



Maritime and Coastguard Agency

MGN 340 (M)

International Maritime Dangerous Goods (IMDG) Code and Cargoes Carried in Cargo Transport Units

Notice to all Ship Owners, Ship Operators and Managers, Masters and Officers of Merchant Ships, Agents, Charterers, Cargo Packers, Cargo Consolidators, Hauliers, Freight Forwarders, Shippers, Consignors, Training Providers, Inspectors of Cargoes, Port Authorities, Terminal Operators, Passengers and others involved in the transport of dangerous goods and other cargoes carried in cargo transport units by sea.

This notice replaces MGN 159

PLEASE NOTE:-

Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel and you should consider seeking independent legal advice if you are unsure of your own legal position.

Summary

This Marine Guidance Note gives details on cargoes which are classified as dangerous in accordance with the International Maritime Dangerous Goods (IMDG) Code. It also gives details of other cargoes which may present a risk to the ship, crew, passengers and the environment when carried in cargo transport units (CTUs).

It also:

Provides for and advises on general approvals where these are required or permitted by the IMDG Code.

Advises and gives clarification on the carriage of the cargoes described above to ensure their safe transport whilst facilitating their smooth passage along the transport supply chain.

Assists with the implementation of the IMDG Code.

Advises on future revisions of this MGN.

1. The Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997 implement the International Maritime Dangerous Goods (IMDG) Code and apply to all United Kingdom ships and all ships in United Kingdom waters.

2. The IMDG Code and its Supplement are directed at everyone involved in the transport of dangerous goods by sea and its provisions affect industries and services involved in the supply chain from manufacturer/consignor to consignee and passengers.

3. Future editions or amendments of the IMDG Code will be announced in a Merchant Shipping Notice. In order to keep up to date with the latest amendments coming from the UN Recommendations on the Transport of Dangerous Goods which is published biennially and provides the source of most of the updating, the IMDG Code will be published on a two yearly cycle. Amendments to the Code will be published electronically on the MCA dangerous goods website, address given on page 4 of this document, shortly after they are adopted by the International Maritime Organization (IMO).

4. Properly planned and maintained training programmes are an essential means of ensuring that those involved in the transport of dangerous goods by sea can demonstrate their compliance with the relevant parts of the IMDG Code and should be commensurate with their responsibilities. Further guidance on training requirements is given in Chapter 1.3 of the IMDG Code.

5. Chapters 1 to 7.8 of the Code refer to approvals, including permits, authorizations or agreements, and certificates and give permission for Competent Authorities to vary Code provisions providing general standards are followed. When this is done and properly authorized by a Competent Authority, Chapter 7.9 of the Code gives assurance that such Approvals will be fully acceptable in other countries. In the United Kingdom, approvals are dealt with on a case by case basis by the MCA. The MCA has issued a small number of General Approvals which are given in the Annex to this notice.

6. The period of validity of ad hoc approvals issued under chapter 1 to 7.8 of the IMDG Code will vary, but the maximum period will not exceed two years from the date of issue in order to align with the issue of new amendments to the IMDG Code. United Kingdom Competent Authority Approvals issued by the MCA that do not state a validity period or that are over 2 years old should not be considered as a valid MCA approval and should immediately be brought to the attention of the MCA for revision.

7. A copy of an MCA approval must either accompany the shipment or, the Dangerous Goods Transport Document must contain details of where the approval is located. Approvals are only valid for transport from the UK to the eventual port of destination and not for any subsequent onward journeys.

8. The MCA issues two types of exemption;

- (1) Under SOLAS for the ship
- (2) Under Chapter 7.9 of the IMDG Code for the consignor.

The MCA will continue to issue exemptions for vessels engaged in domestic journeys, a domestic voyage being a ferry whose voyage is from one port within UK waters to the same or another port within the UK. Requests for route specific exemptions should be addressed in the first instance to the ferry operator who after consideration, may wish to request a vessel exemption from the MCA.

For vessels engaged on international journeys the issuing of exemptions not mentioned in chapters 1 to 7.8 of the IMDG Code can be in accordance with the following paragraphs and Chapter 7.9 of the IMDG Code.

The IMDG Code, except for Class 7, allows a Competent Authority or Competent Authorities to grant exemptions from specific requirements of the IMDG Code for international voyages in accordance with the following conditions:

- that such provisions are at least as effective and offer an equivalent level of safety as that required by the Code

- acceptance of an exemption authorized under this section by a competent authority not party to it is subject to the discretion of that competent authority.

Accordingly, prior to any shipment covered by the exemption being shipped, the recipient of the exemption must notify other competent authorities concerned.

9. Competent Authority or Competent Authorities which have taken the initiative with respect to an exemption:

- must send a copy of the exemption to the International Maritime Organization (IMO) which must bring it to the attention of the Contracting Parties to SOLAS and/or MARPOL, as appropriate. IMO will publish such exemptions on their web site and
- if appropriate, take action to amend the IMDG Code to include the provisions covered by the exemption.

The period of validity of such exemption will not be more than five years from the date of authorization.

A copy of the exemption must accompany each consignment when offered to the carrier for transport under the terms of the exemption. A copy of the exemption or an electronic copy must be maintained on board each ship transporting dangerous goods in accordance with the exemption, as appropriate.

Information on approvals or exemptions which the UK has issued or agreed can be found on the MCA dangerous goods website at http://www.mcga.gov.uk/c4mca/mcga-safety_information/mcga-dangerous_goods.htm

10. Reporting Requirements

Any incidents, such as incorrectly declared goods and/or shipments or unsafe stowage or incorrect segregation, identified by anyone in the supply chain, should be notified to the Environmental Quality Branch of the MCA. Such incidents may be pursued under the Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997 as amended.

Vessels and others in the supply chain are required to comply with the requirements of the Merchant Shipping (Reporting Requirements for Ships Carrying Dangerous or Polluting Goods) Regulations 1995, as amended and the Merchant Shipping (Vessel Traffic Monitoring and Reporting Requirements) Regulations 2004 as amended.

11. Advice

Specific advice on the carriage of dangerous goods by sea can be obtained from the address at the end of this section.

Annex 1 gives information where advice on the use of the IMDG Code and amendments to the Code can be obtained together with details of the other modal Competent Authorities involved in the transport of dangerous goods.

More Information

Environmental Quality Branch
Maritime and Coastguard Agency
Bay 2/03
Spring Place
105 Commercial Road
Southampton
SO15 1EG

Tel : +44 (0) 23 8032 9100
Fax : +44 (0) 23 8032 9204
e-mail: dangerous.goods@mcga.gov.uk

General Inquiries: 24 Hour Infoline
infoline@mcga.gov.uk
0870 600 6505

MCA Website Address: www.mcga.gov.uk

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ANNEX 1 - Consultation process, changes to IMDG Code and information sources

The MCA Standing Advisory Committee on the Carriage of Dangerous Goods on Ships (SAC) is a long established committee and consists predominately of Government and Trade Association representatives. The purpose of the SAC is set out in the terms of reference given below:

“To consider and advise on dangerous goods problems from the technical and shipping aspects, including precautions required to prevent or limit harmful effects to the environment which may result from incidents at sea.”

It is important to distinguish between the function mentioned above and the separate process of consultation.

Consultation is governed by Government guidelines and is a formal process with open access. The IMO sub-committee on Dangerous Goods, Solid Cargoes and Containers (DSC) is where changes to the IMDG Code are discussed and agreed. The DSC briefing meetings are part of the consultation process together with the circulation of documents such as the draft to this MGN to Trade Associations and other persons who have expressed an interest but are not members of Trade Associations. The list of consultees has been developed over a period of years but if you wish to be included in the consultation process, please send your details to the address given previously.

Sources of Information

The MCA Dangerous Goods web-site (which has an introduction to the IMDG Code) will be the primary means by which any amendments to the IMDG Code and issues concerning the transport of dangerous goods by sea are notified to those to whom this Guidance Note is addressed. Alternatively, the point of contact is the Environmental Quality Branch of the MCA at the address given previously.

Information on IMO Publications can be obtained from the
International Maritime Organization
4, Albert Embankment
LONDON SE1 7SR
Tel: 0207 7735 7611
<http://www.imo.org>

The Merchant Shipping Regulations are available via the Office of Public Sector Information web site - <http://www.opsi.gov.uk/>

Current Merchant Shipping Notices (MSNs) and Marine Guidance Notes (MGNs) relevant to shippers and the carriage of dangerous goods in packaged form can be downloaded from the MCA web site <http://www.mcga.gov.uk/c4mca-guidance-regulation/mnotices.htm>

Other relevant publications:

Further advice on this subject which is primarily for the information of surveyors will be contained in "The Carriage of Cargoes -Volume 1 - The Carriage of Packaged Cargoes and Cargo Units - Instructions for the Guidance of Surveyors.

Code of Practice on the Stowage and Securing of Vehicles on Ro/Ro Ships" (HMSO ISBN 0-11-552493-2) published by the Office of Public Sector Information.

DfT Code of Practice Safety of Loads on Vehicles found at
http://www.dft.gov.uk/stellent/groups/dft_roads/documents/page/dft_roads_506864.pdf

Information on Dangerous Goods by Road/Rail –

Department for Transport
Dangerous Goods Unit
Zone 2/34 Great Minster House
76 Marsham Street
London SW1P 4DR

Tel: 020 7944 2755
Fax: 020 7944 2039
E-mail: dangerousgoods@dft.gsi.gov.uk

Information on Dangerous Goods by Air –

Dangerous Goods Office
Civil Aviation Authority
Safety Regulation Group
1W, Aviation House
London Gatwick Airport South
West Sussex, RH6 0YR

Telephone: 01293 573800
Fax: 01293 573991
e-mail: dgo@srg.caa.co.uk

ANNEX 2 – General advice and carriage approvals

General Guidance

Documents of Compliance

Cargo ships of 500 GT and over and passenger ships constructed since 1 September 1984, and cargo ships of under 500 GT constructed since 1 February 1992, are required to carry a Document of Compliance if engaged in the carriage of dangerous goods on international and domestic voyages. Owners of vessels built before these dates carrying dangerous goods are encouraged to obtain such a document. More recently the format of that Document has been amended to show the spaces which have been categorised for the stowage of dangerous goods and its validity is limited to five years.

Safety Precautions and Bilge Pumping Arrangements

For ships constructed before 1st September 1984 to which the special requirements for ships carrying dangerous goods, contained in the Merchant Shipping (Fire Protection) Regulations 1998 do NOT apply, it is recommended that the bilge pumping system should be designed to prevent inadvertent pumping of flammable liquids having a flashpoint below 23°C (closed cup) or toxic liquids, through machinery space piping or pumps. Where large quantities of these goods are carried, consideration should be given to the provision of additional means of draining the cargo space containing the goods.

The MCA will accept blanking off of the bilge suctions leading to the machinery space pumps. When 150 tonnes or more of toxic cargo or of flammable cargo having a flashpoint below 23°C (closed cup) is carried, alternative means of draining the compartment should be provided; e.g. by an ejector system or a suitable pump, certified safe for flammable atmospheres, located in the hold space.

Viscous liquids classified in accordance with 2.3.2 of the IMDG Code and assigned packing group III but with a flash point of less than 23 °C should be stowed in accordance with the vessels Document of Compliance with regards to its flashpoint.

Cargo-passenger ferry voyages engaged on domestic voyages

Due to variations in local operating conditions and ship construction, cargo-passenger ferries operating within the United Kingdom or between the mainland of Britain and outlying islands may be permitted specified alternatives to the conditions of the IMDG Code with the agreement of the MCA. Shippers should contact local ferry operators for details of the service and any local conditions that may apply.

Offshore Supply Vessels

For the purposes of this notice, Offshore Supply/Support Vessels (OSVs) are those vessels which are engaged in the transport of stores, materials and equipment to and from mobile offshore drilling rigs, fixed and floating platforms and other similar offshore installations on voyages within the United Kingdom continental shelf.

By organizing the loading schedules for these vessels, the shipper assumes a high degree of control and responsibility for the cargo operation. All persons must ensure that correct segregation is at all times achievable and that the master is advised at the earliest opportunity of the quantity and nature of dangerous goods prior to loading at the quayside or backloading at the installation by being in receipt of the dangerous goods note.

Unless carried under the requirements of MARPOL Annexes I and II, the IBC or IGC Codes, or a procedure, based on a risk assessment of the operation and cargo carried and accepted by the Administration with regard to sea-fastening arrangements and discharge/loading equipment, the contents of portable tanks should not be loaded or discharged while the tank remains on board.

The guidance contained in MGN 282 as amended should be followed.

Containment Systems (Packages, Large Packagings, Intermediate Bulk Containers (IBCs) and Portable Tanks)

It is the responsibility of the consignor to determine the suitability of the containment system selected for the whole period of the proposed transport journey taking into account chemical compatibility between the contents and the containment system. Consideration should also be given to the temperatures within the CTU and any additional forces which it may be reasonable to expect during the journey.

Segregation

The "classes" for the purposes of applying the segregation requirements are those named in the table given in 7.2.1.16 of the IMDG Code. Note, there is also the need to consider the subsidiary risk when applying the segregation requirements. However for substances, materials or articles having more than two hazards (2 or more subsidiary risk labels) the segregation requirements are given in the Dangerous Goods List. It will not be possible to separately identify subsidiary risks from the labels/placards, only by reference to the Dangerous Goods List.

It must be noted that in addition to the requirements to segregate by class there may be a requirement to segregate by chemical properties and although column 16 of the Dangerous Goods List prescribes such categories of segregation e.g. "away from acids" it remains the responsibility of the consignor to ensure such provisions of the Code are met.

Paragraph 7.2.2.3 of the IMDG Code allows dangerous goods, which should be segregated "away from" each other, to be transported in the same cargo transport unit with the approval of the MCA, see below.

Requests for Approvals, certificates etc permitted under Chapters 1 to 7.8 of the Code

Requests for approval must be received early to avoid unnecessary delay and the approval must be issued prior to the goods being offered for shipment and loading of the cargo transport unit.

Such requests should be made by completion of an MCA Competent Authority Approval request form or by providing the information required on the form and, if appropriate, a Safety Data Sheet for the substance, certificates and drawings. The request forms are available either by phone, fax or letter to the MCA at the address given or electronically via the Dangerous Goods web-site.

For segregation approvals under paragraph 7.2.2.3 of the IMDG Code, details of the contents of the CTU and a diagram of how the goods are to be packed within the CTU must be submitted.

The type and nature of the information requested will vary depending on the nature of the request and granting of such an approval will be considered on a case by case basis.

The MCA may check/verify to ensure that the consignor has carried out correct classification procedures and ensured that the packaging is suitable for the goods that are to be contained within it. However, the consignor is responsible for defining correct safety procedures to ensure compliance with the Regulations.

All other IMDG Code requirements not subject to the approval must be complied with. The MCA may attach additional conditions to such approvals as are deemed appropriate for the maintenance and safety standards onboard ships.

A copy of an approval should accompany the shipment, or, where it is part of general legislation, there should be some reference to where the approval can be found and under which authority it is issued. Approvals are normally valid for transport to the port of destination.

Certain dangerous goods in IBCs must be carried in closed cargo transport units or in freight containers/vehicles, which should have rigid sides or fences at least to the height of the IBC. The MCA will consider alternative arrangements to the fencing provision provided a safety case is submitted to demonstrate an equivalent level of safety.

Annex 3 - Gases (Class 2)

Introduction

The IMDG Code contains general recommendations for the carriage of substances of this class and the following paragraphs are intended as amplification and indications of acceptable standards in respect of:

- .1 pressure receptacles (cylinders);
- .2 filling requirements;
- .3 reference temperatures.

Receptacles

The MCA accepts:

.1 Pressure receptacles (cylinder) (as defined in the IMDG Code) of carbon steel, special steel or aluminium alloys designed, manufactured, tested and maintained in accordance with ADR (European Agreement concerning International Carriage of Dangerous Goods by Road);

.2 Pressure receptacles (cylinder) (as defined in the IMDG Code) made to the superseded standards BS 399; 400; 401; 1045; 1287; 1288; BS 5045 and HO "S", and aluminium pressure receptacles (cylinders) made to HOAL 4 and maintained in accordance with the appropriate parts of ADR;

Details of special receptacles of steel, copper, copper alloy, aluminium, aluminium alloy and pressure receptacles (cylinder) to standards other than those referred to above should be submitted to the MCA for consideration.

When aluminium alloy pressure receptacles (cylinders) are offered for shipment they should be suitably overpacked or carried in such a way that they are not affected by contact with dissimilar metals to avoid incendive thermite sparking.

Non European Union pressure receptacles (cylinders) offered abroad for shipment may be accepted provided they comply with the requirements of the national maritime administration of the country in which they are offered. Non European Union approved pressure receptacles (cylinder) filled in the UK may be accepted for export to a country where approval is recognised and for use onboard ships.

Shippers are advised that the use of foreign pressure receptacles (cylinder) imported into the United Kingdom containing substances of class 2 are subject to restrictions under domestic legislation.

Filling Requirements

The IMDG Code gives filling requirements in Chapter 4.1, P200 and P 203 for pressure receptacles (cylinders) and filling limits are specified in Chapter 4.2 for portable tanks.

Reference Temperatures

Pressure receptacles, which are to be used in the United Kingdom coastal climatic area, which is defined as the United Kingdom and the Irish Republic coastal waters, Irish Sea, North Channel and St Georges Channel, may be filled in accordance with the United Kingdom domestic requirements.

Battery vehicles

Battery Vehicles are vehicles containing elements which are linked to each other by a manifold and permanently fixed to a transport unit. The following elements are considered to be elements of a battery-vehicle: cylinders, tubes, bundles of cylinders (also known as frames), destined for the carriage of gases of Class 2 (with a capacity of more than 450 litres) and which are certified, filled, maintained in accordance with ADR and which have tie down attachments in accordance with the IMDG Code are accepted for short International journeys with or without tractor unit attached.

Pressure receptacles (gas cylinders) carried on Ro-Ro Ships

(i) The MCA has replaced MGN 19 by MGN 341. With reference to the Carriage of Gas Cylinders in boats, caravans and other vehicles where the gas is used solely in connection with its operation or business; information previously found in section 8 of MGN 19 has been further developed and the carriage requirements expanded. These requirements can be found below:

(ii) This is a general approval and as such does not guarantee carriage in every case. It is important users inform the shipping line at the time of booking and not just prior to boarding, as operational constraints may limit the cargo including caravans being carried.

(iii) In paragraphs 1 – 5 below inclusive, the gas supply should be shut off at the cylinders and all cylinders should be adequately secured against movement of the ship, away from sources of ignition and heat.

The requirement to declare to the shipping line prior to the sea journey remains. Failure to declare may be considered an offence under the Merchant Shipping (Dangerous Goods and Marine Pollutant) Regulations.

The following gives detailed guidance on paragraphs (i) and (ii).

1) “Nominally empty”

It should be noted that the IMDG Code considers empty pressure receptacles (cylinders) as dangerous goods unless purged and a certificate confirming this accompanies the cylinder.

2) Toxic gases

Gases which are toxic are excluded from this general approval.

3) Oxygen/Acetylene

The following provision applies to gases carried purely for maintenance work. One acetylene or propane/butane cylinder up to 35 kg gross mass and one oxygen cylinder up to 40kg gross mass, both pressure receptacles (cylinder) should be less than 1m in height and disconnected from any equipment prior to boarding the vessel. It should be noted that local regulations may not permit their carriage. No other class 2 or class 3 liquids are permitted in the same cargo transport unit (vehicle).

Note: It is advised that the local harbour authorities are contacted regarding their local regulations before taking acetylene into a harbour area.

4) Propane and butane for private use

Up to a total of 47 kg (excluding weight of gas receptacle)

5) Calibration gases

Gases which are not toxic and are used for calibration purposes may be carried provided the aggregate water capacity of the pressure receptacles (cylinder) or small receptacles containing gas (gas cartridges) does not exceed 50 litres.

6) Ambulances

Ambulances, which are, for the purposes of this notice, vehicles used to carry sick, injured or disabled persons to a place where they will receive treatment and then be returned, are in some instances unable to comply fully with the conditions of the Regulations. In recognition of the necessity for these vehicles to operate unhindered, the MCA accepts that they may be carried under the conditions as follows:

- (i) Gas cylinders carried must be for the sole purpose of the ambulance operation.
- (ii) The maximum number of cylinders carried must be six, of size 'F' or smaller (i.e. up to 60 litres aggregate water capacity), containing oxygen or UN 3156 Compressed gas, oxidising N.O.S (Oxygen, Nitrous oxide), (trade name entonox). Note size F has 9.4 litres water capacity.

Approximate dimensions of Size F Cylinder = 930mmx140mm

- (iii) Cylinders should be declared to the ship's officer or shore side personnel prior to loading.
- (iv) All cylinders should be adequately secured inside the vehicle before loading against the movement of the ship.
- (v) Supply should be shut off at the cylinder except when necessary for the immediate needs of any patient carried within the ambulance.
- (vi) Leaking and inadequately secured or connected cylinders should be refused for shipment.
- (vii) The vehicle must be readily identifiable as an ambulance.

7) Medical oxygen for personal use carried in vehicles not readily identifiable as ambulances

Private vehicles used to carry sick or disabled persons may carry up to six, of size 'F' or smaller (i.e. up to 60 litres aggregate water capacity) containing UN 1072 oxygen, compressed provided the patient has a letter from a doctor stating they require medical oxygen.

In addition to the above conditions, shipping lines must be informed at the time of booking and use of oxygen on board ship is only in non smoking areas designated by the master.

Note: Shipping lines are invited to bring the above information to the attention of their customers.

Annex 4 - Waste

The transport of waste is covered by Chapter 7.8 of the IMDG Code, however, for the those involved with the carriage of wastes further guidance is given:-

If waste is being shipped, it is the responsibility of the consignor to establish whether or not it is classified dangerous goods for sea transport.

If it is classified as dangerous goods for sea transport, it will be subject to all the provisions of the IMDG Code, as amended.

In addition, if the waste is classified as hazardous under the criteria of the Environment Agency (EA) for England and Wales, the Scottish Environment Protection Agency (SEPA), and the Environment and Heritage Service Northern Ireland (EHSNI) it will be subject to the written notification and procedures of Regulation (EEC) No 259/93, these bodies also regulate the transboundary movement of waste in the United Kingdom.

Wastes which are not classified as dangerous goods for sea transport according to the criteria given in the IMDG Code may present health risks to crew and passengers etc. Shippers of this type of waste, e.g. offal, some types of asbestos, hides etc, have to consider their duties and responsibilities under the Merchant Shipping (Carriage of Cargoes) Regulations, 1999 and the Merchant Shipping and Fishing Vessels (Health and Safety at Work) Regulations, 1997.

In addition, control over the transboundary movement of wastes outside the UK is exercised by competent authorities in each state who may not be the same as those bodies who regulate its transport.

It should be noted that sheeted bulk containers are not permitted under the IMDG Code.

Guidance for loading Cargo Transport Units (CTUs, Freight Containers) being used to carry waste (especially scrap materials)

The following is intended as guidance for those involved in the transport of scrap materials by sea. It should be noted that shipping lines may have specific additional requirements for loading scrap into containers.

1. CTUs must not contain dangerous goods unless they are correctly declared as such.

examples of dangerous goods:

- Closed (pressurised) containers e.g. aerosols, pressure receptacles (gas cylinder)
- Aluminium dross
- Magnesium
- Batteries (lead-acid, lithium etc)

2 Care must be taken to ensure CTUs which are said to hold a single type of metal waste must not be allowed to be contaminated by other metals which may cause, or have the potential to cause, a hazardous atmosphere to form.

3 Ensure that the contents of CTUs are free from acid, alkalis or other substances liable to react with cargo to form a hazardous atmosphere.

4 It should be noted that any CTU consigned for sea transport should be packed and secured to ensure even distribution of weight across the CTU in order to prevent movement of material contained.

Class 6.2 Infectious Substances

A detailed guidance document on the transport of infectious substances has been produced by DfT, CAA and MCA and is available at http://www.dft.gov.uk/stellent/groups/dft_freight/documents/page/dft_freight_504703.hcsp

For domestic voyages of Class 6.2 substances, UN2900 Infectious substance, affecting animals only; UN2814 Infectious substance, affecting humans and UN3291, Clinical waste, unspecified, N.O.S. or (Bio) Medical waste, N.O.S., or Regulated medical waste, N.O.S., class 6.2, where no other service exists other than on board passenger ferries, stowage category E is approved, away from living quarters and preferably under deck. All other conditions of the IMDG Code must apply to such goods, including the correct labelling of the goods and placarding of cargo transport units.

When transporting Clinical Waste under the above UN numbers, the vehicle is to be accompanied by the driver of the vehicle. Unless the Competent Authority have given approval to allow unaccompanied vehicles.

Animal by-products

It is the responsibility of the consignor to determine if the animal by-products meet the classification criteria of Class 6.2 and if so, transported in accordance with the IMDG Code.

During transport the integrity of the packaging, or leak-proof containers, should be maintained. The packaged material or containers must also be labeled to identify the category of the animal by-product being carried.

Detailed guidance on the Disposal of Animal By-products, including former Foodstuffs of Animal Origin, from Food Outlets, including its transport, is given in the Defra document of the same title available via <http://www.defra.gov.uk/animalh/by-prods/default.htm>

It is also an offence under the Merchant Shipping and Fishing Vessels (Health and Safety at Work) Regulations to load onto a ship a cargo of animal by-products which is liable to leak onto the ships deck.

Annex 5 – Firearms and ammunition on Ro-Ro ships

The following only applies to private firearms and ammunition for sporting use and is given as guidance to shipping lines.

It should be noted that firearms are not classified as dangerous goods only the ammunition and as such is subject to the requirements of the IMDG Code.

However, the following guidance is given:

Users are strongly recommended to pre-book advising the operator that you intend to carry ammunition in order to determine any local requirements.

All firearms should be accompanied by a current valid Firearm, Shotgun or Registered Firearms Dealer's (RFD) certificate and these should be available for inspection by either the booking in staff or port security personnel. Certificate holders should be aware of their requirements for ensuring the secure storage of arms and ammunition, for example: Any shooting equipment should not be visible when carried in vehicles.

The shipping line is advised to inform their local port security department to ensure smooth passage of the passenger and firearms/ammunition through the port area.

Ammunition

A maximum of 1000 cartridges of UN Class 1.4S per vehicle, which should be carried in the original manufacturers packaging, is permitted per vehicle without documentation. Quantities in excess of this must be declared and carried according to the full provisions of the IMDG Code.

Ship and Port Security Managers

Your attention is drawn to Transec Maritime Security Circular No. 2/02 The Carriage of Firearms and Ammunition

Annex 6 - Cargoes carried in cargo transport units which includes vehicles or on flat bed lorries

It is important to ensure that any cargo carried in a cargo transport unit is secured to prevent its movement during the sea journey where it may be subject to additional forces during the sea voyage.

Examples of cargoes which have resulted in incidents are:

- (i) Animal carcasses suspended from overhead racks inside the lorry have swung, resulting in the lorry breaking free despite being tied down.
- (ii) Steel carried on flat bed lorries or within vehicles must be secured to prevent its movement before being loaded onto the ship. If fabric strapping is used it must be protected from abrasion by corner guards.
The attention is drawn to port authorities and shipping lines regarding unaccompanied trailers where the securing equipment is owned by the delivering driver and may be removed when the trailer is dropped off.
- (iii) Drums loaded on to other drums without adequate separation protection and securing and the movement of these drums has caused the failure of the lower drum and hence resulting in a spillage.