

Guidance on the Transport of Packaged Dangerous Goods by Sea

Be aware of the existence of the International Maritime Dangerous Goods (IMDG) Code.

Have a current copy available within the organisation.

Ensure that relevant staff are trained in the use and implementation of the Code.

Ensure that its provisions are being followed.

Be diligent - anyone in the supply chain can make a difference.

In case of difficulties, consult a senior manager or director, or your regular claims contact at your TT Club office. Further information can be obtained from the TT Club's Regional Centres.



Further information, and additional copies, can be obtained from the TT Club's regional centres:

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Shipment of packaged dangerous goods (DG) by sea

Many millions of tonnes of packaged DG are transported by sea every year. Most is quite safely received, handled and conveyed, but serious accidents can happen if the provisions of the IMDG (International Maritime Dangerous Goods) Code are not met.

The IMDG Code, based on standards first developed by the United Nations in 1956, is intended to ensure that carriage of DG can be conducted safely. It became mandatory on 1 January 2004, under the provisions of the SOLAS (Safety of Life at Sea) Convention. Compliance with the IMDG Code is, therefore, a requirement of law in the 182 country signatories to SOLAS. The need for mandatory status has been reinforced by an average of two major ship fires or explosions each year over the period 1997-2004 where DG shipments were involved.

International Maritime Dangerous Goods (IMDG) Code

The IMDG Code is updated every two years by the International Maritime Organisation (IMO). It is specifically aimed at the carriage of packaged DG and covers -

- Classification
- Packaging
- Packing
- Documentation & declaration
- Certification
- Marking
- Stowage
- Segregation

There are transitional arrangements with each revision, allowing everyone involved to update systems and procedures appropriately. Thus, by way of example, the edition published in 2004 will come fully into effect 1 January 2006, after the transitional year 2005 shared with the previous edition.

The IMDG Code is available in both hard copy and electronic format (CD-ROM) and can be purchased direct from the IMO in London or from its sales agents around the world.

Problems

Substances or articles are classified as dangerous because, in the event of an incident, they may cause harm to people, loss of property, and/or other economic losses in the supply chain. Major damage has been occasioned to ships and their crews, resulting in fatalities and multi-million dollar losses.

Accidents may arise because of incorrect classification, poor packaging, wrong declaration and wrong or missing marking. In addition, surveys carried out by enforcement agencies for the IMO demonstrate that there is a substantial element of non-compliance with the provisions of the Code - the main elements being placarding and marking, documentation, stowage and securing inside the container, and labelling.

Liability and insurance

The IMDG Code is mandatory and contravention of its provisions is subject to enforcement action by the relevant authority. The risk is that the person responsible for causing or allowing a breach of the IMDG Code will be held liable for all that follows. This may be the shipper, a freight forwarder or any other intermediary involved in the supply chain, including terminal operators and carriers.

All insurances require the insured to comply with any national or international laws and conventions. Failure to comply with the law can invalidate your insurance.

Prevention

In order to avoid criminal prosecution and civil liabilities, those concerned with the transport of DG by sea need to ensure that, within their own sphere of responsibility, consignments and their documentation fully comply with the Code.

Analysis of non-compliance has indicated that about 70% is verifiable within the supply chain. Those concerned with DG shipments should implement verification systems and, where possible, check that the correct labelling has been used on packages and the correct type and number of placards, marks and signs are applied on the outside of containers.

Documentation needs to be checked to ensure that all the required information has been given, and that, at the very least, the proper shipping name and the UN number correctly relate to each other and the declaration and the container packing certificate are both signed. If two substances are said to be stowed in the same container confirm that they are compatible. If there is anything that is not correct, the shipment should not be allowed to go forward until it has been rectified.

Employees who are involved, in any way, with DG shipments should be fully trained.

In summary:

- Prior to loading, check the shipping container is in sound condition internally and externally, and bears a valid CSC plate
- Avoid loading any damaged, leaking or stained packages
- Check proper segregation and compatibility, load distribution & prudent stowage/securing
- Ensure placarding is compliant, secure, durable and not obstructed
- Complete required documentation and ensure that notification is adequately passed to the next responsible person
- Keep relevant safety and first aid equipment accessible, together with clear emergency procedures

Further information

In addition to the Club's office network, please refer to www.ttclub.com where further information will periodically be published.