

CCC 3 - General Observations

1) Agenda Item 1. Provisional Agenda – No substantive comment.

The Sub-Committee, at its second session, agreed to establish, at CCC 3, working and drafting groups on the following subjects (CCC 2/15, paragraph 12.5):

- a. Working Group on Amendments to the IGF Code and Development of Guidelines for Low-Flashpoint Fuels (agenda items 3 and 10 (IGF Code related interpretations));
- b. Working Group on Carriage of Hydrogen in Bulk and Suitability of Materials for Cryogenic Service (agenda items 4, 8 and 10 (IGC Code related interpretations)); and
- c. Working Group on IMSBC Code matters (agenda items 5 and 9)*. IFSMA Indicated it would attend this WG.

2) Agenda Item 2. Decisions of other IMO Bodies.

- a) Nothing significant to report.

3) Agenda Item 3. Amendments to the IGF Code and Development of guidelines for Low-Flashpoint Fuels.

- a) Paper 3/3 (Sweden) is the report of the Correspondence Group tasked with working on version 2 of the IGF Code. The level of progress made was considered disappointing by many delegations and this was shown by the number of delegations, particularly Norway, Germany, Japan and UK, raising issues that needed to be further investigated by the WG, particularly with Fuel Cells and Safety concerns. There was also significant concern that insufficient consideration has been given to the dangers posed by the use of methyl/Ethyl Alcohol as fuel and particularly the difficulties posed in detecting and extinguishing fuel fires. These issues are raised in papers inf.22 submitted by the European Commission and 3/3/1 submitted by Germany. The WG to develop a Technical Provisions for further discussion at CCC4.

(i) The TOR for the WG were agreed as in Paper 3/J/4.

4) Agenda Item 4. Safety requirements for the carriage of liquefied hydrogen in bulk.

- a) Paper 3/4 (Japan) Contains the Report of the Correspondence Group.
 - (i) The Sub Committee was requested to approve 4 Actions and the Report. All were agreed apart from:
 1. Point 3.1 – 2 additional Papers 3/4/2 and 3/Inf 20 (Japan) – more discussion required at WG2.
 2. Point 3.2 – 3.9 were all referred to the WG for action.
 3. Point 3.10 – additional Paper 3/4/1 (Japan) – referred to the WG for careful consideration by technical experts, particularly referring to Boil-off Gas.
 4. Point 11 – 14 to be referred to the WG

5. Nevertheless, the Report was approved in general. WG was established and TOR approved.

5) Agenda Item 5. Amendments to the IMSBC Code and Supplements.

- (a) Paper 3/5 Report of the E&T Group.
 - (i) Nothing significant to report.
 - (ii) Paper 3/5/6 (France) - Carriage of solid bulk cargoes that may liquefy. Specifically, the transportation Nickel Ore from New Caledonia and a 2-year trial.
 - (iii) Annex to be discussed by WG3 and France prepare a Circular Letter with details of the trial.
- (b) Paper 3/5/ 13 (Canada) - Amendments to the "Class" box in the "Characteristics" table of individual schedules of solid bulk cargoes in appendix 1 to the IMSBC Code.
 - (i) The timing of this amend is not critical and further technical consideration should be given by the E&T Group and report to CCC4.
- (c) Papers 3/5/9 (Germany)- proposes to classify Ammonium Nitrate Based Fertilizer (non-hazardous) as a MHB OH, Group B Cargo, and
Paper 3/5/14 (CEFIC) - Comments on Ammonium Nitrate Based Fertilizer (non-hazardous).
 - (i) Significant discussion on this subject as to whether ANBF was or was not a hazardous cargo and that it was not self-heating etc. Notwithstanding, it was agreed that the German Paper does not satisfy everyone and that this cannot be decided at this CCC session and that the discussion should continue in E&T if time is available.
- (d) Papers 3/5/11 (Australia) - Revision of existing individual schedules for SEED CAKE and GRAIN SCREENING PELLETS,
Paper 3/5/18 (Germany) - Comments on document CCC 3/5/11, and
Paper 3/5/6/2 (Spain) - Differentiation of UN 1386 in the IMSBC and IMDG Codes and UN Model Regulations.
 - (i) It was agreed that a correspondence group should be formed to take this forward and this would be arranged by the E&T Group.
- (e) Paper3/5/12 (IIMA) - Draft individual schedule for Blast Furnace Iron By-products.
 - (i) Paper agreed and referred to the E&T Group for consideration.
- (f) Papers 3\5\1 (Japan) Report of the Correspondence Group on Evaluation of Properties of BAUXITE and COAL,
 - (i) IFSMA Intervened

“Thank you Mr Chairman. IFSMA thanks the distinguished delegation of Japan and the Correspondence Group for their extremely important work in trying to move forward the issue of the loading of Bauxite Fines and we do understand the complexities of the issue that confronts them. However, we are very concerned that the loading of such a potentially dangerous cargo that puts the lives of the Mariner at significant risk is taking so long to come to a conclusion with very clear recommendations for a way ahead to protect the Mariner.”

(g) Paper 3/5/21 (Australia) –comments on the report of the Correspondence Group on Evaluation of Properties of BAUXITE and COAL (CCC 3/5/1).

(i) The Global Bauxite Working Group is chaired by Australia and they hope to have a Report for CC4.

(h) Paper 3/5/20 (Italy) - comments on the Correspondence Report on Bauxite and Coal (CCC 3/5/1) and offers an alternative to the IMSBC Code to enhance safety procedures for the ship and crew in carrying Group A cargoes.

(i) IFSMA Intervened

“IFSMA thanks the distinguished delegation of Italy and the co-sponsors of their Paper 3/10/20 and their draft amendments to Para 4.5.2 of the Code. This is a valuable step forward, but we are very concerned at the ambiguity that remains in their Draft. Importantly, what does the term “significant precipitation” mean. To IFSMA’s understanding this is a relative term with no clear definition and neither does it take into account the ambient humidity. It is also of significant concern that at no stage is the Shipmaster involved in the moisture testing of the Bauxite prior to loading and is relying solely on the Shipper and the accuracy of the test, particularly when the Test may well have been taken prior to the vessel’s arrival and the Master has no clear understanding of the amount of precipitation that has taken place. Mr Chairman, IFSMA would wish this Intervention to be recorded and will forward the transcript – thank you.”

(i) There was some debate on this and the NI supported IFSMA. INTERCARGO supported that the wording was ambiguous and required amendment. ITF also came in and supported IFSMA.

(ii) The Bahamas suggested that this be given to the WG. It was agreed that this should be forwarded to the WG and that this should be reported to the MSC for advice and consideration. The Chair of the WG advised that he had much to do and wasn’t sure he could give it the time. Bahamas and Norway both asked that it be considered as a high priority.

(iii) IFSMA Intervened with:

“Mr Chairman, IFSMA agrees with the Bahamas and Norway in view of the significant safety concerns and we urge it be given a high priority by the Chair of the WG for discussion and further recommendations for this Sub Committee. Thank you Mr Chairman.”

(iv) It was agreed that this should paper should go to the WG for further consideration of amends to Para 4.5.1 and 4.5.2 of the Code

(v) There were no other significant issues to report.

- (j) Paper 3/5/3 and 3/5/4 (Norway) - New individual schedule for Olivine Sand and Olivine Gravel.
 - (i) Nothing significant to report. To be reviewed by the E&T Group.
- (k) Paper 3/5/5 (IIMA) - Proposed new individual schedule for Direct Reduced Iron (D) (By-product fines with moisture content typically <12%)
 - (i) A number of points of concern were raised but these would be reviewed by the E&T Group.
- (l) Paper 3/5/10 (Germany) - New individual schedule for Foam glass gravel.
 - (i) Nothing significant to report. To be referred to the E&T Group.
- (m) Paper 3/5/15 (Brazil) - New individual schedule for Sugarcane Biomass Pellets.
 - (i) Nothing significant to report. To be referred to the E&T Group.
- (n) Paper 3/5/16 (Marshall Islands) - New individual schedule for Palm kernel shells.
 - (i) A very welcome Paper that highlights significant safety concerns with this dangerous cargo. Malaysia raised concerns – clearly out of self-interest – arguing that if handled properly it is not a dangerous cargo. This was supported by a number of Nations. To be referred to the E&T Group for further technical examination.
- (o) The WG3 Draft Terms of Reference were agreed

6) Agenda Item 6. Amendments to the IMDG Code and Supplements.

- (a) Paper 3/6 (Germany) - This document contains the discussions and decisions taken by E&T 24 in the context of amendments to the International Maritime Dangerous Goods (IMDG) Code.
 - (i) The Sub Committee agreed the Action Points of the Report.
- (b) Paper 3/6/1(CEFIC) - segregation requirements of organic peroxides, UN 3101 to UN 3120, and exempted organic peroxides
 - (i) The proposed new Organic Peroxide Table was supported by the all apart from the USA and Canada, but agreed it was not well written and should be rewritten and taken forward by the E&T Group.
- (c) Paper 3/6/2(Spain) - This document provides some differences identified between the UN Model Regulations and the IMSBC and IMDG Codes, for UN 1386 SEED CAKE, in particular regarding the contents of oil and moisture, and proposes to achieve a common definition of UN 1386 by amending the IMDG Code, considering possible consequential amendments to the individual schedule for SEED CAKE in the IMSBC Code.
 - (i) Paper supported and sent to E&T.

(d) Paper 3/6/3(Germany) - This document contains a proposal to align the provisions in the IMDG Code with the requirements of IAEA SSR-6.

(i) Paper supported and sent to E&T.

(e) Paper 3/6/4(Germany) - a proposal to clarify the requirement to stow a container with flammable liquids (flashpoint below 23°C) and flammable gases 2.4 m away from sources of ignition.

(i) Paper supported and sent to E&T.

(f) Paper 3/6/5(USA) - proposals for modifications of existing stowage requirements for jet perforating guns.

(i) Paper supported and sent to E&T.

(g) Paper 3/6/6(USA)proposal to modify the existing stowage categories for articles of individual UN numbers utilizing the rationalized approach developed by E&T 24.

(i) Paper supported and sent to E&T.

(h) Paper 3/6/7(Germany) - a proposal to improve the assignment of segregation codes in the Dangerous Goods List.

(i) Paper supported and sent to E&T.

(i) Paper 3/6/8(Germany) - proposal to clarify that ammonium bromate is prohibited for transport and therefore no segregation provision applies. Furthermore, it is proposed to clarify the application of SP 352 and SP 900 to UN 1908 and UN 1791.

(i) Paper supported and sent to E&T.

(j) Paper 3/6/9(Republic of Korea) - comments on the views expressed by some delegations during E&T 24 regarding the proposal in document CCC 2/6/10 to use GESAMP Hazard Profiles in order to identify substances which might be a marine pollutant, and to include that information in chapter 2.10 of the IMDG Code to assist the industry in this regard.

In addition, it is proposed to insert an informative and recommendatory reference note in the IMDG Code, as instructed by CCC 2, to indicate those substances that meet "environmentally hazardous substances" criteria according to the latest GESAMP Hazard Profiles, and should be classified as "marine pollutants".

(i) Conflicting views but E&T should further consider it.

(k) Paper 3/6/10(IPPIC) - proposes the harmonization of the package size limits which can cause certain viscous flammable liquids to be removed from Packing Group III

7) Agenda Item 7. Amendments to SOLAS regulations II-2/20.2 and II-2/20-1 to clarify the fire safety requirements for cargo spaces containing vehicles with fuel in their tanks for their own propulsion**

(a) No Papers provided

8) Agenda Item 8. Suitability of high manganese austenitic steel for cryogenic service and development of any necessary amendments to the IGC Code and IGF Code **

(a) Paper 3/8 (Korea) & 3/8/1 (Japan).

(i) It was agreed to send both Papers to WG 2 for further technical discussion. This will be the first step (evaluation) and if the Sub Committee then agree it will be referred to MSC for approval and to the development of amends to the Codes.

9) Agenda Item 9. Mandatory requirements for classification and declaration of solid bulk cargoes as harmful to the marine environment (7.1.1.1)

(a) Paper 3/9/1 (Finland) - additional amendments to the IMSBC Code and related instruments in order to further facilitate the long-term implementation of MARPOL Annex V.

(i) Finland believes that MARPOL Annex V is not read by Mariners and want Annex V referenced in the individual Schedules of the IMSBC Code. This Paper gained no support from the Sub Committee apart from very strong statement by INTERCARGO. After a lot of delegations continued to argue against this Paper, ICS gave support. Strange that the Industry wants the change in Regulation but the Regulators don't - too difficult for them! Netherlands stated this should go to MEPC as it was not a CCC issue which the Chair agreed with and asked Finland to take note.

10) Agenda Item 10. Unified Interpretation of provisions of IMO safety, security and environment-related conventions (1.1.2.3).

(a) Paper 3/10/1 (IACS) Draft unified interpretations on the International Code of Safety for Ships using Gases or other Low-flashpoint Fuels (IGF Code). IACS submitted that the wording of all the 14 Annexes could be improved. It was agreed that this would be done by the Secretariat and submitted to the Plenary for approval with the exception of:

(i) Annex 6 - as leak detection of liquefied gas stored on open decks is not part of the IGC Code – as this was a very technical issue this would be looked at by WG1 to decide how this should be taken forward.

(ii) Annex 7 - there is a requirement to clarify an emergency situation and this should go to WG 1 for further interpretation and clarification.

(iii) Annex 9 – it was agreed that this UI proposes arrangements beyond the Code. IACS stated that the Code was somewhat vague in the area of LNG leakage on open decks and that this should be referred to WG1 for more detailed technical guidance. There were split views by delegates so the Chair decided that the issue should be sent to WG1 for examination of the requirement and whether a UI is required.

(iv) Annex 10 – This UI is not in line with the Code that the fuel storage hold space may be considered as a cofferdam and this was referred to the WG1 for consideration.

(v) Annex 14 – to be referred to WG1 for further clarification.

(b) Paper 3/10 (IACS) - Follow on from CCC2 UI GC14 Pump Vents in Machinery Spaces.

(i) Secretariat prepare an MSC Circular.

(c) Paper 3/10/2 (IACS) –GC15 Closing Devices for Air Intakes.

(i) Secretariat prepare an MSC Circular including amendments by Norway and USA.

(d) Paper 3/10/3(IACS) – GC16 UI on Cargo tank clearances.

(i) Secretariat prepare an MSC Circular.

(e) Paper 3/10/5(IACS) –UI on External surface area of the tank for determining the sizing of the pressure relief valve.

(i) To be referred to WG2.

(f) Paper 3/10/6 (INTERTANKO) – UI on the type of ESD valve required by paragraph 5.11.6.3 of the IGC Code (as amended by resolution MSC.370(93)).

(i) Issue a Corrigendum to highlight difference of interpretation between English, French and Spanish versions.

(g) Paper 3/10/7 (INTERTANKO) – UI on Safe means of emergency isolation of PRVs – Interpretation of paragraph 8.2.9 of the IGC Code (as amended by resolution MSC.370(93)).

(i) Secretariat prepare an MSC Circular as amended by UK.

(h) Paper 3/10/8 INTERTANKO – UI on back-flushing of the water-spray system

– Interpretation of paragraph 11.3.6 of the IGC Code (as amended by resolution MSC.370(93))

(i) Send to WG2 for clarification and finalise text.

(i) Paper 3/10/9 (Japan) – UI on Fire safety requirements and oxygen monitoring system – Interpretations of paragraphs 3.3.1 and 13.6.4, respectively, of the IGC Code (as amended by resolution MSC.370(93)).

(i) Secretariat prepare an MSC Circular

(j) Paper 3/10/10 (China) – UI on Clarification on the serious deficiencies standard for aperture deformation in corner fittings in CSC 1972 and CSC.1/Circ.138/Rev.1.

(i) To be referred to WG2 for clarification and consideration.

(ii) The TOR of the WG were agreed.

11. Agenda Item 11. Consideration of reports of incidents involving dangerous goods or marine pollutants in packaged form on board ships or in port areas (12.3.1.1)

Papers self-explanatory and nothing significant to report.

12. Agenda Item 12 Biennial status report and provisional Agenda for CCC4

13. Agenda Item 13 Election of Chairman and Vice-Chairman for 2016 –

14. Agenda Item 14 Any Other Business –

Jim Scorer