

AMENDMENT 02-13 TO THE IMSBC CODE AND SUPPLEMENTS

New entry for an individual schedule for iron ore fines in the IMSBC Code

Submitted by Intercargo, ICS, BIMCO, International Group of P and I Clubs (IG)

SUMMARY

<i>Executive summary:</i>	<p>This document comments on DSC 17/4/22, DSC 17/4/23 and DSC 17/4/24 (Brazil). The co-sponsors opine it is premature to consider the Brazilian proposal at this time and support using the Correspondence Group on the Transport of Iron Fines report as the basis for the finalisation of a schedule for iron ore fines as a Group A cargo.</p> <p>Further, recognising the extensive ongoing research into iron ore fines the co-sponsors propose that following the completion and peer review of the research programmes, that the relevant provisions of the Code should be reviewed accordingly with the view to amendments reflecting the findings of the research.</p>
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.3
<i>Planned output:</i>	5.2.3.3
<i>Action to be taken:</i>	Paragraph 14
<i>Related documents:</i>	DSC 17/4/22, DSC 17/4/23, DSC 17/4/24 and DSC 17/4/3

Introduction

1. This document comments on documents DSC 17/4/22, DSC 17/4/23 and DSC 17/4/24 (Brazil) concerning a "New Entry for an individual schedule for iron ore fines in the IMSBC Code" and is submitted in accordance with paragraph 6.12.5 of the Guidelines on the organization and method of work of the Committees (MSC - MEPC.1/Circ.4).

2. Due to the very limited time between the referenced Brazilian papers being published and the commenting deadline this paper focuses on highlighting key concerns and proposes a way forward.

Background

3. In response to a number of casualties and loss of life (some reported in MSC 87/INF.13 and DSC 15/4/16) associated with the carriage of iron ore fines and its propensity to liquefy the Sub-committee has published several circulars warning of the dangers of such cargoes (DSC.1/Circ. 63 and DSC.1/Circ 66) and embarked upon work to introduce a new IMSBC Code schedule for iron ore fines.

4. To advance this work the Sub-committee established the Correspondence Group on the Transport of Iron Fines (DSC 16/15, paragraph 4.45) with one of the terms of reference requesting the preparation of a draft individual schedule for iron ore fines. The correspondence group has reported to the Sub-committee in document DSC 17/4/3.

5. The co-sponsors all participated in the correspondence group and commend the efforts of the coordinator in steering the group towards a consensus on a new schedule for iron ore fines. Although there are outstanding issues to resolve, the co-sponsors support the use of the Correspondence Group report as the basis for the finalisation of a schedule for iron ore fines as a Group A cargo.

Comments on DSC 17/4/22, DSC 17/4/23 and DSC 17/4/24

6. The co-sponsors thank Brazil for their submissions and the extensive research that has been carried out by the Brazilian mining industry and appreciate the engagement of that industry with the shipping industry; most recently hosting representatives of the co-sponsoring organisations at their mines and terminals in Brazil.

7. Notwithstanding the research to date, the co-sponsors are unable to support the proposed iron ore fines schedule in document DSC 17/4/22 or the test methods outlined in DSC 17/4/23 and DSC 17/4/24.

8. Of fundamental concern is the introduction of a new test methodology within the IMSBC Code at this time. There has not been sufficient time to review the proposals in DSC 17/4/23 and DSC 17/4/24 and, as reported to the Correspondence Group and E & T 17, other research on the carriage of iron ore fines is being conducted in Australia which is still on-going. Hence, to include a new test method at this time is considered premature. The co-sponsors and other delegations raised a general concern during E & T 17 about how a new test method should be scientifically peer reviewed prior to inclusion in the IMSBC Code and suggested a protocol should be developed to this effect (DSC 17/4/2 paragraph 8.6).

9. Throughout the proposed schedule in DSC 17/4/22 reference is made to the propensity of iron ore fines to be free draining and “exude free water irrespective of their moisture content at loading”. This phenomenon may be experienced in some cargoes, but it has not been demonstrated to be an intrinsic property of all iron ore fines. In cargoes purported to be free draining the characteristics of the cargo and its behaviour under shipping conditions is not yet fully understood. Hence, it is considered premature to include this concept in a globally applicable schedule for iron ore fines.

10. In DSC 17/4/22, under “A.2 Weather Precautions” the terms “light”, “moderate” and “heavy” precipitation are used. These are considered to be vague terms without definition and are inconsistent with the standard IMSBC Code terminology. It is suggested the text discussed in the correspondence group report (paragraphs 22 to 25) should be used as the basis for this section utilising the new paragraph 4.3.3 of the Code.

11. In addition “A.8 Loading” not only includes reference to exuding free water and a new test protocol discussed above, but is also contradictory and unclear. The text requires the cargo to be trimmed in accordance with sections 4 and 5 of the Code, but not if an “appreciable amount of free water is expected to be exuded during loading and voyage”. It is unclear how the Master could possibly determine whether to trim or not given this advice or determine what may be expected during the voyage. The standard requirement to trim because of the high cargo density also conflicts with the requirement not to trim due to exuding water. This will put the Master in a difficult position to ascertain the exact trimming provisions required of the cargo.

A way forward

12. The co-sponsors propose using the Correspondence Group report as the basis for the finalisation of a schedule for iron ore fines as a Group A cargo during DSC 17.

13. Recognising the extensive research being carried out by the Brazilian and Australian mining industries, it is also proposed that any agreed provisions for iron ore fines agreed for the 02-13 amendment to the IMSBC Code should be considered under ongoing review. Following completion and peer review of the research programmes the Code provisions may be re-considered for amendment 03-15 to the Code (when the Brazilian submissions reference herein may be re-considered).

Action requested of the Sub-committee

14. The Sub-committee is invited to consider the above comments and proposal in paragraphs 12 and 13 and decide as appropriate.
