



# INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

## MEMORANDUM

TO: Distribution

FROM: Alan Spackman, Vice President, Offshore Technical and Regulatory Affairs

SUBJECT: Report on the 15<sup>th</sup> Session of the IMO Sub-Committee on Dangerous Goods, Solid Cargoes and Containers

DATE: 29 October 2010

---

The 15<sup>th</sup> Session of the IMO's Sub-Committee on Dangerous Goods, Solid Cargoes and Containers (DSC 15) was held from 13 to 17 September 2010, under the Chairmanship of Mrs. Olga. P. Lefèvre (France). The meeting was attended by representatives of 62 IMO Member States, one Associate Member, three United Nations specialized agencies, two Inter-Governmental organizations, and 25 Non-Governmental organizations. The International Association of Drilling Contractors was not represented at the meeting.

The following is a summary of issues addressed by the Sub-Committee that may interest owners or operators of mobile offshore drilling units (MODUs):

### **On-line availability of amendments to the IMDG Code**

The Secretariat informed the Sub-Committee of its intention to create an IMDG Code Module in the Global Integrated Shipping Information System (GISIS), and noted that the new GISIS Module is expected to be live in November 2010. The link for that website will be included in the "Foreword" of the published version of the IMDG Code incorporating amendment 35-10, which is expected to be ready, as a sales item, during the same month. The website will contain PDF copies of amendments to the Code as well as a feedback mechanism for reporting disparities of an editorial nature.

### **Cargo transport units containing dangerous goods**

The Sub-Committee agreed that the provisions on the placarding of cargo transport units containing dangerous goods in limited quantities could benefit from improvement and instructed its E&T Group (tentatively scheduled to meet 11 to 15 April 2010) to finalize text for incorporation in amendment 36-12,

### **Guidance on protective clothing**

On 1 January 2011, SOLAS regulation II-2/19 will also require ships to carry chemical protective clothing, selected according to the standards to be developed by the Organization.

The observer from ISO informed the Sub-Committee that ISO/TC 94 and ISO/TC 8 were in the process of revising ISO standard 16602:2007 (Protective clothing for protection against chemicals) and that the Publicly Available Standard (PAS) would not be available for at least one year.

The Sub-Committee decided to await the outcome of ISO in order to avoid a duplication of the work and encouraged Member Governments and international organizations to participate in the work of ISO/TC 94 and ISO/TC 8. A postponement of the work on this output is being requested.

### **Guidelines for packing cargo transport units (CTUs)**

The Sub-Committee agreed to the draft amendments to the IMO/ILO/UNECE Guidelines for packing cargo transport units (CTUs) for submission to the 89<sup>th</sup> session of the Maritime Safety Committee (MSC 89, May 2011) for approval and for forwarding the above draft amendments to ILO and the UNECE for concurrent endorsement, as appropriate.

### Enclosed spaces entry and rescue drills

The Sub-Committee had formed a Correspondence Group to progress work on this issue. That Group could not reach a consensus on the issues related to the oxygen content for enclosed space entry. The Sub-Committee ultimately agreed to require steady readings of 21% oxygen by volume prior to entry, but in consideration that national requirements may differ an additional note was added to reflect this fact.

Resolving another issue, the Sub-Committee also agreed that two sets of guidance should be prepared: a generic set of recommendations dealing with hazards associated with entry into enclosed spaces on all ships; and another set dealing specifically with entry into cargo spaces protected by inert gas systems on tankers.

The Sub-Committee agreed to the draft Revised Recommendations for entering enclosed spaces aboard ships and the associated draft Assembly resolution for submission to MSC 89 for approval, with a view to subsequent adoption by the Assembly.

The Sub-Committee's Working Group held extensive discussion on the issue of drills and agreed that the accidents associated with entry into enclosed spaces were due to a lack of a properly functioning safety culture on board some ships. Some delegations expressed the opinion that this issue should be addressed through the mandating of enclosed space entry drills, while others expressed the view that procedures incorporated through the ISM Code would be more appropriate.

As consensus on a way forward could not be reached due to time constraints, Member Governments and international organizations were invited to submit comments and proposals on this issue to DSC 16.

### Adjustments to the Sub-Committee's work program

Areas of interest in the Sub-Committee's requested the following revised work program include:

Description	Number	Parent	Coordinating	Involved	Target
Amendment to SOLAS to mandate enclosed space entry and rescue drills	5.2.2	MSC	DSC	BLG	2012
Amendments to the International Convention for Safe Containers, 1972 and associated circulars	5.2.3.1	MSC	DSC		2011
Amendment (36-12) to the IMDG Code and supplements	5.2.3.4	MSC	DSCI		2011
Review of the Guidelines for packing of CTUs	5.2.3.14	MSC	DSC		2013

### Arrangements for future sessions

The 16<sup>th</sup> session has been tentatively scheduled to take place from 19 to 23 September 2011.

The agenda for DSC 16 includes:

- Revised Guidelines for packing of CTUs;
- Amendments to the International Convention for Safe Containers, 1972 and associated circulars;
- Amendments to SOLAS to mandate enclosed space entry and rescue drills; and
- Amendments to the IMDG Code and supplements.

A working group will be established for:

- Amendment to SOLAS to mandate enclosed space entry and rescue drills.

### Election of the Chairman and Vice-Chairman

The Sub-Committee re-elected Mrs. Olga Pestel Lefèvre as its Chairman and elected Mr. Arsenio A. Dominguez (Panama) as its Vice-Chairman for 2011.

When it becomes available, the complete report of the Sub-Committee, including its annexes, will be made available on the IADC Website at: <http://www.iadc.org/committees/offshore/IMO.html> .

Please feel free to contact me by phone (+1 / 713 292 1964) or e-mail ([alan.spackman@iadc.org](mailto:alan.spackman@iadc.org)) with any questions you may have regarding this summary report.