

SUB-COMMITTEE ON CARRIAGE OF  
CARGOES AND CONTAINERS  
6th session  
Agenda item 6

CCC 6/6/18  
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## AMENDMENTS TO THE IMDG CODE AND SUPPLEMENTS

### Comments on the report of the thirty-first session of the Editorial and Technical Group

Submitted by IACS

#### SUMMARY

*Executive summary:* This document comments on the report of the thirty-first session of the Editorial and Technical Group regarding the clarification of the terms "life-saving appliances" and "areas with public access" in paragraph 7.1.4.4.2 of the IMDG Code (CCC 6/6, paragraphs 3.37 to 3.40)

*Strategic direction, if applicable:* Other work

*Output:* OW 3

*Action to be taken:* Paragraph 7

*Related documents:* CCC 5/5/13 (paragraphs 8.39 to 8.41), CCC 5/8/1 and CCC 6/6 (paragraphs 3.37 to 3.40)

#### Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of 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 paragraphs 3.37 to 3.40 of document CCC 6/6, providing the report of the thirty-first session of the Editorial and Technical Group (E&T) regarding the clarification of the terms "life-saving appliances" and "areas with public access" in paragraph 7.1.4.4.2 of the IMDG Code.

2 IACS submitted document CCC 5/8/1 to the Sub-Committee's last session. The document provided proposals to clarify the terms "life-saving appliances" and "areas with public access" in paragraph 7.1.4.4.2 of the IMDG Code. Having considered this document, the Sub-Committee:

- .1 recognized that the term "life-saving appliances" in paragraph 7.1.4.4.2 of the Code needed further clarification and instructed E&T 31 to further consider this issue and invited interested Member States and international organizations to submit proposals on this matter; and
- .2 noted that there was general support for the interpretation of "areas with public access" as contained in paragraph 6 of document CCC 5/8/1 and decided to proceed with this matter in the form of draft amendments to the IMDG Code by instructing E&T 31 to prepare such draft amendments, based on paragraph 6 to document CCC 5/8/1 (CCC 5/13, paragraphs 8.39 to 8.41).

3 E&T 31 considered these proposals and agreed to the draft interpretation in paragraph 5 of document CCC 5/8/1 concerning the term "life-saving appliances". Regarding the draft interpretation in paragraph 6 of document CCC 5/8/1 concerning the term "public access", the Group noted the view that initially, when provision 7.1.4.4.2 of the Code was being drafted, the wording "public access" had been meant for passengers. Following discussion, the Group agreed to bring more clarity to the provision by referring to ship's passengers' access and left the draft amendment in square brackets for the time being, pending further consideration by CCC 6, as contained in annex 3 (CCC 6/6, paragraphs 3.39 and 3.40).

### **Discussion**

4 Noting the concurrence of E&T 31 (paragraph 3 above), IACS reiterates its proposal in paragraph 5 of document CCC 5/8/1 regarding the interpretation of paragraph 7.1.4.4.2 on the issue of "life-saving appliances i.e.:

"For the purpose of this provision of the Code, the term "life-saving appliances" means the vessel's main survival craft and rescue boat(s) as required by SOLAS regulations III/21 or III/31.1 and is not intended to mean other life-saving appliances, such as lifebuoys, additional liferafts required by SOLAS regulation III/31.3.2 and III/31.1.4 and any lifejackets and immersion suits associated with such liferafts."

5 In the view of IACS, if the term "life-saving appliances" includes lifebuoys, "remotely located" liferafts, lifejackets and immersion suits, as well as personal flotation devices and self-inflating slides, then this provision in paragraph 7.1.4.4.2 of the IMDG Code would have a significant restriction on where goods of class 1 can be loaded onto a ship.

6 Regarding the term "public access", IACS urges the Sub-Committee to concur with the proposal of E&T 31 provided in annex 3 of document CCC 6/6, i.e. to replace the term "areas with public access" in paragraph 7.1.4.4.2 of the Code by "areas where the ship's passengers can access without any authorization or limitation".

### **Action requested of the Sub-Committee**

7 The Sub-Committee is invited to consider the foregoing and take action as appropriate.