

HAZARDOUS COMMON ISSUES & POSSIBLE SOLUTIONS

DFDS guide for prevention of potential refusals.

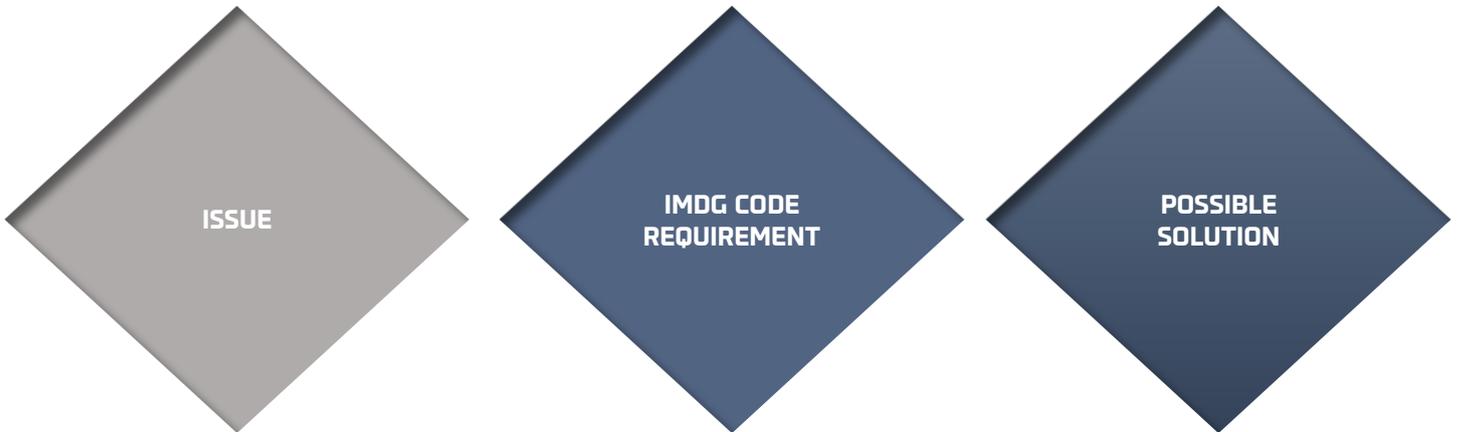
Important Information: Some provisions and exemptions of the ADR code are different in comparison to the IMDG code. Some key examples of this are: requirements for flashpoints, marine pollutants, a compliant container/vehicle packing certificate and additional conflicts between UN numbers, especially relating to acids and alkalis. It is important to note that, when a hazardous load is being transported by sea, the IMDG code takes precedence over the ADR code.

Dear freight customer,

Over the past few months, an increase in the number of hazardous refusals has been highlighted. In light of this, we have put together the below table that lists some of the common issues, we are presented with upon arrival to the Port, the requirements of the IMDG Code and possible solutions:

We work closely with the MCA, who are an Executive Agency of the Department of Transport. We share relevant compliant and non-compliant information with the MCA and work towards improving safety at Sea and Coastal areas. The MCA also assists us in providing support to our customers to ensure safe shipment of hazardous cargo at all times.

For further information and support please follow <https://www.gov.uk/government/organisations/maritime-and-coastguard-agency/about>



Container/Vehicle Packing Certificate Not Completed	The minimum information required on the Packing Certificate is a name, date and signature. The person who packed and loaded the goods onto the vehicle must complete this.	The Container/Vehicle Packing Certificate must be completed by the person responsible for loading the goods into the vehicle.
Declaration Not Completed	The minimum information required on the Shippers Declaration is a date and signature. The person who completed the Dangerous Goods Transport Document must complete this.	The consignor is responsible for ensuring the correct information is provided on the Dangerous Goods Transport Document and must complete and sign the Declaration.

Flashpoint too low for PGIII	Packing Group III normally has a minimum Flashpoint of 23C. However, if the viscosity of the product meets the requirements set out in IMDG 2.3.2.2, then we can accept a Flashpoint below 23C.	If the goods meet the requirements set out in 2.3.2.2, it must state ' In Accordance with IMDG 2.3.2.2 ' on the DGN. We will then be able to accept the load with a Flashpoint below 23C. If the above is not stated on the Dangerous Goods Transport Document, or if the product does not meet the requirements set out in IMDG 2.3.2.2 , then the load will be refused.
One quantity of Dangerous Goods for multiple UN numbers	Separate quantity and packaging information must be listed for each different Proper Shipping Name, UN Number and Packing Group.	It is important that each different Proper Shipping Name, UN Number and Packing Group has its own weight and packaging information. If this cannot be determined, the load will be refused.
No Dangerous Goods Transport Document	Unless the product is exempt from the IMDG Code, a fully completed and signed Dangerous Goods Transport Document and Container/Vehicle Packing Certificate, that comply with Chapter 5.4 of the IMDG Code, must be provided for all hazardous items.	If it cannot be established that the product is non-hazardous, the load will be refused until a completed Dangerous Goods Transport Document can be provided.
Required Information Missing on the Dangerous Goods Transport Document	Each hazardous goods item must have the minimum required information, as per IMDG 5.4.1.4. This includes: - UN number - Proper Shipping Name (supplemented with the correct technical name of the product where necessary) - Primary Class (including subdivision*) - Any sub hazard(s)* - Packing Group* - Technical Name* - Packaging and weight information. <i>*If applicable.</i>	When any required information is missing, the load will be refused. A corrected Dangerous Goods Transport Document must be provided before shipment can be approved.
Shipment of Class 1.4 in a Closed Transport Unit	Class 1.4 shipments vary according to how they must be transported, especially compatibility groups other than 1.4S; they must be shipped in a closed transport unit and are limited to 10kg per vessel (1.4F is prohibited on pax sailing).	A Closed Transport Unit (CTU) form must be completed before shipment. Please contact our Reservations Department (dover.fbookings@dfds.com) for a copy of this form.
Emergency contact number and container / vehicle ID number should be stated on the	Emergency contact number is mandatory in French Ports. As per 5.4.2.1: " <i>When dangerous goods are packed or loaded into any container³ or vehicle,</i>	The MCA are tightening their checks, and this is a requirement as per 5.4.2.1.

<p>Dangerous Goods Transport Document.</p>	<p><i>those responsible for packing the container or vehicle shall provide a "container/vehicle packing certificate" specifying the container/vehicle identification number(s) and certifying that the operation has been carried out in accordance with the following conditions."</i></p>	
<p>Gas flammable liquid with FP <23°C shipped under temperature regulations but not for safety reasons, please see 7.3.7.6.2.</p>	<p>As per 7.3.7.6.2: <i>"When flammable liquids having a flashpoint less than 23°C c.c. and not requiring temperature control for safety reasons are transported under temperature control conditions for commercial reasons, explosion proof electrical fittings are required except when the substances are precooled to and transported at a control temperature of at least 10°C below the flashpoint. In case of failure of a non-explosion proof refrigerating system, the system shall be disconnected from the power supply. It shall not be reconnected if the temperature has risen to a temperature less than 10°C below the flashpoint."</i></p>	<p>For example: UN1230, METHANOL with a flashpoint of 12°C in a running fridge, the temperature cannot be more than 2°C.</p>
<p>Marine Pollutant vs 2.10.2.7.</p>	<p>We have seen an increase in customers not providing a Dangerous Goods Transport Document when 2.10.2.7 applies.</p> <p>2.10.2.7: <i>"Marine pollutants packaged in single or combination packagings containing a net quantity per single or inner packaging of 5 L or less for liquids or having a net mass per single or inner packaging of 5 kg or less for solids are not subject to any other provisions of this Code relevant to marine pollutants provided the packagings meet the general provisions of <u>4.1.1.1</u>, <u>4.1.1.2</u> and <u>4.1.1.4</u> to <u>4.1.1.8</u>. In the case of marine pollutants also meeting the criteria for inclusion in another hazard class all provisions of this Code relevant to any additional hazards continue to apply."</i></p> <p>As per 2.10.2.7, this only refers to the marine pollutant condition, the rest of the code still applies and a Dangerous Goods Transport Document is still required.</p>	<p>For example: UN1791 PGII is classified as marine pollutant by the IMDG Code.</p> <ul style="list-style-type: none"> - If UN1791 PGII is shipped as LQ, it means each inner packaging is max 1 litre, so it is not mandatory to state on the Dangerous Goods Transport Document the MP condition. - If UN1791 PGII is not shipped as LQ but the Dangerous Goods Transport Document clearly states the inner packagings are less than 5 litres each, then it is not mandatory to state on the dgn the MP condition. - If UN1791 PGII is not shipped as LQ and the Dangerous Goods Transport Document does not state the capacity of each inner packaging (for

		example, there is only the weight of the box), then the MP condition must be stated on the Dangerous Goods Transport Document (as we do not know the capacity of the inner packaging).
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ADR EXEMPTIONS WHICH REQUIRE TO BE DECLARED WITH DANGEROUS GOODS TRANSPORT DOCUMENT FOR MARITIME SHIPMENT (non-exhaustive list)

ADR EXEMPTION	IMDG RULE	CONSEQUENCE FOR MARITIME TRANSPORT
Below 1000 pts / 1.1.3.6 exemption	Does not exist under IMDG	The goods need to be declared as hazardous cargo with full dangerous goods transport document.
Class 8 batteries shipped under SP598	SP598 does not exist under IMDG	The batteries need to be declared as hazardous cargo with full dangerous goods transport document.
LITHIUM batteries shipped under SP188	SP188 is valid under IMDG	Statement of shipment under SP188 required on cmr, delivery note or by e-mail.
LIMITED QUANTITIES	LQ is a partial exemption under IMDG	Limited Quantities must be declared for maritime transport and a dangerous goods transport document is required.
Excepted Quantities	EQ is a partial exemption under IMDG	Excepted Quantities must be declared for maritime transport and a dangerous goods transport document is required.
UN3257 tank under TU35	Does not exist under IMDG / an empty tank which is NOT cleaned must be considered as full (IMDG Code 4.2.1.5)	Empty uncleaned tank must be declared for maritime transport and a dangerous goods transport document must be provided.
UN3360 not ADR regulated	REGULATED under IMDG as per SP117 (39-18) and as per SP123 (40-20)	Vegetable fibers, dry must be declared for maritime transport with a dangerous goods transport document.
UN1327 not ADR regulated	REGULATED under IMDG	UN1327 must be declared for maritime transport (unless shipped under SP954 conditions) with a dangerous goods transport document stating the moisture content.
1.1.3.1 a), c) and f)	Do not exist under IMDG Code	The goods need to be declared as hazardous cargo with full dangerous goods transport document.

1.1.3.1 d) and e)	Do not exist under IMDG Code	DFDS has specific procedures for breakdown vehicle and emergency transport unit. A dangerous goods transport document may be required. Please contact our freight booking department for information about this kind of shipment.
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We hope that this guide is of interest to you and your customers and that you find this useful when pre-advising hazardous goods. We hope that this will reduce any potential unnecessary hazardous refusals upon arrival to the Port.

Please continue to send your hazardous pre-advisements to doover.fbookings@dfds.com for pre-checking. Please also ensure you provide the vehicle registration number and/or the booking number relating to the shipment.

If you have any further questions, please do not hesitate to contact the freight reservations department.

Best Regards
 FREIGHT RESERVATIONS DEPARTMENT

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