

DECLARATION OF NON-DANGEROUS GOODS STATUS

To Whom It May Concern,

We, NPP Power Europe B.V., would like to officially declare that our NPP VRLA (Valve-Regulated Lead-Acid) batteries, specifically of the VRLA-AGM type, are not considered dangerous goods. They can be safely transported by sea, air, or land without invoking the regulations that apply to dangerous goods.

Our declaration is supported by the following details concerning the transport regulations:

Road and Railway Transport (ADR/RID):

UN Number: 2800

Proper Shipping Name: BATTERIES, WET, NON-SPILLABLE

Class: 8

Hazard label: 8

Packing Group: Not assigned

Special provisions: 238, 295, 598

Packing instructions (P) and Packing Provision (PP): P003, P801 (only for new batteries), PP16

Tunnel codes (ADR only): (E)

- *Special provision 238 (ADR/RID):* **Our NPP VRLA batteries are considered non-spillable as they can withstand appropriate vibration and pressure differential tests without leaking battery fluid. They do not require the provisions of ADR/RID due to their safe characteristics.**
- *Special provision 598 (ADR/RID):* **Our new and used (at the end of service life) storage batteries are not subject to the requirements of ADR/RID if the following criteria are met:**

New batteries must be:

- *Equipped with carrying devices, unless suitably stacked, such as on pallets.*
- *Free from any hazardous acid residues on their exterior.*
- *Safeguarded against short circuits.*
- *Properly secured to prevent slipping, falling, or damage.*

End-of-life batteries must be:

- *Stored in a manner that prevents slipping, falling, or damage.*
- *Equipped with carrying devices or stacked suitably, such as on pallets.*
- *Maintained free from any hazardous acid residues on the outside.*
- *Safeguarded against short circuits.*

NPP Power Europe B.V.

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Sea Transport (IMDG Code):

UN Number: 2800
Proper Shipping Name: BATTERIES, WET, NON-SPILLABLE
Class: 8
Hazard label: 8
Packing Group: Not assigned
Special provision: 238
Packing instruction (P) and Packing Provision (PP): P003, PP16
Emergency Schedule (EmS): F-A, S-B

- **Special provision 238 (IMDG Code): Our non-spillable batteries meet the criteria, ensuring that the electrolyte will not flow from a ruptured or cracked case at a temperature of 55°C. The terminals are protected from short circuits, complying with the provisions of IMDG Code.**

Air Transport (IATA DGR):

UN Number: 2800
Proper Shipping Name: BATTERIES, WET, NON-SPILLABLE
Class: 8
Hazard label: Corrosives (figure 7.3.V)
Packing Group: Not assigned
Special provisions: A48, A67, A164, A183
Packing instruction on passenger aircraft: 872
Packing instructions on Cargo Aircraft Only: 872

- **Special provisions A48, A67, A164, A183 (IATA DGR): When transported via air, sea, or land, the batteries are categorized as "Battery, Electric Storage, Wet, Nonspillable." These batteries should be labelled as such on the Bill of Lading and packaged appropriately, with their terminals safeguarded to prevent short circuits.**

For transportation compliance with DOT, IATA, and ICAO regulations, and based on successful completion of the Vibration and Pressure Differential Test outlined in DOT [49 CFR 173.159 (f)] and IATA/ICAO [Special Provision A67], NPP sealed lead-acid batteries are certified for secure transportation. These batteries can be safely transported on passenger or cargo vessels, either on deck or under deck, in adherence to the IMDG regulations and special provision 238 for road, rail, and sea transportation.

We hereby affirm that our NPP VRLA batteries meet these regulations' requirements and safety standards for transportation and are therefore considered non-dangerous goods.

Name: Kaloyan Kirilov
Designation: Technical Manager
Date: November 2nd, 2023
Signature:



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