



SUB-COMMITTEE ON DANGEROUS
GOODS, SOLID CARGOES AND
CONTAINERS
15th session
Agenda item 4

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AMENDMENTS TO THE IMSBC CODE, INCLUDING EVALUATION OF PROPERTIES OF SOLID BULK CARGOES

Environmental Hazard Classification

Submitted by Australia

SUMMARY

Executive summary: This submission highlights a potential issue concerning the classification of some *Dangerous goods in solid form in bulk* whereby these materials may not be able to be appropriately classified, as required by SOLAS VII/7, for the environmental hazard they present

Strategic direction: 5.2

High-level action: 5.2.3

Planned output: 5.2.3.1

Action to be taken: Paragraphs 10 and 11

Related document: None

Introduction

1 The International Maritime Dangerous Goods (IMDG) Code, 2008 includes criteria in chapter 2.9 for Environmentally Hazardous Substances (EHS). This has implications for a range of bulk materials not previously classed as a dangerous good presenting an environmental risk.

2 SOLAS regulation VII/7 identifies *Dangerous goods in solid form in bulk* through classification as dangerous goods by the IMDG Code. For environmentally hazardous dry bulk materials the classification is either:

- Class 9 UN3077 – ENVIRONMENTALLY HAZARDOUS SUBSTANCE – SOLID N.O.S (sole hazard); or
- "MARINE POLLUTANT" subsidiary risk (where material has other hazards).

3 The International Maritime Solid Bulk Cargoes (IMSBC) Code becomes mandatory from 1 January 2011 and, as the focus of this Code is on safety, it does not identify requirements for goods classified as UN3077 or with a MARINE POLLUTANT subsidiary risk in the same way as it does for other *Dangerous goods in solid form in bulk*.

The issue

4 The IMSBC Code specifies requirements for the carriage of metal concentrates but the IMDG Code definition for "Environmentally Hazardous Substances" may also cover these substances if their toxicity is taken into account.

5 Some of these materials have LC50 values in the order of 0.5mg/l but values as low as 0.007mg/l occur with some compounds found in sulphide concentrates. Many are categorised as at least Chronic II, although some have been found to be Acute I. Similarly, other materials identified as having dangerous properties do not have a MARINE POLLUTANT subsidiary risk applied.

6 As the classification of UN3077 or MARINE POLLUTANT subsidiary risk is not identified in the relevant schedule of the IMSBC Code, a Master does not have information on whether the material presents an environmental hazard.

7 The omission of this information has implications for loading and carriage of EHS, including a high risk to the environment due to the accumulated effects of spillage during loading and unloading operations. There are also implications for operational activities, such as the removal of:

- cargo residues from stemming from loading and discharge operations, either in port or on passage,
- bilge water from holds on passage, and
- cargo residues in cargo hold washings that result from hold cleaning.

8 It should be noted that environmental considerations of these materials is also being discussed in the context of discharge of cargo residues in the MEPC Correspondence Group on the Review of Annex V of MARPOL.

9 This issue requires further discussion to bring about a consistent application of the requirements.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider this issue and decide as appropriate.

11 The Sub-Committee may wish to consider requesting the Secretariat to inform MEPC 61 of any relevant outcomes on this issue.
