Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Preparation of Shipping Papers



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

11/14/2025

The Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a September 30th Interpretive Letter the application of the federal Hazardous Materials Regulations ("HMR") to the preparation of shipping papers. See Reference No. 25-0103.

PHMSA was responding to a request from Mr. Robert Johnson of Lennox Corporate ("LC").

LC provided a sample shipping paper and noted that it was previously issued guidance that the sample provided met the requirements in 49 CFR § 172.201(a)(1)(i). However, LC stated that a carrier had expressed concern with the use of the term "Dangerous Goods" as a header for each hazardous material description as shown in the shipping paper.

LC asked whether the sample provided complies with the shipping paper requirements in § 172.201(a).

PHMSA responds in the affirmative, stating that display of the term "Dangerous Goods" in the manner shown does not conflict the requirements for the description of hazardous materials on a shipping paper. It further states that:

… when describing hazardous materials that are included on a shipping paper, a person is required to use one of the methods listed in § 172.201(a)(1)(i) through (a)(1)(iii), as the word "or" (emphasis added) is used to indicate three separate options to identify hazardous materials on a shipping paper. Listing the hazardous materials first as shown in the sample shipping paper provided in your incoming letter meets the requirements in § 172.201(a)(1)(i).

Therefore, PHMSA states that listing the hazardous materials first as shown in the sample shipping paper meets the requirements in § 172.201(a)(1)(i).

A copy of the Interpretive Letter which includes the sample shipping paper provided by LC can be found here.