

SUB-COMMITTEE ON DANGEROUS  
GOODS, SOLID CARGOES AND  
CONTAINERS  
18th session  
Agenda item 7

DSC 18/7/11  
25 July 2013  
Original: ENGLISH

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

**Asbestos under UN 2212 and UN 2590**

**Submitted by the International Transport Workers' Federation (ITF)**

**SUMMARY**

*Executive summary:* This document comments on DSC 18/INF.8 which suggest amendments to the text of UN 2212 and UN 2590 regarding the cleaning of cargo spaces when carrying specific cargoes containing asbestos, as contained in draft Amendment 37-14 (DSC 18/7/1)

*Strategic direction:* 5.2

*High-level action:* 5.2.3

*Planned output:* 5.2.3.4

*Action to be taken:* Paragraph 6

*Related documents:* DSC 18/7/1 and DSC 18/INF.8

**Introduction**

1 This document comments on document DSC 18/INF.8 and is submitted in accordance with the provisions of paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.2).

2 ITF has not participated in the E&T Group and, therefore, would not make comment on the correct description or classification of the various types of asbestos being shipped and in particular the substance called ASBESTOS, CHRYSOLITE. We would agree, however, that all asbestos products are hazardous and that blue asbestos, Crocidolite, in particular is extremely hazardous to the health of workers.

3 Conscious that both ILO and IMO have banned the use of materials containing asbestos in the construction or operation of ships and the wider industrial environment, we are opposed to subjecting workers to any level of asbestos, as advised by the WHO, and only those taking extreme precautions to be involved in the cleaning up or removal of asbestos. We would therefore wish for the suggested amendment in paragraph 4 of DSC 18/INF.8 to be written not as guidance but clear requirement.

### **Proposal**

4 The text of UN 2212 in column 17 of the Dangerous List with the text of UN 2590 to be amended in the penultimate sentence to read, "If cleaning of cargo spaces has to be carried out at sea, the safety procedures followed and standard of equipment used shall be at least as effective as those employed as industry best practice in a port."

5 ITF is committed to the eradication of asbestos in the workplace and require its ultimate removal from all industries including the maritime.

### **Action requested of the Sub-Committee**

6 The Sub-Committee is invited to consider the proposal provided in this document, particularly paragraph 4, and take action, as appropriate.

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