippers about the actual contents of the shipments should be sought, and appropriate checks on such shipments should be conducted with documented evidence to demonstrate on record that due diligence has been exercised by the parties concerned.

Contravention of Dangerous Goods (Consignment by Air) (Safety) Regulations

4. The consignment of undeclared or misdeclared dangerous goods constitutes a contravention of Cap. 384A of the Laws of Hong Kong, and the shipper and/or freight forwarder involved are liable for prosecution. On conviction, the shipper and/or the freight forwarder may be subject to a fine of \$250,000 and imprisonment for 2 years.

5. Shippers and freight forwarders involved in dangerous goods occurrences may also be subject to closer regulatory monitoring and additional inspection requirements imposed by this Department. A corrective action plan must be provided to demonstrate the actions taken, with relevant supporting evidence, to prevent recurrence to the satisfaction of this Department.

6. Should there be any query regarding this circular, please contact the Dangerous Goods Office at 2910 6856 or 2910 6857.

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Issue date: 26 August 2020

An electronic version of this circular can be downloaded at
<http://www.cad.gov.hk/english/DGAC.html>