



Dry Ice Shipping Compliance Checklist

UN1845 / Class 9 essentials for pharma & biotech shippers, for U.S. domestic shipments

Run through this before every shipment to confirm your packaging and paperwork meet DOT and carrier requirements.

1. Package marking (required on every package)

- ☐ Proper shipping name shown on the outside of the package: "Dry Ice" or "Carbon Dioxide, Solid"
- ☐ UN number displayed: UN1845
- ☐ Net weight of dry ice marked on the package (or "2.5 kg or less" if applicable)
- ☐ If shipped under the refrigerant exception: name of the product being cooled is also marked on the package
- ☐ If shipped for diagnostic or treatment purposes (e.g., frozen specimens): package indicates this purpose

2. Packaging

- ☐ Package allows CO₂ gas to vent: never sealed airtight
- ☐ Insulation matched to transit duration and the required product temperature range
- ☐ Packaging construction can handle pressure buildup without rupturing

3. Know your thresholds

- ☐ Packages at or under 2.5 kg (5.5 lb), used solely as a refrigerant, are excepted from most DOT requirements once properly marked (49 CFR §173.217)
- ☐ General regulatory package cap: 200 kg (441 lb) of dry ice per package
- ☐ Check your carrier's own dry ice limits before shipping, since most major carriers publish acceptance limits below the federal maximum

4. Mode changes the rules

- ☐ Ground (domestic, by truck): dry ice used solely as a refrigerant is not fully regulated as hazmat if 49 CFR §173.217 marking and packaging requirements are met
- ☐ Air: fully regulated. Requires a Class 9 hazard label, net weight in kg on the air waybill, and, unless the shipment qualifies for an exception, a shipper's declaration for dangerous goods
- ☐ Ocean / vessel: fully regulated under the IMDG Code, with its own stowage and segregation requirements

5. Documentation for larger or fully regulated shipments

- ☐ Shipping paper (or approved alternative written documentation) includes: proper shipping name, Class 9, UN1845, number of packages, and net quantity of dry ice per package
- ☐ Personnel handling dry ice hazmat functions are trained under 49 CFR Subpart H

Before you ship: quick gut-check

- ☐ Is the package vented, not sealed?
- ☐ Is the net weight of dry ice marked on the outside?
- ☐ Does shipping by air change what's required, versus ground?
- ☐ Does your carrier's own limit differ from the federal cap?

This checklist is a planning reference based on 49 CFR §173.217 and general DOT/IATA guidance current as of September 2026. It is not legal advice and does not replace your own compliance review. Regulations and carrier policies change. Confirm current requirements against 49 CFR Part 173, the IATA Dangerous Goods Regulations, and your carrier before shipping.



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