

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals

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Item 3 (c) of the provisional agenda

Hazard communication issues: miscellaneous

Comments on ICMM's proposal to amend Annex 4

Transmitted by the expert from the United States of America

Background

1. Working document ST/SG/AC.10/C.4/2106/21, transmitted by the International Council on Mining and Metals, proposes certain amendments to A.4.3.14.7 and table 1.5.2 related to the way the GHS refers to IMO codes in section 14 of the safety data sheet. In particular, the GHS currently references only IMO codes related to the transport of liquids, and ICMM's paper intends to generalize the GHS's discussion to include IMO codes for other cargoes.

2. While the United States supports this effort, its experts believe that certain technical corrections need to be made to ICMM's proposal related to its references to the IGC code.

3. The IGC Code and its predecessors contain ship construction requirements, as well as cargo carriage requirements, for the carriage of liquefied gases, while the IBC and IMSBC Codes prescribe carriage requirements for bulk liquid and bulk solid cargoes, respectively. Vessels carrying liquefied gases in bulk must comply with requirements of the Code (GC, eGC, or IGC) that was in force when the ship was built, unlike vessels carrying liquids or solids in bulk, which must comply with the version of the Code currently in force.

4. However, this distinction is not clear in ICMM's proposed amendments to subsection A4.3.14.7. Additionally, the phrase "gaseous bulk cargoes" is incorrect in the context of the IGC Code and its predecessors and in the proposed new fourth paragraph in subsection A4.3.14.7. These Codes apply to "liquefied gases in bulk" not all "gaseous" cargoes. These cargoes are liquids and are transferred like liquids.

Proposal

5. In paragraph 9 of ICMM's paper should be revised to read (additions underlined):

In Annex 4, subsection A4.3.14.7, first paragraph

Replace "*This sub-section only applies when cargoes are intended to be carried in bulk according to the following IMO instruments: Annex II of MARPOL 73/789, the IBC code¹⁰.*"

with:

“This sub-section only applies when cargoes are intended to be carried in bulk according to IMO instruments: e.g., Annex II or Annex V of MARPOL 73/789, the IBC Code¹⁰, the IMSBC Code¹¹ and the IGC Code¹² (or earlier versions eGC and CG)”.

6. In paragraph 10, proposed footnote 12 should be revised to read (deletions shown in strikethrough and additions underlined):

¹² IGC Code means The International Code of the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk, ~~as amended~~, including applicable amendments to which the vessel has been certified.

7. The proposed text in paragraph 13 should be revised to read (deletions shown in strikethrough and additions underlined):

“For ~~gaseous bulk cargoes~~ liquefied gas cargoes in bulk provide the product name and ship type according to IGC (or earlier versions eGC and CG)”.
