

LABELMASTER
DANGEROUS GOODS SYMPOSIUM
Chicago 6 – 8 September 2017

IMDG CODE UPDATE

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THE REGULATIONS TO BE COVERED

- IMDG CODE Amendment 39-18;
- Adopted by IMO Sub-Committee on Carriage of Cargoes and Containers meeting 11-15 Sept. 2017;
- Completed by CCC Editorial & Technical Group;
- Confirmed by IMO Maritime Safety Committee;
- Can be applied from 1 January 2019;
- Mandatory from 1 January 2020.

THE REGULATIONS TO BE COVERED

- Can only cover principal amendments.
- Will not cover UN Manual of Tests & Criteria.
- Amendments to text in Code shown by symbols:
 - = insertion of an item
 - ▲ = change to an item
 - ⊗ = deletion of an item
- Full texts only available online on restricted basis.

IMDG 38-16 AMENDMENTS

- Corrections to IMDG 38-16 – principally minor editorial and typographical corrections;
- SP225 additional 3rd paragraph giving examples of fire extinguishers covered;
- P002 PP11 UN1361/2 CARBON/ACTIVATED permits 5H1 (plastics), 5L1 (textile) & 5M1 (paper) bags;
- Alignment of P200 (3) (a), (b) & (d) with UN;
- 5.2.2.2.1.3 alignment of lithium battery label.

IMDG 39-18 AMENDMENTS TO ALIGN WITH UN

- New 2.0.6 Transport of **ARTICLES CONTAINING DANGEROUS GOODS N.O.S.**;
- A UK initiative, but why when UN3363 available?
- New industrial applications for containment systems with integral DGs above LQ or where LQ is zero;
- Mis-use of UN3363 or last minute proposals to UN for new entries;
- Considerable lengthy regulatory effort required;

IMDG 39-18 AMENDMENTS TO ALIGN WITH UN

- Usually very robust containment system with little risk of spillage in transport;
- Very small quantities but in excess of zero LQ and possibly more than one DG;
- Often for specialist humanitarian, emergency response, medical or research purposes;
- Attempt at easily understood generic approach;
- Includes definition of articles but only for that section;
- Not applicable to Class 1, 6.2 & 7.

IMDG 39-18 AMENDMENTS TO ALIGN WITH UN

- 2.3.2.5 Viscous liquids exemption provision, receptacle limit increased from 30l to 450l;
- Completely new Chapter 2.8 for Class 8 corrosive substances to align with UN/GHS texts, but no changes to assignment of downstream transport requirements;
- Many lithium battery provisions!
- New provisions for polymerizing substances;

IMDG 39-18 AMENDMENTS TO ALIGN WITH UN

- New SP388 for UN 3166 VEHICLES AND ENGINES;
- UN 3268 SAFETY DEVICES, ELECTRICALLY INITIATED now specifies types of PGII performance level packagings that may be used;
- 5.2.2.2 New layout for specimen labels.

MODE SPECIFIC IMDG 39-18 AMENDMENTS

- Numerous stowage and handling code changes;
- SP973 assigned to UN1327 HAY;1363 COPRA;1364 COTTON WASTE;1365 WET COTTON;1386 SEED CAKE – class labels not always needed on bales/packages;
- 3.4.6, 3.5.6 & 5.4.5.1 '*dangerous goods declaration*' replaced with '*dangerous goods transport document*';

MODE SPECIFIC IMDG 39-18 AMENDMENTS

- Completely revised Emergency Response Procedures for Ships Carrying Dangerous Goods (EMS Guide) developed.
- 5.3 Placarding requirements revised to include bulk containers (inc. flexible bulk containers ‘in at least two opposing positions’;

MODE SPECIFIC IMDG 39-18 AMENDMENTS

- 5.4.3 *'Documentation required aboard the ship'* requires special list, manifest or stowage plan for excepted packages of Class 7;
- New 7.1.4.4.5 *'Transport to or from offshore oil platforms, mobile offshore drilling units and other offshore installations'* for UN 0124 & 0494 JET PERFORATING GUNS;
- Special stowage provisions for stabilized dangerous goods added (7.1.4.7.1) Category D and SW1 applied.

MODE SPECIFIC IMDG 39-18 AMENDMENTS

- New table 7.2.6.3.4 dis-applies segregation requirements for organic peroxides (UN 3101-3120 & 1325) whilst *‘due regard shall continue to be taken of the dangerous reactions specified in the provisions of 7.2.6.1.1. to 7.2.6.1.4.’*;
- **7.3.7 Cargo transport units under temperature control** substantively revised and re-ordered and now includes polymerizing substances;

ISSUES TO BE DISCUSSED AT CCC4

- UN 3496 SP963 clarification of exemption for Nickel-metal hydride batteries;
- Segregation provisions for uranium hexafluoride (6.1);
- P403 PP31 requiring hermetically sealed packagings applied to solid fused material;
- SP363 increase MP label size for UN 3530 from 100 x 100mm to 250 x 250mm

ISSUES TO BE DISCUSSED AT CCC4

- Securing batteries in CTUs;
- Revision of proposed SP308/945 for UN2216 FISHMEAL (FISHSCRAP), STABILIZED;
- Revision of provisions for fumigated CTUs;
- Add new segregation group codes to column 16(b) of DGL;

ISSUES TO BE DISCUSSED AT CCC4

- New provisions for 'battery-vehicles' in short international journeys;
- Safety Management System (telematics) for CTUs;
- Update guidance on DG handling, storage and emergency response in ports

THANK YOU FOR YOUR ATTENTION!