

## International Maritime Dangerous Goods Code (IMDG) Amendment 34 Changes

“IMDG Amendment 34” is authorized for use January 1, 2009 and becomes mandatory law January 1, 2010. The following highlight some of the more significant changes contained in the original 168 page IMO Maritime Safety Committee (MSC) document. The proposals were agreed to by the DSC committee.

**1. New ID Numbers:** The Dangerous Goods List in Volume #2 of Chapter 3 of the IMDG Code will have 12 new “UN” numbers which will go up to UN3481. They are listed below:

- 0505 SIGNALS, DISTRESS, ship, 1.4G
- 0506 SIGNALS, DISTRESS, ship, 1.4S
- 0507 SIGNALS, SMOKE, 1.4S
- 0508 1-HYDROXYBENZOTRIAZOLE, ANHYDROUS, dry or wetted with less than 20% water by mass, 1.3C
- 3474 1-HYDROXYBENZOTRIAZOLE, ANHYDROUS, WETTED, with not less than 20% water, by mass, 4.1
- 3475 ETHANOL AND GASOLINE MIXTURE or ETHANOL AND MOTOR SPIRIT MIXTURE or ETHANOL AND PETROL MIXTURE, with more than 10% ethanol, 3
- 3476 FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT, containing water-reactive substances, 4.3
- 3477 FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT, containing corrosive substances, 8
- 3478 FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT, containing liquefied flammable gas, 2.1
- 3479 FUEL CELL CARTRIDGES or FUEL CELL CARTRIDGES CONTAINED IN EQUIPMENT or FUEL CELL CARTRIDGES PACKED WITH EQUIPMENT, containing hydrogen in metal hydride, 2.1
- 3480 LITHIUM ION BATTERIES, 9
- 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or LITHIUM ION BATTERIES PACKED WITH EQUIPMENT, 9

**2. New ID Numbers with the new SP 960:** There are 5 new UN numbers listed in the IMDG Code with the new special provision 960 which states, “Not subject to the provisions of this Code but may be subject to provisions governing the transport of dangerous goods by other modes.” This is beneficial communications when shipping cargo not considered hazardous under the IMDG but is regulated by other member state regulations. An example is the IMDG non regulated vehicles now have a UN3166 entry in the dangerous goods list with special provision 960. Vehicles are regulated in the United States.

- 1910 CALCIUM OXIDE, 8
- 2807 MAGNETIZED MATERIAL, 9
- 2812 SODIUM ALUMINATE, SOLID, 8
- 3166 ENGINE, INTERNAL COMBUSTION or VEHICLE, FLAMMABLE GAS POWERED, or VEHICLE, FLAMMABLE LIQUID POWERED, 9
- 3171 BATTERY-POWERED VEHICLE, OR BATTERY POWERED EQUIPMENT, 9

- 3. Training:** Training for shore-side personnel involved in the dangerous goods transportation by water is now required rather than recommended. In the past, vessel personnel training was mandatory and shore side personnel was recommended but Amendment 34 makes the training of both now mandatory. This training may be audited by the “Competent Authority”. Persons who are not trained may only operate under the direct supervision of a trained person based on section 1.3.1.1 of the IMDG Code.
- 4. Marine Pollutants:** There is no longer a distinction between a severe marine pollutant originally designated as “PP” and a marine pollutant originally designated with a “P”. The bullet point designating a possible marine pollutant (•) in the dangerous goods list is also deleted from the table. A shipper is still required to declare any consignment as being a marine pollutant if it meets the criteria. There is a new section 2.9.3 which describes these products. Chapter 2.10 of the IMDG has been rewritten. There is also a marine pollutant label which pictures both a dead tree and fish.
- Note:** This new system for classification of Marine Pollutants designed in part to comply with the Global Harmonization System (GHS) is complicated and classifying mixtures and solutions would add an additional level of complexity. Title 49CFR did not adopt the IMDG change but will still maintain the indicative list in Appendix B of the hazmat table of 172.101.



- 5. Cargo Tanks:** The IMO Tank Instructions column 12 has been deleted from the Dangerous Goods List because the transitional provisions on their use will have expired by the time Amendment 34 becomes mandatory on January 1, 2010.
- 6. Excepted Quantities:** A new column 7b has been added to the Dangerous Goods List to cover excepted quantities. Excepted quantities are small amounts, up to 39g or 30 ml per inner package, 1 kg per outer package. These are subject to the regulations only to the rules of the new chapter 3.5, part 2 (classification) and some sections of 4.1 (packagings) and 5.4 (documentation). They will be labeled with an “excepted quantity” label and the class number. The dangerous goods note shall state the words “dangerous goods in excepted quantities” together with the description of the shipment. An entry E0 in column 7b indicates that a substance may not be transported in excepted quantities. Codes E1 to E5 indicate different quantity limits according to a table in chapter 3.5. The total number of excepted quantity packages in a Container Transport Unit (CTU) shall not exceed 1000.



- 7. Limited Quantities:** For a substance not permitted in limited quantities, the column 7a entry “None” now becomes ‘0’
- 8. Radioactive materials:** For class 7 radioactive cargo, chapter 2.7 is completely rewritten and there is a new chapter 1.5, “general provisions concerning class 7”.