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ABS REGULATORY NEWS

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UPDATE TO THE IMDG CODE (AMENDMENT 41-22)

This Regulatory News highlights amendments (41-22) to the International Maritime Dangerous Goods (IMDG) Code, bringing changes to storage and transfer procedures for dangerous goods. Notable updates include revised testing and certification for aerosols, cylinders and pressure vessels, along with new provisions for portable shells made of fiber reinforced materials. Ship owners should comply with the revised code for safe cargo transport.

INTRODUCTION

Resolution [MSC.501\(105\)](#) encompasses several amendments to the IMDG Code, aligning it with the revisions in the UN Recommendations on the Transport of Dangerous Goods, 21st Revised Edition. These amendments, in addition to regular substance reviews, introduce key changes such as a new definition for "pressure receptacle shell" in 1.2.1 of the IMDG Code, guidance on marking refillable UN pressure receptacles and guidance on portable tanks utilizing fiber-reinforced plastic (FRP) shells.

AMENDMENTS (41-22) TO THE IMDG CODE

Resolution **MSC.501(105)** was adopted on 28 April 2022, with **entry into force on January 1, 2024**. The Maritime Safety Committee also agreed that SOLAS contracting governments may apply the amended IMDG Code in whole or in part from January 1, 2023. In addition to the regular review of new and existing substances, the primary changes included in the amendments were for the following:

Part 1 - General Provisions

- Chapter 1.2 There are several new definitions included to provide clarity to the descriptions and uses, such as new definitions for inner vessel and pressure receptacle shell.

Part 2 - Classification

- New entries were added for a "self-reactive" and three organic peroxides.
- Under the section for the packaging group assignment for substances and mixtures, a new invitro test for skin classifications for corrosive exposure has been added.
- Added clarification for Chronic 1 and 2 marine pollutants classifications.

KEY NOTES

- Incremental changes throughout the IMDG Code clarify and simplify storing and transferring procedures.
- Notable changes include significant updates to testing and certification of aerosols, cylinders and pressure vessels.
- Introduction of chapter 6.10 for provisions regarding portable shells made of fiber-reinforced materials.
- Shipment of cargoes in portable tanks with FRP materials may be allowed if new construction and testing requirements are met.
- Amendments (41-22) to the IMDG Code (Res. MSC.501(105)) enter into force on January 1, 2024.

- Test summaries for lithium batteries requirements have been modified and do not apply to small button power cells already inside the equipment.
- Testing for “Low-dispersible radioactive material” has been updated.

Part 3 - Dangerous Goods List

- New UN number “UN3550” provided for cobalt dihydroxide powder.
- Dangerous goods list has been amendment such as, the UN number "UN3208" changed the expected quantity code from E2 to E0 and "UN3209" from E0 to E2. Segregation Group UN2796 changed slightly from SGG1a to SGG1.

Part 4 - Tank and Packing Provisions

- The packing instructions for P003, P004, P005, P006, P130, P144, P408, P801, P903, P906, P907, P909 and P910 received notes that the 400 kg limit does not apply when shipped in overpacks and non-specification packaging.
- Packing instruction P920 specifically addresses packaging for mixtures of fluorine and nitrogen.
- Water capacity has been updated from 1,000 to 3,000 liters.

Part 5 - Consignment Procedures

- Clarifies labeling requirements on overpacks of radioactive material. Labels must be on both sides.
- The requirement for showing the telephone number on the lithium battery has been removed. However, this may continue to be applied until 31 December 2023.
- Labeling requirements for temperature-controlled substances and stabilized substances were added. Where applicable, the words “TEMPERATURE CONTROLLED” and "stabilized" must be printed on the corresponding containers.

Part 6 - Package Testing and Construction

- **Major change** related to chapter 6 includes a new section **6.10** as related to the “**Provisions for design, construction, inspection and testing of portable shells made of fiber reinforced (FRP) materials**”.
- Several ISO standards for pressure vessels have been added.
- Inspection requirements for new pressure receptacles have been updated.
- Changes made to frequency of periodic inspections of existing pressure receptacles.
- Deletion of ‘special stowage’ from note 1 in 7.2.7.1.4 as it is no longer applicable.
- Introduced new requirements related to construction and testing of IBC’s, MEEGC’s, and road tank vehicles.

Part 7 - Provisions Concerning Transport Operations

- In the Index, deleted the entry for “Iron Powder”.
- Amended the following entries from Index.

Substance, material or article	MP	Class	UN No.
Extracts, aromatic, liquid, see		3	1197
Extracts, flavoring, liquid, see		3	1197

- Added the following new entries.

Substance, material or article	MP	Class	UN No.
1-butylene, see		2.1	1012
cis-2-butylene, see		2.1	1012
trans-2-butylene, see		2.1	1012
COBALT DIHYDROXIDE POWDER, containing not less than 10% respirable particles	P	6.1	3550
EXTRACTS, LIQUID, for flavor or aroma		3	1197

REVISED CIRCULARS

Revised recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo transport units (MSC.1/Circ.1361/Rev.1 Dated 28 April 2022)

This circular supersedes the previous one, reference MSC.1/Circ. 1361.

- Placarding size was increased, including requirements to be readable after 3 months.
- Removed reference for optional “other” marking for fumigated cargoes.

Revised Emergency Response Procedures for Ships carrying dangerous goods (EmS Guide) (MSC.1/Circ.1588/Rev.2 dated 24 May 2022)

This circular supersedes the previous one, reference MSC.1/Circ.1588/Rev 1.

- This revision considers the amendments to the IMDG code 41-22.
- The purpose of this Guide is to provide guidance for dealing with fires and spillages (leakages) on board ships involving the dangerous goods listed in the IMDG Code.
- Various changes to schedules in the index.

VOLUNTARY EARLY IMPLEMENTATION OF REVISED IMDG CODE

Voluntary compliance from January 1, 2023, relevant information:

- Bahamas Maritime Authority Technical Alert 23-05 – BMA Voluntary early implementation of revised IMDG Code. The Bahamas has advised its early acceptance of the amended IMDG Code.
- Other flag administrations may authorize early implementation upon request.

REFERENCES

Document	Title
IMO Resolution MSC. 501 (105)	Amendments to the International Maritime Dangerous Goods (IMDG) Code
MSC.1/Circ.1588/Rev.2	Revised Emergency Response Procedures for Ships carrying dangerous goods (EmS Guide)
MSC.1/Circ.1361/Rev.1	Revised recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo transport units

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