

The IMO Sub-Committee on Carriage of Cargoes and Containers held its 7th Session (CCC 7) remotely from 6 - 10 September 2021, using the Kudo platform, under the chairmanship of Mrs Maryanne Adams (MARSHALL ISLANDS), supported by her Vice Chair, Mr David Anderson (AUSTRALIA), both of whom were duly re-elected for 2022.

Three Working Groups (WG) were formed and headed as follows:

**WG1** Amendments to the IGF Code and Development of Guidelines for Low-flashpoint Fuels,  
Mr. C. Allgeier (GERMANY)

**WG2** Suitability of High Manganese Austenitic Steel for Cryogenic Service,  
Mr. A. E. Linsner (MARSHALL ISLANDS)

**WG3** Revision of the Inspection Programmes for Cargo Transport Units Carrying Dangerous Goods,  
Mr. I. Lancaster (NEW ZEALAND)

The meeting was attended by representatives from Member States, Associate Members, United Nations Agencies, Inter Governmental Organisations and Non-Governmental Organisations.

Items of particular interest to InterManager members are as follows:

**ADDRESS BY SECRETARY GENERAL.** Mr Kitack Lim welcomed delegations to the seventh session of the CCC Sub-Committee, observing that the COVID-19 pandemic has severely impacted the maritime transport of cargoes and containers. As inland transportation, port and warehousing operations have been hit by lockdowns, labour shortages and volume overloads, the positioning, use, and return of containers within the global supply chain has slowed and shortage of containers has been an ongoing challenge.

Despite the massive problems caused by the pandemic, the world's 1.2 million seafarers have kept global supply chains moving. Importantly, this included essential personal protective equipment, medical supplies and food to keep the supermarkets stocked.

IMO's commitment to the well-being of seafarers is reflected in this year's World Maritime Theme: "Seafarers: at the core of shipping's future" and he went on to emphasise that seafarers have been the silent heroes and collateral victims of the COVID-19 pandemic, as travel restrictions left hundreds of thousands of them stranded on board ships, or unable to join ships.

Mr Lim observed that the CCC sub-committee last met in September 2019 but despite the long interval, he was pleased to note the pragmatic arrangements that had been put in place. This included many correspondence groups, an extra session of the Editorial & Technical sub-committee, consideration of a large number of documents by correspondence and many informal meetings in preparation for this session.

Turning to proceedings for the coming week, he highlighted the importance of work on the IGF Code. This recognises increasing world-wide interest in the use of low flashpoint fuels for international shipping, which has a high efficiency and a lower environmental impact through a reduction of GHG emissions, in support of implementing the IMO's initial GHG Strategy. He went on to praise progress made by the correspondence group on the development of the IGF Code and urged finalisation of the draft interim guidelines for the safety of ships using fuel cell power installations as a matter of priority, in order to provide an international standard for such ships. Concerning the safe carriage of packaged dangerous goods and solid bulk cargoes, he highlighted the excellent efforts made earlier this year by the 33<sup>rd</sup> and 34<sup>th</sup> sessions of the E&T Group, which

prepared the next set of amendments to the IMDG and IMSBC Codes for finalisation. Both Codes are used daily by seafarers, shippers and other stakeholders, all of whom depend on the provisions of the Codes for the safe carriage of the cargoes regulated by them.

In closing, the Secretary-General reminded delegates that they will also be invited to consider matters regarding the suitability of high manganese austenitic steel for cryogenic service, and inspection programmes for cargo transport units carrying dangerous goods with a view to finalising the revision work at this session.

With this, he wished delegates every success in their deliberations.

**AMENDMENTS TO THE IGF CODE AND DEVELOPMENT OF GUIDELINES FOR LOW FLASHPOINT FUELS.**

The Sub-Committee recalled that CCC 6 re-established the Correspondence Group (CG) on development of Technical Provisions for the Safety of Ships using Low-flashpoint fuels. The following matters were considered by the CG:

- Draft interim guidelines on fuel cells;
- Development of draft amendments to the IGF Code to address safety provisions for ships using low-flashpoint oil fuels;
- Interim guidelines to address safety provisions for ships using LPG fuels;
- Draft amendments to the IGF Code as proposed in documents CCC 6/3/3 and CCC 6/3/5;
- Draft UI regarding part A-1, para 9.2.2 of the IGF Code;
- Draft amendments to para 9.3.1 of the IGF Code;
- Work plan for the future development of low-flashpoint fuels under the IGF Code;
- Development of guidelines for the safety of ships using hydrogen as fuel;
- Development of guidelines for the safety of ships using ammonia as fuel; and,
- Updating of the work plan.

Having considered these matters, the Working Group (WG 1) was established and set to work on a separate meeting platform. The subsequent report submitted by WG 1 was approved in general, and in particular, took action as follows:

- Noted the discussion within the group on the decisions taken by the Group in developing the provisions of the draft interim guidelines for the safety of ships using fuel cell power installations;
- Agreed the draft interim guidelines for the safety of ships using fuel cell power installation and the associated draft MSC circular;
- Acknowledged, as an urgent action of the Sub-Committee, the consideration and approval of the draft interim guidelines for the safety of ships using fuel cell power installations by MSC 104;
- Endorsed the updated work plan for the development of new fuels under the IGF Code prepared by the Group;
- Noted that Japan offered to collect safety information for the use of ammonia as part of the work by the CG, if established; and,
- Agreed the recommendation to re-establish the CG on Development of Technical Provisions for the Safety of Ships using Low-Flashpoint Fuels with terms of reference as set out in WG 1's report.

**AMENDMENTS TO THE IGC AND IGF CODES TO INCLUDE HIGH MANGANESE AUSTENITIC STEEL AND RELATED GUIDANCE FOR APPROVING ALTERNATIVE METALLIC MATERIAL**

**FOR CRYOGENIC SERVICE.** The Sub-Committee noted that MSC 102 approved MSC.1/Circ.1622 on *Guidelines for the acceptance of alternative metallic materials for cryogenic service in ships carrying liquefied gases in bulk and ships using gases or other low-flashpoint fuels*. Furthermore, following the satisfactory results of a fatigue test provided by the Republic of Korea, also approved MSC.1/Circ/Rev.1 on *Revised interim guidelines on the application of high manganese austenitic steel for cryogenic service*. Following consideration by correspondence prior to the virtual meeting, and progress made by the CG on Consequential Amendments to the IGC and IGF Codes incorporating High Manganese Austenitic Steel, WG 2 was furnished with appropriate terms of reference and duly submitted its report. The Sub-Committee approved it in general, and in particular:

- Noted the Group's consideration on confirmation of continued successful operation on the **Green Iris**, having identified the cause of a malfunction in which there was no consequential damage to the high manganese steel tank of the vessel;
- Endorsed the agreement made by the Group on additional compatibility testing for the application of high manganese austenitic steel;
- Endorsed the Group's request to submit test results carried out in accordance with the proposed additional test requirements for ammonia service;
- Agreed draft amendments to the IGC and IGF Codes with a view to approval by MSC 105;
- Agreed draft amendments to the *Guidelines for the acceptance of alternative metallic materials for cryogenic service in ships carrying liquefied gases in bulk and ships using gases or other low-flashpoint fuels*;
- Agreed draft amendments to the *Interim guidelines on the application of high manganese steel for cryogenic service*, with a view to approval by MSC 105;
- Agreed the Group's recommendation to re-establish a CG and its proposed terms of reference; and,
- Extended the target completion year for this output to 2023.

**AMENDMENTS TO THE IMSBC CODE AND SUPPLEMENTS.** The Sub-Committee noted that after consideration of the documents submitted to this session, the Editorial and Technical Group (E&T) will be instructed to finalise draft amendment 06-21 to the IMSBC Code, for circulation and subsequent adoption by MSC 105 in April 2022.

A total of fourteen documents were considered by correspondence prior to the virtual meeting, during which the Sub-Committee endorsed the Chair's proposals contained in annex 2 to document CCC 7/1/2, as modified by the annex to document CCC 7/1/2/Add.1 under the following headings:

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- Amendment to the definition of "group A";
- Reclassification of ammonium nitrate-based fertiliser (non-hazardous);
- Proposals for amendments to section 9 of the IMSBC Code and MSC.1/Circ.1600;
- Clam shell;
- Brown fused alumina;
- Nitrogen-phosphorus fertiliser with Sulphur and micronutrients (boron and zinc);
- Dunite sand and granular dunite;
- Clarification of the term "intrinsically safe type" used in the IMSBC Code;
- Crushed granodiorite;
- Castor Beans or Castor Meal or Castor Pomace or Castor Flake UN 2969;
- Advice on the safety assessment of sea transport of liquefiable solid bulk cargo;

- Dangers of carbon dioxide given off by solid bulk cargoes;
- Draft amendments to the IMSBC Code; and,
- Properties of solid bulk cargoes, index and Bulk Cargo Shipping Names in 3 languages (English, Spanish and French).

During the virtual meeting, the following matters were considered:

- Lead concentrate, leach product;
- Substance identification number for bulk cargoes;
- Revised draft schedule for direct reduced iron (D) (by-product fines with moisture of at least 2%);
- Granular triple superphosphate; and,
- Draft amendment 06-21 to the IMSBC Code and instructions to the E&T Group.

**AMENDMENTS TO THE IMDG CODE AND SUPPLEMENTS.** It was recalled that MSC 102 had adopted amendments (40-20) to the IMDG Code by resolution MSC.477 (102), which is expected to enter into force on 1 June 2022. CCC 6 had established the CG on a review of Maritime Special Provisions, instructing the Group to report to this session, CCC 7, and noted after consideration of the relevant submissions, that it should provide clear advice, instruction and authorization to E&T 35, in order to finalise the draft amendments (41-22) to the IMDG Code, with a view to adoption at MSC 105 in 2022.

**Matters considered by Correspondence prior to the virtual meeting.** A total of fifteen documents were considered by the Sub-Committee prior to the virtual meeting covering the following matters:

- Editorial corrections to the IMDG Code (amendment 40-20);
- Corrections to the French version of the IMDG Code;
- Preparation of draft amendments (41-22) to the IMDG Code;
- Portable tanks with shells made of fibre-reinforced plastics materials;
- Consequential amendments to the EmS Guide (Revised Emergency Response Procedures for Ships Carrying Dangerous Goods);
- Report of E&T 32;
- The role of the Rotterdam Rules in vessel safety;
- Coccolus, which refers to the toxic seeds of the Indian *Anamirta cocculus*, which are clearly solid;
- Stowage provisions for goods of class 1;
- UN 3481 large equipment packaging and transportation;
- Transport of Charcoal;
- Contact information for the main designated national competent authorities; and
- Informing the UN TDG Sub-Committee.

**Matters considered during the virtual meeting.** The following matters were considered:

- Elimination of the leaching test for low specific activity radioactive material LSA-III;
- Provisions concerning transport operations;

- Editorial amendments to the *revised Recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo transport units* (MSC.1/Circ.1361);
- Properties of iron powder in the index of the IMDG Code;
- Report of the CG on a Review of Maritime Special Provisions;
- Documentation requirements;
- Charcoal-related matters;
- Maritime special provisions;
- Container data loggers and tracking devices; and,
- Draft amendment 41-22 to the IMDG Code and instructions to the E&T Group.

Having considered the matters set out above and taking into account the progress and comments made at this session, the Sub-Committee re-established the CG on IMDG Code Matters, under the coordination of Germany and issued it with specific terms of reference.

**CONSIDERATION OF REPORTS OF INCIDENTS INVOLVING DANGEROUS GOODS OR MARINE POLLUTANTS IN PACKAGED FORM ON BOARD SHIPS OR IN PORT AREAS.** It was recalled that the Secretariat had developed a GISIS functionality, permitting Member States to submit the results of container inspection programmes online through the GISIS platform, as published in Circular Letter No.3844 of 8 May 2018. In this regard, document CCC 7/INF.2 provided the results of container inspection programmes for 2019, submitted by Canada, Chile, the United States and Hong Kong China. In addition, results for 2020 were also submitted by Canada, Chile, Finland, Sweden and the United States.

**REVISION OF THE INSPECTION PROGRAMMES FOR CARGO TRANSPORT UNITS CARRYING DANGEROUS GOODS.** It was recalled that MSC 102 noted the discussion on the revision of the inspection programmes for cargo transport units (CTUs) carrying dangerous goods, in particular the importance of IMO's involvement in the work of the International Plant Protection Convention (IPPC) regarding the pest control associated with the movement of CTUs and their cargoes; and that the Secretariat was requested to closely follow the work of IPPC and to participate as a member of the Sea Containers Task Force.

The Sub-Committee considered by correspondence prior to the virtual meeting, the revised report of the CG and two commenting documents. It noted the progress made by the CG on the revised circular for the implementation of the inspection of CTUs, including a potential title change for the circular (CCC 7/10/Rev.1, para 37), and the progress on contamination and pest control matters with regard to CTU inspections.

The Sub-Committee next set out terms of reference for WG 3, instructing it to further consider inclusion of contamination and pest control in the CTU inspection programme and to finalise the draft guidelines for the implementation of the inspection programmes for CTUs.

Following WG 3's deliberations and publication of its report, the Sub-Committee approved it in general, and in particular:

- Noted that the majority of the Group opted for option A ( to include contamination and pest control provisions in the draft guidelines); and that relevant draft amendments had been prepared accordingly;

- Noted that WG 3 had finalized the draft guidelines for the implementation of the inspection programmes for cargo transport units and endorsed them with a view to approval at MSC 105 in April 2022;
- Noted the Group's consideration on the need for revising the current GISIS module on "Reports of CTU inspections" in accordance with the revised format and requested the Secretariat to make preparations to update the module following the expected approval date of the draft guidelines;
- Noted the Group's discussion on whether any additional work would be necessary with respect to contamination and pest control measures, also that Member States and the industry could benefit from a non-exhaustive list of voluntary guidance available on the matter to raise awareness; and,
- Endorsed the draft MSC circular on the list of voluntary guidance, with a view to approval at MSC 105 in conjunction with the approval of draft guidelines for the implementation of the inspection programmes for CTUs, and take action, as appropriate.

### **UNIFIED INTERPRETATIONS (UIs) OF PROVISIONS OF IMO SAFETY, SECURITY, AND ENVIRONMENT-RELATED CONVENTIONS.**

**Clarification of the IGC Code requirements.** The Sub-Committee discussed document CCC 7/11 (IACS), providing a draft UI of paras 11.3.4 and 11.3.7 of the International Code for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (IGC Code), which has been developed with a view to facilitating the consistent and global implementation of the Code's requirements. Views were expressed that it would be more appropriate for the proposals in this draft UI to be addressed by an amendment to the IGC Code, thus it was agreed not to proceed with the draft UI and IACS was invited to make a submission to CCC 8, under the new output "Review of the IGC Code".

**Draft UI of para 16.7.3.3 of the IGC Code.** Three documents were submitted, by China, IACS and Intertanko. Following discussion, the Sub-Committee discerned that, although the intention of the draft UI was to address the inconsistencies of the requirements between the IGC and IGF Codes and could be supported, it would be more appropriate for the UI proposals to be addressed as an amendment to the IGC Code. Having agreed not to proceed with the proposed UI, Member States and international organisations were encouraged to work together with a view to making a submission to CCC 8.

### **Comments on the draft UI of the term "duct" in paras 5.4.4 and 5.13.2.4 of the IGC Code.**

Following a fairly lengthy discussion, the Sub-Committee agreed with the draft UI of paras 5.4.4 of the IGC Code on the outer duct in gas fuel piping systems as follows:

"The expression "duct" in 5.4.4 and 5.13.2.4 should mean to include the equipment enclosure required in 16.4.3.1 and 16.4.3.2 (e.g. GVU enclosure) as well as the structural pipe duct intended to contain any release of gas from inner pipe equipment. The term "structural pipe duct" should mean an outer duct forming part of structure such as hull structure or superstructure or deck house where permitted, other than gas valve unit rooms.

The gas valve unit rooms should be:

- Gastight towards other enclosed spaces;
- Equipped with mechanical exhaust ventilation having a capacity of at least 30 air changes per hour and arranged to maintain a pressure less than atmospheric pressure; and,

- Able to withstand the maximum built-up pressure arising in the room in case of a gas pipe rupture, as documented by suitable calculations taking into account the ventilation arrangements”

This interpretation will apply to new ships only.

**DATE OF NEXT MEETING.**

The eighth session of the Sub-Committee (CCC 8) has been tentatively scheduled to take place from 19 to 23 September 2022.

End

Captain Paddy McKnight