



Maritime and Coastguard Agency

RECOMMENDATIONS ON THE SAFE USE OF PESTICIDES IN SHIPS

Notice to operators, shipowners, charterers, masters, agents, port and harbour authorities, shippers, container and vehicle packers, cargo terminal operators, fumigators, fumigant and pesticide manufacturers and all persons responsible for the unloading of freight containers

(This notice takes immediate effect)

Summary

The purpose of this guidance note is to advise on:

- (1) the importance of safe and proper procedures when pesticides are used on board ships;
- (2) the appropriate application of the IMO Recommendations on the Safe Use of Pesticides in Ships both to cargo and to cargo spaces; and
- (3) to indicate the likely application of other related requirements or guidance which would be applicable to the use of, handling or transport of pesticides.

1. In accordance with the Merchant Shipping (Carriage of Cargoes) Regulations 1997¹, where pesticides are used in the cargo spaces of ships prior to, during, or following a voyage, the IMO publication "RECOMMENDATIONS ON THE SAFE USE OF PESTICIDES IN SHIPS" (1996 Edition, IMO267E), available from IMO, Publications Section, 4 Albert Embankment, London SE1 VSR where relevant thereto shall be complied with. The contents of this publication are also incorporated into the Supplement to the International Maritime Dangerous Goods (IMDG) Code. The use of pesticides includes the fumigation of cargo spaces and of cargo, in port, or in-transit, and any part of the ship so affected by their use, as contained in the Recommendations.
2. The Maritime and Coastguard Agency, in conjunction with the Ministry of Agriculture, Fisheries and Food, the Scottish Office, Agriculture, Environment and Fisheries Department and the Health and Safety Executive, considers that it is essential that adequate precautions are taken by all those responsible for the commissioning of pest control on board ships. MCA strongly recommends observance of all the provisions contained in the Recommendations, but the necessity for the master and crew to cooperate with shore-based fumigation personnel in compliance with other safety requirements should be recognised. In the United Kingdom the Health and Safety Executive (HSE) is the relevant shore-based authority.

¹ S.I. 1997/No.19 as amended

3. Mandatory requirements cover the conditions for preparation and carriage of cargo transport units under fumigation. These are classified as Class 9 dangerous goods with the proper shipping name "CARGO TRANSPORT UNIT UNDER FUMIGATION" in the International Maritime Dangerous Goods (IMDG) Code, ("cargo transport unit" being any freight container or vehicle shipped under fumigation). The Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997 require compliance with the IMDG Code for packaged dangerous goods for aspects such as declaration, stowage, segregation, marking, labelling and the display of a fumigation warning sign.
4. Pesticides, when not in use and carried as cargo may also be subject to the Regulations specified in paragraph 3 above and the IMDG Code.
5. The Recommendations regarding fumigation practice were written as a result of consultations with experts on pest control, pesticide safety and ship operation.
6. In one case, failure to comply with the recommended procedures caused a number of people to be hospitalised after exposure to phosphine gas generated in a cargo of grain fumigated with Aluminium Phosphide during the sea passage. The fumigant tablets were not fully decomposed and, hence, the fumigation process was not fully completed before the vessel arrived at the discharge port. There have also been a number of other incidents involving containerised cargoes arriving under fumigation at United Kingdom ports with no accompanying documentation on the ship or at the port of discharge regarding the nature of the cargo.
7. Merchant Shipping Notice MSN 1718 should be referred to for the statutory requirements on the safe use of pesticides (including fumigants), in cargo spaces on board ships when they are loaded or intended to be loaded with cargo. Although extensively referred to in these requirements, the scope and application of the IMO Recommendations is generally wider, providing, for example, guidance on the disinfestation of food stores, galleys and crew and passenger accommodation.
8. As pesticides are hazardous substances their handling and application and exposure to them are subject to regulations affecting the health and safety of workers at work. For further information other related documents should be referred to, e.g. Chapter 27 of the "Code of Safe Working Practices for Merchant Seamen"² and the Health and Safety Executive Approved Code of Practice (Control of Substances Hazardous to Health in Fumigation Operations"³.

² Available from The Stationery Office
ISBN 0 11 5518363

³ HSE Books ACOP L86 and also Guidance note on Fumigation CS22.

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