

IHMM CERTIFICANT DANGEROUS GOODS TRANSPORTATION COMPLIANCE CHECKLIST



Replacement Edition - 2026

Legal and operational review current through July 20, 2026

DETERMINATION

An immediate update is appropriate. The November 2025 webpage should be replaced because it contains stale timing language, overstates model rules, and mixes binding requirements with proposals, working papers, and incident-specific practices.

WHY THE EXISTING CHECKLIST SHOULD BE REPLACED

#	ISSUE	REQUIRED CORRECTION
1	IMDG status	The webpage says Amendment 42-24 is mandatory January 1, 2026 but still labels it "voluntary now." It is now mandatory and the voluntary-transition language must be removed.
2	U.S. / UN hierarchy	The checklist directs U.S. training and classifications to reflect UN Rev. 24. Current U.S. HMR remain controlling; HM-215R is proposed, not final. UN Rev. 24 is a model framework unless adopted.
3	Battery evidence	The webpage refers to a "UN 38.3 test report" demanded at a named port. The enduring compliance control is to verify testing and make the required test summary available; full reports and port submissions depend on applicable law or acceptance rules.
4	Nonbinding and incident-specific items	ADN working papers, a U.K. enforcement RFI, and generalized post-incident Latin American controls should not be framed as universal requirements. Replace them with binding-text, competent-authority, and carrier-acceptance checks.
5	Recordkeeping and incident response	The present checklist does not state key U.S. record periods, security-plan review controls, or immediate incident-notification obligations. These are added with jurisdictional qualifiers.

Publishing recommendation: Replace the webpage body with the checklist below, update the linked matrix to the 2026 replacement edition, and archive the prior page text as superseded.

How to Use This Checklist

This is a shipment-planning and internal-audit aid for IHMM certificants. No single code governs every multimodal movement. Compliance is cumulative: identify each jurisdiction and mode, apply the binding law for that leg, and satisfy any stricter competent-authority, carrier, port, airport, terminal, or permit condition.

STOP-WORK RULE: Do not tender or accept a shipment when classification, packaging authority, required evidence, documentation, marks, training, permits, or carrier acceptance is missing or materially inconsistent.

Quick Release Hold Points

☐ Route and all jurisdictions confirmed	☐ Binding law and current edition identified
☐ Classification and special provisions documented	☐ Packaging/means of containment authorized and in test
☐ Battery or other commodity-specific evidence complete	☐ Shipping papers/declarations reconciled
☐ Marks, labels, placards, and signage verified	☐ Training and credentials current
☐ Carrier/port/airport/terminal acceptance confirmed	☐ Security, emergency, and incident procedures ready
☐ Required permits, approvals, and registrations valid	☐ Final independent review completed and release authorized

1. Define the Shipment and Governing Law

- ☐ Identify the offeror/consignor, packer, loader, carrier, freight forwarder, operator, consignee, importer, waste generator, and any party performing a regulated pre-transportation or transportation function.
- ☐ Map every leg: domestic origin movement, border crossing, transit country, transshipment point, port/airport/terminal, international modal leg, and domestic destination movement.
- ☐ For each leg, record the binding national, regional, and modal instrument, its edition or effective date, and all applicable addenda, corrigenda, national variations, permits, approvals, exemptions, and carrier rules.
- ☐ Distinguish binding law from UN Model Regulations, proposals, working papers, guidance, enforcement discretion, and industry practice. Do not use UN Rev. 24 as the governing legal citation unless the controlling regime has adopted it.
- ☐ For a U.S. leg using ICAO, IMDG, Transport Canada, or another authorized international standard, document the specific authorization and all additional U.S. conditions under 49 CFR 171.22-171.25.
- ☐ Confirm whether PHMSA registration, competent-authority approval, an equivalent level of safety determination, special permit, ERAP, DGSA appointment, carrier permit, route permit, or other authorization is required.

2. Classification and Commodity-Specific Controls

- ☐ Confirm the proper shipping name, UN/NA identification number, primary and subsidiary hazard, packing group, technical name, environmental hazard or marine pollutant status, flash point where required, and any control or emergency temperature.
- ☐ Document the classification basis. Treat an SDS as supporting information, not an automatic substitute for a transport classification determination.
- ☐ Confirm whether the material is a waste, residue, empty uncleaned packaging, elevated-temperature material, environmentally hazardous substance, infectious substance, genetically modified organism, self-reactive substance, organic peroxide, explosive, radioactive material, or material requiring stabilization.
- ☐ Review every applicable special provision, exemption, limited-quantity or excepted-quantity condition, and mode restriction. Verify that all conditions - not merely quantity thresholds - are met.
- ☐ For lithium and sodium-ion cells, batteries, equipment, and battery-powered vehicles, identify chemistry, configuration, watt-hour rating or lithium content, state of charge where applicable, and whether the item is prototype, low-production, damaged/defective, recalled, waste, or offered for recycling.
- ☐ For lithium batteries, verify successful UN 38.3 testing and availability of the required test summary. Do not assume that a full laboratory report must accompany every shipment unless required by the controlling authority, port, carrier, or contract.

3. Packaging, Tanks, IBCs, Cylinders, and Vehicles

- ☐ Use a packaging or means of containment authorized for the specific substance, concentration, packing group, quantity, mode, and jurisdiction.
- ☐ Confirm specification markings, manufacture date, periodic test or inspection dates, maximum gross mass, pressure rating, compatibility, absorbent/cushioning, closure method, torque, venting, inner-packaging orientation, and package integrity.
- ☐ Retain manufacturer closure instructions and objective evidence that employees followed them. Do not reuse or recondition packaging unless authorized and properly inspected.

- Verify overpack, salvage packaging, large packaging, composite packaging, intermediate bulk container, cargo tank, portable tank, tank container, rail tank car, cylinder, and bulk-container requirements as applicable.
- Confirm vehicle, tank, vessel, container, and equipment approvals; certificates; inspection dates; placard holders; emergency equipment; fire extinguishers; PPE; wheel chocks; grounding/bonding; and load securement.
- Check segregation, compatibility, foodstuff separation, stowage, accumulation limits, and mixed-load restrictions before loading. Record the decision when unlike dangerous goods are consolidated.

4. Shipping Papers, Declarations, and Emergency Information

- Prepare the basic description and all additional entries in the sequence, format, language, and units required by the governing instrument for that leg.
- Verify quantities, package count and type, technical names, special permits/approvals, waste descriptions, marine pollutant or environmentally hazardous statements, flash point, control/emergency temperature, and other mode-specific entries.
- Include the required shipper certification, emergency response information, emergency telephone number, dangerous goods declaration, container/vehicle packing certificate, waste manifest, customs document, and transit or import permit, as applicable.
- Make required documents accessible to the driver, train crew, vessel, aircraft operator, terminal, emergency responders, and enforcement officials in the legally required form. Confirm when electronic records are authorized and when a physical copy is still required.
- Reconcile information across the commercial invoice, bill of lading, air waybill, dangerous goods declaration, manifest, booking, customs filing, warehouse record, and package or vehicle markings.
- In the United States, retain non-waste hazardous materials shipping papers for two years and hazardous waste shipping papers for three years after acceptance by the initial carrier. Apply any longer period required by another applicable law, permit, contract, or record type.

5. Marks, Labels, Placards, Orange Panels, and Signage

- Verify package marks, hazard and handling labels, orientation arrows, lithium battery mark, limited/excepted quantity marks, environmentally hazardous or marine pollutant mark, elevated-temperature mark, overpack mark, and cargo-aircraft-only label, as applicable.
- Confirm each mark and label is correct in content, size, color, durability, location, orientation, contrast, and visibility and is not obscured by straps, wrap, doors, or other labels.
- Verify freight-container, tank, vehicle, wagon, and vessel placards, orange panels, identification numbers, elevated-temperature marks, fumigation warnings, and other required signage for each leg.
- Ensure overpacks and consolidation units reproduce required marks and labels when inner package markings are not visible.
- Remove or cover obsolete or misleading marks and placards only when legally permitted and after the hazard is no longer present.
- Retain dated photographs of representative packages, overpacks, containers, tanks, and vehicles as shipment evidence when practicable.

6. Training, Competency, and Responsible Personnel

- Identify every employee or contractor performing classification, packaging, marking, labeling, documentation, loading, unloading, acceptance, transport, emergency-response, or security functions.
- Provide general awareness, function-specific, safety, security-awareness, and any required in-depth security training; add mode-specific and jurisdiction-specific training for air, vessel, road, rail, and inland-waterway functions.
- Verify required recurrent training intervals and retrain when regulations, assigned functions, equipment, commodities, or procedures materially change.
- For ADR/RID/ADN operations, verify required Chapter 1.3 training, ADR driver certification, safety adviser/DGSA coverage, and crew or vessel qualifications, subject to applicable exemptions and national implementation.
- For air transport, use a competency-based training and assessment program consistent with the applicable State/operator framework, and confirm personnel are trained for the functions they actually perform.
- Maintain training records with employee name, completion date, training materials or scope, provider, and certification. In the United States, retain current training records inclusive of the preceding three years for the period of employment as a hazmat employee and for 90 days thereafter.

7. Mode-Specific Release Checks

MODE / FRAMEWORK	RELEASE CHECKS
Road - U.S. / Canada / ADR / national law	Confirm driver and carrier authority, shipping paper accessibility, route/tunnel restrictions, vehicle/tank approvals, segregation, load securement, placards/orange panels, emergency equipment, attendance/parking rules, and local permits.

MODE / FRAMEWORK	RELEASE CHECKS
Rail - HMR / RID / national law	Confirm carrier acceptance, wagon/tank-car qualification, train consist and placement information, documentation transfer, switching or yard restrictions, route controls, emergency information, and local carrier restrictions.
Sea - IMDG 42-24	Use Amendment 42-24 as mandatory from January 1, 2026. Verify dangerous goods declaration, container/vehicle packing certificate, package and CTU condition, segregation, stowage, limited quantity rules, marine pollutant status, port/terminal requirements, and vessel acceptance.
Air - ICAO 2025-2026	Use the 2025-2026 Technical Instructions with current addenda and corrigenda. Check State and operator variations, packing instruction, quantity limits, state of charge, cargo-aircraft-only restrictions, documentation, acceptance check, and handling/storage requirements.
Inland waterways - ADN / national law	Confirm vessel and tank certificates, crew qualifications, loading/unloading controls, documentation and instructions in writing, stability and segregation, gas-free or residue status, terminal rules, and national implementation.
Multimodal handoff	At every transfer, reconcile classification, quantities, packaging, marks, documents, emergency information, custody, damage status, and the next leg's acceptance requirements. Do not assume compliance with one mode automatically satisfies the next.

8. Carrier, Port, Airport, Terminal, and Third-Party Acceptance

- ☐ Obtain current carrier, airline, vessel operator, rail carrier, port, airport, terminal, warehouse, and freight-forwarder acceptance requirements before tender.
- ☐ For air, check current ICAO State variations and operator variations. For sea, check port, terminal, vessel, and competent-authority restrictions in addition to IMDG 42-24.
- ☐ Obtain written pre-approval for unusual, high-risk, prototype, damaged/defective, recalled, waste, temperature-controlled, radioactive, explosive, infectious, or large-format battery shipments where required or prudent.
- ☐ Confirm each subcontractor is authorized, trained, insured, equipped, and contractually obligated to follow the identified rules. Do not assume legal duties can be transferred merely by contract.
- ☐ Include change-control, notification, record-access, incident-reporting, audit, and indemnity provisions appropriate to the parties' actual legal responsibilities.
- ☐ Verify final routing and transshipment points immediately before dispatch; a carrier reroute can create a new jurisdictional or modal compliance obligation.

9. Security, Emergency Preparedness, and Incident Reporting

- ☐ Determine whether a written security plan is required. Address personnel security, unauthorized access, en route security, high-consequence commodities, route risk, temporary storage, and cybersecurity affecting transport documentation or tracking.
- ☐ Assign a responsible official, communicate security duties, control access to sensitive shipment data, and review the plan at the legally required interval. U.S. plans must be reviewed at least annually and revised as needed.
- ☐ Verify 24-hour emergency contacts, response information, spill/fire procedures, isolation distances, medical information, contractor availability, mutual aid, and notification trees before movement.
- ☐ Train employees to stop work, isolate a package or vehicle, preserve evidence, notify management, and contact competent authorities after a leak, fire, loss, theft, undeclared shipment, misdeclaration, package damage, or other event.
- ☐ Identify immediate and written incident-reporting deadlines for every applicable jurisdiction and mode. In the United States, specified serious incidents require National Response Center notice as soon as practical and no later than 12 hours, followed by written reporting when required.
- ☐ Conduct a documented root-cause analysis and corrective action review after an incident, near miss, rejection, enforcement contact, or repeated documentation error.

10. Final Release, Records, Audit, and Change Control

- ☐ Use an independent final check or competent second-person review for classification, packaging, marks/labels, documents, quantity limits, and carrier acceptance before tender.
- ☐ Place the shipment on hold when information is missing, inconsistent, outdated, or unsupported. Document who has authority to release a hold.

- ❑ Retain objective evidence: classification worksheet, tests, approvals, packaging instructions, training records, inspection certificates, documents, photographs, acceptance correspondence, permits, and audit findings.
- ❑ Record the exact regulatory edition, addendum, corrigendum, variation, and effective date used for the shipment. Save official source material or a controlled citation sufficient to reconstruct the decision.
- ❑ Archive superseded checklists, matrices, SOPs, labels, forms, and software rule sets with a visible “superseded - do not use” notice.
- ❑ Trigger review when PHMSA finalizes HM-215R; ICAO, IMO, ADR/RID/ADN, Transport Canada, MERCOSUR, or a national authority issues a binding amendment; a carrier changes acceptance rules; or an incident reveals a control failure.
- ❑ Perform a formal checklist review no later than January 2027 and a quarterly link/effective-date check of high-use official sources.

Selected U.S. Record and Review Controls

CONTROL	U.S. BASELINE	CHECKLIST DIRECTION
Shipping papers	2 years; 3 years for hazardous waste	Count from acceptance by the initial carrier. Apply longer overlapping requirements when applicable.
Training records	Current training inclusive of preceding 3 years; employment period plus 90 days	Maintain required record elements and make records available to authorized officials.
Security plan	Retain while in effect; review at least annually	Update for changed routes, facilities, threats, commodities, personnel, or operations.
Serious incident notice	As soon as practical, no later than 12 hours for specified events	Prepare a jurisdiction-specific notification matrix; written reporting may also be required.

JURISDICTIONAL QUALIFIER: The table above states selected U.S. baselines only. Other jurisdictions, permits, waste laws, customs rules, competent-authority decisions, contracts, and management systems may require different or longer periods.

Official Source Register

Use official texts and current corrections. Links should be checked quarterly and whenever a rule change, incident, or carrier rejection occurs.

REF.	OFFICIAL SOURCE
S1	Existing IHMM Certificant Compliance Checklist (superseded page reviewed)
S2	PHMSA / Federal Register - HM-215R NPRM, 91 FR 5996 (Feb. 10, 2026)
S3	eCFR - 49 CFR 171.22, use of international standards and regulations
S4	eCFR - 49 CFR 172.201, shipping papers and U.S. retention periods
S5	eCFR - 49 CFR 172.704, hazmat employee training and records
S6	eCFR - 49 CFR Part 172, Subpart I, safety and security plans
S7	eCFR - 49 CFR 171.15 and 171.16, incident notification and reporting
S8	eCFR - 49 CFR 173.185, lithium cells and batteries; UN 38.3 records and test summaries
S9	UNECE - ADR 2025 official files and corrections
S10	OTIF - RID 2025 official publication
S11	UNECE - ADN 2025 official publication
S12	IMO - IMDG Code Amendment 42-24, mandatory from January 1, 2026
S13	ICAO - 2025-2026 Technical Instructions validity and official updates
S14	ICAO - Doc 9284 addenda, corrigenda and errata
S15	ICAO - current State variations

REF.	OFFICIAL SOURCE
S16	Transport Canada - Transportation of Dangerous Goods Regulations
S17	MERCOSUR - CMC Decision 15/2019 official record
S18	UNECE - UN Model Regulations, Rev. 24 (model framework)
S19	UNECE - ADR country, competent authority and notification information

Document Control and Legal Notice

OWNER IHMM / designated dangerous goods subject-matter reviewer	EFFECTIVE DATE July 20, 2026	NEXT FORMAL REVIEW No later than January 2027
STATUS Replacement edition	COMPANION RESOURCE IHMM Global DG Transport Compliance Matrix - 2026	ARCHIVE DIRECTION Prior checklist text: superseded - do not use for current compliance

LEGAL AND OPERATIONAL DISCLAIMER: This checklist is a high-level compliance navigation and audit tool. It is not a substitute for the current text of applicable law, competent-authority decisions, permits, approvals, exemptions, carrier/operator variations, or shipment-specific legal and technical review. Requirements can change without notice, and the most restrictive applicable legal or acceptance condition may control.