



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

January 22, 2026

Mr. Scott Higman  
MSC Mediterranean Shipping Company (USA) Inc.  
700 Watermark Blvd.  
Mt. Pleasant, SC 29464

Reference No. 26-0008

Dear Mr. Higman:

This is in response to your January 15, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transportation of unpackaged vehicles in cargo transport units (CTUs) under the International Maritime Dangerous Goods (IMDG) Code. Specifically, you ask whether unpackaged vehicles shipped inside of CTUs require placarding when offered for transport in accordance with special provision 962 of Amendment 42-24 of the IMDG Code.

The answer to your question is no. Special provision 962 of the IMDG Code addresses when marking, labeling, and placarding requirements apply to packaged vehicles, and excludes unpackaged vehicles from these requirements. As you note in your email, the next amendment to the IMDG Code—*i.e.*, Amendment 43-26, applicable on January 1, 2028—once adopted will require placarding for all vehicles in CTUs whether packaged or unpackaged. Amendments 42-24 and 43-26 to the IMDG Code may be considered by PHMSA for incorporation by reference in a future harmonization rulemaking. We note that permissive placarding is authorized by both the currently effective HMR and the currently effective IMDG Code.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Nickels", with a long horizontal flourish extending to the right.

Matthew Nickels  
Acting Director, Standards & Rulemaking Division  
Office of Hazardous Materials Safety

**From:** INFOCNTR (PHMSA)  
**To:** Baker, Yul (PHMSA)  
**Cc:** Hazmat Intentus  
**Subject:** FW: Clarification on IMDG Code Placarding for UN 3556 Lithium-Ion Battery Powered Vehicles  
**Date:** Thursday, January 15, 2026 14:06:55  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[maoc003.png](#)

Good afternoon,

Please see the following interpretation request. Let us know if you need anything else.

Best,

Aminah

**From:** scott.higman@msc.com <scott.higman@msc.com>  
**Sent:** Thursday, January 15, 2026 9:48 AM  
**To:** PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>; HQS-SMB-CG-ENG-5-HazardousMaterialDivision@uscg.mil  
**Cc:** Michael.P.Comerford@uscg.mil; hillary.sadoff@uscg.mil; PhillipVictor.T.Romero@uscg.mil; stefan.gielen@msc.com; leslie.godelaine@msc.com; yve.vanlimbergen@msc.com; christopher.parvin@msc.com; neill.bishop@msc.com; kelley.glover@msc.com  
**Subject:** Clarification on IMDG Code Placarding for UN 3556 Lithium-Ion Battery Powered Vehicles

You don't often get email from [scott.higman@msc.com](mailto:scott.higman@msc.com). [Learn why this is important.](#)  
**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I write today with a sense of urgency to obtain a formal DOT interpretation for the transportation of the subject commodities. We are currently experiencing significant challenges as several U.S. terminals and port authorities are interpreting IMDG Code placarding requirements and Special Provisions for UN 3556 Lithium-Ion Battery Powered Vehicles differently based on comments from fire departments and federal field-level authorities. This inconsistency has created confusion and resulted in an economic impact, as U.S. export cargo on terminal is presently at an impasse.

As of the date of this request, over 100 TEUs of U.S. Exports are being delayed at U.S. ports due to the confusion and we believe a rapid formal determination is needed to alleviate the problem and answer the question: "To placard or not placard the outside of CTUs said to contain Lithium-Ion Battery Powered Vehicles UN 3556 Class 9 commodities that are not placed inside the CTU (Dry Van Container) and not enclosed in crates or overpacks inside the container.

As you may be aware, this placarding issue was addressed during IMO Editorial & Technical Group (E&T Group) #43, where it was collectively recognized that the confusion will be resolved with Amendment 43-26, which will require external placarding on Cargo Transport Units (CTUs).

Until that amendment takes effect, MSC maintains the interpretation that a shipping container (CTU) is not considered packaging—it is a transport unit and therefore, Class 9 placards should not be affixed to a container carrying UN 3556 un-crated vehicles (un-packaged) as cargo, in accordance with Special Provision (SP) 962.

I am seeking clarification on the DOT, PHMSA and U.S. Coast Guard's interpretation of this matter to ensure compliance and operational continuity.

Thank you for your attention to this issue. Please feel free to contact me by or email to discuss further.

Excerpt from NCB HAZCHECK for UN 3556

**UN 3556: VEHICLE, LITHIUM ION BATTERY POWERED** IMDG 42-24 | IMDG 41-22 | ADR 2025

*No Variant Name*

Classification Information	
(1) UN Number	3556
(2) Proper Shipping Name	VEHICLE, LITHIUM ION BATTERY POWERED
(3) Class / Division	9
(4) Subsidiary Hazards	-
(5) Packing Group	-
(6) Special Provisions	384 388 405 961 962
(7a) Limited Quantities	0
(7b) Excepted Quantities	EO

Packing Information	
(8) Packing Instructions	P912
(9) Packing Provisions	-
(10) IBC Instructions	-
(11) IBC Provisions	-
(13) Tank Instructions	-
(14) Tank Provisions	-

Additional Information	
(15) Emergency Schedules	Fire: F-A Spillage: S-I
(16a) Stowage and Handling	Category: A
(16b) Segregation	-
(17) Properties and Observations	This entry applies to vehicles powered by lithium ion batteries with the batteries installed, such as electrically-powered cars, lawn tractors, wheelchairs and other mobility aids.
Flashpoint	-
High Consequence	No
State	Solid
Marine Pollutant	No

General Stowage Requirements	
Cargo Ships	Passenger Ships
On Deck Or Under Deck	On Deck Or Under Deck

**Labels, Marks & Placards**

**Package Labels**

1. Labels and placards are not required for vehicles not fully enclosed by packagings, crates or other means that prevent ready identification

**CTU Placards**

1. Labels and placards are not required for vehicles not fully enclosed by packagings, crates or other means that prevent ready identification

IMDG Segregation Bar	
Class	Segregation Requirements
1.1/2/1.5	X
1.3/1.6	X

Part 3 – Dangerous Goods List, special provisions and exceptions													Chapter 3.2 – Dangerous Goods List								
UN No.	Proper shipping name (PNA)	Class or division	Subsidiary hazard(s)	Packing group	Special provisions	Limited and excepted quantity provisions		Packaging				IBC		Portable tanks and bulk containers			EmS	Storage and handling	Segregation	Properties and observations	UN No.
						Limited quantities (7a)	Excepted quantities (7b)	Instructions (8)	Provisions (9)	Instructions (10)	Provisions (11)	Task instructions (12)	Provisions (13)	(14)	(15)	(16)					
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)			
3552	SODIUM ION BATTERIES CONTAINED IN EQUIPMENT or SODIUM ION BATTERIES PACKED WITH EQUIPMENT, with organic electrolyte	9	-	-	188 230 310 348 360 376 377 384 400 401	0	ED	P903 P908 P909 P910 P911 LP903 LP904 LP905 LP906	-	-	-	-	-	-	-	-	F-A, S-I	Category A SW19	-	Electrical batteries containing sodium ion may react (e.g. flame, heat, emission of toxic, corrosive or flammable gases or vapour) or disassemble due to damage, defects or short circuit.	3552
3553	DISILANE	2.1	-	-	-	0	ED	P200	-	-	-	-	-	-	-	-	F-D, S-U	Category D SW2	SG43 SG46	Gas that is extremely flammable and spontaneously ignites in air (pyrophoric). Repulsive odour. Slowly decomposes with water, instant to mucous membranes and is an asphyxiant. Boiling point: 14.3°C. Lighter than air (0.47%).	3553
3554	GALLIUM CONTAINED IN MANUFACTURED ARTICLES	8	-	-	366	5 kg	ED	P003	PP90	-	-	-	-	-	-	-	F-A, S-B	Category B SW1	-	Gallium (UN 2803) is highly corrosive to aluminum. Carriage should be prohibited in hovercraft and other ships constructed from aluminum.	3554
3555	TRIFLUOROMETHYL-TETRAZOLESODIUM SALT IN ACETONE, with not less than 68% acetone, by mass	3	-	8	28	0	ED	P303	PP26	-	-	-	-	-	-	-	F-E, S-V	Category D SW1 H2 H3	SG30	Desensitized explosive. Explosive and sensitive to friction in the dry state. May form extremely sensitive compounds with heavy metals and their salts.	3555
3556	VEHICLE, LITHIUM ION BATTERY POWERED	9	-	-	384 388 404 405 961 962	0	ED	P912	-	-	-	-	-	-	-	-	F-A, S-I	Category A	-	This entry applies to vehicles powered by lithium ion batteries with the batteries installed, such as electrically-powered cars, lawn tractors, wheelchairs and other mobility aids.	3556
3557	VEHICLE, LITHIUM METAL BATTERY POWERED	9	-	-	384 388 404 405 961 962	0	ED	P912	-	-	-	-	-	-	-	-	F-A, S-I	Category A	-	This entry applies to vehicles powered by lithium metal batteries with the batteries installed, such as electrically-powered cars, lawn tractors, wheelchairs and other mobility aids.	3557
3558	VEHICLE, SODIUM ION BATTERY POWERED	9	-	-	384 388 404 405 961 962 977	0	ED	P912	-	-	-	-	-	-	-	-	F-A, S-I	Category A	-	This entry applies to vehicles powered by sodium ion batteries with the batteries installed, such as electrically-powered cars, lawn tractors, wheelchairs and other mobility aids.	3558

Sincerely and Best Regards,

**Scott Higman**

Director, Safety, Security, and Compliance  
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Sensitivity: Internal