



**WORLD SHIPPING COUNCIL**  
PARTNERS IN TRADE

**COMMENTS BY WSC REGARDING CLASSIFICATION AND TRANSPORT OF CHARCOAL SUBMITTED IN ACCORDANCE WITH THE IMO SECRETARIAT'S REQUEST IN DOCUMENT E&T 34/J/2**

1. WSC appreciates this opportunity to submit comments regarding the classification, handling and transport of charcoal in advance of E&T 34.
2. WSC remains concerned that sufficient time must be devoted to a careful, considered and comprehensive review of possible measures to enhance the safety of the classification, handling and transport of consignments of charcoal.
3. We therefore continue to support the recommendation in the report of the Correspondence Group on a Review of Maritime Special Provisions (document CCC 7/6/2) regarding the establishment at CCC 7 of a working group on charcoal issues with the terms of reference outlined in paragraph 40 of that report.
4. If the establishment at CCC 7 of such a working group is not possible, we intend to propose to CCC 7 that consideration be given to the establishment of a correspondence group tasked with consideration of the issues identified in the aforementioned terms of reference in paragraph 40 of document CCC 7/6/2, and to make recommendations to CCC 8, as appropriate.
5. Without prejudice to our position of principle as set out above (see also document CCC 7/6/13), we can support that elements of the submissions by Germany (document CCC 7/6/4) and CEFIC (document CCC 7/6/8) and from other sources form the basis for initial considerations by E&T 34 regarding measures to enhance the safety of the carriage of consignments of charcoal.
6. Using the submission by Germany as the foundational template, we set forth below a preliminary proposal for how a possible way forward might look like. In addition, some parts of our preliminary proposal invite further discussion and/or further explanations from the submitters of document CCC 7/6/4 (Germany) and document CCC 7/6/8 (CEFIC).

We also note that if the proposal that the consignor shall provide the carrier with a vanning certificate is supported at CCC, there would be a need to develop a template vanning certificate that can be used internationally. WSC would welcome the opportunity to participate in the development of such a draft template for further consideration at E&T and CCC.

7. We also want to underline the importance of the stowage location on board commercial ships of consignments of charcoal. This includes the necessity to make a clear distinction between the cargo being offered and the type of ship being used, e.g. containerized packed charcoal cargo to be loaded on board cellular container ships; packed charcoal cargo to be loaded on board RoRo ships; possible other combinations of cargo and ship. This means, *inter alia*, that
  - (i) The stowage of charcoal must be brought in line with the final decisions, and associated amendments to the IMDG Code, regarding the classification, handling and transport of consignments of charcoal; and
  - (ii) Information regarding consignments of charcoal (and other hazardous cargoes) should be communicated between Ship Operators operating in VSAs and similar arrangements. Such information exchange requires, and presupposes, that consignors of consignments of charcoal must mandatorily provide to the bill of lading issuing carrier information prior to vessel loading about the consignments being tendered to the carrier. This is an issue currently being considered by the Correspondence Group on the Review of Maritime Special Provisions that is scheduled to submit its recommendations regarding documentary requirements to CCC 7 by no later than April 30. This is another reason why the discussion regarding the classification, handling and transport of charcoal at E&T 34 in our view can only be initial in nature.

#### **PRELIMINARY PROPOSAL BY WSC**

Section AAAA For UN 1361 CARBON, animal or vegetable origin, column 6 (special provisions) in the Dangerous Goods List should be amended as follows:

- .1 delete SP223 and SP925; and
- .2 insert a new special provision 9xx.

Section BBBB In chapter 3.3, the following new special provision should be inserted:

"9xx .

1 This entry applies to CARBON, animal or vegetable origin, in particular to charcoal.

.2 Exemptions from the provisions of this Code are not applicable. The test N.4 according to section 33.4.6 of the Manual of Tests and Criteria is not applicable to the maritime transport of this material.

.3 The following preventive measures shall apply to all consignments of charcoal:

- (1) Transport in bulk containers or in IBCs exceeding 1.5 m<sup>3</sup> is not permitted;
- (2) The maximum mass of charcoal per package should not exceed 30 kg. Packaging should be in good condition and must not be torn.
- (3) The consignor shall for each charcoal consignment provide to the carrier a weathering certificate describing the cooling process and attesting that it has cooled down to no more than 5°C above ambient temperature and has weathered for at least 14 days before being stowed in the CTU;
- (4) [To ensure maximum dissipation of heat,] packages shall be stowed in a CTU leaving [a headspace of at least 60 cm]. [The size of a block of densely stowed packages with this material shall not exceed 11 m<sup>3</sup>]; **COMMENT: WSC requests that both the headspace and utilization values be further considered.**

**Regarding *headspace*, CEFIC suggests a headspace of 30 cm. The CINS & IGPI Charcoal Guidelines suggest “to fill the container to the maximum amount permitted in order to reduce the free space in the container and thus reduce the volume of air (oxygen). Air circulation should be reduced as much as possible”. Some other experts have observed that the introduction of a headspace in order to have sufficient cooling air in the container might also have a boosting effect in terms of having sufficient oxygen available to sustain a fire. It has thus been argued that what is necessary is to have the cargo packed in such a way that sufficient cooling is possible between the cargo layers. It has also been observed that good results have been achieved as well by taping of the container ventilation.**

**Regarding *utilization*, CEFIC suggests 16 m<sup>3</sup>. The CINS and IGPI Guidelines do not address this issue except to state that “The cargo should be properly stowed and secured. However, packing should take account of the weight of the bags so as not to cause those at the bottom to be crushed or to split “.**

- (5) The consignor shall provide to the carrier a vanning certificate for each charcoal consignment issued by an independent surveyor/licensed officer, and based on an inspection of the cargo packed into each CTU, to confirm compliance with the Code and

the above conditions. The vanning certificate shall include the following:

- .1 Packing type.
- .2 Cargo is packed and secured in a proper manner.
- .3 Packaging is water resistant, in good condition and not torn.
- .4 The temperature of the cargo when loaded is not more than 5°C above the ambient temperature.
- .5 The packaging and interior atmosphere is clean and odorless, with no presence of fumes or smoke.
- .6 Stowage pattern.
- .7 Date of production.
- .8 A minimum of 6 pictures / thermoscans made during the packing of the container at similar intervals, with the final picture/scan being of the tail end of the container, lashed, secured and with one door closed. The vanning certificate may be no more than 7 days old when the charcoal consignment is loaded aboard ship, and the consignment shall not be loaded aboard ship earlier than 15 days after the date of production.

**COMMENT: WSC encourages consideration, as a matter of priority, of the development of an international test standard for self-heating substances (SHS). Upon the availability of such an international test for SHS, the data requirements for the vanning certificate may be expanded to include a valid self-heating certificate.**

(6) Stowage Code:

SW 1 Protected from sources of heat

SW 11 Shaded from direct sunlight

H2 Keep as cool as reasonably practicable

Stowage category C: ON DECK only and ACCESSIBLE

.4 For CARBON of mineral origin, see UN 3088.

.5 For CARBON, ACTIVATED, see UN 1362."

**COMMENT: We request that it be clarified that cargoes under UN 1362 may never be stowed under deck.**

**COMMENT REGARDING THE BELOW SHADED TEXT: This part of the German submission requires, we believe, further consideration. Which cargo ships does the term "general cargo ship" refer to? Where are such ships deployed – Regionally? Globally? Is this primarily intended for inland waterways, e.g. ADN European Agreement Inland Waterways? Which considerations support the under deck stow suggestion? Are three temperature readings per day realistic?**

**Is it in all scenarios possible to restrict the ventilation? We believe that these and likely other questions need to be considered before a decision may be made on whether to ultimately include this part of the proposal.**

**ADDITIONAL COMMENT REGARDING STOWAGE IN SHADED TEXT:**

**We request that it be clarified that cargoes under both UN 1361 and UN 1362 may never be stowed under deck.**

[Section CCCC In column 16a of the Dangerous Goods List, a new stowage code SWxx should be inserted.

Section 4444 In 7.1.5, a new stowage code SWxx should be defined as follows:

".1 Vehicles may be stowed on a ro-ro ship under deck, when the vehicle deck is equipped with an approved fixed pressure water-spraying system in accordance with SOLAS regulation II-2/20, paragraph 6.1.2.

.2 Packages may be stowed under deck of a general cargo ship when special stowage according to 7.6.2.7.4 is observed."

Section 5555 In chapter 7.6, a new provision 7.6.2.7.4 should be inserted:

"7.6.2.7.4 Stowage provisions for CARBON (UN 1361)

7.6.2.7.4.1 Packages containing CARBON UN 1361 may be stowed under deck, when the following provisions are complied with:

.1 Temperature readings shall be taken 3 times a day during the voyage and recorded.

.2 If the temperature of the cargo exceeds 55°C and continues to increase, ventilation to the hold shall be restricted. If self-heating continues, then carbon dioxide or inert gas shall be introduced.

.3 A double-strip-stowage is recommended to facilitate heat dissipation.

The diagram in 7.6.2.7.2.3 shows how this can be achieved." ]