

Title	IMDG Code / SUPPLEMENT / Appendix / DSC/Circ. 11
Note	Incorporating Amendment 42-24

DSC/Circ. 11

30 April 2003

SHIPS CARRYING FUMIGATED BULK CARGOES

- 1 The Sub-Committee on Dangerous Goods, Solid Cargoes and Containers (DSC), at its seventh session (23 to 27 September 2002), considered a number of reports on casualties and incidents involving dangerous cargoes submitted by Governments and international organizations concerned.
- 2 The Sub-Committee's attention was drawn to the risks associated with ships carrying solid bulk cargoes (DSC 7/6/2), which have been treated with toxic gases (fumigated) and might negatively affect the safety and health of personnel. These include:
- .1 the assumption that the concentration of the toxic fumigant is sufficiently low when the ship arrives in the port of discharge, as to avoid safety and health risks to ship and shore personnel or enforcement officers. Unfortunately, this is not always the case and there are reported incidents where employees have been exposed to the fumigant, usually phosphine, causing health problems;
  - .2 unlike cargo transport units (CTU's), ships containing bulk cargo under fumigation are not required to be labelled as such. So they are not visibly recognized as a potential safety and health risk; and
  - .3 though some ports require a notification to the Harbour Master, and/or appropriate authorities, from the Master of a ship containing fumigated bulk cargo, wishing to enter the port, that action has been taken to make the ship's holds and the cargo gas-free, such notification does not always take place, resulting in potential health risks for the ship's crew, terminal personnel and others when the ship is being unloaded.
- The attention of Member Governments is drawn to the following observations:
- .4 the International Convention for the Safety of Life at Sea (SOLAS) regulation VI/4, obliges that appropriate precautions shall be taken in the use of pesticides in ships, in particular for the purposes of fumigation. The *Recommendations on the Safe Use of Pesticides in Ships*, recommended to governments in pursuance of their obligations under chapter VI of the SOLAS Convention, as amended, are intended as a guide to competent authorities, mariners, fumigators, fumigant and pesticide manufacturers, and others concerned; and
  - .5 for bulk carriers SOLAS requires a Safety Management System that should contain safety procedures for fumigated cargoes. For ships other than bulk carriers that transport fumigated bulk cargoes, the Safety Management System became mandatory on 1 July 2002.
- 3 It is therefore recommended that Member Governments issue regulations to oblige ships that carry solid bulk cargoes under fumigation to notify accordingly the Harbour Master, as well as any other appropriate authorities, prior to arrival in port and to ensure that the ship's hold and its cargo are gas-free upon berthing the ship.
- 4 Member Governments are invited to bring the above information to the attention of shipowners, ship operators, companies, shipmasters, shippers and all other parties concerned requesting that appropriate action be taken in accordance with the provisions of the relevant IMO instruments.