



International Carbon Black Association

Carbon Black and Its Treatment within “Guidelines for the Carriage of Charcoal and Carbon in Containers”

“**Guidelines for the Carriage of Charcoal and Carbon in Containers**” was published in 2017 to improve safety during the carriage of Charcoal and Carbon. These guidelines were jointly developed by two groups:

1. **CINS (Cargo Incident Notification System)** was established in 2011 to share **information** on all cargo related **incidents. Its** 14 member companies include many of the major maritime carriers.
<https://www.cinsnet.com/about-cinsnet/>
2. **International Group of P&I Clubs** which includes thirteen P&I Clubs which provide marine liability cover (protection and indemnity) for approximately 90% of the world's ocean-going tonnage.
<https://www.igpandi.org/>

The Guideline re-confirms the classification for the various types of Carbon Products as well as their treatment under International Maritime Dangerous Goods (IMDG) Code. Section 2 on Page 4 of the guideline confirms that **IMDG Code does not apply to Carbon Black of mineral origin** (derived from petroleum and natural gas.)

Excerpt:

2. CARBON NOT SUBJECT TO THE PROVISIONS OF THE IMDG CODE

The provisions of the IMDG Code do not apply to non-activated Carbon blacks of mineral origin and Carbons made by a steam activation process.

IMDG Code Special Provision 925, under Part 3, Chapter 3.3, of the Code states:

IMDG Code Special Provision	
925	<p>The provisions of this Code do not apply to:</p> <ul style="list-style-type: none">- non-activated carbon blacks of mineral origin;- a consignment of carbon if it passes the tests for self-heating substances as reflected in the United Nations Manual of Tests and Criteria (see 33.3.1.3.3), and is accompanied by a certificate from a laboratory accredited by the competent authority, stating that the product to be loaded has been correctly sampled by trained staff from that laboratory and that the sample was correctly tested and has passed the test; and- carbons made by a steam activation process.

The guideline further clarifies under section 1.2 Page 3 that the following Charcoal/Carbon dangerous goods categories are subject to IMDG Code:

IMDG Class	UN Number	Description
Class 4.2	UN 1361	CARBON animal or vegetable origin
Class 4.2	UN 1362	CARBON, ACTIVATED
Class 4.2	UN 3088	SELF-HEATING SOLID, N.O.S (technical name: Charcoal)

The document contains the following definitions:

- Activated Carbon is derived from activated natural mineral products including coconut, coal and animal bones.
- Charcoal/Carbon is a lightweight, black residue, consisting of Carbon and any remaining ash, obtained by removing water and other volatile constituents from animal and vegetation substances. Charcoal is usually produced by slow pyrolysis, which is the heating of wood or other organic substances in the absence of oxygen.

Carbon Black (CAS-No. 1333-86-4), based on its source materials, of mineral origin, and its manufacturing process does not fall under the above two definitions and represents an entirely different substance with a unique and separate HS Code. Harmonized Item Description and Coding System (HS) is an international standard maintained by the World Customs Organization (WCO) that classifies traded products. Items are identified by a 6-digit harmonized number that is recognized by countries that have adopted the Harmonized System.

Note: Various carbon products are easily identifiable as they each have unique and separate HS codes:

- **Carbon Black:** HS Code 2803.00.00 (CAS No. 1333-86-4) (EINECS: 215-609-9)
- Activated Carbon: HS Code 3802 (CAS No. 7440-44-0) (EINECS: 264-846-4)
- Charcoal/Char Dust: HS Code 4402 (CAS No. 6291-96-6) (EINECS 240-383-3)

Carbon Black can be identified by its HS Code 2803.00.00

Manufacturers of Carbon Black (HS Code 2803.00.00) include the following International Carbon Black Association (ICBA) members:

Birla Carbon
 Cabot Corporation
 Cancarb Limited
 Continental Carbon
 Imerys
 Orion Engineered Carbons LLC
 Tokai Carbon CB

For further reference please see: <https://www.carbon-black.org/>