



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**December 23, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 22162

**EXPIRATION DATE: 2026-09-30**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: DGM Sverige AB  
Arlandastad, Sweden

US AGENT: Currie Associates, Inc.  
Glens Falls, NY

2. PURPOSE AND LIMITATIONS:

a. This emergency special permit authorizes the transportation in commerce of low production lithium batteries contained in equipment (spacecraft). This special permit provides no relief from the Hazardous Materials Regulations (HMR) or the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO TI) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

b. The safety analyses performed in the development of this special permit only considered the hazards and risks associated with the transportation in commerce.

c. No party status will be granted to this special permit.

d. This special permit serves as an approval under Special Provision A88 and State Variation US 3 of the ICAO TI and as a "Competent Authority Approval" as defined under 49 CFR § 107.1.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 173.185(a)(1) in the lithium batteries are of a type not proven to meet the requirements of Section 38.3 of the UN Manual of Tests and Criteria and § 173.185(b) in that alternative packaging is authorized.

Tracking Number: 2025124660

5. BASIS: This emergency special permit is based on the application of DGM Sverige AB dated December 11, 2025, submitted in accordance with § 107.117 and the determination it is necessary to prevent significant economic loss.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium ion batteries contained in equipment*	9	UN3481	N/A
Lithium metal batteries contained in equipment*	9	UN3091	N/A

\*Only low production lithium batteries contained in equipment (spacecraft) may be offered for transportation under the terms of this special permit. ("Low production" is defined as a production run of no more than 100 cells or batteries annually of a particular type.).

7. SAFETY CONTROL MEASURES:

a. PACKAGING:

- (1) Each battery must be securely mounted within the spacecraft, and the spacecraft must be secured within a sealed non-DOT specification aluminum box consisting of three primary parts: (i) upper lid, (ii) lower platform, and (iii) damped/isolated plate to hold the satellite.
- (2) Each battery must be secured within the spacecraft in such a manner as to prevent short circuits, accidental operation, and significant movement relative to the spacecraft under the shocks, loadings and vibrations normally incident to transport.
- (3) The net weight of each battery may not exceed 6 kg.
- (4) Waste lithium batteries and lithium batteries being shipped for recycling or disposal are forbidden for air transport.

b. TESTING:

- (1) The cells within each battery must be of a type that has been successfully subjected to all applicable tests as required by Part III, Section 38.3, of the UN Manual of Tests and Criteria, Fifth Revised Edition.
- (2) Each battery need not be of a type that have been demonstrated by testing to pass all required tests as specified in the “UN Manual of Tests and Criteria” but shall successfully complete all applicable qualification testing.
- (3) The cells must be protected by over-pressure burst vents that prevent short circuit thermal runaway.
- (4) The battery must be equipped with a circuit breaker or an internal PCB capable of preventing overcharge, short circuits, and reverse current flow for cells connected in parallel.

c. OPERATIONAL CONTROLS:

- (1) The state of charge for low production lithium ion batteries may not exceed 30% when offered for transportation.
- (2) Only the following spacecraft (satellite) are authorized to be transported under the terms of this special permit:
  - (i) ADIS satellite. The ADIS satellite may contain only batteries conforming to the following:
    - (A) Battery A with 8S4P configuration, each composed of 32SAFT VES16 lithium ion cells. The total Watt-hour rating of the battery may not exceed 512 Wh.
    - (B) Battery B composed of nine SAFT LS 26500 lithium metal cells connect in series. The total lithium content of the battery may not exceed 18.0 g.
  - (ii) GARAI satellite. The GARAI satellite may contain only the battery composed 32SAFT VES16 lithium ion cells in a 8S4P configuration. The total Watt-hour rating of the battery may not exceed 512 Wh.
- (3) Transportation of each spacecraft is authorized for the one-way movement from Sweden to Vandenberg Space Force Base, CA. Storage of the spacecraft at an intermediate location in Los Angeles, CA is permitted.

(4) Lithium cells or batteries that are leaking or liable to rapidly disassemble, dangerously react produce a flame or a dangerous evolution of heat or a dangerous emission of toxic, corrosive, or flammable gases, or vapors under normal conditions of transport may not be transported under this special permit .

d. MARKING: Each package covered under the terms of this special permit must be durably and legibly marked and displayed on a background of contrasting color with “DOT-SP 22162”.

8. SPECIAL PROVISIONS:

a. Under the terms of this special permit, the grantee may only offer hazardous materials (i.e., the grantee is not authorized as a carrier).

b. A person who is not a holder of this special permit who receives a package covered by this special permit may reoffer it for transportation provided no modification or change is made to the package and it is offered for transportation in conformance with this special permit, the HMR, and the ICAO TI.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

d. This special permit in no way affects the need to obtain any required authorizations from other agencies of the United States Government or from the competent authorities of countries of origin, transit, destination, or the State of the Air Operator.

e. The grantee must maintain a record of all activity conducted under the authority granted in this special permit and upon request make this information available to DOT representatives or enforcement officials. The record must contain a listing and number of shipments made to include:

(1) Dates of shipment; and

(2) Description of each type of shipment

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle and cargo-only aircraft.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each aircraft or motor vehicle used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
  - o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
  - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
  - o Registration required by § 107.601 et seq., when applicable.

Each “Hazmat employee”, as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) — “The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this

special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:

A handwritten signature in blue ink, appearing to read "Dan B.", is written over a faint, circular official stamp.

for William Quade  
Acting Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, East Building PHH-13, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at <https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search>. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: CB