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From:	General Secretariat of the Council
To:	Delegations
Subject:	6th session of the IMO Sub-Committee on Carriage of Cargoes and Containers (CCC 6), (London, 9-13 September 2019) – Non-paper from the Commission drafted to facilitate EU co-ordination

DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (23.09.2019)

Delegations will find attached a non-paper from the Commission drafted to facilitate co-ordination between the EU Member States and the Commission in respect of the subject mentioned above.

ANNEX

NON PAPER

DRAFTED TO FACILITATE CO-ORDINATION BETWEEN THE EU MEMBER STATES AND THE EUROPEAN COMMISSION[1] FOR THE SIXTH SESSION OF THE SUB-COMMITTEE ON CARRIAGE OF CARGOES AND CONTAINERS (CCC 6)

(LONDON, 09-13 SEPTEMBER 2019)[2]

Non-restrictive list of items for which EU, common or coordinated positions could be agreed upon.

This document lists all received documents[3]. The Commission suggests focussing the discussion on the proposed positions and on the consideration of support to submissions by another EU or EEA State as fellow EU/EEA Member State. This does not exclude the discussion of any other item on the agenda, if explicitly requested by an EU/EEA Member State or the Commission.

The comments by the Commission are printed in *italics*. The proposed line of conduct to be followed by the Member States and the Commission is printed in ***bold italics*.**

1 For reasons of brevity, the word "Commission" used in this document means the responsible service of the European Commission.

2 It is the intention of the Presidency to ensure the necessary co-ordination of the Member States' positions on the spot on the basis of the discussion of this paper.

3 Based on documents received up to 26 August 2019.

Agenda item 1 – Adoption of the agenda

Docs: CCC 6/1, CCC 6/1/1-2

CCC 6/1 (Secretariat): includes the provisional agenda for CCC 6.

CCC 6/1/1 (Secretariat): contains annotations to the provisional agenda.

CCC 6/1/2 (Chair): informs about the proposed selection of working and drafting groups for the session, taking into account the volume of documentation submitted to the session and relevant decisions of MSC and MEPC.

In accordance with document CCC 6/1/2, the following working/drafting groups are envisaged to be established during this session of CCC:

- *Working Group on Amendments to the IGF Code and Development of Guidelines for Low-flashpoint Fuels (agenda items 3 and 8 (IGF Code related interpretations));*
- *Working Group on Suitability of High Manganese Austenitic Steel for Cryogenic Service (agenda item 4);*
- *Working Group on Amendments to the CSS Code (agenda item 7);*
- *Drafting Group on IMSBC Code Matters (agenda item 5); and*
- *Drafting Group on Amendments to the Inspection Programmes for Cargo Transport Units Carrying Dangerous Goods (agenda item 10).*

Agenda item 2 – Decisions of other IMO bodies

Docs: CCC 6/2, CCC 6/2/1-3

CCC 6/2 (Secretariat): refers to the decisions taken by MEPC 73 and MSC 100 that are relevant to the work of the Sub-Committee.

CCC 6/2/1 (Secretariat): refers to the decisions taken by SDC 6, SSE 6, PPR 6 and HTW 6 that are relevant to the work of the Sub-Committee.

CCC 6/2/2 (Secretariat): refers to the decisions taken by MEPC 74 and MSC 101 that are relevant to the work of the Sub-Committee.

CCC 6/2/3 (IACS): provides information about the carriage of dangerous goods on ships carrying industrial personnel and proposes some additional text for inclusion in the draft International Code of Safety for Ships Carrying Industrial Personnel.

The relevant outcome of the other IMO bodies will be discussed in detail under the relevant CCC 6 agenda items.

Agenda item 3 – Amendments to the IGF Code and development of guidelines for Low-Flashpoint fuels

Docs: CCC 6/3, CCC 6/3/1-7, CCC 6/INF.6, CCC 6/INF.17

CCC 6/3 (Germany *as the coordinator of the Correspondence Group*): contains the report of the Correspondence Group on Development of Technical Provisions for the Safety of Ships using Low-Flashpoint Fuels.

CCC 6/3/1 (Republic of Korea): suggests amendments to the draft safety requirements for the LPG fuelled vessel based on document CCC 5/INF.27 and proposes a work plan for this agenda item.

CCC 6/3/2 (EU): presents an FSA study on safety-related issues for the potential use of low-flashpoint oil fuels as a marine fuel as well as draft amendments to the IGF Code to regulate the use of such fuels.

CCC 6/3/3 (IACS): provides proposals for amendments to paragraphs 9.4.7, 9.4.8, 9.6.1.1, 12.5, 13.3.5 and 13.3.7 of part A-1 of the IGF Code.

CCC 6/3/4 (Canada): provides proposals for amendment to regulation 11.6 of chapter 11, Part A-1 of the IGF Code.

CCC 6/3/5 (China): provides proposals for draft amendments to paragraph 6.7.3.1.1 of the IGF Code with a view to improve the design requirements for the pressure relief system of the LNG fuel tanks, ensuring that the pressure relief system is of sufficient capacity when implementing the isolation requirements specified in paragraph 6.7.2.6.

CCC 6/3/6 (CESA): comments on the Correspondence Group report on the Development of Technical Provisions for the Safety of Ships Using Low-flashpoint Fuels and provides proposals regarding the references to IEC standards within the draft interim guidelines for the Safety of Ships using Fuel Cell Power Installations. CESA recommends making better use of the detailed calculation methodology provided in IEC 60079-10-1:2015 in order to address the hazards associated with the large variety of fuel cell designs in a generic manner. Novel technology has to be assessed with flexible and scientifically sound methods in order to fully utilize innovation for achieving GHG goals.

CCC 6/3/7 (ICS, INTERTANKO, CLIA and IPTA): provides comments on CCC 6/3/2 regarding the validity of the proposals contained in the document including the assumptions contained in CCC 6/INF.6 that have been used to derive the technical evaluation of risk associated with the use of low-flashpoint diesel fuels.

CCC 6/INF.6 (EU): presents the full report of an FSA study on safety-related issues for the potential use of low-flashpoint oil fuels.

CCC 6/INF.17 (CESA): provides complementing information on the application of the standard IEC 60079-10-1:2015 for assigning hazardous zones. The methodology is illustrated by a sample application on a containerized fuel cell power installation designed for providing onboard electrical energy.

EU relevance

The purpose of Directive 2009/45/EC on safety rules and standards for passenger ships is to introduce a uniform level of safety of life and property on new and existing passenger ships and high-speed passenger craft engaged on domestic voyages, and to lay down procedures for negotiation at international level with a view to a harmonisation of the rules for passenger ships engaged on international voyages. Article 6(2)(a)(i) of Directive 2009/45/EC applies SOLAS, as amended, to Class A passenger ships. As the IGF Code is mandatory for passenger ships through SOLAS, the Commission is of the view that this matter should be regarded as falling under the Union's exclusive external competence.

In addition, Directive 2014/94/EU of the European Parliament and of the Council of 22 October 2014 on the deployment of alternative fuels infrastructure requires Member States to ensure that LNG is available at EU core ports for seagoing ships as from the end of 2025. National policy frameworks have been established by EU Member States for the market development of alternative fuels and their infrastructure, with a particular focus on the different supporting measures and initiatives for the promotion and development of LNG refuelling points for sea going ships.

Background

CCC 4 established a Correspondence Group (CG) on Development of Technical Provisions for the Safety of Ships using Low-flashpoint Fuels in order to develop draft amendments to the IGF Code regarding fuel cells and draft technical provisions for the safety of ships using methyl/ethyl alcohol as fuel. The CG reported to CCC 5 on progress made on these topics, but it was noted that a number of open issues remained and had to be further discussed at CCC 5. The Sub-Committee agreed that the best way forward was to deal with the use of ethyl/methyl alcohols and fuel cells through the development of interim guidelines. This route would allow the Sub-Committee to adopt a more flexible amendment process in a period where experience-based knowledge is still being developed and there is limited scale deployment of the associated technologies. The IGF WG succeeded in finalizing the draft interim guidelines for the safety of ships using methyl/ethyl alcohol fuels. The Sub-Committee agreed to recommend to MSC 100 to forward the interim-guidelines to other Sub-Committees seeking specific advice on related paragraphs.

CCC 5 re-established the CG on Development of Technical Provisions for the Safety of Ships using Low-Flashpoint Fuels under the coordination of DE. The CG was instructed to develop draft interim guidelines on fuel cells, as well as to consider a number of proposals for amendments to the IGF Code.

One of the issues discussed by the CG was document CCC 5/3/4 in which China presented the issues related to lowering the flashpoint of fuels from 60°C to 55°C. This discussion followed from CCC 4, which discussed the submission by DE (CCC 4/3/5 and CCC 4/INF.11), proposing that risk assessment methods such as Formal Safety Assessment (FSA) should be used for further research on the use of low flashpoint fuels. MSC 96 and MSC 98 had decided that safety concerns with regard to ships using low-flashpoint oil fuels should be addressed in the context of the IGF Code only, without reopening discussions on the possibility of amending the flashpoint requirements in SOLAS which are set at 60°C.

In this regard it should be noted that Article 8.01(3) of Directive 2006/87/EC of the European Parliament and of the Council of 12 December 2006 which sets out technical requirements for inland waterway vessels includes requirements for the flashpoint of marine fuel oil of not lower than 55°C for inland waterway vessels. It is also important to note that, similarly to what SOLAS II-2/4.2.1 and MSC.1/Circ.1321 foresee, section 10 of Annex I, Chapter II-2, Part A of Directive 2009/45/EC provides that for ships constructed on or after 1 January 2003 oil fuel having a flashpoint of less than 60 °C but not less than 43 °C may be permitted subject to a number of conditions.

DELETED

At a lunchtime presentation during CCC 5, DE set out the results of a FSA study on the use of diesel, which has a flashpoint between 52°C and 60°C. During CCC 5 the working group did not have enough time to consider the Chinese proposal in detail and this work was continued within the CG. In the CG while one delegation was of the view that a new, fuel-related chapter of the IGF Code regarding low-flashpoint fuel oil should be considered a long-term goal and interim guidelines should be developed as there was not sufficient experience in maritime application of such fuels, the overwhelming majority agreed that CCC 6 should consider developing a new fuel-related chapter for inclusion in the IGF Code. In addition, the majority supported the DE proposal to establish regulations for the 52°C to 60°C flashpoint range rather than the proposal by China (CCC 5/3/4) for a 55°C to 60°C range.

Consideration at CCC 6

DE, as coordinator of the CG, highlighted in its report (CCC 6/3) that the CG had made good progress on all items but a number of open issues still required further discussion at CCC 6. Therefore it proposed Terms of Reference for the establishment of a working group (WG) at CCC 6.

CCC 6/2/1 provides the feedback received from the different Sub-Committees regarding relevant parts of the draft interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel:

- *SDC 6 and PPR 6 agreed to the text referred to them without further comments.*

- *HTW 6 noted that regulation V/3 of the STCW Convention and section A-V/3 of the STCW Code were written primarily for LNG, but they were still relevant to the training of those serving on vessels using methyl/ethyl alcohol as fuel. However, it was agreed that the competencies would need to be amended to reflect the correct training requirements for the specific hazards, once the CCC Sub-Committee completes its work on methyl/ethyl alcohol as a fuel. Therefore, HTW 6 prepared amended text of the draft Interim Guidelines for the safety of ships using methyl/ethyl alcohol as fuel for consideration at CCC 6.*

- *SSE 6 proposed alternative text with respect to paragraph 11.6.1-3 and paragraph 11.6.8. SSE 6 also noted that foams using perfluorooctanesulphonic acid (PFOS) and other surfactants in fire-fighting foam on board ships were still under consideration and should be taken into account by CCC 6. In this regard, MEPC 73 noted the information contained in MEPC 73/18/3 and MEPC 73/INF.16 (NO) on the negative effect of the use of PFOS in firefighting foam on board ships on the marine environment and requested interested parties to submit further comments on the matter to a future session of the Committee.*

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In document CCC 6/3/1, the Republic of Korea highlights the need to establish technical provisions for the safety of ships using LPG, providing conclusions from studies that were carried out, including a Hazard Identification (HAZID) for LPG fuelled Ro-Pax. The Annex to the document includes draft guidelines to tackle this issue. The Republic of Korea proposes the establishment of a CG in order to consider the proposed guidelines and then continue the work at a working group during CCC 7. **DELETED**

The EU document (CCC 6/3/2) summarises the results of a FSA on the identification of potential additional hazards, assessment of related risks and identification of potential risk control measures to achieve safety equivalence for low-flashpoint diesel with a flashpoint between 52°C and 60°C, in comparison to conventional maritime diesel (the full study is provided in CCC 6/INF.6). The outcome of this study shows that there are only slight differences in the risk of using low-flashpoint diesel fuels compared to conventional oil fuels when it comes to worst case scenarios. These marginal additional risks could be addressed by specific regulations in the IGF Code, the first draft of which are included in the annex to the document. **DELETED**

In CCC 6/3/7, shipping industry organisations (ICS, INTERTANKO, CLIA and IPTA) question the validity of the FSA presented in document CCC 6/INF.6 in view of issues they raised in the document, in particular related to situations when engine-rooms are subject to temperatures of at least 60°C. They therefore consider that the proposed regulations contained in annex 1 of document CCC 6/3/2 will lead to a reduction in the safety levels of ships that use low-flashpoint diesel fuels with a flashpoint of between 52°C and 60°C.

IACS (CCC 6/3/3) proposes a number of amendments to part A-1 of the IGF Code.

As a follow-up to the work carried out in the CG on the development of paragraph 11.8 of chapter 11, part A-1 of the IGF Code, Canada (CCC 6/3/4) proposes to amend paragraph 11.6.2. Canada notes that in order to address fire protection of spaces containing equipment for fuel preparation as originally intended by paragraph 11.3.1, both fixed-system as proposed by the addition of paragraph 11.8 and portable measures should be required to fully protect the space and its occupants. The proposal is to have a portable dry powder extinguisher of at least 5 kg capacity located also in a fuel preparation room.

China also proposes in CCC 6/3/5 amendments to IGF Code, in this case to paragraph 6.7.3.1.1 of the IGF Code, related to the sizing of the pressure relieving system for each LNG fuel tank. The document raises differences between the provisions for PRV design in the IGC and in the IGF code. Whilst doing so, an alternative text is proposed where the release capacity of the PRVs is not affected in the case of one of them is isolated in the terms of 6.7.2.2 and 6.7.2.6. **DELETED**

CESA (CCC 6/3/6) comments on the report of the CG (CCC 6/3) and proposes amendments to Chapter 4 Electrical systems of the "Draft interim guidelines for the Safety of Ships using Fuel Cell Power Installations". In particular, CESA proposes to introduce IEC 60079-10-1:2015 as the only standard reference for hazardous area classification and presents paragraph 4.2.2 just as an alternative zone definition. **DELETED**

Although the present wording is not identical, this approach is also consistent with the one followed by the current text of the "draft interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel". As the same principles are being addressed, the outcome should be the same. **DELETED**

This adjustment would also imply that paragraphs 4.2.2bis and 4.2.5 become unnecessary, as they are already covered by 4.2.1.

DELETED

Agenda item 4 – Amendments to the IGC and IGF Codes to include high manganese austenitic steel and related guidance for approving alternative metallic material for cryogenic service

Docs: CCC 6/4, CCC 6/4/1, CCC 6/INF.5, CCC 6/INF.15

CCC 6/4 (Marshall Islands *as coordinator of the Correspondence Group*): contains the report of the Correspondence Group on the Suitability of High Manganese Austenitic Steel for Cryogenic Service with particular emphasis on generic guidelines for Approving Alternative Metallic Material for Cryogenic Service.

CCC 9/4/1 (Republic of Korea): proposes draft amendments to the IGC and IGF Codes to be considered by the Sub-Committee.

CCC 6/INF.5 (Republic of Korea): provides operational experience of high manganese austenitic steel for cryogenic service based on CCC 5/WP.4 TOR 3.

CCC 6/INF.15 (Republic of Korea): provides updated technical information for high manganese austenitic steel for cryogenic service in relation to the discussion of the Correspondence Group on increasing the maximum allowable thickness of high manganese austenitic steel for cryogenic service.

Agenda item 5 – Amendments to the IMSBC Code and supplements

Docs: CCC 6/5, CCC 6/5/1-14, CCC 6/INF.3-4, CCC 6/INF.7, CCC 6/INF.10-11, CCC 6/INF.13-14, CCC 6/INF.16, CCC 6/INF.18

CCC 6/5 (Secretariat): contains the report of the Editorial and Technical Group at its thirtieth session.

CCC 6/5/1 (Secretariat): provides, for the consideration of the Sub-Committee, the report of the Review Group relating to the draft new model course on Safe Handling and Transport of Solid Bulk Cargoes, as set out in document CCC 6/5/1/Add.1.

CCC 6/5/1/Add.1 (Secretariat): provides the draft new model course on Safe Handling and Transport of Solid Bulk Cargoes.

CCC 6/5/2 (Turkey): contains a proposal for a new individual schedule for clam shell to be included in the IMSBC Code.

CCC 6/5/3 (Belgium): contains a proposal for a new individual schedule for lead concentrate, leach product for inclusion in the IMSBC Code.

CCC 6/5/4 (United Kingdom): follows up the recommendations of the report of the incident of the bulk carrier Cheshire, as was presented in document CCC 5/5/19, and makes additional recommendations for further consideration and action by the Sub-Committee to address handling of ammonium nitrate and ammonium nitrate based fertilizer cargoes.

CCC 6/5/5 (United Kingdom): follows up the recommendations of the report of the incident of the bulk carrier Cheshire, as presented in document CCC 5/5/19, and makes additional recommendations for amended guidance for the carriage of ammonium nitrate and ammonium nitrate based fertilizer cargoes.

CCC 6/5/6 (United Kingdom, BIMCO, ICHCA, IFSMA, IBTA, IHMA and NI): proposes the adoption of a number of specific hazard identification, risk assessment and control procedures aimed at reducing the continuing loss of life and serious accidents involving solid bulk cargoes, particularly the IMSBC Code group B cargoes, as identified in document CCC 6/5/4. This document takes into account relevant recommendations in Revised recommendations for entering enclosed spaces aboard ships (resolution A.1050(27)) and Recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo holds (MSC.1/Circ.1264).

CCC 6/5/7 (CEFIC): describes the basis and rationale for replacing the existing schedule for AMMONIUM NITRATE BASED FERTILIZER (non-hazardous), with two individual schedules, for AMMONIUM NITRATE BASED FERTILIZER MHB (OH) and AMMONIUM NITRATE BASED FERTILIZER (unclassified) in the IMSBC Code, based on the proposals agreed in principle by CCC 5 and the report of E&T 31 (CCC 6/5).

CCC 6/5/8 (CEFIC): proposes a new individual schedule for AMMONIUM NITRATE BASED FERTILIZER MHB (OH) in the IMSBC Code, based on the proposals agreed in principle by CCC 5. Its basis and rationale are described in document CCC 6/5/7.

CCC 6/5/9 (CEFIC): proposes a new individual schedule for AMMONIUM NITRATE BASED FERTILIZER (unclassified) in the IMSBC Code, based on the proposals agreed in principle by CCC 5. Its basis and rationale are described in document CCC 6/5/7.

CCC 6/5/10 (China): proposes to include brown fused alumina as a new individual schedule in the IMSBC Code.

CCC 6/5/11 (Australia): provides a summary of the ongoing coal self-heating research project being undertaken in Australia and proposes a path to discuss how to implement the outcomes and recommendations of the final report.

CCC 6/5/12 (Australia and Brazil): proposes an amended definition of "Group A" in the IMSBC Code to include phenomena other than "liquefaction".

CCC 6/5/13 (IIMA): follows on from the outcome of CCC 5 and subsequent developments on the issue of assessment of solid bulk cargoes for the MHB (CR) hazard and addresses one issue raised, namely that the text of the draft guidance for conducting the refined MHB corrosivity test could be improved.

CCC 6/5/14 (Australia, Brazil, Canada, NACE International and IIMA): follows on from the outcome of CCC 5 and subsequent developments on the issue of assessment of solid bulk cargoes for the MHB (CR) hazard and addresses the issue of applicability of the refined MHB (CR) test to cargoes other than those tested by the Global Industry Alliance.

CCC 6/INF.3 (Turkey): contains the supporting information for the proposed new individual schedule for clam shell to be included in draft amendment 06-21 to the IMSBC Code.

CCC 6/INF.4 (Belgium): provides the IMO Solid Bulk Cargo Information Reporting Questionnaire and the Safety Data Sheet to support a proposal for a new individual schedule for lead concentrate, leach product.

CCC 6/INF.7 (United Kingdom and IBTA): presents the data analysis used as a basis to recommend proposed amendments to the IMSBC Code and Revised recommendations for entering enclosed spaces aboard ships (resolution A.1050(27)). Reference is made in document CCC 6/5/6.

CCC 6/INF.10 (Germany): Consideration of the concept of cohesiveness of bulk solids as a basis for possible applications for the assessment of the stability of ships′ cargoes.

CCC 6/INF.11 (Peru): presented in this document shows the performance of lower concentrations of ethoxyquin, and a tocopherol-based antioxidant, when FISHMEAL is shipped in bulk. The introduction of amended text to the IMSBC Code to cover these aspects is proposed for the stabilization of fishmeals.

CCC 6/INF.13 (China): contains the supporting documentation for the proposed new individual schedule for brown fused alumina, including the IMO Solid Bulk Cargo Information Reporting Questionnaire.

CCC 6/INF.14 (China): contains the supporting documentation for the proposed new individual schedule for brown fused alumina, including the MSDS and Certification for Safe Transport of Chemical Goods.

CCC 6/INF.16 (Australia): provides an update research report from the Australian Coal Industry′s Research Program (ACARP).

CCC 6/INF.18 (Australia and Brazil): presents proposed draft amendments to the IMSBC Code (based on the amendment 04-19 to the Code in document MSC 101/WP.5/Add.5), as discussed in document CCC 6/5/12.

CCC 6/INF.22 (IBTA): proposes that ships carrying solid bulk cargoes classified as group B in the IMSBC Code should be provided with safety data sheets (SDS) in order to provide clear, concise and accurate occupational health information to seafarers, transport workers and emergency responders.

CCC 6/INF.23 (IBTA): proposes that the IMSBC Code requirement for the shipper's form for cargo information to be provided to the masters of ships loading solid bulk cargo should also include for its provision to the operators or terminal representatives of the port facilities that will be handling the cargo to allow them to implement the precautions necessary for its safe and proper loading and unloading.

EU relevance

Article 13 of Directive 2002/59/EC on establishing a vessel traffic management and information system requires that dangerous or polluting goods, including products listed in the International Maritime Solid Bulk Cargoes Code (IMSBC Code), as amended, carried on board a ship, should be reported to the Union maritime information and exchange system (SafeSeaNet). Article 3 of Directive 2002/59/EC provides that for the purposes of the Directive the referenced IMO Conventions and Codes should be considered as those in their up-to-date version. Therefore, any changes to the IMSBC Code would affect the dangerous or polluting goods that ships have to report to Member States and subsequently to SafeSeaNet.

In addition, Article 16 Regulation (EU) 2019/1239 of the European Parliament and of the Council of 20 June 2019 establishing a European Maritime Single Window environment and repealing Directive 2010/65/EU requires that the Commission shall establish a common hazmat database containing a list of dangerous and polluting goods which are to be notified in accordance with Directive 2002/59/EC and IMO FAL 7, taking into consideration the relevant data elements from the IMO Conventions and Codes. EMSA had already developed the Central Hazmat Database (CHD) incorporating the relevant dangerous or polluting goods information identified in the IMO Conventions and Codes (MARPOL Convention, IMSBC Code, IMDG Code, IGC and IBC) and which need to be reported to SafeSeaNet.

There is therefore an EU interest in knowing the changes to the list of dangerous and polluting goods mentioned in IMO Conventions and Codes

- Ship-shore documentation for unloading and loading bulk carrier cargoes

In document CCC 6 INF.23, IBTA sets out a case that the IMSBC Code requirement for the shipper's form for cargo information to be provided to the masters of ships loading solid bulk cargo should also include for its transmission to the operators or terminal representatives of the port facilities that will be handling the cargo to allow them to implement the precautions necessary for its safe and proper loading and unloading. They ask for interested parties to work with them to co-sponsor a new output.

DELETED

Agenda item 6 – Amendments to the IMDG Code and supplements

Docs: CCC 6/6, CCC 6/6/1-19, CCC 6/INF.8-9

CCC 6/6 (Secretariat): contains the discussions and decisions taken by E&T 31 in the context of amendments to the International Maritime Dangerous Goods (IMDG) Code.

CCC 6/6/1 (Secretariat): contains proposals for editorial corrections to the IMDG Code amendment 39-18, adopted by resolution MSC.442(99), identified by the Secretariat (publishing services).

CCC 6/6/2 (Secretariat): contains proposals for editorial corrections to the Revised Emergency Response Procedures for Ships Carrying Dangerous Goods (EmS Guide) (MSC.1/Circ.1588).

CCC 6/6/3 (Secretariat): contains a list of the existing footnotes in the IMDG Code in view to be reviewed by the E&T Group.

CCC 6/6/4 (France): proposes editorial corrections to the French version and the English version of amendment 39-18 to the IMDG Code.

CCC 6/6/5 (France): makes comments and proposals relating to document CCC 6/6/1 of the Secretariat.

CCC 6/6/6 (France): proposes editorial corrections to the French version of the EmS Guide and observations on document CCC 6/6/2.

CCC 6/6/7 (Germany): proposes simplification of segregation requirements by abolishing the distinction between acids and strong acids.

CCC 6/6/8 (Germany): proposes the assignment of alcoholates to the segregation group of alkalis and to require their segregation from acids.

CCC 6/6/9 (Germany): Segregation from liquid organic substances might be difficult to achieve when these organic substances do not meet the criteria for dangerous goods and are not declared as such. This document proposes a solution for this problem.

CCC 6/6/10 (Germany): discusses recent incidents generated by spontaneous combustion of charcoal and proposes new special provisions and amendments to stowage provisions for UN 1361 CARBON.

CCC 6/6/11 (Germany): refers to problems occurring in the context of transport of NORM and proposes facilitation of such transports by a new special provision in the IMDG Code.

CCC 6/6/12 (Germany): proposes a new allocation of 2,4-Dichlorophenol to UN 2923 in the index of the IMDG Code due to current classifications according to which the substance not only has toxic but also corrosive properties.

CCC 6/6/13 (Turkey): proposes to harmonize special packing provision B21 in the IMDG Code for consistency.

CCC 6/6/14 (Russian Federation): proposes to develop clarification on application of the provisions of the IMDG Code concerning UN portable tanks for multimodal transportation, bearing in mind the situation when competent authorities use dual classification of tank-containers in compliance with requirements applicable for UN portable tanks and requirements applicable for ADR/RID tanks at the same time. Such an approach does not seem to be appropriate as technical requirements for UN portable tanks and requirements for ADR/RID tanks for inland transportation are different.

CCC 6/6/15 (United States): contains a proposal to update the index of the IMDG Code by deleting the entry for diisopropylbenzenes as test data indicate it is not a marine pollutant.

CCC 6/6/16 (Republic of Korea): proposes to clarify provisions regarding control and emergency temperatures for formulations of self-reactive substances of class 4.1 and organic peroxides of class 5.2, transported in packagings.

CCC 6/6/17 (Liberia, ICS, IUMI, BIMCO, ICHCA, P & I Clubs, IVODGA and WSC): discusses the problem of non-declaration and misdeclaration of dangerous goods and contains a proposal to undertake a comprehensive review of maritime special provisions (SPs) in the IMDG Code, as appropriate.

CCC 6/6/18 (IACS): comments on the report of the thirty-first session of the Editorial and Technical Group regarding the clarification of the terms "life-saving appliances" and "areas with public access" in paragraph 7.1.4.4.2 of the IMDG Code (CCC 6/6, paragraphs 3.37 to 3.40).

CCC 6/6/19 (ICHCA): provides comments on documents CCC 6/6/10 and CCC 6/9 regarding classification and transport of carbon following incidents involving the spontaneous ignition of charcoal.

CCC 6/INF.8 (Germany): contains an incident report on spontaneous ignition of charcoal, supporting the proposal in document CCC 6/6/10.

CCC 6/INF.9 (Germany): contains a report on radiological risk assessment supporting the proposal in document CCC 6/6/11.

EU relevance

The same EU legislative provisions and requirements mentioned under Agenda item 5 are also applicable in the case of the products listed in the International Maritime Dangerous Goods Code (IMDG Code), as amended.

DELETED

Agenda item 7 – Amendments to the CSS Code with regard to weather-dependent lashing

Docs: CCC 6/7, CCC 6/INF.12

CCC 6/7 (Sweden): contains the report of the Correspondence Group on Weather Dependent Lashing.

CCC 6/INF.12 (OCIMF): introduces OCIMF's work on Deck Cargo Management Onboard Offshore Vessel.

Agenda item 8 – Unified interpretation (UI) of provisions of IMO safety, security and environment-related conventions

Docs: CCC 6/8, CCC 6/8/1-5, 7

CCC 6/8 (IACS): provides copies of IACS Unified Interpretations GC20 and GC21 relating to paragraphs 4.20.1.1 and 4.20.1.2, respectively, of the "revised" IGC Code (resolution MSC.370(93)). In particular, the document discusses where tee welds can be accepted in type A or type B independent tanks; and the welding of type C independent tanks including bi-lobe tanks, primarily constructed of curved surfaces fitted with a centreline bulkhead.

CCC 6/8/1 (IACS): provides four (4) new IACS unified interpretations (in relation to paragraphs 5.13.1.1.2, 8.1, 13.2.2, and 13.9.3 of the IGC Code) and a revised version of IACS UI GC25 (in relation to paragraph 5.12.3.1 of the IGC Code). These have been developed to facilitate the consistent and global implementation of the IGC Code. The document also provides ten (10) draft unified interpretations (in relation to paragraphs 4.4 and 5.13.2.4, 5.5.7, 5.6.5 and 18.9, 5.6.6, 5.11.4, 12.1.8, 13.3.7 and Table 18.1, 13.6.2.7, 13.6.4, and 16.7.1.4 of the IGC Code). Finally, the document seeks clarification regarding paragraph 15.4.1 of the IGC Code.

CCC 6/8/2 & CCC 6/8/2/Corr.1 (IACS): provides draft IACS unified interpretations of paragraphs 11.2 and 11.3.4 of the IGC Code and a draft revised version of IACS UI GC22 (relevant to paragraphs 11.3.1, 11.3.3 and 11.3.4 of the IGC Code). These have been developed in light of the discussions at CCC 5 of documents CCC 5/8/2 (IACS) and CCC 5/8/6 (IACS).

CCC 6/8/3 (Norway): contains a proposal for a unified interpretation of part A-1, paragraph 9.2.2 of the IGF Code.

CCC 6/8/4 (IACS): provides a copy of a draft IACS′ unified interpretation (UI) to facilitate the consistent and global implementation of paragraph 9.3.1 of the IGF Code.

CCC 6/8/5 (IACS): provides a draft updated version of the unified interpretation of paragraphs 6.9.1.1 and 6.9.1.2 of the IGF Code.

CCC 6/8/7 (Republic of Korea): proposes a unified interpretation on the application of the opening or access between the machinery space of category A and a Gas Valve Unit room located in the machinery space of a gas carrier, e.g. LNG carrier.

EU relevance

The purpose of Directive 2009/45/EC, on safety rules and standards for passenger ships, is to introduce a uniform level of safety of life and property on new and existing passenger ships and high-speed passenger craft, when both categories of ships and craft are engaged on domestic voyages, and to lay down procedures for negotiation at international level with a view to a harmonisation of the rules for passenger ships engaged on international voyages. Article 6(2)(a)(i) of Directive 2009/45/EC applies SOLAS, as amended, to Class A passenger ships. As the IGF Code is made mandatory for passenger ships through SOLAS, the Commission is of the view that matters related to the IGF Code should be regarded as falling under the Union's exclusive external competence.

Consideration at CCC 6

In CCC 6/8/3, Norway explains that there is a need to establish a unified interpretation of paragraph 9.2.2 of part A-1 of the IGF Code to ensure adequate safety barriers preventing gas leakages into gas safe machinery spaces.

IACS (CCC 6/8/4) provides a copy of a draft UI to facilitate the consistent and global implementation of paragraph 9.3.1 of part A-1 of the IGF Code. This paragraph requires that for single fuel installations the fuel supply system shall allow full redundancy and segregation all the way from the fuel tank to the consumer so that a leakage in one system does not lead to an unacceptable loss of power. IACS contends that none of the single fuel engines running on gas only, which are currently available on the market, are provided with two independent fuel supply systems on the engine. Therefore, the UI proposed by IACS explains that the required redundancy can be met through other means: multi-engine arrangements with independent and separate fuel supplies for each engine or group of engines, or by the use of secondary propulsion arrangements such as Power Take In (PTI) with independent fuel supplies. Considering the possible means proposed by IACS, it seems the literal wording of present paragraph 9.3.1 ("full redundancy and segregation all the way from the fuel tank to the consumer") will never be fulfilled. **DELETED**

In CCC 6/8/5, IACS advices that there is a need to amend the existing UI of paragraphs 6.9.1.1 and 6.9.1.2 of part A-1 of the IGF Code. IACS notes that some LNG fuel tanks are unable to accumulate pressure for 15 days without opening of the pressure relief valves as required by the above-mentioned paragraphs. To meet this requirement IACS proposes an amendment of the existing UI (MSC.1/Circ.1558) for improved clarification of paragraphs 6.9.1.1 and 6.9.1.2. Nevertheless, the proposal consists of a rather prescriptive design layout arrangement, lacking definition, where two (out of many) options are presented. **DELETED**

Agenda item 9 – Consideration of reports of incidents involving dangerous goods or marine pollutants in packaged form on board ships or in port areas

Docs: CCC 6/9, CCC 6/9/1, CCC 6/INF.2

CCC 6/9 (China): provides comments on document CCC 5/INF.16 regarding the spontaneous ignition of charcoal and highlights the issues that need to be considered for the safe transport of charcoal which has passed the N.4 test.

CCC 6/9/1 (Republic of Korea): contains the results of inspections of Cargo Transport Units (CTUs), carried out by the Republic of Korea in 2018.

CCC 6/INF.2 (Secretariat): provides a consolidated report on the results of container inspection programmes carried out in 2018.

Agenda item 10 - Revision of the Inspection programmes for cargo transport units carrying dangerous goods (MSC.1/Circ.1442, as amended by MSC.1/Circ.1521)

Docs: CCC 6/10, CCC 6/10/1-3

CCC 6/10 (FAO): proposes that cleanliness be included in the items to check in CTU inspection programmes. This would assist in determining the number of incidences of pest contamination of CTUs and their cargoes to complement the data collection by national plant protection organizations (NPPOs), and thus support the identification of ways to manage pest risks associated with the movement of CTUs and their cargoes on a global level.

CCC 6/10/1 (New Zealand and ICHCA): proposes draft amendments for MSC.1/Circ.1442, as amended by MSC.1/Circ.1521 to widen out the scope of the aforementioned circular to include inspections of CTUs not containing Dangerous Goods and also to include inspection criteria for pest contamination.

CCC 6/10/2 (ICS, BIMCO, ICHCA, IICL and WSC): While expressing support for the proposal in document CCC 6/10, this document draws attention to proposals made by member governments of IPPC that, if implemented, could result in significant costs and other implications for international containerized supply chains and impose requirements on masters regarding loading of containers aboard ships.

CCC 6/10/3 (ICHCA): Further to the continuing annual reports submitted to the Organization in accordance with MSC.1/Circ.1442 as amended by MSC.1/Circ.1521, high profile containership incidents have led the CINS Organization to conduct an inspection initiative on a sample of all types of cargo for both imports and exports. The findings support the call for strengthening vigilance, visibility and compliance with industry and regulatory standards for containerized cargoes within the maritime supply chain.

Agenda item 13 – Any other business

Docs: CCC 6/13, CCC 6/13/1-4, CCC 6/INF.19-21

CCC 6/13 (Cameroon): demonstrates how implementing the amendment to regulation VI/2 of the SOLAS Convention on the mandatory weighing of containers prior to loading has improved the safety of container transport on departure from Cameroon.

CCC 6/13/1 (ICHCA, WNTI and NI): addresses whether there is sufficient and up to date training materials available from IMO and IAEA to support those involved in the handling and sea transportation of class 7 cargoes.

CCC 6/13/2 (France, Italy, ICS, BIMCO, ICHCA, IICL, WSC and BIC): describes the difference of requirements for the stacking strength of containers in ISO Standard 1496-1 and the CSC and recommends that the CSC be aligned with ISO 1496-1.

CCC 6/13/3 (BIC): informs the Sub-Committee of BIC′s progress in deploying the BoxTech Global Container Database. BoxTech was launched by BIC to provide a single industry platform for container technical information, including container tare weights needed for method 2 declarations of verified gross mass (VGM), required under SOLAS since 1 July 2016.

CCC 6/13/4 (BIC): contains an updated report on the activity of the Global ACEP Database since CCC 5.

CCC 6/INF.19 (Republic of Korea): addresses the competitiveness of LNG fuel for large vessels with a focus on LNG carriers as reference. The information could be utilized by the shipping industry that has been exploring alternative fuel options in face of the upcoming Sulphur Oxides (SOX) regulations.

CCC 6/INF.20 (Republic of Korea): provides the result of a study on the adequacy of the revised regulation of a filling limit in LNG cargo tanks considering the aspects of the economy, environment and risk.

CCC 6/INF.21 (Republic of Korea): provides information regarding Natural Gas Hydrate (NGH) tank containers as a design alternative for cost-effective mid-stream supply chain establishment.

- *Carriage of radioactive materials*

EU Relevance

The EU's Directive on Shipments of Radioactive Waste and Spent Fuel (Council Directive 2006/117/Euratom of 20 November 2006 on the supervision and control of shipments of radioactive waste and spent fuel) establishes a system of prior authorisation for such shipments in Europe. The Directive:

- *requires operators to notify national authorities about shipments of radioactive materials which depart from, go through, or end up in the EU*
- *allows EU countries to ship spent fuel to each other for reprocessing and organise the return of the resulting radioactive materials*
- *allows EU countries to send shipments of radioactive materials that do not comply with the Directive back to their country of origin*
- *prohibits the export of radioactive waste to African, Caribbean or Pacific countries, to Antarctica, or to any country which does not have the resources to safely manage it.*

Delays and denial of the shipment of radioactive materials were of concern within the EU for a number of years. In fact, in 1982 the Commission, at the request of the European Parliament, established the Standing Working Group (SWG) on the Transport of Radioactive Materials in the EU. It is composed of national experts specifically focusing on the field of safety in the transport of radioactive materials. It is an advisory committee on the application of rules and regulations on the international transport of radioactive materials both inside the EU and between Member States and non-EU countries.

The SWG noted that national bodies should not deny the transport of radioactive material if such shipments fulfil the obligatory requirements. Nonetheless, it was observed that carriers, ports and handling facilities had denied shipments of radioactive material for two main reasons: Negative perceptions of radioactive materials as well as the complexity of regulation and related costs. Some ferry services and harbours, for example, had refused to transport and handle radioactive material even though the risk created by the material was very low as in the case of IMDG "excepted packages", which per se do not pose any danger to persons involved in their transport.

There is therefore an EU interest in training related to the shipment of radioactive materials.

Background

During FAL 42, the World Nuclear Transport Institute (WNTI) highlighted in document FAL 42/16/1 the difficulties some shippers experienced in the carriage of radioactive materials by sea, notwithstanding the various initiatives that were taken by the Facilitation Committee in the past. FAL 42 invited CCC 5 to consider whether any training materials for the safe and efficient transport of radioactive materials were needed (e.g. a model course) and to advise FAL 43 accordingly. During CCC 5, the World Nuclear Transport Institute (WNTI) introduced document CCC 5/12/3 remarking that in its opinion the development of such a model course would help to enhance the awareness on the safe transport of radioactive material among port and ship operators. It informed the Sub-Committee that it would be ready to act as the course developer of such a model course.

CCC 5 did not take a decision on this issue because it needed further information and input as regards the availability of suitable courses on the carriage of radioactive material. Consequently, CCC 5 encouraged interested Member States and international organizations to work together, with a view to carry out a gap analysis for the existing training materials for submission to a future session of the Sub-Committee.

Consideration at CCC 6

Following from CCC 5, ICHCA, WNTI and NI submitted CCC 6/13/1 including a list of categories where there is either no or insufficient training currently available through IMO and IAEA. They therefore propose that the development of an IMO model training course should be undertaken.

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