

SUB-COMMITTEE ON POLLUTION  
PREVENTION AND RESPONSE  
4th session  
Agenda item 3

PPR 4/3/1  
22 November 2016  
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**SAFETY AND POLLUTION HAZARDS OF CHEMICALS AND PREPARATION OF  
CONSEQUENTIAL AMENDMENTS TO THE IBC CODE**

**Comments on the draft revised chapter 21 of the IBC Code**

**Submitted by Liberia, Marshall Islands, INTERTANKO, DGAC and IPTA**

**SUMMARY**

*Executive summary:* This document proposes to amend the draft revised criteria in section 21.5.5 of the IBC Code concerning the application of column D3 of the GESAMP Hazard Profile, based on the draft revised chapter 21 of the IBC Code, as set out in annex 5 of the report of ESPH 22 (PPR 4/3)

*Strategic direction:* 7.2

*High-level action:* 7.2.2

*Output:* 7.2.2.1

*Action to be taken:* Paragraph 8

*Related document:* PPR 4/3

**General**

1 This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee* and their subsidiary bodies (MSC-MEPC.1/Circ.4/Rev.4) and comments on the report of ESPH 22 (PPR 4/3), notably on the criteria in section 21.5.5 of the Code, as set out in annex 5 of the document.

**Discussion**

2 ESPH 22 considered a revised draft chapter 21 of the IBC Code and incorporated several revisions. Chapter 21 sets out the criteria for assigning carriage requirements for products subject to the IBC Code. During the discussion, DGAC and INTERTANKO raised a point about section 21.5.5 of the criteria (special requirement 15.12 – Toxic Products) and its applicability to the product Methyl alcohol.

3 Under the revised chapter 21 of the Code, this product would be assigned the special requirement for toxic products in *column o* of chapter 17 of the Code (Summary of minimum requirements), in the next amendment. This special requirement does not currently apply to Methyl alcohol.

4 Methyl alcohol is an industrial chemical produced and transported in very large volumes in chemical tankers. It has the unusual property of causing damage to the optic nerve when orally ingested, resulting in blindness. For this reason, Methyl alcohol has been assigned a rating of "T" (Target Organ Toxicity) in column D3 of the GESAMP Hazard Profile. This "T" rating triggers the special requirement for toxic products, according to the revised criteria in the draft chapter 21. However, the special requirement specifies design requirements that are intended for products with serious inhalation hazards (e.g. location of exhaust openings of tank vent systems and vapour return lines), which would not provide any protection from the ingestion hazards of Methyl alcohol and therefore is not needed.

5 Any product assigned a "T" rating in column D3 of its hazard profile should be assessed to determine whether the assignment is based on exposure via inhalation or another route of exposure. If based on another route (i.e. oral or dermal), special requirement 15.12 – Toxic Products should not apply.

### **Proposal**

6 Based on the above rationale, it is proposed that paragraph 21.5.5.1 in the draft chapter 21 be revised as follows:

"All of paragraph 15.12 is added to *column o* ... and/or the product is toxic to mammals by prolonged exposure (D3 = C, M, R, T (based on inhalation), N or I)."

7 As a consequential amendment for purposes of consistency with the above, it is further proposed to revise paragraph 21.5.9.1 as follows:

"Paragraph 15.17 shall be added to *column o* ... Toxic to mammals by prolonged exposure (D3 = C, M, R, T (based on inhalation), N or I); and/or highly to severely corrosive to skin ..."

### **Action requested of the Sub-Committee**

8 The Sub-Committee is invited to consider the proposal set out in this document and to take action as appropriate.

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