

SUB-COMMITTEE ON DANGEROUS  
GOODS, SOLID CARGOES AND  
CONTAINERS  
10th session  
Agenda item 3

DSC 10/3/?  
5 August 2005  
Original: ENGLISH

**AMENDMENTS TO THE IMDG CODE AND SUPPLEMENTS,  
INCLUDING HARMONIZATION OF THE IMDG CODE WITH THE  
UN RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS**

**Mandatory IMDG Training for Shore Side Personnel**

**Submitted by ICS**

<b><i>Executive Summary:</i></b>	ICS comments on, and supports, the proposal of the United Kingdom contained in DSC 10/3/8.
<b><i>Action to be taken:</i></b>	Paragraph 4
<b><i>Related Documents:</i></b>	DSC 10/3/8, DSC 10/6/2, DSC 10/6/4, DSC 10/6/6

1 This document has been submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines of the Organization and method of work of the MSC and MEPC and their subsidiary bodies (MSC/Circ.1099 – MEPC/Circ.405) and comments on document DSC 10/3/8.

2. The United Kingdom (DSC 10/3/8) proposes the amendment of the IMDG Code to apply a safety management system approach to the training of shore-based personnel engaged in the safe transport of dangerous goods by sea. Since the IMDG Code's implementation, incidents have occurred where mis-declaration or the lack of declaration of a container's contents has been a major contributory factor. Related issues have been discovered during inspections by administrations of CTUs and the results duly reported to the DSC Sub-Committee. Indeed several DSC 10 submissions under Agenda item 6 underline these concerns.

3 Noting this, and mindful of the fact that, in the case of sealed containers, ships' crew have to rely upon the contents being correctly classified, loaded and documented, this is an important safety issue for seafarers. ICS strongly supports the principle of training for those involved in the loading of containers and, assuming that member Governments agree that IMO is the appropriate body to make provisions in this important area, can fully support the proposal described by the United Kingdom in paper DSC 10/3/8.

**Action requested of the Sub-Committee**

4 The Sub-Committee is invited to note the above and to decide as appropriate.