

PORT STATE CONTROL COMMITTEE INSTRUCTION 47/2014/08

Guidance for Compliance with the Carriage of Dangerous Goods in Packaged Form Requirements

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1 INTRODUCTION

1.1 General

This document is intended to provide guidance on the inspection of dangerous goods in packaged form.

1.2 Goals and purpose

The goal of this guidance is to provide guidance to Port State Control Officers (PSCO) to verify compliance with the relevant SOLAS and MARPOL regulations and the relevant parts of the IMDG Code with regards to The Carriage of Dangerous Goods in packaged form.

1.3 Application

Regulation as stated in SOLAS, MARPOL and the IMDG Code may apply to the carriage of dangerous goods in packaged form.

SOLAS

This guidance is applicable to all ships to which the SOLAS 74 convention applies and which are carrying dangerous goods as defined in regulation 1 of Part A of Chapter VII of that convention.

Application:

	Constructed on or after	But before	Regulation
Passenger ships	1 September 1984	1 July 2002	II-2/54
Passenger ships	1 July 2002	-	II-2/19
Cargo ships ≥ 500 tons	1 September 1984	1 July 2002	II-2/54
Cargo ships < 500 tons	1 February 1992	1 July 2002	II-2/54
Cargo ships	1 July 2002	-	II-2/19

MARPOL

Annex III of the International Convention for the Prevention of Pollution from Ships, 1973 as modified by the protocol of 1978 relating thereto (MARPOL), deals with the prevention of pollution by harmful substances carried by sea in packaged form.

IMDG

All ships, irrespective of keel date, type and size, carrying substances, materials or articles identified in the IMDG Code as marine pollutants, are subject to the provisions of the IMDG Code.

The MSC 90 meeting adopted amendment 36 to the mandatory IMDG Code which entered into force on 1 January 2014.

1.4 Relevant documentation

Paris MoU manual (latest revision)

SOLAS, 1974, Chapter VII, Part A

SOLAS, Chapter II-2/19

MARPOL Annex III

IMDG CODE (edition(s) in force) including the supplements

MSC circ 1027/ MSC circ 1148 or MSC circ 1266 when issuing or renewing the Document of compliance after 18/12/2008.

1.5 Definitions and Abbreviations

The PSCC Instruction containing "Definitions and Abbreviations" serves as general document and is to be used in conjunction with this Paris MoU document.

2 INSPECTION OF SHIP

2.1 General

The ship may, when carrying dangerous goods in packaged form, have the latest version of relevant parts of the IMDG Code on board. Due to the fact that this might be in an IMO language that the PSCO is not familiar with, the PSCO could consider taking his/her IMDG Code on board.

Note: Amendments to the mandatory IMDG Code are adopted at two-year intervals (or multiples thereof) so that they enter into force on the 1st of January of even years, e.g, 1 January 2012, 1 January 2014 and so on. One year prior to the date of entry into force of new amendments Governments are invited to apply them on a voluntary basis. During that period, the carriage of dangerous goods in packaged form in compliance with either the IMDG code in force, or the Code incorporating the new amendments should be accepted.

2.2 Initial inspection

Certificates and documents

During the inspection of vessel's relevant certificates and documents the PSCO may ask for:

- Document of Compliance for carriage of dangerous goods (only for ships constructed on or after 1 September 1984) (S74-1/CII-2/R54.3, S74-24/CII-2/R19.4);
- International Certificate of Fitness for the carriage of INF Cargo (only for ships carrying INF cargo) (Solas 74 regulation VII/17) and a shipboard emergency plan (only for ships carrying INF cargo) (INF Code – 10.1)
- On ships carrying dangerous goods the PSCO may start by performing an inspection on deck. In this inspection the PSCO may:
 - Note positions of certain dangerous goods, cargo transport units or packages.
 - Note markings / labelling, UN numbers, etc.

Further check of relevant certificates and documents

After a physical inspection on deck the PSCO may ask for the following additional certificates and documents:

- Dangerous goods special list or manifest, or detailed stowage plan (ILO134/A4.3(h), SOLAS 74, chapter VII, regulation 4, MARPOL 73/78, annex III, regulation 4));
- If on board the dangerous goods transport document(s) (IMDG Code Chapter 5.4.1.)
Note: It shall be noted that the transport documents are not required to be on board.

With the information collected in the inspection (spot check) the PSCO may start to compare the information with the certificates and documents.

- Check whether the specific transport cargo units or packages stowed in a position on/under deck are correctly entered in the stowage plan.
- Check whether the cargo transport cargo units or packages are permitted to be stowed in that position by comparing the Document of Compliance for the carriage of dangerous goods.
Note: The document of compliance is not required for dangerous goods in limited and excepted quantities and for dangerous goods of classes 6.2 and 7.
- Check for the transport units in the IMDG Code, Chapter 3.2, Dangerous goods list (column 16), whether the dangerous cargo (by UN number) is stowed in accordance with its stowage category (on/under deck). See chapter 7.1 of the IMDG Code.

Note: stowage categories of the IMDG Code do not erase Document of Compliance obligations (if applicable) and Document of Compliance obligations (if applicable) do not erase stowage categories of the IMDG Code, both have to be applied.

Note: Dangerous goods packed in limited and/or excepted quantities are allocated stowage category A.

- Check the segregation by dangerous cargo classes and subsidiary risk(s) between several different cargo transport units loaded on board.
- See Chapter 3.2, dangerous goods list (column 16), segregation table chapter 7.2.4 IMDG Code and Chapter 7.6.3 for the segregation on general cargo ships
- Chapter 7.4.3 for the segregation of cargo transport units on board container ships
Note: this chapter is also applicable for general cargo ships carrying containers.
- Chapter 7.5.3 for the segregation of cargo transport units on board roll-on/roll-off ships.

Chapter 7.7.5 for the segregation in ship borne barges and on board barge-carrying ships.

Note: For dangerous goods packed in limited and excepted quantities the segregation provisions of chapter 7 are not applicable.

- Check whether enlarged labels (placards) and marks and signs are affixed to the exterior surfaces of the cargo transport units. See chapter 5.3 IMDG Code.

2.3 Clear Grounds

Examples of clear grounds include the following:

- Crew has insufficient knowledge on the carriage of dangerous goods.
- Dangerous goods certification and documentation not as required.
- Stowage or segregation of dangerous goods not in accordance with IMDG Code (chapter 7).

In case of clear grounds the PSCO shall carry out a more detailed inspection.

2.4 More detailed inspection

A more detailed inspection may compromise the following:

- Further check (in addition to the initial inspection) whether other cargo transport units or packages are allowed to be stowed in that particular position by comparing the Document of Compliance for the carriage of dangerous goods.
- Further check (in addition to the initial inspection) of the IMDG Code, Chapter 3.2, Dangerous goods list (column 16), whether other dangerous cargo (by UN number) is stowed in accordance with its stowage category (on/under deck). See chapter 7.1 IMDG Code.

Note: stowage categories of the IMDG Code do not erase Document of Compliance obligations (if applicable) and Document of Compliance obligations (if applicable) do not erase stowage categories of the IMDG Code, both have to be applied.

Note: Dangerous goods packed in limited and/or excepted quantities are allocated stowage category A.

- Further check (in addition to the initial inspection) of the segregation by dangerous cargo classes and subsidiary risk(s) between several different cargo transport units loaded on board. See Chapter 3.2, dangerous goods list (column 16), segregation table chapter 7.2.4. IMDG Code and

Chapter 7.6.3 for the segregation on general cargo ships

Chapter 7.4.3 for the segregation of cargo transport units on board container ships

Note: this chapter is also applicable for general cargo ships carrying containers.

Chapter 7.5.3 for the segregation of cargo transport units on board roll-on/roll-off ships

Chapter 7.7.5 for the segregation in ship borne barges and on board barge-carrying ships

Note: For dangerous goods packed in limited and/or excepted quantities the segregation provisions of chapter 7 are not applicable.

- Check whether different dangerous goods classes and subsidiary risk(s) loaded in one transport unit are allowed to be carried in the same transport unit. See chapter 7.3.4 IMDG Code and segregation table chapter 7.2.4. IMDG Code
- Check if the dangerous cargo special list or manifest is based on the information required in chapter 5.4.1.4 and 5.4.1.5 of the IMDG Code and stowage location and total quantity of dangerous goods and marine pollutants are included in the manifest.
- Information required in chapter 5.4.1: At least UN number, Proper Shipping Name and Class. In certain cases more information is required (refer to 5.4.1 of the IMDG Code).
- Check if emergency response information as described in chapter 5.4.3.2 IMDG Code is available on board.
- *If on board* check in the dangerous goods transport documentation (DGD) if all required information as described in chapter 5.4.1.4 and 5.4.1.5 is there and a signed and dated shippers declaration is included in the dangerous goods transport document.

Note: The layout of the Multimodal Dangerous Goods form in chapter 5.4.5 of the IMDG Code is not mandatory.

- *If on board* check if the container/vehicle packing certificates (CPC) are signed and dated (not applicable to tanks).
- Check if special certification or other documents are required as indicated in Chapter 5.4.4.
Note: these are not always required to be on board of the ship.

2.5 **Expanded inspection**
Not applicable.

3 FOLLOW-UP ACTION

3.1 Possible deficiencies

- Missing information in the ships dangerous cargo special list, manifest or detailed stowage plan;
- Missing markings / labeling, UN numbers on cargo transport units;
- Missing emergency response information;
- Missing other required information and documentation as required in chapter 5.4.4 IMDG Code;
- Cargo is not loaded or stowed in accordance with the IMDG Code;
- Container/vehicle packing certificates (CPC) or Shippers declaration not signed and dated;
- Missing information in the dangerous goods transport documentation (DGD);
- Crew has insufficient knowledge on the carriage of dangerous goods.

Deficiencies found in these areas may also indicate a failure in the Safety Management System on board.

3.2 Deficiencies warranting detention

A PSCO should use his/her professional judgment to determine whether to detain the ship.

In order to assist the PSCO in the use of these guidelines, the following deficiencies should be considered to be of such nature that they may warrant the detention of a ship:

- The absence of a valid Document of Compliance for carriage of dangerous goods (if required);
- The absence of a valid INF certificate and/or shipboard emergency plan.
- The absence of a Dangerous Cargo special list, manifest or detailed stowage plan **before departure** of the ship (SOLAS Chapter VII R4.5; IMDG Chapter 5.4.3);
- The stowage and segregation provisions of the IMDG Code Chapter 7 are not met;
- The ship is carrying dangerous goods not in compliance with the Document of Compliance for carriage of dangerous goods of the ship;
- The ship is carrying damaged or leaking dangerous goods packages;
- Ship's personnel assigned to specific duties related to the cargo are not familiar with those duties, any dangers posed by the cargo and with the measures to be taken in such a context.

4 REPORTING

4.2 Reports

Any deficiency found by the PSCO should be recorded in the Report of inspection. The following codes can be used for deficiencies concerning dangerous goods in packed form:

011 Ship's certificates and documents

01126 Document of compliance dangerous goods

01135 Documents for the carriage of dangerous goods

12 Carriage of cargo and dangerous goods

- 12101 Stowage / packing of dangerous goods
- 12104 Dangerous goods codes
- 06105 Other (cargo)

SOLAS related operational deficiencies

- 12112 Dangerous goods or harmful substances in packaged form
- 17102 Other (SOLAS operational)

MARPOL related operational deficiencies

- 17103 other (MARPOL operational)

143 MARPOL – annex III

- 14301 Packaging
- 14302 Marking and labeling
- 14303 Documentation
- 14304 Stowage
- 14305 Other (MARPOL – annex III)