

SUB-COMMITTEE ON DANGEROUS
GOODS, SOLID CARGOES AND
CONTAINERS
17th session
Agenda item 4

DSC 17/4/41
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AMENDMENT 02-13 TO THE IMSBC CODE AND SUPPLEMENTS

Comments on the Report of the Editorial and Technical Group

**Submitted by the International Group of P & I Associations (P&I Clubs),
INTERCARGO, ICS and BIMCO**

SUMMARY

Executive summary: This document comments on document DSC 17/4/2, paragraphs 6.6 to 6.11 along with 9.1.6 and 9.1.7 which deal with document E&T 17/5/1 (France) and, in particular, the proposal for a modified test method to be included in the new schedule for nickel ore cargoes. The co-sponsors of this document believe that agreement on such a modified test method should be deferred until the ramifications of using such a modified test are clearly understood, given the dramatic differences between the proposed modified test and the existing test methodology.

Strategic direction: 5.2

High-level action: 5.2.3

Planned output: 5.2.3.3

Action to be taken: Paragraph 8

Related documents: DSC 17/4/2 and E&T 17/5/1

Background

1 This document comments on document DSC 17/4/2 "Report of the Editorial and Technical Group" and is submitted in accordance with the provisions of paragraph 6.12.5 of the Guidelines on the organization and method of work of the Committees (MSC-MEPC.1/Circ.4/Rev.2).

Discussion

2 In the E&T 17 meeting in March, consideration was given to document E&T 17/5/1 (France) which proposed the inclusion of a new schedule for nickel ore cargoes.

3 Some members of the E&T 17 Group expressed a number of concerns, including with regard to the proposal for inclusion of a modified test method, and discussions of this item concluded with France undertaking to provide additional information in order to clarify the percentages shown in square brackets in their document relating to the safety factor.

4 The co-sponsors acknowledge that the work carried out by France is an important step in better understanding the nature of these complex materials and agree that it is important a new schedule for nickel ore cargoes is agreed at DSC 17, but the co-sponsors remain concerned about the Vibration Table with Penetration Bit Test (VTPB), as adapted in the French proposal. As a result the co-sponsors believe that the inclusion of such a test method should be deferred until the potential ramifications of using such a test are clear.

5 In particular the co-sponsors are concerned that the Penetration Test methodology, while in the IMSBC Code since 1994 has not, until recently, been widely used and therefore there is a shortage of expertise to use the existing test methodology, let alone evaluate the consequences of making the substantial changes proposed in the new schedule, such as:

- .1 an increase in the penetration bit diameter from 15 mm to 20 mm;
- .2 a near 10-fold increase in the weight of the penetration bit from 177 g to 1,500 g;
- .3 increasing the fail criteria from a 50 mm penetration to 80 mm; and
- .4 the use of a "surface confinement disk".

6 These are dramatic changes to the existing test methodology and, until the proposal has been independently tested, it is impossible to say whether these changes improve on the results achieved with the existing testing methodologies.

7 The co-sponsors do not agree that there is an overriding urgency to adopt this proposed testing methodology for nickel ore cargoes whilst doubts remain concerning the consequences of the proposed new VTPB test. The co-sponsors believe that the proposed test method, contained in the draft schedule for nickel ore cargoes, should be independently tested on further nickel ore samples before consideration can be given to inclusion of such a test method in the IMSBC Code. As a result, the co-sponsors propose that agreement on the inclusion of such a test method in the IMSBC Code should be deferred at DSC 17 until this has taken place.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the above comments and proposal in paragraph 7, and decide as appropriate.
