

SUB-COMMITTEE ON CARRIAGE OF
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6th session
Agenda item 2

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DECISIONS OF OTHER IMO BODIES

Carriage of dangerous goods on ships carrying industrial personnel

Submitted by IACS

SUMMARY

Executive summary: This paper provides information about the carriage of dangerous goods on ships carrying industrial personnel and proposes some additional text for inclusion in the draft International Code of Safety for Ships Carrying Industrial Personnel

Strategic direction, if applicable: 2

Output: 2.4

Action to be taken: Paragraph 10

Related documents: SDC 6/WP.4, SDC 6/13 (paragraph 6.24.1) and CCC 6/2/1 (paragraph 2.4)

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work for the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1); and provides comments on paragraph 2.4 of document CCC 6/2/1 regarding the outcome of SDC 6 (SDC 6/13, paragraph 6.24.1).

2 Paragraph 6.24.1 of document SDC 6/13 requests the Sub-Committee on Carriage of Cargoes and Containers (CCC) to consider relevant sections of the draft International Code of Safety for Ships Carrying Industrial Personnel (the draft IP Code). Text concerning the carriage of dangerous goods is included in section 3.1.8 of the draft IP Code. Inter alia, the texts proposed by the Sub-Committee on Ship Design and Construction (SDC) in annex 2 to document SDC 6/WP.4 state:

"3.1.8.1 Carriage of dangerous goods in packaged form

3.1.8.1.1 In order to meet the functional requirements in paragraph 2.1.8.2, the following apply:

- .1 for ships, other than high-speed craft, certified to carry more than 240 persons on board, SOLAS regulation II-2/19.3.6.2 for passenger ships carrying 36 passengers shall apply; and
- [.2 for the purpose of the requirements of IMDG Code, [X] industrial personnel shall be counted as one passenger.]

3.1.8.2 Carriage of dangerous goods in solid form in bulk

3.1.8.2.1 In order to meet the functional requirements in paragraph 2.1.8.2, the following apply:

- .1 for ships, other than high-speed craft, certified to carry more than 240 persons on board, SOLAS regulation II-2/19.3.6.2 for passenger ships carrying 36 passengers shall apply; and
- [.2 for the purpose of the requirements of IMSBC Code, industrial personnel shall be considered as personnel in the context of training and personnel protection.]

(Note: i.e. chapter 3 – Safety of personnel and ship of the IMSBC Code)."

Discussion

3 Having considered the draft texts provided in paragraph 2 above, IACS provides the following comments on the hazards associated with the carriage of dangerous goods on ships that carry industrial personnel; and the differences between these ships and Special Purpose Ships.

4 Dangerous goods can be carried either in packaged form, in which case carriage is covered by the IMDG Code; or in bulk, in which case carriage is covered by the IMSBC Code.

5 When dangerous goods are carried on Special Purpose Ships, the Code of Safety for Special Purpose Ships, 2008 (2008 SPS Code) assumes that they are carried in stores for use on board and it is required that a formal safety assessment is carried out i.e.:

"7.5 The issues of stowage, personal protection and emergency procedures when dangerous goods are in use, and the subsequent stowage of opened dangerous goods, should be addressed through a formal safety assessment. In addition to the IMDG Code, to carry out such a formal safety assessment, suppliers and safety data sheets for the dangerous goods should also be consulted."

6 However, for ships carrying industrial personnel, the situation is not so clear. Firstly, there may be a mixture of special and industrial personnel on board. Secondly, the dangerous goods may be carried as "stores" for use in the work which the special personnel are to carry out on board. The presence of industrial personnel on board, who may not be aware of the nature of the dangerous goods carried as "stores" for use by the special personnel, should be considered. Further, it is noted that the IMDG Code explicitly excludes ships stores from its requirements.

Proposals

7 Taking into account the comments and analysis provided above, IACS recommends that consideration be given to including a statement in the draft IP Code, similar to that in the 2008 SPS Code, paragraph 7.4, which states:

"Although the IMDG Code does not apply to ships' stores, the master, and persons on board the ship responsible for the use of ship's stores on board should be aware of the provisions of the IMDG Code and should apply them as best practice whenever possible."

8 When the Sub-Committee considers the text in paragraph 3.1.8.1.1.2 of the draft IP Code, IACS considers this text could be improved in terms of providing clarity by the following changes (additions/deletions):

.2 for the purpose of the requirements of IMDG Code, ~~[X] industrial personnel shall be counted as one passenger~~ ships, other than high-speed craft, certified to carry more than 240 persons on board should be considered as passenger ships, those certified to carry 240 or fewer persons on board should be considered as cargo ships.

9 Finally, IACS notes a possible typographical error in paragraphs 3.1.8.1.1.1 and 3.1.8.2.1.1 of the draft IP Code. It is considered that the words "more than" should be added before "36 passengers" in these paragraphs.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the above discussions and the proposals in paragraphs 7, 8 and 9 above; and take action as appropriate.
