

## Welcome to the latest edition of TT Talk, number 39 in the series

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### **1. Dangerous goods - new code in force from 1 January 2004 - no further leeway allowed**

Andy Trasler, of TTMS (UK), has sent us this follow-up to the item on Dangerous Goods in TT Talk, Edition 38.

As noted in our last edition, after the usual transitional period of one year, the new IMDG code comes into force on January 1st 2004. What happens to cargo being shipped now, but which will not reach its destination until the New Year?

The answer is very simple: the regulations come into force on New Year's Day and all hazardous consignments on board ship at that time must be in compliance with the new rules. There is no further leeway period allowed.

This means that all shipments of hazardous materials being prepared for dispatch before the end of the year must already comply with the new rules,

As you will know, the shipping and transport industries are increasingly subject to vigilance in the fight against terrorism, and the authorities are well aware of the threat posed by hazardous materials, whether declared or not. So, from now on, you can expect many more rigorous checks. Non-compliance with the IMDG code may therefore result in a delay to the ship and your cargo, as well as a substantial fine. The fine and attendant publicity will not be good news for your company's reputation and delay to the consignment will be a serious embarrassment in your relationships with your customer. Furthermore, delay to a whole ship will be extremely expensive and wholly disproportionate to the profit you are making on the movement.

The Club's rules require members to use their best endeavours to comply with the relevant dangerous goods regulations. Any claim made as a result of any kind of incident relating to the movement of hazardous materials will therefore be subject to scrutiny to make sure that you did indeed use best endeavours. As a result of compliance with the IMDG code becoming a legal obligation, the level required to clear the "best endeavours" hurdle has been raised by another notch. Your obligations are now that much more onerous.

As specialist insurers of the transport industry, the Club recognises that accidents can happen even in the best-regulated organisations, that unscrupulous customers can put companies at risk and that hazardous materials can evade the most vigilant checks. In contrast to other insurers, who may exclude this kind of risk entirely, a unique feature of the Club's insurance is that claims arising out of circumstances which appear to breach cover can be referred to the board of directors. The chief executives and senior officers of transport-related companies who make up the board will use their professional knowledge and expertise to review the claim and decide whether it should be paid.

Judgement of transport people by transport people!

## 2. Fumigation risks in containerised and bulk cargoes

The Hazworld.com website recently carried an article on the problems that can arise when cargoes are fumigated. Readers with good memories may remember that TT Talk addressed this issue in Editions 17 and 19, published in January and March 2002 respectively. The Hazworld article was prompted by a circular issued by the TT Club's sister club, the UK P&I Club, following a survey of containers that had recently been carried out in Rotterdam.

The Hazworld article reads:

quote

Fumigation risks in containerised and bulk cargoes

China's recent enactment of a law requiring the fumigation of all wooden packaging used in shipments to the country is another indication of the increasing prevalence of this cargo treatment practice. Yet fumigation poses risks that are easily underestimated.

The UK P&I Club has advised its shipowner and operator members to ensure that adequate warnings are posted on containers under fumigation and that proper procedures are followed when entering such units. As experience has shown, contact with residual fumigants can lead to permanent disability, severe injury or even death.

The Club issued its warning following a recent survey in Rotterdam which found that 21 per cent of 300 containers chosen at random for inspection contained methyl bromide, formaldehyde or phosphine. Only three units displayed the required "Under Fumigation" warning label.

Fumigants are typically used to protect foodstuffs from rodents, insects, mould and fungi. Of nine leading fumigants, the three most commonly used in containers are phosphine, sulphuryl fluoride and methyl bromide. Phosphine is readily absorbed by inhalation and through the gastrointestinal tract. At low levels of inhalation, symptoms include headache, weakness, faintness and pains in the chest. At high levels, nausea, vomiting and pulmonary oedema can occur. Contact with methyl bromide through inhalation and absorption through the skin can cause damage to the brain, nervous system, skin, lungs and possibly kidneys.

While the high toxicity of phosphine gas has long been recognised, its flammability risk is not widely appreciated. Its lower flammability limit is only 1.8 per cent by volume in air. If an air/phosphine mixture in which the phosphine concentration exceeds this limit is ignited in a confined space, it is highly probable that an explosion will occur.

Phosphine gas is generated from aluminium phosphide tablets when the aluminium phosphide reacts with moisture in the air. This process, in addition to liberating phosphine, produces aluminium oxide as a byproduct and, occasionally, small quantities of diphosphine gas. Unlike phosphine, diphosphine is spontaneously combustible. Diphosphine is more likely to be generated if the aluminium phosphide tablets contain amounts of phosphorous in excess of that specified in an acceptable formulation.

Aluminium phosphide tablets are routinely used in fumigation and a very large number of shipments are fumigated annually without any problems. It appears that fumigant explosions have only occurred when cheaper brands of aluminium phosphide tablets produced in developing countries were used.

unquote

The relevant website address is

[http://www.existec.com/index.asp?np=news\\_24#newstop](http://www.existec.com/index.asp?np=news_24#newstop)

## 3. A dictionary of combined transport terms

Do you sometimes find it difficult to remember the precise meaning of all those terms that you use in your daily business operations? If that is so, help is at hand. The United Nations Economic Commission for

Europe (UNECE) has recently published a 63-page multilingual dictionary, defining in English, French, German and Russian; the various terms used in multi-modal, intermodal and combined transport (themselves all defined in this dictionary!)

The dictionary can be downloaded in Adobe format from

[http://www.unece.org/trans/new\\_tir/wp24/documents/term.pdf](http://www.unece.org/trans/new_tir/wp24/documents/term.pdf)

Good browsing!

#### **4. A seasonal tailpiece**

The next edition of TT Talk will appear in January 2004. In the meantime we wish you all very happy holidays.

Just in case you were thinking of celebrating with a little drink, beware of the perils of something too strong, as the following note from Hazworld demonstrates:

quote

Tokyo fire department officials are urging Japan's liquor association to warn drinkers of the fire hazard of hard liquors.

This follows an incident in a Shinjuku-ku bar in which a 35-year old tried to light a cigarette while drinking 96 proof Polish vodka. He set his drink alight and then spilt it over himself, causing burns to his arms.

Fire department officials said under the Fire Service Law, any drink of 60 proof or over is designated as a dangerous material. "When you are under the influence of alcohol your ability to make decisions quickly is hampered, so we expect this kind of incident to happen again," a spokesman said.

unquote

As you can see, even when we are off duty, there is just no way that we can escape from Dangerous Goods!

#### **5. Conclusion**

We hope that you will have found the above items interesting. If you would like to have further information on any of them, or have any comments you would like to make, then e-mail the Editor at [tt.talk@ttclub.com](mailto:tt.talk@ttclub.com). We look forward to hearing from you.

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