



TRANSPORTATION OF CHARCOAL (CARBON) NEW REGULATION AS OF 1 JANUARY 2026

October 2025



REGULATORY CHANGES – IMDG CODE 42-24

INTRODUCTION OF SPECIAL PROVISION 978

Special Provision 978 replaces 925.

IMPLEMENTATION TIMELINE

Voluntary compliance starts 1 January, 2025, with mandatory enforcement from 1 January, 2026, for new regulations.

SAFETY AND COMPLIANCE IMPACT

Updated regulations enhance safety and require standardized documentation, packaging, and container handling procedures.

MSC MANDATORY IMPLEMENTATION DATE

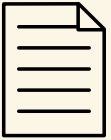
MSC will enforce full compliance on a mandatory basis starting **1 November 2025** (ahead of IMO mandatory date).

UN1361 CLASSIFICATION DETAILS



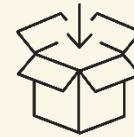
NO	PROPER SHIPPING NAME (PSN)	CLASS	PACKING GROUP (PG)	SPECIAL PROVISION (SP)	PACKING INSTRUCTION	PACKING PROVISION	IBC INSTRUCTION	IBC PROVISION
1361	CARBON, animal or vegetable origin	4.2	II	978	P002	-	IBC06	-
1361	CARBON, animal or vegetable origin	4.2	III	978	P002 LP02	-	IBC08	B3

PACKAGING, STUFFING, AND DOCUMENTATION



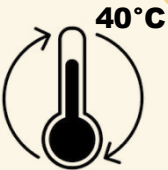
WEATHERING CERTIFICATE REQUIREMENT

After production, the unpacked material shall be stored under cover, but in the open air (weathering) for a minimum period of **14 days before being packaged for transport**.



PACKAGING AND CONTAINER REQUIREMENTS

Special Packing Instructions PP12 has been removed for UN1361 (packaging 5H1, 5L1 and 5M1 are not allowed).



TEMPERATURE LIMIT ON THE DAY OF PACKING

The temperature of the material **must not exceed 40°C** on the day of packing to comply with safety regulations.



ADDITIONAL MANDATORY INFORMATION ON THE TRANSPORT DOCUMENT

- Date of production
- Date of packing into packaging
- Temperature of the material (in °C) on the day of packing into the packaging.



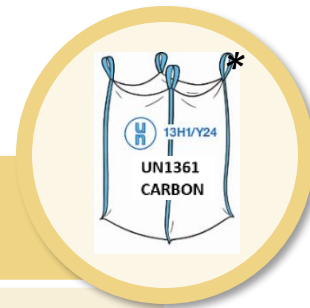
STOWAGE

A minimum headspace in the Cargo Transport Unit of **30 cm** shall be maintained.

WHAT DO I NEED TO AFFIX ON MY PACKAGING?



You need to affix the following on your UN approved packaging.



CONVENTIONAL PACKAGING

- UN approval marks (IMDG 6.1)

Marks and labels (IMDG 5.2)

- UN number & Proper Shipping Name
 - (at least 12 mm high)
- Class

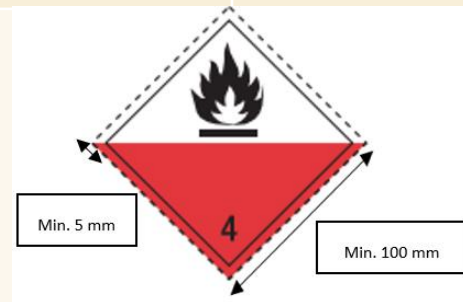
INTERMEDIATE BULK CONTAINER (IBC)

- UN approval marks (IMDG 6.5)

Marks and labels (IMDG 5.2)

- UN number & Proper Shipping Name
 - (at least 12 mm high)
- Class

(Note: when the IBC has a capacity of > 450L it must be marked on two opposing sides)



**(illustration purposes only)*

DO I NEED TO AFFIX MARKS AND LABELS ON EVERY SINGLE ITEM OF PACKAGING?

Depends on the packaging used.

If you use a single packaging – for example UN approved bags – then all marks and labels must be affixed to each and every bag.

If you are using an outer packaging – for example UN approved plywood box – then all the marks and labels shall be affixed to the outer packaging only, and the packaging inside the plywood box (inner packaging) are exempt of labels and marks.

I STILL HAVE A STOCK OF NON-UN APPROVED BAGS; CAN I STILL USE THEM?

Yes, you are allowed to still use them under the following conditions:

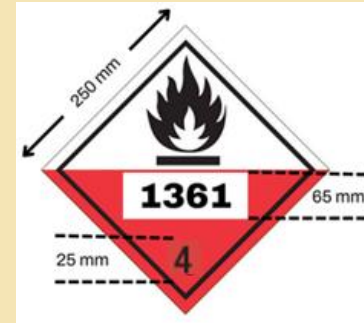
1) The bags are:

- a) Sift-proof
- b) Hold a maximum 50 kg per bag

2) The bags are packaged in a UN approved outer packaging; the max cargo net weight per outer packaging is 400 kg. Some examples of outer packaging include plywood box 4D or fibreboard box 4G.

WHAT DO I NEED TO AFFIX ON THE CONTAINER?

On all four sides of the container, the placard 4.2 shall appear as per below example.
Where the cargo gross weight exceeds 4000 tons, the UN number (without prefix UN- shall be affixed).



Note: it is also allowed to have the UN number in orange next to the class placard (instead of already included in the placard).

1361



WHAT KIND OF DOCUMENTATION IS REQUIRED?

It is mandatory for all dangerous goods to be accompanied by a Dangerous Goods Declaration (DGD). In addition, the IMDG code requires the following information on the DGD.

- Date of production
- Date of packing into packaging
- Temperature of the material (in °C) on the date of packing into the packaging.

IMO DANGEROUS GOODS DECLARATION

1 Shipper (*)		2 Transportation Document Number BL: (*)	
		3 PAGE of	4 Shipper's Reference
6 Consignee (*)		5 Freight Forwarder's Reference	
		7 Carrier (to be declared by the Carrier)	
8 SHIPPER'S DECLARATION I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name(s), and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.			
10 Vessel/Flight and Date (*)	11 Port/Place of Loading (*)	9 Additional Handling Information • Date of production • Date of packing into packaging • Temperature of the material on the date of packing into the packaging " °C".	
12 Port/Place of Discharge (*)	13 Destination (*)		
14 Shipper's Name		Number and Kind of Packages, Description of Goods, GHS (if any), Net Mass (kg), Gross Mass (kg)	

