

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
5th session
Agenda item 8

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY AND
ENVIRONMENT-RELATED CONVENTIONS**

**Clarification of paragraph 7.1.4.4.2 of the
International Maritime Dangerous Goods (IMDG) Code**

Submitted by IACS

SUMMARY

Executive summary: This document discusses the need to clarify the terms "life-saving appliances" and "areas with public access", as used in paragraph 7.1.4.4.2 of the IMDG Code

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 7

Related documents: None

Introduction

1 The International Maritime Dangerous Goods (IMDG) Code, which was adopted by resolution MSC.122(75), provides a mandatory guide to the safe transportation or shipment of dangerous goods or hazardous materials and has been continually updated on a biennial basis.

2 Paragraph 7.1.4.4.2 (Stowage of goods class 1) of the IMDG Code states:

"7.1.4.4.2 Goods of class 1 with the exception of division 1.4 shall be stowed not less than a horizontal distance of 12 m from living quarters, life-saving appliances and areas with public access."

Discussion

3 Having received comments from port State control officers (PSCOs), IACS has discussed the need to clarify the following terms found in paragraph 7.1.4.4.2 of the IMDG Code:

- .1 "life-saving appliances"; and
- .2 "areas with public access".

4 Regarding paragraph 3.1 above, if the term "life-saving appliances" includes lifebuoys, "remotely located" liferafts, lifejackets and immersion suits, as well as personal flotation devices and self-inflating slides; then this provision in the IMDG Code can have a significant restriction on where goods of class 1 can be loaded onto a ship.

5 To facilitate the practicable, consistent and global implementation of this provision in the IMDG Code, IACS offers the following draft unified interpretation:

"For the purpose of this provision of the Code, the term 'life-saving appliances' means the vessel's main survival craft and rescue boat(s) as required by SOLAS regulations III/21 or III/31.1 and is not intended to mean other life-saving appliances, such as lifebuoys, additional liferafts required by SOLAS regulation III/31.3.2 and III/31.1.4 and any lifejackets and immersion suits associated with such liferafts."

6 IACS also considers that the term "areas with public access" is undefined. Again, with a view to facilitating the global and consistent implementation of this mandatory provision, IACS proposes that the following areas may be regarded as "areas with public access":

- .1 in cargo ships, any area used for the access to the ship (e.g. areas for embarkation and disembarkation and pilot boarding area) and areas where the ship's crew normally work or to which they have access, except the cargo area; and
- .2 in passenger ships, any area that the ship's passengers can access without any authorization or limitation and the areas as described in paragraph 6.1 above.

Action requested of the Sub-Committee

7 The Sub-Committee is invited to consider the foregoing and the draft unified interpretations, as set out in paragraphs 5 and 6 above, and take action as appropriate.