REGULATORY BRIEF #22

IMDG 43-26: Are Your Battery and EV Procedures Ready?

IMDG Code Amendment 43-26 | Voluntary application: 1 January 2027 | Mandatory entry into force: 1 January 2028

KEY MESSAGE Amendment 43-26 changes provisions affecting battery classification, vehicle acceptance, dangerous goods entries, special provisions, package marking, segregation and transport operations. Operators should assess the changes relevant to their cargoes and procedures before the voluntary application period.

1. Regulatory background and implementation

The International Maritime Organization (IMO) has adopted IMDG Code Amendment 43-26. The amendment revises provisions across Parts 1 to 7 of the International Maritime Dangerous Goods Code and addresses developments in dangerous goods transport, including lithium-ion and sodium-ion batteries, electric vehicles and other cargoes.

The supplied amendment summary identifies 1 January 2027 as the date for voluntary application and 1 January 2028 as the mandatory entry-into-force date. The accompanying industry article notes that voluntary application is subject to the decisions of the relevant maritime administrations. Companies should therefore confirm which edition is accepted by the relevant Administration and carrier during the transition period.

Until Amendment 43-26 becomes mandatory, Amendment 42-24 is identified in the supplied industry article as the mandatory edition from 1 January 2026. The applicable edition and any transitional arrangements should be confirmed for each relevant trade and authority.

2. Battery classification and documentation

2.1 Lithium-ion, sodium-ion and hybrid battery systems

The amendment extends the scope of provisions in 2.9.4 and 2.9.5 to articles, engines, equipment and vehicles. The supplied summary identifies additional notes concerning remanufactured batteries, type-proving of sodium-ion batteries as a whole, and the obligation to make test summaries available.

New 2.9.4.8 addresses hybrid batteries containing lithium-ion and sodium-ion cells. According to the supplied summary, these are to be classified as lithium-ion batteries under the applicable UN 3480, UN 3481 or UN 3536 entries and tested as lithium-ion batteries. Each cell type must individually be demonstrated to meet the UN 38.3 test criteria.

Operators and consignors should verify the actual battery chemistry, configuration and installation arrangement. Batteries transported separately, batteries installed in equipment and battery systems installed in cargo transport units may be subject to different entries and provisions. Existing classification records, test documentation and dangerous goods descriptions should be reviewed against the complete amended Code.

2.2 New and revised battery-related UN entries

The supplied summary identifies the following battery-related changes:

- UN 3536: the proper shipping name is amended to “LITHIUM ION BATTERIES INSTALLED IN CARGO TRANSPORT UNIT”.
- UN 3563: new entry for LITHIUM METAL BATTERIES INSTALLED IN CARGO TRANSPORT UNIT.
- UN 3564: new entry for SODIUM ION BATTERIES INSTALLED IN CARGO TRANSPORT UNIT.

Dangerous Goods List references, booking systems, cargo descriptions, declarations and onboard reference material should be checked for the revised and new entries.

3. Electric vehicles and vehicle acceptance

3.1 New Special Provision 980

New SP 980 sets out vehicle acceptance criteria. The supplied amendment summary states that consignors must assess vehicles for leaks, electrical damage, damage to the supplemental restraint system (SRS), and evidence of previous extreme events before offering them for transport. It also states that batteries subject to SP 376 must be removed.

Vehicle acceptance procedures should identify who performs the assessment, what information or evidence is required, how defects are escalated and how the acceptance decision is recorded. Particular attention should be given to vehicles that have sustained collision damage, battery damage or electrical malfunction.

3.2 Revised Special Provisions 961 and 962

SP 961 and SP 962 are substantially revised and now refer to SP 980. The supplied summary identifies enhanced battery, fuel and braking checks. It also states that CTU placarding under SP 962 applies equally to packaged and unpackaged vehicles.

Shipping companies and operators should review vehicle-carriage instructions, acceptance checklists, cargo information requirements and placarding procedures against the exact amended provisions. The amendment does not mean that every electric vehicle automatically has identical documentation or handling requirements; the applicable provisions depend on the vehicle, its condition, classification and the relevant special provisions.

4. Package marking, segregation and emergency information

4.1 Revised Battery mark

Part 5 renames the mark previously described as the “Lithium or sodium ion battery mark” to the “Battery mark”. The supplied summary states that its scope is extended to SP 188 and SP 400. It also notes that button-cell UN numbers need not appear where other cells or batteries are present, and that the mark should be co-located with hazard labels where package dimensions allow.

4.2 Radioactive cargo segregation

Part 7 revises the Class 7 segregation table in 7.1.4.5.18, including updated distances and clearer ship-type columns. The table headings are also updated to “CLASS/DIVISION”. Operators handling Class 7 cargo should review stowage planning references and segregation checks against the revised table.

4.3 EmS Guide and emergency preparedness

The supplied industry article reports consequential amendments to the Emergency Response Procedures for Ships Carrying Dangerous Goods (EmS Guide) accompanying the revised IMDG Code. It describes the EmS Guide as providing practical information to support responses to fire and spillage incidents involving dangerous goods aboard ships.

Operators should check that the emergency information available to the vessel remains consistent with the dangerous goods actually carried and with the applicable amended references. Dangerous goods declarations, cargo identification, emergency schedules and onboard emergency information should be checked for consistency. This brief does not reproduce or interpret individual EmS schedules; the applicable official guidance should be consulted.

5. Other notable amendments across IMDG Parts 1–7

- Part 1 – Definitions: amendments to definitions including cylinder types, filling ratio, large packagings, unit load and net explosive mass. New definitions include usable water capacity, single packaging and pressure volume product (pV-product).
- Part 2 – Classification: provisions for energetic material samples and certain organic substance samples are revised; additional changes address battery and vehicle scope, remanufactured batteries and sodium-ion battery type-proving. Minor classification changes affect Classes 1, 4.2, 5.2, 6.1, 6.2, 8 and 9.
- Part 3 – Dangerous Goods List and Special Provisions: approximately 50 existing DGL entries and approximately 27 existing special provisions are amended, according to the supplied summary. New UN entries include UN 2348, UN 2862 and UN 3561 to UN 3564. New special provisions include SP 410 to SP 413 and SP 980.

- Part 4 – Packing and tank provisions: amendments to single-packaging references and approximately 25 packing instructions; new special packing provisions PP98, PP99 and PP100; and portable-tank transitional provisions, including TP43.
- Part 5 – Consignment procedures: the battery mark is renamed and its scope and placement provisions are revised.
- Part 6 – Construction and testing: amendments affect packing and tank design, construction and testing requirements, including updates to referenced ISO standards. New 6.10.3 addresses service equipment for FRP portable tanks.
- Part 7 – Transport operations: revised Class 7 segregation information; a CTU stacking-orientation requirement linked to the orientation used during stacking tests; and two independently powered measuring devices for temperature-control monitoring under 7.3.7.4.3.

6. Shore-based personnel competence and IMDG training

The supplied industry article highlights IMDG Code Chapter 1.3 and the training requirements applicable to shore-based personnel engaged in dangerous goods transport activities. It identifies personnel preparing shipments, checking documentation, handling containers or arranging maritime transport as groups whose duties may require relevant IMDG knowledge.

Operators should review whether personnel training reflects the functions actually performed and whether regulatory changes have been communicated to the relevant staff. General awareness training may provide a foundation, while personnel undertaking specialised functions may require additional function-specific instruction. Training arrangements should be assessed against the applicable requirements of Chapter 1.3 and the organisation's assigned responsibilities.

This brief does not endorse or promote a training provider. The appropriate training content and level should be determined by the duties performed and the applicable regulatory requirements.

7. Recommended operator readiness checklist

Shipowners, managers, operators and organisations involved in the preparation, acceptance or carriage of dangerous goods should consider the following actions:

- Obtain and review the complete official text of IMDG Code Amendment 43-26, including the Dangerous Goods List, special provisions and associated provisions.
- Confirm the applicable edition and voluntary-application arrangements with the relevant maritime Administration and carrier.
- Identify trades and vessels carrying lithium-ion, sodium-ion or hybrid batteries, battery-powered equipment, vehicles, radioactive materials or specialised cargoes.
- Review battery classification records, UN 38.3 evidence and the availability of required test summaries.
- Update vehicle acceptance procedures to address leaks, electrical damage, SRS damage and evidence of previous extreme events under SP 980.
- Review the treatment of batteries subject to SP 376 and the removal requirement stated in the supplied summary of SP 980.
- Revise vehicle procedures and checklists for the amended SP 961 and SP 962, including battery, fuel and braking checks and CTU placarding.
- Update dangerous goods descriptions and systems for the revised UN 3536 entry and new UN 3563 and UN 3564 entries.
- Review package marking instructions for the renamed Battery mark and its revised scope and placement.
- Check Class 7 segregation references and relevant stowage planning procedures.
- Check that onboard dangerous goods emergency information and applicable EmS references are current and consistent.
- Review shore-based personnel competence and training arrangements against their duties and IMDG Chapter 1.3.
- Brief relevant shipboard and shore-based personnel and retain records of procedure updates, familiarisation and implementation.
- Establish a controlled implementation plan ahead of 1 January 2027 and verify mandatory compliance by 1 January 2028.

8. Practical compliance considerations

The impact of Amendment 43-26 will depend on the cargoes handled, the vessel's trades and the functions performed by the company. Not every amendment will apply to every operator. A documented applicability review is therefore a useful first step: identify the relevant UN entries, special provisions, packing and marking requirements, stowage controls and personnel responsibilities.

A procedure revision alone may not be sufficient if cargo booking systems, acceptance forms, dangerous goods databases, vessel instructions, emergency information and personnel familiarisation remain unchanged. Operators should be able to demonstrate that relevant controls are understood, applied and recorded at the appropriate stages of the transport chain.

Communication between consignors, freight forwarders, container packing facilities, shipping lines and vessel personnel is important because classification or documentation errors introduced early in the transport chain may only be detected at a later stage.

9. Conclusion

IMDG Code Amendment 43-26 introduces changes to battery classification and documentation, vehicle acceptance, dangerous goods entries, package marking, segregation and transport operations, alongside wider amendments throughout Parts 1 to 7. The accompanying industry material also highlights the importance of emergency information and shore-based personnel competence.

Companies involved in the carriage of batteries and vehicles should use the transition period to identify applicable changes, review their procedures and records, and familiarise relevant personnel. The central operational question is whether the organisation can demonstrate that applicable cargo is correctly classified, assessed, documented, marked, accepted and supported by appropriate emergency information.

Regulatory references and source limitations

Primary instrument: International Maritime Organization (IMO), IMDG Code Amendment 43-26. The supplied "IMDG Code Amendment 43-26 – Summary of Changes" (National Cargo Bureau / Hazcheck, three pages) provides a compact, expressly non-exhaustive summary of changes and identifies the voluntary application and mandatory entry-into-force dates.

Additional contextual source: the user-supplied article "IMDG Code Amendment 43-26: What Changes in 2027 and 2028 for Dangerous Goods Transport by Sea?" This article provides general context on battery and EV transport, EmS Guide consequential amendments, shore-based personnel training and implementation planning.

Important limitation: *This brief is an operational overview based on the two supplied reference documents. It is not an exhaustive statement of the amended Code and does not replace the complete official IMDG Code, relevant IMO instruments, flag/port State instructions or carrier requirements. Verify exact wording, applicability and implementation arrangements against the official texts before approving or changing company procedures.*