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

15 June 2021

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-eighth session

Geneva, 28 June-2 July 2021

Item 7 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Outcome of the thirty-fourth session of the Editorial and Technical Group (the IMDG Code)

Submitted by the International Maritime Organization (IMO)

Introduction

1. The thirty-fourth session of the Editorial and Technical Group (E&T) of the Sub-Committee on Carriage of Cargoes and Containers (CCC) met from 15 to 19 March 2021 and was chaired by Mr. Steven Webb (United States of America).
2. The relevant parts of the report of the thirty-fourth session of the Editorial and Technical Group of the IMO are provided in the annex to this document. The whole report can be downloaded from IMODOCS¹.
3. Within the E&T report, the Group requested the IMO Secretariat to either note an outcome for this Sub-Committee or request advice to further help the development of amendment 41-22 of the IMDG Code. Some paragraphs of the report merit particular attention of the UN TDG Sub-Committee. These are the following: 2.5, 2.7, 2.12, 2.13, 3.3, 3.5, 3.14, 5.12 and 5.22.

Note

4. Note the following actions taken by the Group in relation to the next amendment of the IMDG Code. In some instances, similar clarifications may be useful in the UN Model Regulations. The Sub-Committee is invited to note these actions and take action as deemed appropriate.
5. In considering a proposed amendment to P404 in 4.1.4.1, to move the fourth paragraph ("Inner packagings shall have threaded...during transport.") before the sentence ("Outer packagings...125 kg.") in paragraph (1), the Group noted that the proposal was logical, but preferred to maintain harmonization with the Model Regulations, and did not adopt the proposed amendment. It was requested that the Sub-Committee be informed of this decision to note if any further action was requested by the Sub-Committee (paragraphs 2.4 to 2.5 of the E&T report).
6. In 6.5.5.1.6.1 of the IMDG Code (6.5.5.1.6(a) of the Model Regulations), the Group agreed that adding a definition "C = the capacity in litres" under the existing definition for "Ao", was appropriate to aid users in applying the formula (paragraphs 2.13 to 2.14 of the E&T report).
7. The Group considered the proposed new definition for "pressure receptacle shell" in 1.2.1 of the IMDG Code. While agreeing to the definition, the Group also agreed to add

¹ <https://docs.imo.org/Shared/Download.aspx?did=128665>

a comma after the word "tube", in order to clarify the listed items in the definition (paragraphs 3.3 to 3.4 of the E&T report).

8. Note the views of the Group concerning a proposal on the assignment of cocculus in the index of the IMDG Code from UN 3172 to UN 3462. The Group invited interested Member States and international organizations to make submissions, as appropriate, to the Sub-Committee, as appropriate (paragraphs 5.10 to 5.12 of the E&T report).

9. Note the views of the Group concerning document CCC 7/6/10 (China), providing information about a lithium battery energy storage system and proposing to add an amendment for large equipment packaging in P903. The Group did not support the proposal and invited interested Member States and international organizations to make submissions to the Sub-Committee on this matter and request their advice on classification of these devices, as appropriate (paragraphs 5.20 to 5.22 of the E&T report).

Advice

10. In some instances, the Group indicated a desire for further information from the Sub-Committee, prior to making an amendment that may result in disharmonized regulations. Views of the Sub-Committee on the following issues are requested to help prepare the next amendment to the IMDG Code.

11. The Group considered a proposal to add a reference to SCO-III material in 5.3.1.1.5.1 of the IMDG Code. The proposal would require a placard for large freight containers carrying unpackaged SCO-III material. The proposal further indicated that this is in line with SSR-6 Section 571. The Group agreed to leave the proposed correction in square brackets and agreed to inform the Sub-Committee on this matter and request their advice, possibly in consultation with IAEA, on their intention for placarding requirements of SCO-III (paragraphs 2.6 to 2.7 of the E&T report).

12. The Group considered a proposal to replace the word "and" by the word "or" in paragraphs 6.4.24.3 and 6.4.24.6 of the IMDG Code, concerning the use of radioactive package designs meeting a previous version of the IAEA regulations and the use of special form radioactive material manufactured to a design receiving unilateral approval under an older IAEA regulation. The Group agreed to leave the proposed corrections in square brackets and agreed to inform the Sub-Committee on this matter and request their advice, possibly in consultation with IAEA, on their intended choice of wording (paragraphs 2.11 to 2.12 of the E&T report).

Annex**E**

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
7th session
Agenda item 6

CCC 7/6/14
7 April 2021
Original: ENGLISH
Pre-session public release:

AMENDMENTS TO THE IMDG CODE AND SUPPLEMENTS**Report of the thirty-fourth session of the Editorial and Technical Group (IMDG Code)****Note by the Secretariat****SUMMARY**

Executive summary: This document contains the report of the Editorial and Technical Group (IMDG Code) at its thirty-fourth session

Strategic direction, if applicable: 6

Output: 6.10

Action to be taken: Paragraph 7

Related documents: MSC 102/24 and resolution MSC.477(102)

1 GENERAL**Introduction**

1.1 The thirty-fourth session of the Editorial and Technical Group (E&T) of the Sub-Committee on Carriage of Cargoes and Containers (CCC) met remotely from 15 to 19 March 2021 and was chaired by Mr. Steven Webb (United States).

1.2 The session was attended by delegations from the following Member States:

ARGENTINA	MARSHALL ISLANDS
AUSTRALIA	MYANMAR
BELGIUM	NETHERLANDS
BRAZIL	NIGERIA
CANADA	PAKISTAN
CHINA	SAUDI ARABIA
DENMARK	SOUTH AFRICA
FINLAND	SPAIN
FRANCE	SWEDEN
GERMANY	TURKEY
GREECE	UNITED ARAB EMIRATES
IRAN (ISLAMIC REPUBLIC OF)	UNITED KINGDOM
JAPAN	UNITED STATES

LIBERIA

VIETNAM

and observers from the following international organizations and non-governmental organizations in consultative status:

INTERNATIONAL CHAMBER OF SHIPPING (ICS)
INTERNATIONAL UNION OF MARINE INSURANCE (IUMI)
BIMCO
ICHCA INTERNATIONAL LTD. (ICHCA)
EUROPEAN CHEMICAL INDUSTRY COUNCIL (CEFIC)
LEAGUE OF ARAB STATES (LAS)
DANGEROUS GOODS ADVISORY COUNCIL (DGAC)
WORLD NUCLEAR TRANSPORT INSTITUTE (WNTI)
INTERNATIONAL MOBILE SATELLITE ORGANIZATION (IMSO)
INTERNATIONAL VESSEL OPERATORS DANGEROUS GOODS ASSOCIATION, INC.
(IVODGA)
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION (PHMSA)
INTERNATIONAL TRANSPORT WORKERS' FEDERATION (ITF)
WORLD SHIPPING COUNCIL (WSC)
BUREAU INTERNATIONAL DES CONTAINERS ET DU TRANSPORT INTERMODAL
(BIC)

Instructions to the E&T Group

1.3 The Group recalled that MSC 102 had approved the holding of E&T 34 on the IMDG Code, depending on the finalization of amendments to the UN Recommendations on the Transport of Dangerous Goods (the UN Model Regulations), to take place in spring 2021, with a view to preparing the next set of draft amendments (41-22) to the IMDG Code. In doing so, MSC 102 had authorized E&T 34 to consider the IMDG Code-related submissions to CCC 7 (under agenda item 6 of CCC 7), with a view to reporting back to CCC 7.

Adoption of the agenda

1.4 The Group adopted the agenda set out in document E&T 34/1.

1.5 The list of participants is contained in document E&T 34/INF.1.

2 PREPARATION OF DRAFT EDITORIAL CORRECTIONS TO THE AMENDMENTS TO THE IMDG CODE (AMENDMENT 40-20)

2.1 Based on documents E&T 34/2 (Germany), E&T 34/2/1 (Secretariat), annex 1 to E&T 34/2/2 (France) and E&T 34/2/3 (Secretariat), the Group prepared draft editorial corrections to the English version of the IMDG Code (amendment 40-20), as set out in annex 1. In so doing, the Group took action as described in the paragraphs hereafter.

Segregation groups – 18 Alkalis (SGG18) – UN 3274

2.2 In considering document E&T 34/2 (Germany), the Group agreed to the proposal to harmonize the entry for UN 3274 with the UN Model Regulations in 3.1.4.4 of the IMDG Code. The Group agreed to slightly modify the proposal to read "Alcoholates solution n.o.s. in alcohol", in order to fully harmonize the text with the entry in the Dangerous Goods List of the IMDG Code.

2.3 The corresponding draft correction, as prepared by the Group, is contained in annex 1.

List of packing instructions – P404

2.4 In considering document E&T 34/2 (Germany) and the proposal to move the fourth paragraph ("Inner packagings shall have threaded...during transport.") before the sentence ("Outer packagings... 125 kg.") in paragraph (1) for P404 in 4.1.4.1 of the IMDG Code, the Group noted the following views:

- .1 the proposal deviates from the UN Model Regulations, and harmonization is important; and
- .2 the proposal would be logical and is also contained in RID/ADR.

2.5 After consideration, the Group agreed not to incorporate the proposal in E&T 34/2 in the corrections to the IMDG Code but agreed that it would be useful to inform the UN TDG Sub-Committee on this matter.

Placarding – special provisions for class 7 – SCO-III

2.6 In considering document E&T 34/2 (Germany) and the proposal to add a reference to SCO-III material in 5.3.1.1.5.1 of the IMDG Code, the Group noted the following views:

- .1 it would be logical to add a reference to SCO-III, as proposed;
- .2 the paragraph in question is not meant to deal with SCO-III, and hence the proposal cannot be supported without amending the UN Model Regulations first; and
- .3 the error in the UN Model Regulations should not impede amending the IMDG Code first.

2.7 In this context, the Group agreed to leave the proposed correction in square brackets for further consideration, as contained in annex 1, and agreed to inform the UN TDG Sub-Committee on this matter and request their advice, possibly in consultation with IAEA, on their intention for placarding requirements of SCO-III .

Dangerous goods transport information – examples of dangerous goods descriptions

2.8 The Group considered the proposal in document E&T 34/2 (Germany) to delete both entries for UN 1098 in 5.4.1.4.4 of the IMDG Code, as UN 1098 is now classified as marine pollutant and is therefore no longer suitable as an example.

2.9 While agreeing to the proposal, the Group also agreed that it would be useful to replace the deleted entries with relevant new examples. Therefore, the Group agreed to add two new entries for UN 1603 in 5.4.1.4.4 of the IMDG Code.

2.10 The corresponding draft corrections, as prepared by the Group, are contained in annex 1.

Transitional measures for class 7

2.11 In considering document E&T 34/2 (Germany) and the proposal to replace the word "and" by the word "or" in paragraphs 6.4.24.3 and 6.4.24.6 of the IMDG Code, the Group noted the following views:

- .1 similar corrections are needed for the UN Model Regulations;
- .2 the word "and" may be correct and hence there would be no need for corrections; and
- .3 the word "or" is used in paragraph 6.4.24.4 of the IMDG Code, and this should be taken into account.

2.12 In this context, the Group agreed to leave the proposed corrections in square brackets for further consideration, as contained in annex 1, and agreed to inform the UN TDG Sub-Committee on this matter and request their advice, possibly in consultation with IAEA, on their intended choice of wording.

Minimum wall thickness

2.13 In considering document E&T 34/2 (Germany) and the proposal to add a new column for capacity to the table in 6.5.5.1.6.1 of the IMDG Code, the Group agreed that the proposed size limits were not relevant. Therefore, the Group agreed that this issue would be better addressed by adding a definition "C = the capacity in litres" under the existing definition for "A_o". The Group also agree to inform the UN TDG Sub-Committee on this matter.

2.14 The corresponding draft correction, as prepared by the Group, is contained in annex 1.

Segregation table – class 4.1

2.15 The Group considered the proposal in document E&T 34/2 (Germany) to amend the entry for "Flammable solids", class 4.1, in the table in 7.2.4 of the IMDG Code, in order to take into account polymerizing substances. In so doing, the Group agreed that the most appropriate way for including all relevant substances would be to use the similar wording as in the heading for 2.4.2 of the IMDG Code, i.e. "Flammable solids, self-reactive substances, solid desensitized explosives and polymerizing substances".

2.16 The corresponding draft correction, as prepared by the Group, is contained in annex 1.

Special provisions for incidents involving radioactive material

2.17 The Group noted that the delegation of Germany decided to withdraw the proposal in document E&T 34/2 concerning the reference to "GS-G-2.1" in 7.8.4.5 of the IMDG Code, as the existing reference is correct.

Use of overpacks and unit loads of class 7 goods

2.18 The Group agreed to the proposal in document E&T 34/2 (Germany) to clarify 5.1.2.1 of the IMDG Code with regard to the fact that class 7 goods may need to be marked with a different label in addition to the word "OVERPACK".

2.19 After having modified the proposed text slightly, the Group deemed that it would be more appropriate to consider this as an amendment to the IMDG Code, as opposed to a correction. Therefore, the Group agreed to leave the proposed amendment in square brackets, as contained in annex 3.

Additional marking

2.20 The Group noted that the delegation of France decided to withdraw the proposal in document E&T 34/2/2 concerning the deletion of "a" in the first two rows in the table in 6.5.2.2.1 of the IMDG Code.

Corrections to the French version of the IMDG Code

2.21 The Group considered annex 2 to document E&T 34/2/2 (France), containing editorial corrections to the French version of the IMDG Code (amendment 40-20), and agreed to the draft editorial corrections, as set out in annex 2.

Corrections to the English version of the IMDG Code

2.22 The draft editorial corrections to the English version of the amendments to the IMDG Code (amendment 40-20) are contained in annex 1.

3 PREPARATION OF DRAFT AMENDMENTS (41-22) TO THE IMDG CODE

Harmonization with the amendments to the UN Recommendations on the transport of dangerous goods, twenty-first revised edition

3.1 The Group considered document E&T 34/3 (Secretariat), containing the amendments to the UN Recommendations on the Transport of Dangerous Goods, twenty-first revised edition, emanating from the tenth session of the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals, which was held in Geneva on 11 December 2020. These amendments will be utilized in promulgating the twenty-second revised edition of the UN Recommendations on the Transport of Dangerous Goods.

3.2 The Group, taking the above document as the basis, prepared the draft amendment 41-22 to the IMDG Code, as set out in annex 3. In so doing, the Group took action as described in the paragraphs hereafter.

Pressure receptacle shell

3.3. The Group considered the proposed new definition for "pressure receptacle shell" in 1.2.1 of the IMDG Code. While agreeing to the definition, the Group also agreed to add a comma after the word "tube", in order to clarify the listed items in the definition. The Group agreed to inform the UN TDG Sub-Committee on this matter.

3.4 The corresponding draft amendment, as modified by the Group, is set out in annex 3.

Units of measurement – electrical resistance

3.5 The Group considered the proposed new entry for "Electrical resistance" in the table in 1.2.2.1 of the IMDG Code and noted that " $1 \Omega = 1 \text{ kg} \cdot \text{m}^2 / \text{s}^3 / \text{A}^2$ " may be wrong in this regard. Therefore, the Group agreed to leave these amendments in square brackets for further consideration, as contained in annex 3, and agreed to inform the UN TDG Sub-Committee on this matter. The Group also noted that " $1 \Omega = 1 \text{ kg} \cdot \text{m}^2 \cdot \text{s}^{-3} \cdot \text{A}^{-2}$ " may be the correct equation. The Group agreed to request the UN TDG Sub-Committee to review the above potential correct equation and advise the Group on its appropriateness for incorporation in this section.

UN 1891

3.6 When considering the proposed amendments concerning the entry for UN 1891 in the Dangerous Goods List in 3.2 of the IMDG Code, the Group agreed, additionally, to indicate the flashpoint of -20°C c.c. of this substance in column 17 of the Dangerous Goods List.

3.7 The corresponding draft amendments, as modified by the Group, are set out in annex 3.

UN 3550

3.8 The Group considered the proposed new entry for "COBALT DIHYDROXIDE POWDER, containing not less than 10% respirable particles" as UN 3550 in the Dangerous Goods List in chapter 3.2 of the IMDG Code. The Group agreed that columns for "EmS" (15) and "Stowage and handling" (16a) needed to be completed with appropriate codes. With regard to column 15, the Group agreed that "F-A, S-A" would be appropriate and the most consistent choice. With regard to column 16a, the Group agreed that "Category D" and "SW2", i.e. requiring the substance to be carried on deck and clear of living quarters, would be the more appropriate and logical choice, taking into account the hazards of the substance. With regard to the column for "Segregation" (16b), the Group agreed that this column could be left empty, because there were no specific segregation requirements to be assigned for this substance.

3.9 The Group also agreed to insert in the column for "Properties and observations" (17) a description "Pink odourless powder" and a caution "Toxic by dust inhalation". During the discussion, the Group noted the view that to avoid wrongful classification of this substance as UN 3077, this issue needed to be highlighted in the IMDG Code. In this context, the Group agreed to add a text "This entry does not apply to cobalt dihydroxide that does not meet the particle size requirement for toxicity testing as specified in 2.6.2.1.3. In those cases, the product may be shipped under the UN 3077 entry." into column 17. The Group agreed to leave the above-mentioned text in square brackets for further consideration, taking into account the concerns raised that the text might be more suitable to be included as a new mandatory special provision, or perhaps not at all.

3.10 The Group further agreed that, based on the data sheet provided to the UN TDG Sub-Committee, this substance may be a marine pollutant and hence inserted in the column for "Subsidiary hazard(s)" the symbol "P". The Group agreed to leave this notation in square brackets for further consideration, taking into account that more research on the properties of this substance was required in this regard.

3.11 The corresponding draft amendment, as modified by the Group, is set out in annex 3.

Lithium battery mark – telephone number

3.12 The Group agreed to the proposed new note in 5.2.1.10.2 of the IMDG Code, containing transitional provision on applying the mark shown in the figure "Lithium battery mark" in 5.2.1.10.2 of the IMDG Code amendment 40-20 until 31 December 2026. The Group agreed to add the words "showing the telephone number for additional information" in the new note, to further clarify what has been deleted from the previous version of the mark.

3.13 The corresponding draft amendment, as modified by the Group, is set out in annex 3.

Marking of refillable UN pressure receptacles

3.14 The Group noted the amendment instruction, stemming from the amendments to the UN Model Regulations (document ST/SG/AC.10/48/Add.1), to insert a new note after (e) in 6.2.2.7.2 of the IMDG Code, containing a reference to "6.2.1.4.3 (b)". Noting that a reference to "6.2.1.4.3 (b)" may be erroneous, the Group agreed to replace that reference with "6.2.1.4.4.2." The Group agreed to leave the reference to "6.2.1.4.4.2" in square brackets for further consideration, as contained in annex 3, and agreed to inform the

UN TDG Sub-Committee on this matter and request their advice on the correct reference in this regard.

Portable tanks with shells made of fibre-reinforced plastics (FRP) materials

3.15 The Group agreed to the new chapter 6.10 of the IMDG Code, containing provisions for the design, construction, inspection and testing of portable tanks with shells made of fibre-reinforced plastics (FRP) materials. The Group further recognized that the technical provisions were based on long-standing provisions proven safe through experience in the RID/ADR/ADN, enhanced by best practices from other regional and national experience, and supplemented to incorporate technical advances. During the comprehensive discussion, the Group noted the following views:

- 1 the 30-minute fire resistance test may be inadequate and a longer test could be considered;
- 2 the proposed new provisions for FRP tanks have been developed carefully and are adequate for their purpose in maritime transport, including the 30-minute fire resistance test; and
- 3 the possible editorial corrections stemming from the UN level may need to be taken into account in the future.

3.16 The corresponding draft amendments are set out in annex 3. With regard to the above-mentioned concerns raised during the discussion by some participants, the Group invited interested Member States and international organizations to make further submissions to CCC 7, as appropriate.

Provisions concerning transport operations

3.17 In considering the proposals for amendments to part 7 of the IMDG Code, the Group noted concerns with regard to the proposed amendments in 7.1.3.3.1 and 7.3.3.2, stemming from the amendments to the UN Model Regulations (document ST/SG/AC.10/48/Add.1). During the discussion, the Group noted the following views:

- 1 with regard to "structurally serviceable", the circular CSC.1/Circ.138/Rev.1 may need to be taken into account;
- 2 the proposed new provisions serve a different purpose than the circular;
- 3 the CTU Code may need to be taken into account;
- 4 the proposed new provisions, while intended to provide guidance to shippers on what types of defects may be the ones that affect the integrity of a cargo transport unit, may have the opposite impact and further limit the number of CTUs suitable for transport;
- 5 the proposal to delete the quantitative criteria concerning "structurally serviceable for class 1" in 7.1.2 and consequential amendments that may arise require more consideration; and
- .6 provisions in 4.3.1 and 5.4.2.1.6 may also need further consideration.

3.18 In conclusion, the Group agreed to keep a decision on the proposed draft new provisions in abeyance and agreed to leave the proposed amendments in 7.1.2, 7.3.3.2, and 4.3.1 in square brackets for further consideration, as contained in annex 3. The Group also invited interested Member States and international organizations to make further submissions to CCC 7.

Consideration of new proposals submitted to E&T 34

Additional information on document CCC 6/6/7 and modified proposals

3.19 The Group considered document E&T 34/3/1 (Germany), containing modifications to the proposals included in document CCC 6/6/7 (Germany) and providing additional information (safety data sheet).

3.20 The Group agreed to the proposals in document E&T 34/3/1 to simplify the segregation requirements by abolishing the distinction between acids and strong acids. The Group also agreed to delete the word "strong" in column 17 of the relevant entries in the Dangerous Goods List in 3.2 of the IMDG Code. The Group agreed to leave these amendments to column 17 in square brackets, for further consideration.

3.21 The corresponding draft amendments, as modified by the Group, are set out in annex 3.

Draft amendment 41-22

3.22 Subsequently, the Group prepared draft amendment 41-22 to the IMDG Code, as set out in annex 3, for consideration by CCC 7 and subsequent finalization by E&T 35.

4 PREPARATION OF DRAFT AMENDMENTS TO IMDG CODE SUPPLEMENT

Consequential amendments to the EmS Guide

4.1 The Group recalled that MSC 102 had approved MSC.1/Circ.1588/Rev.1 on the *Revised Emergency Response Procedures for Ships Carrying Dangerous Goods* (EmS Guide).

4.2 The Group prepared consequential amendments to the Revised EmS Guide, emanating from draft amendment 41-22 (see section 3 above), in order to prepare the draft MSC circular containing the corresponding amendments to MSC.1/Circ.1588/Rev.1. The draft amendments prepared by the Group are set out in annex 4.

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)

4.3 The Group considered document E&T 34/4 (Secretariat), containing proposals for 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).

4.4 The Group, while agreeing to the proposals in document E&T 34/4, noted that the picture presenting the fumigation warning mark in the draft amendments to MSC.1/Circ.1361 may not be identical with the corresponding picture in 5.5.2.3.2 of the IMDG Code. The Group invited the Secretariat to rectify this issue before the approval of the amendments to MSC.1/Circ.1361.

4.5 During the discussion on the above-mentioned amendments to MSC.1/Circ.1361, the Group noted the view that it might be useful to refer to a more encompassing term "pests" instead of "insects" in the circular.

4.6 The draft amendments to MSC.1/Circ.1361, as agreed by the Group, are contained in annex 5. With regard to the issues on terminology in paragraph 4.5 above, the Group invited interested Member States and international organizations to make further submissions to CCC 7.

5 ANY OTHER BUSINESS

5.1 The Group also considered the following IMDG Code-related submissions to CCC 7, with a view to providing recommendations to CCC 7, as authorized by MSC 102.

Report of E&T 32

5.2 The Group considered document CCC 7/6 (Secretariat), containing the report of E&T 32, which was held from 16 to 20 September 2019. The Group agreed to consider one by one the actions requested of the Sub-Committee, as contained in paragraph 5.1 of document CCC 7/6. In conclusion, the Group noted that these requested actions had either been taken over by subsequent events or were ongoing issues in nature. Therefore, the Group agreed to recommend to CCC 7 that, instead of considering the requested actions one by one, it may be enough for CCC 7 to note them in general.

The role of the Rotterdam Rules in vessel safety

5.3 The Group noted documents CCC 7/6/1 and CCC 7/6/1/Corr.1 (CMI), which invite the Sub-Committee to recognize the importance of the Rotterdam Rules as it studies the underlying problem of container fires and other serious incidents and make recommendations on how to proceed.

Container data loggers and tracking devices

5.4 The Group recalled that CCC 6 had noted the opinion of E&T 31 regarding new provisions for data loggers and tracking devices, and the invitation to interested Member States and international organizations to submit proposals to CCC 6 with respect to the definition of equipment that was of a "certified type" and other types of equipment powered by means other than lithium batteries (CCC 6/6, paragraphs 3.10 to 3.13). CCC 6 had also noted that no submissions had been received on this issue. During the ensuing discussion, CCC 6 had noted the views as presented in paragraph 6.45 of document CCC 6/14.

5.5 The Group also recalled that, after consideration, CCC 6 had agreed to:

- .1 refer sub-paragraphs .1 to .3 of the draft new provision 5.5.4.1 of the IMDG Code (CCC 6/6, annex 3) to E&T 32 for further consideration and inclusion, if appropriate, in the draft amendments (40-20) to the IMDG Code, taking into account provision 7.3.5 of the IMDG Code;
- .2 keep a decision on proposed draft new provision 5.5.4.1.4 of the IMDG Code (CCC 6/6, annex 3) in abeyance; and
- .3 invite ISO to provide more information to CCC 7.

5.6 The Group further recalled that E&T 32 had reached a consensus on the draft amendments to 5.5.4.1 of the IMDG Code, including sub-paragraphs .1 to .3, and agreed to include them into draft amendments (40-20), which were subsequently adopted at MSC 102. During the discussion, E&T 32 had also noted that with regard to the invitation by CCC 6 to ISO to provide more information to CCC 7, SOLAS regulation II-2/19.3.2 and the footnote reference to publication IEC 60079 in 7.3.5 of the IMDG Code, along with any other corresponding standards, could be useful in any work ISO may undertake concerning this issue.

5.7 The Group had for its consideration the following documents:

- .1 CCC 7/6/3 (ISO), recommending that three sets of criteria be used to define a "certified safe type" container data logger or tracking device, dependent on whether the device is affixed to a tank container, a dry cargo container or a reefer container; and also recommending that the three sets of criteria should apply irrespective of whether the device is permanently affixed to the container or is a single-trip-only device; and
- .2 CCC 7/6/11 (BIC et al.), commenting on CCC 7/6/3 and proposing that a transitional phase be implemented for container data loggers and tracking devices already in commercial deployment following a decision to amend the IMDG Code with criteria for deeming container devices to be of a "certified safe type".

5.8 In the ensuing discussion, the Group noted the following views:

- .1 the work done by ISO, as presented in document CCC 7/6/3, is appreciated and could be a basis for developing requirements;
- .2 in developing the requirements, it is essential to take into account all transport modes;
- .3 the fundamental issue is that the devices shall not be dangerous;
- .4 the time frame indicated in document CCC 7/6/11 seems very optimistic;
- .5 the time frame is in regard to a transitional phase; it is based on the assumption that certified safe type criteria be agreed in 2021;
- .6 a working or a drafting group could be established at CCC 7 to further develop the requirements;
- .7 the requirements may not be ready for finalizing at CCC 7, taking into account the current lack of regulatory text; and
- .8 the regulatory text concerning inland waterways could be a basis for further work.

5.9 After consideration, the Group agreed to invite interested Member States and international organizations to make further submissions to CCC 7.²

² Interested delegations may collaborate with ISO (marianna.levtov@nexxiot.com), as appropriate

Cocculus

5.10 The Group considered document CCC 7/6/5 (Germany), proposing to change the assignment of cocculus in the index of the IMDG Code from UN 3172 to UN 3462.

5.11 In the ensuing discussion, the Group noted the following views:

- .1 references to both UN 3172 and UN 3462 could be included in the index;
- .2 ADR includes both UN numbers; and
- .3 the amendment should first be considered to be included in the UN Model Regulations, with a view to full harmonization.

5.12 In this context, the Group invited interested Member States and international organizations to make submissions, as appropriate, to the UN TDG Sub-Committee, as appropriate.

Proposed corrections to Circular Letter No.4135

5.13 The Group considered document CCC 7/6/6 (France), proposing corrections to the English and French versions of the IMDG Code (amendment 40-20), as published by Circular Letter No.4135.

5.14 In this context, the Group noted that MSC 102, when finalizing and adopting amendment 40-20 to the IMDG Code, had taken into account the proposals in document CCC 7/6/6.

Stowage provisions for goods of class 1

5.15 The Group considered document CCC 7/6/7 (United States), recommending deleting "special stowage" from note 1 in 7.2.7.1.4 of the IMDG Code, as this language is no longer applicable in the context of the revisions to chapter 7 included in amendment 36-12 of the IMDG Code.

5.16 The Group agreed to the proposed amendments, to be incorporated in the draft amendments (41-22), as set out in annex 3.

Properties of iron powder in the Index of the IMDG Code

5.17 The Group considered document CCC 7/6/9 (China), proposing to delete "iron powder, see" from the index of the IMDG Code.

5.18 In the ensuing discussion, the Group noted the following views:

- .1 the proposal cannot be supported because it could lead to shippers classifying this substance as non-dangerous without applying the criteria in part 2 of the IMDG Code;
- .2 the proposal can be supported, taking also into account that there is no similar entry in the index of the UN Model Regulations;
- .3 some iron powders are not pyrophoric, thus "iron powder, see" reference to UN 1383 will cause misunderstanding that all the iron powder shall be shipped under UN 1383;
- .4 more background information concerning why the entry was included in the IMDG Code may be helpful in consideration of this proposal; and

- .5 the entry for "Iron powder, pyrophoric, see" should also be taken into account.

5.19 In this context, the Group agreed to invite interested Member States and international organizations to submit further proposals to CCC 7, as appropriate.

UN 3481 large equipment packaging and transportation

5.20 The Group considered document CCC 7/6/10 (China), providing information about the lithium battery energy storage system and proposing to add an amendment for large equipment packaging in P903.

5.21 In the ensuing discussion, the Group noted the following views:

- .1 the recent amendments to P903 and 4.1.3.3 of the IMDG Code entail that there will be no mass or volume limits for large unpackaged equipment offered for transport in accordance with P903; and
- .2 a separate issue is how the devices in question should be classified and whether they could be transported under P903.

5.22 After consideration, the Group did not support the proposal and invited interested Member States and international organizations to make submissions to the UN TDG Sub-Committee on this matter and request their advice on classification of these devices, as appropriate.

Transport of charcoal

5.23 The Group recalled that E&T 32 had considered documents CCC 6/6/10 (Germany), CCC 6/INF.8 (Germany) and CCC 6/9 (China). E&T 32 had a discussion on the possible amendments to the IMDG Code, particularly regarding the transport requirements for charcoal. In this regard, E&T 32 had considered the possibility of amending the index of the IMDG Code to make it clear that charcoal is exclusively assigned to UN 1361. However, due to the fact that "charcoal, activated" is used as a synonym for "CARBON, ACTIVATED", E&T 32 had agreed to leave the index as it is, in order to remain harmonized with the UN Model Regulations.

5.24 The Group also recalled that, after consideration, E&T 32 had noted the three options, as presented in paragraph 3.26 of document CCC 7/6. Subsequently, E&T 32 had noted that the majority of the delegations supported the option in sub-paragraph .3 of paragraph 3.26. Nevertheless, E&T 32 had agreed to invite interested Member States and international organizations to submit further proposals and information to CCC 7.

5.25 The Group had for its consideration the following documents:

- .1 CCC 7/6/4 (Germany), discussing recent incidents generated by spontaneous combustion of charcoal and proposing amendments to documentation requirements and stowage provisions for UN 1361 CARBON animal or vegetable origin;
- .2 CCC 7/INF.3 (Germany), containing an incident report on spontaneous ignition of charcoal, supporting the proposal in document CCC 7/6/4;
- .3 CCC 7/INF.4 (Germany), containing a survey on self-heating properties of charcoal, carried out in the course of the investigation into the fire incident on **MV Katrina** (2015); and supporting the proposal in document CCC 7/6/4;
- .4 CCC 7/6/8 (CEFIC), presenting CEFIC's proposal to improve the safety of the charcoal carriage; and

- .5 CCC 7/6/13 (ICHCA et al.), recommending the inclusion of the proposals in documents CCC 7/6/4 and CCC 7/6/8 in a comprehensive discussion within a working group on charcoal issues at CCC 7, which the Correspondence Group on a Review of Maritime Special Provisions in its report (CCC 7/6/2) recommends that the Sub-Committee establish.

5.26 The Group noted that WSC had provided information on recent informal work and proposals on this matter, as contained in annex 6. In the ensuing discussion, the Group noted the following views:

- .1 a working group or a correspondence group should be established at CCC 7;
- .2 as the work is ongoing, a circular could be developed in the meantime;
- .3 N.4 test should be improved and not discarded;
- .4 exemptions should be allowed;
- .5 a vanning certificate requirement may not be appropriate; and
- .6 a vanning certificate is already in use.

5.27 In conclusion and noting that there was not enough time for a detailed discussion, the Group agreed to recommend to CCC 7 to consider establishing a working group on transport requirements for charcoal, or if that is not possible, a correspondence group, in order to progress on this matter. The Group also invited interested Member States and international organizations to submit further proposals and information to CCC 7.³

Correspondence Group on a Review of Maritime Special Provisions

5.28 The Group recalled that CCC 6 had considered document CCC 6/6/17 (Liberia et al.), discussing the problem of non-declaration and misdeclaration of dangerous goods and containing a proposal to undertake a comprehensive review of maritime special provisions (SPs) in the IMDG Code, as appropriate. During the ensuing discussion, CCC 6 had noted the views as presented in paragraph 6.21 of document CCC 6/14.

5.29 The Group also recalled that, after consideration, and in order to progress the work intersessionally, CCC 6 had established the Correspondence Group on a Review of Maritime Special Provisions, under the coordination of Germany, with terms of reference set out in paragraph 6.22 of document CCC 6/14. The report of the Correspondence Group is set out in document CCC 7/6/2 (Germany).

³ Interested delegations may collaborate with WSC (lkjaer@worldshipping.org), as appropriate.

5.30 In addition to document CCC 7/6/2, the Group had for its consideration document CCC 7/6/12 (Liberia et al.), commenting on the report of the Correspondence Group on a Review of Maritime Special Provisions (document CCC 7/6/2) and proposing amendments to the IMDG Code regarding documentation requirements for all dangerous goods, including those exempted by maritime special provisions (SPs).

5.31 In the ensuing discussion, the Group noted the following views:

- .1 the views expressed by the Group on this matter should be forwarded to the Correspondence Group; and
- .2 the request of the Correspondence Group in paragraph 41.18 of document CCC 7/6/2 to establish a working group at CCC 7 should be combined with the request in paragraph 5.27 above regarding charcoal.

5.32 After consideration, and taking into account that due to the postponement of CCC 7, the Correspondence Group is currently continuing its work and will submit a revised report to CCC 7 later, the Group agreed to recommend to interested Member States and international organizations to participate in the work of the Correspondence Group (cg@hbh.bremen.de).

Contact information for the main designated national competent authorities

5.33 The Group noted that it is the intention of the Secretariat to cease amending and issuing MSC.1/Circ.1563/Corr.2 on *Contact information for the designated national competent authority* in the future, and that from now on, Member States are invited to access GISIS in order to update their corresponding main designated national competent authorities' contact information through their GISIS account administrators.

5.34 In this context, the Group agreed to the corresponding amendments to 7.9.3 of the IMDG Code, to be incorporated in the draft amendments (41-22), as set out in annex 3.

6 CONSIDERATION OF THE REPORT TO THE SUB-COMMITTEE

6.1 The draft report of the Group (E&T 34/WP.1) was prepared by the Secretariat for consideration. Thereafter, the actions and decisions taken by the Group were open for comments or corrections by correspondence until Friday, 26 March 2021, 11.59 p.m. (UTC), before the issue of the final report.

7 ACTION REQUESTED OF THE SUB-COMMITTEE

7.1 The Sub-Committee is invited to approve the report in general and, in particular, to:

- .1 note the discussions and deliberations of the Group and agree, in principle, to the draft editorial corrections to the English version of the IMDG Code (amendment 40-20), noting that there are remaining issues to be resolved in square brackets, forward to E&T 35 for a review and subsequent finalization (paragraphs 2.1 to 2.22 and annex 1);
- .2 agree, in principle, to the draft editorial corrections to the French version of the IMDG Code (amendment 40-20), noting that there are remaining issues to be resolved in square brackets, forward to E&T 35 for a review and subsequent finalization (paragraph 2.21 and annex 2);
- .3 note, in general, the discussions and deliberations of the Group and agree, in principle, to the draft amendment 41-22 to the IMDG Code, noting that there are

- remaining issues to be finalized by E&T 35 in square brackets, (paragraphs 2.18 to 2.19, 3.1 to 3.21, 5.15 to 5.16, 5.33 to 5.34 and annex 3);
- .4 note the deliberations of the Group on portable tanks with shells made of fibre-reinforced plastics (FRP) materials and that interested Member States and international organizations were invited to submit further proposals to CCC 7 (paragraphs 3.15 to 3.16 and annex 3);
 - .5 note the deliberations of the Group on provisions concerning transport operations and that interested Member States and international organizations were invited to submit further proposals to CCC 7 (paragraphs 3.17 to 3.18 and annex 3);
 - .6 agree, in principle, to the draft consequential amendments to the *Revised Emergency Response Procedures for Ships Carrying Dangerous Goods* (EmS) Guide, emanating from draft amendment 41-22 (paragraphs 4.1 to 4.2 and annex 4);
 - .7 agree, in principle, to the 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) and that interested Member States and international organizations were invited to submit further proposals to CCC 7 (paragraphs 4.3 and 4.6 and annex 5);
 - .8 note the opinion of the Group regarding the consideration of actions requested of the Sub-Committee by E&T 32, and agree to the Group's recommendation to note them, in general, rather than consider them one by one (paragraph 5.2);
 - .9 note the deliberations of the Group on the role of the Rotterdam Rules in vessel safety (paragraph 5.3);
 - .10 note the deliberations of the Group on container data loggers and tracking devices and that interested Member States and international organizations were invited to submit further proposals to CCC 7, in collaboration with ISO, as appropriate (paragraphs 5.4 and 5.9);
 - .11 note the deliberations of the Group on cocculus and the invitation to interested Member States and international organizations to make submissions, as appropriate, to the UN TDG Sub-Committee, as appropriate (paragraphs 5.10 to 5.12);
 - .12 note the deliberations of the Group on proposed corrections to Circular Letter No.4135 (paragraphs 5.13 to 5.14);
 - .13 note the deliberations of the Group regarding stowage provisions for goods of class 1, in particular, note 1 in 7.2.7.1.4 of the IMDG Code and agree, in principle, to the corresponding draft amendments to the IMDG Code (paragraphs 5.15 to 5.16 and annex 3);
 - .14 note the deliberations of the Group regarding the properties of iron powder and the deletion of its corresponding entry in the index of the IMDG Code and that interested Member States and international organizations were invited to make further submissions to CCC 7, as appropriate (paragraphs 5.17 to 5.19);
 - .15 note the deliberations of the Group on UN 3481 large equipment packaging and transport, and note the invitation to interested Member States and international

organizations to make submissions to the UN TDG Sub-Committee on this matter and request their advice on classification of these devices, as appropriate (paragraphs 5.20 to 5.22);

- .16 note the deliberations of the Group regarding the transport of charcoal and the recommendation to consider establishing a working group or a correspondence group on transport requirements for charcoal, in order to progress on this matter; and that interested Member States and international organizations were invited to submit further proposals and information to CCC 7, in collaboration with WSC, as appropriate (paragraphs 5.23 to 5.27);
- .17 note the deliberations of the Group on the work of the Correspondence Group on a Review of Maritime Special Provisions and endorse the Group's recommendation to interested Member States and international organizations to participate in the work of the Correspondence Group (paragraphs 5.28 to 5.32);
- .18 note the deliberations of the Group on contact information for the main designated national competent authorities and the corresponding draft amendments to the IMDG Code (paragraphs 5.33 to 5.34 and annex 3); and
- .19 authorize the Secretariat to inform the UN TDG Sub-Committee to consider several technical findings identified by the Group, which might have implications to the relevant provisions for multi-modal transport (paragraphs 2.5, 2.7, 2.12, 2.13, 3.3, 3.5 and 3.14).
