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SUB-COMMITTEE ON BULK LIQUIDS
AND GASES
14th session
Agenda item 3

BLG 14/3/3
4 December 2009
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**EVALUATION OF SAFETY AND POLLUTION HAZARDS OF CHEMICALS AND
PREPARATION OF CONSEQUENTIAL
AMENDMENTS**

**Proposal to amend the classification of Fatty Acid Methyl Ester (FAME) products
under chapter 17 of the IBC Code**

Submitted by the International Chamber of Shipping (ICS)

SUMMARY

<i>Executive summary:</i>	ICS proposes that in light of BLG 14/3, paragraph 5.21, and what may be considered to be “new data” based on extensive experience gained during carriage, Fatty Acid Methyl Esters (FAME) should be reclassified as being non-toxic under the requirements of the IBC Code
<i>Strategic direction:</i>	7.2, 5.2 and 1.3
<i>High-level action:</i>	7.2.2, 5.2.3 and 1.3.3
<i>Planned output:</i>	5.2.3.1 and 1.3.3.1
<i>Action to be taken:</i>	Paragraph 9
<i>Related documents:</i>	BLG 14/3 and IBC Code – Chapter 15.12

Introduction

1 BLG 14/3, paragraph 5.21, advises that proposals have been received for carriage requirements of products to be reviewed as a consequence of reassessment or of new data becoming available. ICS considers that experience gained in the carriage of Fatty Acid Methyl Ester (FAME) constitutes such new information and requests that the Sub-Committee decides whether the carriage requirement for FAME should be reconsidered.

2 FAME is a product listed in chapter 17 of the IBC Code and is carried in large volumes on chemical tankers. Column “k” of chapter 17 of the IBC Code classifies FAME as toxic.

3 Column “o” of chapter 17 identifies applicable “*Specific and operational requirements*” for the carriage of products. Chapter 15.12.3 of the IBC Code, referred to in column “o” of chapter 17, includes requirements that toxic products should not be stowed adjacent to oil fuel tanks.

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General

4 During ESPH 15, some members noted that products such as FAME are frequently stowed, in compliance with the Code, adjacent to heated cargoes with no reported adverse effects. Members also agreed that there was little or no technical justification for a prohibition on FAME being stowed adjacent to oil fuel tanks based on its toxicity, despite being classified as “toxic” in the Code.

5 The consequential rise in temperature of FAME caused by stowage adjacent to heated cargoes causes no environmental or safety concerns. The prohibition on stowage of toxic cargoes adjacent to oil fuel tanks is presumably to avoid the risk of fuel oil contamination in the event of a bulkhead leak between the cargo and the fuel oil. It is understood that contamination of fuel oil by FAME following a bulkhead leak would present no toxic contamination risk and that therefore that there is no justification for this prohibition regarding FAME.

6 The prohibition on stowing FAME cargo adjacent to oil fuel tanks, under IBC Code chapter 15.12.3, significantly affects the flexibility of loading available to chemical tankers. ICS notes that some members consider that reclassifying FAME as non-toxic would have no adverse safety or environmental affects. It is further noted that lifting this prohibition would significantly increase the operational flexibility of chemical tanker fleets.

7 It is recognized that the reclassification of FAME to remove its current, toxic status could potentially be achieved if the producers of this product were persuaded to resubmit data to GESAMP/EHS to support such a reclassification. Unfortunately, producers of this product have not indicated a preparedness to follow this course of action.

Proposal

8 It is proposed that:

- .1 the ESPH Working Group re-evaluate Fatty Acid Methyl Esters (FAME) to determine whether the current “toxic” classification under column “k” in chapter 17 of the Code is appropriate, or alternatively;
- .2 the ESPH Working Group consider the appropriateness of granting an exemption for the carriage of Fatty Acid Methyl Esters (FAME) from the requirements as a toxic product under column “o” of chapter 17 of the Code.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider this issue and decide as appropriate.
