PREPARATION OF DRAFT AMENDMENTS (42-24) TO THE IMDG CODE

CONSIDERATION OF PROPOSALS REFERRED TO E&T 38 BY CCC 8

Regulation of stabilized substances

Submitted by BIMCO, CEFIC, DGAC, ICS, P & I Clubs, WSC and IVODGA

SUMMARY

Executive summary: This document informs of the interim outcomes of discussions amongst the co-sponsors on the matter of stabilized substances, as a result of the discussion at CCC 8 on document CCC 8/6/11 and CCC 8’s decision to refer this matter to E&T 38.

Strategic direction, if applicable:

Output: 7.10

Action to be taken: Paragraph 6

Related document: CCC 8/6/11

Background

1. CCC 8 had for its consideration document CCC 8/6/11 (Morocco et al.) on stabilized substances, setting forth proposals to amend the IMDG Code to address identified deficiencies regarding special transport conditions and operational controls in order to ensure safe transport.

2. In order to address the identified deficiencies therein, the above-mentioned document proposed that the IMDG Code provision 5.4.1.4 include an additional sub-paragraph 5.4.1.4.3.8 with the following text:

"5.4.1.4.3.8 Stabilized Substances: If the goods to be transported contain the word "STABILIZED" in the proper shipping name and are assigned SP386, the SADT/SAPT shall be indicated as "SADT/SAPT xx°C" together with the anticipated duration of the effectiveness of inhibitors. Additionally, any special transport conditions or operational controls required for the safe transport shall be included on the dangerous goods transport document."
In order to ensure greater visibility into cargo transported at a temperature higher than ambient, document CCC 8/6/11 also proposed to amend SP386 as noted in that document.

After consideration, CCC 8 agreed to refer this matter to E&T 38 for further consideration, with a view to providing further advice to CCC 9.

Interim outcome of industry discussions

Recognizing the importance of addressing this matter for shippers, carriers, port authorities, transport workers, as well as the environment, the co-sponsors have engaged in constructive discussions with the intention of understanding the different positions, narrowing down outstanding issues and facilitating the decision-making process on how to proceed with the subject matter. Noting that these are not conclusive, discussions are currently under way on the following points:

1. the provision of the self-accelerating decomposition temperature (SADT) to the carrier and the relevance of the SADT in determining safe transport conditions;

2. the provision of the self-accelerating polymerization temperature (SAPT) to the carrier, and the relevance and reliability of the SAPT as a basis of determining safe transport conditions, including but not limited to test methods for determining the SAPT.

3. the widespread use of chemical inhibitors as a means of enhancing safety in the transport of polymerizing substances as well as regulatory standards in this regard; and

4. the provision of critical information to the carrier (e.g. critical temperature, chemical inhibitors' efficacy period and parameters) for the carrier and port authorities to be able to use in the prevention of destabilization and/or to mitigate cases where chemical stabilization becomes ineffective.

Action requested of the Group

The Group is invited to consider the above information (paragraph 5) and take action, as appropriate.