



New regulations for charcoal transport

Dear Customer,

We would like to inform you about a regulatory amendment of the IMO regarding the transportation of charcoal of animal or vegetable origin. As per the International Maritime Dangerous Goods (IMDG) Code amendment 42-24, charcoal must be declared as Dangerous Goods, classified as **UN1361 CARBON**, animal or vegetable origin, **Class 4.2**.

The updated regulation introduces **Special Provision 978** and follows a phased implementation timeline, with voluntary compliance starting on **January 1, 2025**, and mandatory implementation from January 1, 2026.

This change is driven by critical safety concerns and aims to protect our crew, our vessels and all our customers' cargo. Between 2015 and 2022, **68 fires** occurred on container vessels directly linked to the transportation of charcoal. Scientific evidence has shown that the NH4 Test, previously used to classify cargo as non-dangerous, is no longer valid for exempting charcoal from Dangerous Goods classification.

Key points of legal amendments and Special Provision 978 include:

- Materials must be weathered for at least **14 days** after production or packed under inert gas after pyrolysis, followed by a 24-hour storage period.
- Materials must only be packed if their temperature does not exceed **40°C** on the day of packing.
- Containerized transports in bulk without any packaging are not allowed.
- Cargo transport units must have a minimum **30 cm headspace**.
- Dangerous Goods Declaration must contain the following information:
 - Date of production
 - Date of packing into packagings
 - Temperature of the material on the day of packing into packaging

To enhance safety, from **April 1, 2025**, Hapag-Lloyd will require a **Dangerous Goods Declaration (DGD)** for all charcoal shipments under the new IMDG Code requirements and

will no longer accept non-DG charcoal.

Shipments with Charcoal must be loaded into UN-approved and certified packaging and the requirements for marking, labelling and placarding of packages and containers apply. Partner lines and feeder operators might introduce this even earlier.

To support this transition, Hapag-Lloyd will not apply the **Dangerous Goods Premium (DGP)** surcharge for UN1361 shipments from **April 1, 2025 to December 31, 2025**. Other DG related surcharges might still be applied.

We encourage you to be prepared for these updates by adjusting your processes and documentation. Hapag-Lloyd remains committed to supporting you throughout this transition.

If you require additional information, please contact our teams at your nearest [location](#), who will guide you based on your individual situation. Thank you for your cooperation as we work together to prioritize safety and regulatory compliance.

Best regards,



Diana

from our Customer Communications Team