



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

## **NOTICE OF ENFORCEMENT POLICY REGARDING INTERNATIONAL STANDARDS**

The U.S. Department of Transportation’s Pipeline and Hazardous Materials Safety Administration (PHMSA) understands that many offerors and carriers of hazardous materials in international transport will soon be adhering to requirements in the internationally-adopted 2025–2026 International Civil Aviation Organization’s Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions) and Amendment 42-24 of the International Maritime Organization, International Maritime Dangerous Goods Code (IMDG Code). The Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) currently authorize offerors and carriers to use the 2023–2024 Edition of the ICAO Technical Instructions and Amendment 41-22 of the IMDG Code.

PHMSA gives notice that while it will: (1) continue to evaluate whether to propose the inclusion of the 2025–2026 Edition of the ICAO Technical Instructions and Amendment 42-24 of the IMDG Code in a future notice of proposed rulemaking (NPRM); and (2) potentially adopt these updated standards in a future final rule, PHMSA will not take enforcement action against any offeror or carrier who is using these standards when all or part of the transportation is by air with respect to the ICAO Technical Instructions, or all or part of the transportation is by vessel with respect to the IMDG Code.<sup>1</sup> In addition, for transport by rail and highway to, from, or within the United States, PHMSA will not take enforcement action against any offeror or carrier who offers or accepts hazardous materials identified and described on a shipping paper and/or packages marked and/or labeled in accordance with these standards—provided that appropriate emergency response information consistent with 49 CFR Part 172, Subpart G, accompanies the shipment.

However, items described and packaged for transportation under the respective international standards as UN3559 and UN0514, “Fire Suppressant Dispersing Devices,” must first be approved by the Associate Administrator in accordance with 49 CFR § 173.56.

This notice of enforcement policy has been coordinated with our modal partners, including the Federal Aviation Administration, Federal Motor Carrier Safety Administration, Federal Railroad Administration, and the United States Coast Guard. PHMSA and our four modal partners will exercise the policy together.

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<sup>1</sup> Must conform to all applicable requirements of 49 CFR Part 171, Subpart C.

This notice is limited to the use of the standards incorporated by reference in 49 CFR § 171.7(t) and (v), respectively. Offerors and carriers must comply with all other obligations under the HMR and other applicable laws. This notice will remain in effect until withdrawn or otherwise modified.

Issued December 9, 2024, in Washington D.C.

A handwritten signature in blue ink that reads "William S. Schoonover". The signature is cursive and fluid.

**William S. Schoonover**  
Associate Administrator for Hazardous Materials Safety