

Carriage of IMDG cargoes

The club regularly receives member queries on the carriage of dangerous cargoes in packaged form. As of 1 January 2018, the 2016 edition of the IMDG code is mandatory. This article provides a reminder of the requirements.



Akshat Arora
Senior Surveyor
T +65 6506 2809
E akshat.arora@ctplc.com

The regulation

The carriage of dangerous cargoes in packaged form is covered under the provisions of the IMO's International Maritime Dangerous Goods code (IMDG code), as required by SOLAS Chapter VII regulations.

As of 1 January 2018, the 2016 edition of the [IMDG code](#) (incorporating [amendment 38-16](#)) is mandatory. Some of the Contracting Governments were already applying the revised requirements, in part or in whole, on a voluntary basis from 1 January 2017.

Specifically, the IMDG code states requirements and standards for the following:

- Limited quantities
- Excepted quantities
- Stowage/segregation categories
- Packing instructions/provisions
- Labels/signs and markings.

In December 2017, IMO released [corrigenda](#) which makes editorial corrections to the English version of the IMDG code amendment 38-16.

Explosives (IMDG class 1)

For explosives, extra care should be taken as there have been several incidents due to unstable compounds reacting and resulting in explosion. When presented with shipments of fireworks, shipping lines are advised to take steps to satisfy themselves that the fireworks originate from a legitimate and trustworthy manufacturer.

For ammunitions, it is recommended to ensure that they are not capable of firing during carriage.

The club has also received several queries regarding carriage of expired explosives (ammunitions, pyrotechnics or fireworks) for decommissioning/disposal. In these cases, there is a deterioration risk as these explosives have gone beyond stated expiry date(s), making them unstable/unpredictable. As such, it is recommended that the volatility and stability of the expired explosives is carefully evaluated by an expert as it is possible that there could be a higher risk.



Radioactive substances (IMDG class 7)

Nuclear/radioactive cargoes (IMDG class 7) are not included in the ship's document of compliance (DOC) for dangerous cargo. Even in the clubs' Pooling Agreement, under Appendix IV (Excluded Risks Clause 4), nuclear risks are excluded. However, there

is an exception whereby cover can remain in place for carriage of 'excepted matter' (as defined in the Nuclear Installations Act 1965 of the United Kingdom). Members are recommended to refer to the [club's publication on carriage of radioactive cargoes](#) for further guidance.

Conclusion

From the club's perspective, the carriage of dangerous cargoes in packaged form can be undertaken without prejudice to cover, provided that the arrangements for its stowage, segregation, packing, labelling and marking fall within the guidelines specified by the IMDG code, and copies of the Safety Data Sheets are provided to the vessel for use in emergency response to accidents and incidents involving dangerous goods in transport (IMDG 5.4.3.2.1).

The vessel has a document of compliance (DOC) for dangerous cargo which states the specific cargoes allowed for carriage on board, together with the precautionary notes. It is recommended to check this document and verify prior to accepting the cargo for carriage.

To ensure full compliance during a particular voyage, the classification, packaging, stowage and segregation of dangerous goods is governed by legislation enforced in the country of origin, the country of destination, any country which it enters while in transit and the country under whose flag the carrying vessel operates.

