



U.S. Department
of Transportation
Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, DC 20590

Notice Highlighting Existing Options Related to Hazardous Materials Shipping Papers and Social Distancing during the COVID-19 Public Health Emergency

The U.S. Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) has received inquiries regarding the requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the exchange of shipping papers. Many of these inquiries have focused on the need to maintain social distancing between shippers and carriers.

Under the HMR, no physical contact between parties is required for the purposes of shipping papers. Shippers and carriers may therefore meet all requirements for hazardous materials shipping papers and maintain necessary social distancing. Shipping papers may be exchanged, for example, by physically attaching the document to a clipboard and placing it on a table and stepping away while the paper is signed, or sending the document via email or other means of electronic transmission.

Concerns have specifically been raised about the shipper's certification statement. Section 172.204(d) states that the shipper's certification on a shipping paper: "...[m]ust be legibly signed by a principal, officer, partner, or employee of the shipper or his agent; and ... [m]ay be legibly signed manually, by typewriter, or by other mechanical means." A shipper may ask a person to sign on its behalf, i.e., to enter the shipper's name as the signature for the shipper's certification on the shipping paper. The request may be made verbally or in writing, and may be electronically transmitted (e.g., text message or email).

Using the methods outlined above, PHMSA believes carriers and shippers may satisfy the safety requirements of the HMR while maintaining appropriate social distancing during the COVID-19 public health emergency.

Issued April 10, 2020, in Washington D.C.

A handwritten signature in blue ink that reads "William S. Schoonover".

William S. Schoonover
Associate Administrator
for Hazardous Materials Safety