

Ref : DMA/AIFI/96/C 864
Date: 17/01/2018

Dear Captain
Good Day,

Attached file (fumigation Hazards) along with two MSCs regarding “ HAZARDS ASSOCIATED WITH ALUMINUM PHOSPHIDE FUMIGATION “ made for your good knowledge and reference.

You are requested to confirm receipt, discuss the contents in the next consolidated meeting on board & keep a copy in the file DA-11 .

Best Regards,

Ali Mohtasham
Accident Investigation / Fleet Inspection Expert
Department of Maritime Affairs
ROD Ship Management Co.
Dept. Tel No. : +98-21-26100357
Dept. Fax No.: +98-21-26100356
Direct Tel No.: +98-21-23843563
Please reply to dma@sealeaders.com

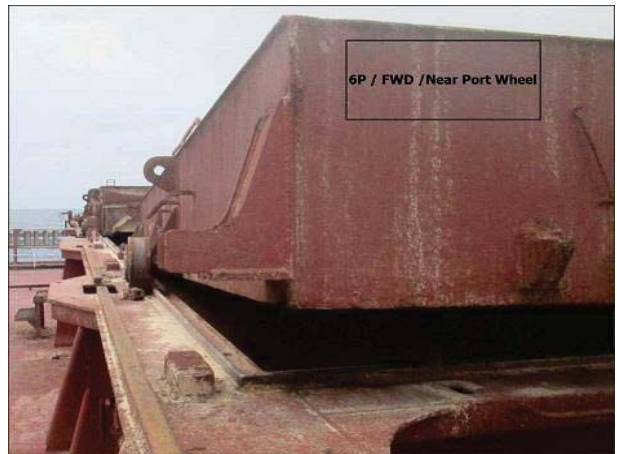
(Note: This e-mail has been sent as BCC <blind carbon copy to : All R.O.D.-SMC Vessels, to eliminate the lengthy list that would result if this e-mail is printed)

HAZARDS ASSOCIATED WITH ALUMINUM PHOSPHIDE FUMIGATION

Reference is made to a recent accident which happened on board one of the fleet vessels after departure from a South American port with 66000 MT of Corn in bulk. She had departed the port 33 hours before the explosion and was en-route towards her destination, when an explosion was heard on deck and subsequently white smoke was noted coming from one of the cargo holds.

Initial investigation carried out and it was revealed that the white smoke was from cargo hold no.6 where due to explosion the cover had been lifted up, displaced and partially opened. Both hatch cover pontoons, coamings and securing cleats had sustained heavy damages in such extent that cover could not be closed and cargo was exposed to weather.

Vessel has to deviate back to her loading port for repairs on hatch cover.





White smoke



Hatch cove deformed



Heat damaged cargo with remaining tablet/pellet residues (blackening)



The size of any explosion will depend on the quantity of flammable gas ignited; in some cases, the explosion of a phosphine gas / air mixture has been of sufficient force to cause access hatches or hatch covers to be blown upwards and displaced whilst hatch cleats, hatch coamings and the hatch covers have been severely damaged, presenting the potential risk of serious injury to personnel and delays to the voyage.

The passage of the flame through the flammable atmosphere within the hold can also cause blackening of the surface of the cargo and the steel structures within the cargo space.

The fumigator's written instructions concerning the use of the fumigant product and the conduct of the fumigation after their departure from the vessel must be followed precisely.

The guidance contained in the Material Safety Data Sheets (MSDS) for the tablets and their residue must be left with the vessel and must be reviewed and understood.

It will be seen from the foregoing guidance that problems with aluminum phosphide tablets can arise when they are not spread evenly in cargo holds, instead being placed in piles on the cargo surface.

The problem is further exacerbated by the presence of free water in contact with the tablets. Therefore, tablets should be evenly spread over the surface of the cargo or evenly placed sub-surface; the tablets should not be heaped together in one or a handful of locations. When the tablets

are evenly spread, there is less likelihood of excessive heat being generated and it is unlikely that sufficient phosphine gas to form a flammable atmosphere with the air in the hold will be produced.

Piles of tablets usually occur when the fumigation operation is rushed by the fumigators; therefore, where practicable, it must be ensured that the fumigators are reminded to take their time to properly distribute the required number of tablets over or in the cargo, and that clusters of tablets are not set.

If cargo hold fire alarms are activated, smoke / vapour (considering that phosphine gas is colourless) is seen issuing from hold openings, or if hatch covers, coamings or the main deck in way of the holds are found to be warmer than normal, then the cause of the problem must be investigated whilst always taking all necessary safety precautions. Where smoke tube fire alarms are fitted, it needs to be considered that the system will be continuously drawing phosphine gas from the holds and venting this outside the accommodation superstructure, therefore the risk of using the system should be fully evaluated prior to fumigation commencing.

If problems develop it is recommended that expert advice be sought at the earliest opportunity as some actions, such as opening a hold access hatch, may cause the situation to deteriorate. In the event of a problem, it is recommended that, where possible, gas monitoring for oxygen, carbon monoxide and flammable gases (% LEL) is conducted on the problematic hold using a suitably calibrated gas detector to support the expert with their provision of assistance. As noted earlier, the presence of free water in contact with aluminum phosphide tablets will speed up the reaction causing higher temperatures and the production of more phosphine gas, heightening the possibility of a flammable atmosphere being formed in the hold. The cargo surface must therefore be kept dry, protected from precipitation during loading and, it should be considered that sweat may form on the cargo or on hold steelwork while the holds are sealed whilst fumigation is in progress. It must also be ensured that the vessel is cargo worthy, with weathertight hatch covers, vents and access hatches, to prevent water ingress into the holds. As an additional precautionary measure to reduce the potential for moisture laden air to enter the hold, Ram-nek tape or expanding foam can be added to hatch cover joints although the creation of a fully airtight hold could potentially present problems of overpressure or a vacuum forming in the hold because of temperature changes.

If it is necessary for crewmembers to handle the residue of spent aluminum phosphide tablets; then the fumigator's instructions in this regard should be followed as well as the guidance contained in the MSDS for the spent product. Appropriate safety measures should be followed and personal protective equipment, which will usually be cloth gloves and a dust mask, should be worn. It must also be noted that when aluminum phosphide residues are collected and stored together, they may spontaneously ignite due to the presence of unspent chemical.

The toxicity of phosphine gas must never be underestimated. Pure phosphine gas is odourless. The odour, often compared to the smell of garlic, carbide or decaying fish, is due to a contaminant, offering the advantage of serving as a warning to people. But it is important to know that the lack of odour does not guarantee that there is no dangerous gas. Odour may not be detected under all circumstances and the gassing may last much longer than the emission of the smell.

For further information, please refer to MSC 1/Circ. 1264 and MSC 1/Circ. 1396 as attached.



Ref. T3/1.01

MSC.1/Circ.1264
27 May 2008

**RECOMMENDATIONS ON THE SAFE USE OF PESTICIDES IN SHIPS
APPLICABLE TO THE FUMIGATION OF CARGO HOLDS**

1 The Maritime Safety Committee, at its sixty-second session (24 to 28 May 1993), approved the Recommendations on the safe use of pesticides in ships (MSC/Circ.612), proposed by the Sub-Committee on Containers and Cargoes at its thirty-second session.

2 The Maritime Safety Committee, at its eighty-fourth session (7 to 16 May 2008), approved the Recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo holds, which apply to carriage of solid bulk cargoes including grain in pursuance of the requirement of SOLAS regulation VI/4, proposed by the Sub-Committee on Dangerous Goods, Solid Cargoes and Containers at its twelfth session, set out in the annex.

3 The Committee agreed that the Recommendations should not apply to the carriage of fresh food produce under controlled atmosphere.

4 Member Governments are invited to bring the Recommendations to the attention of competent authorities, mariners, fumigators, fumigant and pesticide manufacturers and others concerned.

5 The present circular supersedes MSC/Circ.612, as amended by MSC/Circ.689 and MSC/Circ.746 with regard to the fumigation of cargo holds.

ANNEX

RECOMMENDATIONS ON THE SAFE USE OF PESTICIDES IN SHIPS APPLICABLE TO THE FUMIGATION OF CARGO HOLDS

1 INTRODUCTION

1.1 Insect and mite pests of plant and animal products may be carried into the cargo holds with goods (introduced infestation); they may move from one kind of product to another (cross-infestation) and may remain to attack subsequent cargoes (residual infestation). Their control may be required to comply with phytosanitary requirements to prevent spread of pests and for commercial reasons to prevent infestation and contamination of, or damage to, cargoes of human and animal food both raw and processed materials. Although fumigants may be used to kill rodent pests, the control of rodents on board ships is dealt with separately. In severe cases of infestation of bulk cargoes such as cereals, excessive heating may occur.

1.2 The following sections provide guidance to shipmasters in the use of pesticides* with a view to safety of personnel. They cover pesticides used for the control of insect** and rodent pests in empty and loaded cargo holds.

2 PREVENTION OF INFESTATION

2.1 Maintenance and sanitation

2.1.1 Ship cargo holds, tank top ceilings and other parts of the ship should be kept in a good state of repair to avoid infestation. Many ports of the world have rules and by-laws dealing specifically with the maintenance of ships intended to carry grain cargoes; for example, boards and ceilings should be completely grain-tight.

2.1.2 Cleanliness, or good housekeeping, is as important a means of controlling pests on a ship as it is in a home, warehouse, mill or factory. Since insect pests on ships become established and multiply in debris, much can be done to prevent their increase by simple, thorough cleaning. Box beams and stiffeners, for example, become filled with debris during discharge of cargo and unless kept clean can become a source of heavy infestation. It is important to remove thoroughly all cargo residue from deckhead frames and longitudinal deck girders at the time of discharge, preferably when the cargo level is suitable for convenient cleaning. Where available, industrial vacuum cleaners are of value for the cleaning of cargo holds and fittings.

2.1.3 The material collected during cleaning should be disposed of, or treated, immediately so that the insects cannot escape and spread to other parts of the ship or elsewhere. In port it may be burnt or treated with a pesticide, but in many countries such material may only be landed under phytosanitary supervision. If any part of the ship is being fumigated the material may be left exposed to the gas.

* The word *pesticide* as used throughout the text means fumigants. Examples of some commonly used pesticides are listed in appendix 1.

** The word *insect* as used throughout the text includes mites.

2.2 Main sites of infestation

2.2.1 *Tank top ceiling*: If, as often happens, cracks appear between the ceiling boards, food material may be forced down into the underlying space and serve as a focus of infestation for an indefinite period. Insects bred in this space can readily move out to attack food cargoes and establish their progeny in them.

2.2.2 *'Tween-deck centre lines, wooden feeders and bins* are often left in place for several voyages and because of their construction are a frequent source of infestation. After unloading a grain cargo, burlap and battens covering the narrow spaces between the planks should be removed and discarded before the holds are cleaned or washed down. These coverings should be replaced by new material in preparation for the next cargo.

2.2.3 *Transverse beams and longitudinal deck girders* which support the decks and hatch openings may have an L-shaped angle-bar construction. Such girders provide ledges where grain may lodge when bulk cargoes are unloaded. The ledges are often in inaccessible places overlooked during cleaning operations.

2.2.4 *Insulated bulkheads near engine-rooms*: When the hold side of an engine-room bulkhead is insulated with a wooden sheathing, the airspace and the cracks between the boards often become filled with grain and other material. Sometimes the airspace is filled with insulating material which may become heavily infested and serves as a place for insect breeding. Temporary wooden bulkheads also provide an ideal place for insect breeding, especially under moist conditions, such as when green lumber is used.

2.2.5 *Cargo battens*: The crevices at the sparring cleats are ideal places for material to lodge and for insects to hide.

2.2.6 *Bilges*: Insects in accumulations of food material are often found in these spaces.

2.2.7 *Electrical conduit casings*: Sometimes the sheet-metal covering is damaged by general cargo and when bulk grain is loaded later, the casings may become completely filled. This residual grain has often been found to be heavily infested. Casings that are damaged should be repaired immediately or, where possible, they should be replaced with steel strapping, which can be cleaned more easily.

2.2.8 Other places where material accumulates and where insects breed and hide include:

- The area underneath burlap, which is used to cover limber boards and sometimes to cover tank top ceilings.
- Boxing around pipes, especially if it is broken.
- Corners, where old cereal material is often found.
- Crevices at plate landings, frames and chocks.
- Wooden coverings of manholes or wells leading to double-bottom tanks or other places.
- Cracks in the wooden ceiling protecting the propeller shaft tunnel.
- Beneath rusty scale and old paint on the inside of hull plates.
- Shifting boards.
- Dunnage material, empty bags and used separation cloths.
- Inside lockers.

3 CHEMICAL CONTROL OF INSECT INFESTATION

3.1 Methods of chemical disinfection

3.1.1 *Types of pesticides and methods of insect control*

3.1.1.1 To avoid insect populations becoming firmly established in cargo holds and other parts of a ship, it is necessary to use some form of chemical toxicant for control. The materials available may be divided conveniently into two classes: contact insecticides and fumigants. The choice of agent and method of application depend on the type of commodity, the extent and location of the infestation, the importance and habits of the insects found, and the climatic and other conditions. Recommended treatments are altered or modified from time to time in accordance with new developments.

3.1.1.2 The success of chemical treatments does not lie wholly in the pesticidal activity of the agents used. In addition, an appreciation of the requirements and limitations of the different available methods is required. Crew members can carry out small-scale or “spot” treatments if they adhere to the manufacturer’s instructions and take care to cover the whole area of infestation. However, extensive or hazardous treatments including fumigation and spraying near human and animal food should be placed in the hands of professional operators, who should inform the master of the identity of the active ingredients used, the hazards involved and the precautions to be taken.

3.1.2 *Fumigants*

3.1.2.1 Fumigants act in a gaseous phase even though they may be applied as solid or liquid formulations from which the gas arises. Effective and safe use requires that the space being treated be rendered gastight for the period of exposure, which may vary from a few hours to several days, depending on the fumigant type and concentration used, the pests, the commodities treated and the temperature. Additional information is provided on two of the most widely used fumigants, Methyl bromide and Phosphine, in appendix 1.

3.1.2.2 Since fumigant gases are poisonous to humans and require special equipment and skills in application, they should be used by specialists and not by the ship’s crew.

3.1.2.3 Evacuation of the space under gas treatment is mandatory and in some cases it will be necessary for the whole ship to be evacuated (see 3.3.1 and 3.3.2 below).

3.1.2.4 A “fumigator-in-charge” should be designated by the fumigation company, government agency or appropriate authority. He should be able to provide documentation to the master proving his competence and authorization. The master should be provided with written instructions by the fumigator-in-charge on the type of fumigant used, the hazards to human health involved and the precautions to be taken, and in view of the highly toxic nature of all commonly used fumigants these should be followed carefully. Such instructions should be written in a language readily understood by the master or his representative.

3.2 Disinfestation of empty cargo holds

3.2.1 An empty cargo hold may be fumigated. Examples of some commonly used pesticides are listed in appendix 1. (For precautions before, during and after fumigation of cargo holds see 3.3 below.)

3.3 Disinfestation of cargoes and surrounds

3.3.1 *Fumigation with aeration (ventilation) in port*

3.3.1.1 Fumigation and aeration (ventilation) of empty cargo holds should always be carried out in port (alongside or at anchorage). Ships should not be permitted to leave port until gas-free certification has been received from the fumigator-in-charge.

3.3.1.2 Prior to the application of fumigants to cargo holds, the crew should be landed and remain ashore until the ship is certified “gas-free”, in writing, by the fumigator-in-charge or other authorized person. During this period a watchman should be posted to prevent unauthorized boarding or entry, and warning signs should be prominently displayed at gangways and at entrances to accommodation. A specimen of such a warning sign is given in appendix 2.

3.3.1.3 The fumigator-in-charge should be retained throughout the fumigation period and until such time as the ship is declared gas-free.

3.3.1.4 At the end of the fumigation period the fumigator will take the necessary action to ensure that the fumigant is dispersed. If crew members are required to assist in such actions, for example in opening hatches, they should be provided with adequate respiratory protection and adhere strictly to instructions given by the fumigator-in-charge.

3.3.1.5 The fumigator-in-charge should notify the master in writing of any spaces determined to be safe for re-occupancy by essential crew members prior to the aeration of the ship.

3.3.1.6 In such circumstances the fumigator-in-charge should monitor, throughout the fumigation and aeration periods, spaces to which personnel have been permitted to return. Should the concentration in any such area exceed the occupational exposure limit values set by the flag State regulations, crew members should be evacuated from the area until measurements show re-occupancy to be safe.

3.3.1.7 No unauthorized persons should be allowed on board until all parts of the ship have been determined gas-free, warning signs removed and clearance certificates issued by the fumigator-in-charge.

3.3.1.8 Clearance certificates should only be issued when tests show that all residual fumigant has been dispersed from empty cargo holds and adjacent working spaces and any residual fumigant material has been removed.

3.3.1.9 Entry into a space under fumigation should never take place except in the event of an extreme emergency. If entry is imperative the fumigator-in-charge and at least one other person should enter, each wearing adequate protective equipment appropriate for the fumigant used and a safety harness and lifeline. Each lifeline should be tended by a person outside the space, who should be similarly equipped.

3.3.1.10 If a clearance certificate cannot be issued after the fumigation of cargo in port, the provisions of 3.3.2 should apply.

3.3.2 *Fumigation continued in transit*

3.3.2.1 Fumigation in transit should only be carried out at the discretion of the master. This should be clearly understood by owners, charterers, and all other parties involved when considering the transport of cargoes that may be infested. Due consideration should be taken of this when assessing the options of fumigation. The master should be aware of the regulations of the flag State Administration with regard to in-transit fumigation. The application of the process should be with the agreement of the port State Administration. The process may be considered under two headings:

- .1 fumigation in which treatment is intentionally continued in a sealed space during a voyage and in which no aeration has taken place before sailing; and
- .2 in-port cargo fumigation where some aeration is carried out before sailing, but where a clearance certificate for the cargo hold(s) cannot be issued because of residual gas and the cargo hold(s) has been re-sealed before sailing.

3.3.2.2 Before a decision on sailing with a fumigated cargo hold(s) is made it should be taken into account that, due to operational conditions, the circumstances outlined in 3.3.2.1.2 may arise unintentionally, e.g., a ship may be required to sail at a time earlier than anticipated when the fumigation was started. In such circumstances the potential hazards may be as great as with a planned in-transit fumigation and all the precautions in the following paragraphs should be observed.

3.3.2.3 Before a decision is made as to whether a fumigation treatment planned to be commenced in port and continued at sea should be carried out, special precautions are necessary. These include the following:

- .1 at least two members of the crew (including one officer) who have received appropriate training (see 3.3.2.6) should be designated as the trained representatives of the master responsible for ensuring that safe conditions in accommodation, engine-room and other working spaces are maintained after the fumigator-in-charge has handed over that responsibility to the master (see 3.3.2.12); and
- .2 the trained representatives of the master should brief the crew before a fumigation takes place and satisfy the fumigator-in-charge that this has been done.

3.3.2.4 Empty cargo holds are to be inspected and/or tested for leakage with instruments so that proper sealing can be done before or after loading. The fumigator-in-charge, accompanied by a trained representative of the master or a competent person, should determine whether the cargo holds to be treated are or can be made sufficiently gastight to prevent leakage of the fumigant to the accommodation, engine-rooms and other working spaces in the ship. Special attention should be paid to potential problem areas such as bilge and cargo line systems. On completion of such inspection and/or test, the fumigator-in-charge should supply to the master for his retention a signed statement that the inspection and/or test has been performed, what provisions have been made and that the cargo holds are or can be made satisfactory for fumigation. Whenever a cargo

hold is found not to be sufficiently gastight, the fumigator-in-charge should issue a signed statement to the master and the other parties involved.

3.3.2.5 Accommodation, engine-rooms, areas designated for use in navigation of the ship, frequently visited working areas and stores, such as the forecastle head spaces, adjacent to cargo holds being subject to fumigation in transit should be treated in accordance with the provisions of 3.3.2.13. Special attention should be paid to gas concentration safety checks in problem areas referred to in 3.3.2.4.

3.3.2.6 The trained representatives of the master designated in 3.3.2.3 should be provided and be familiar with:

- .1 the information in the relevant Safety Data Sheet; and
- .2 the instructions for use, e.g., on the fumigant label or package itself, such as the recommendations of the fumigant manufacturer concerning methods of detection of the fumigant in air, its behaviour and hazardous properties, symptoms of poisoning, relevant first aid and special medical treatment and emergency procedures.

3.3.2.7 The ship should carry:

- .1 gas-detection equipment and adequate fresh supplies of service items for the fumigant(s) concerned as required by 3.3.2.12, together with instructions for its use and the occupational exposure limit values set by the flag State regulations for safe working conditions;
- .2 instructions on disposal of residual fumigant material;
- .3 at least four sets of adequate respiratory protective equipment; and
- .4 a copy of the latest version of the Medical First Aid Guide for Use in Accidents Involving Dangerous Goods (MFAG), including appropriate medicines and medical equipment.

3.3.2.8 The fumigator-in-charge should notify the master in writing of the spaces containing the cargo to be fumigated and also of any other spaces that are considered unsafe to enter during the fumigation. During the application of the fumigant the fumigator-in-charge should ensure that the surrounding areas are checked for safety.

3.3.2.9 If cargo holds are to be fumigated in transit:

- .1 After application of the fumigant, an initial check should be made by the fumigator-in-charge together with trained representatives of the master for any leak which, if detected, should be effectively sealed. When the master is satisfied that all precautions detailed in 3.3.2.1 to 3.3.2.12 have been fulfilled (refer to model checklist in appendix 3) then the vessel may sail. Otherwise, provisions outlined in 3.3.2.9.2 or 3.3.2.9.3 are to be followed.

If the provisions of 3.3.2.9.1 are not satisfied,

either:

.2 After application of fumigants, the ship should be delayed in port alongside at a suitable berth or at anchorage for such a period as to allow the gas in the fumigated cargo holds to reach sufficiently high concentrations to detect any possible leakage. Special attention should be paid to those cases where fumigants in a solid or liquid form have been applied which may require a long period (normally from 4 to 7 days unless a recirculation or similar distribution system is used) to reach such a high concentration that leakages can be detected. If leakages are detected, the ship should not sail until the source(s) of such leakages is(are) determined and eliminated. After ascertaining that the ship is in a safe condition to sail, i.e. no gas leakages are present, the fumigator-in-charge should furnish the master with a written statement that:

.2.1 the gas in the cargo hold(s) has reached sufficiently high concentrations to detect any possible leakages;

.2.2 spaces adjacent to the treated cargo hold(s) have been checked and found gas-free; and

.2.3 the ship's representative is fully conversant with the use of the gas-detection equipment provided.

or:

.3 After application of the fumigants and immediately after the sailing of the ship, the fumigator-in-charge should remain on board for such a period as to allow the gas in the fumigated cargo hold or spaces to reach sufficiently high concentrations to detect any possible leakage, or until the fumigated cargo is discharged (see 3.3.2.20), whichever is the shorter, to check and rectify any gas leakages. Prior to his leaving the ship, he should ascertain that the ship is in a safe condition, i.e. no gas leakages are present, and he should furnish the master with a written statement to the effect that the provisions of 3.3.2.9.2.1, 3.3.2.9.2.2 and 3.3.2.9.2.3 have been carried out.

3.3.2.10 On application of the fumigant, the fumigator-in-charge should post warning signs at all entrances to places notified to the master as in 3.3.2.8. These warning signs should indicate the identity of the fumigant and the date and time of fumigation. A specimen of such a warning sign is given in appendix 2.

3.3.2.11 At an appropriate time after application of the fumigant, the fumigator-in-charge, accompanied by a representative of the master, should check that accommodation, engine-rooms and other working spaces remain free of harmful concentrations of gas.

3.3.2.12 Upon discharging his agreed responsibilities, the fumigator-in-charge should formally hand over to the master in writing responsibility for maintaining safe conditions in all occupied spaces. The fumigator-in-charge should ensure that gas-detection and respiratory protection equipment carried on the ship is in good order, and that adequate fresh supplies of consumable items are available to allow sampling as required in 3.3.2.13.

3.3.2.13 Gas concentration safety checks at all appropriate locations, which should at least include the spaces indicated in 3.3.2.5, should be continued throughout the voyage at least at eight-hour intervals or more frequently if so advised by the fumigator-in-charge. These readings should be recorded in the ship's log-book.

3.3.2.14 Except in extreme emergency, cargo holds sealed for fumigation in transit should never be opened at sea or entered. If entry is imperative, at least two persons should enter, wearing adequate protection equipment and a safety harness and lifeline tended by a person outside the space, similarly equipped with protective, self-contained breathing apparatus.

3.3.2.15 If it is essential to ventilate a cargo hold or holds, every effort should be made to prevent a fumigant from accumulating in accommodation or working areas. Those spaces should be carefully checked to that effect. If the gas concentration in those areas at any time exceeds the occupational exposure limit values set by the flag State regulations, they should be evacuated and the cargo hold or cargo holds should be re-sealed. If a cargo hold is re-sealed after ventilation it should not be assumed that it is completely clear of gas and tests should be made and appropriate precautions taken before entering.

3.3.2.16 Prior to the arrival of the ship, generally not less than 24 hours in advance, the master should inform the appropriate authorities of the country of destination and ports of call that fumigation in transit is being carried out. The information should include the type of fumigant used, the date of fumigation, the cargo holds which have been fumigated, and whether ventilation has commenced. Upon arrival at the port of discharge, the master should also provide information as required in 3.3.2.6.2 and 3.3.2.7.2.

3.3.2.17 On arrival at the port of discharge the requirements of receiving countries regarding handling of fumigated cargoes should be established. Before entry of fumigated cargo holds, trained personnel from a fumigation company or other authorized persons, wearing respiratory protection, should carry out careful monitoring of the spaces to ensure the safety of personnel. The monitored values should be recorded in the ship's log-book. In case of need or emergency the master may commence ventilation of the fumigated cargo holds under the conditions of 3.3.2.15, having due regard for the safety of personnel on board. If this operation is to be done at sea, the master should evaluate weather and sea conditions before proceeding.

3.3.2.18 Only mechanical unloading that does not necessitate entry of personnel into the cargo holds of such fumigated cargoes should be undertaken. However, when the presence of personnel in cargo holds is necessary for the handling and operation of unloading equipment, continuous monitoring of the fumigated spaces should be carried out to ensure the safety of the personnel involved. When necessary, these personnel should be equipped with adequate respiratory protection.

3.3.2.19 During the final stages of discharge, when it becomes necessary for personnel to enter the cargo holds, such entry should only be permitted subsequent to verification that such cargo holds are gas-free.

3.3.2.20 Upon completion of discharge and when the ship is found free of fumigants and certified as such, all warning signs should be removed. Any action in this respect should be recorded in the ship's log-book.

4 REGULATIONS FOR THE USE OF PESTICIDES

4.1 National and international controls on pesticide usage

4.1.1 In many countries the sale and use of pesticides are regulated by governments to ensure safety in application and prevention of contamination of foodstuffs. Among the factors taken into account in such regulations are the recommendations made by international organizations such as FAO and WHO, especially in regard to maximum limits of pesticide residues in food and foodstuffs.

4.1.2 Examples of some commonly used pesticides are listed in appendix 1. Pesticides should be used strictly in accordance with the manufacturer's instructions as given on the label or package itself. National regulations and requirements vary from one country to another; therefore particular pesticides which may be used for treatment of cargo holds and accommodation in ships may be limited by the regulations and requirements of:

- .1 the country where the cargo is loaded or treated;
- .2 the country of destination of the cargo, especially in regard to pesticide residues in foodstuffs; and
- .3 flag State of the ship.

4.1.3 Ships' masters should ensure that they have the necessary knowledge of the above regulations and requirements.

5 SAFETY PRECAUTIONS – GENERAL

5.1 Fumigation

5.1.1 Ship's personnel should not handle fumigants and such operations should be carried out only by qualified operators. Personnel allowed to remain in the vicinity of a fumigation operation for a particular purpose should follow the instructions of the fumigator-in-charge implicitly.

5.1.2 Aeration of treated cargo holds should be completed and a clearance certificate issued as in 3.3.1.8 or 3.3.1.10 before personnel are permitted to enter.

5.2 Exposure to pesticides resulting in illness

5.2.1 In the case of exposure to pesticides and subsequent illness, medical advice should be sought immediately. Information on poisoning may be found in the Medical First Aid Guide for Use in Accidents Involving Dangerous Goods (MFAG) or on the package (manufacturer's instructions and safety precautions on the label or the package itself).

APPENDIX 1

FUMIGANTS SUITABLE FOR SHIPBOARD USE

The materials listed should be used strictly in accordance with the manufacturer's instructions and safety precautions given on the label or package itself, especially in respect of flammability, and with regard to any further limitations applied by the law of the country of loading, destination or flag of the ship, contracts relating to the cargo, or the shipowner's instructions.

1 Fumigants against insects in empty cargo holds

TO BE APPLIED ONLY BY QUALIFIED OPERATORS

- Carbon dioxide
- Nitrogen
- Methyl Bromide and carbon dioxide mixture
- Methyl Bromide
- Hydrogen cyanide
- Phosphine

2 Fumigants against insects in loaded or partially loaded cargo holds

CARE IS NEEDED IN SELECTING TYPES AND AMOUNTS OF FUMIGANTS FOR TREATMENT OF PARTICULAR COMMODITIES

- Carbon dioxide
- Nitrogen
- Methyl Bromide and carbon dioxide mixture
- Methyl Bromide
- Phosphine

3 Fumigant information

3.1 *Methyl Bromide*

Methyl Bromide is used in situations where a rapid treatment of commodities or space is required. It should not be used in spaces where ventilation systems are not adequate for the removal of all gases from the free space. In-ship in-transit fumigations with Methyl Bromide should not be carried out. Fumigation with Methyl Bromide should be permitted only when the ship is in the confines of a port (either at anchor or alongside) and to disinfest before discharge, once crew members have disembarked (see 3.1.2.3). Prior to discharge, ventilation must be done, forced if necessary, to reduce the gaseous residues below the occupational exposure limit values set by the flag State regulations in the free spaces. (See procedures for ventilation in 3.3.2.17 to 3.3.2.19).

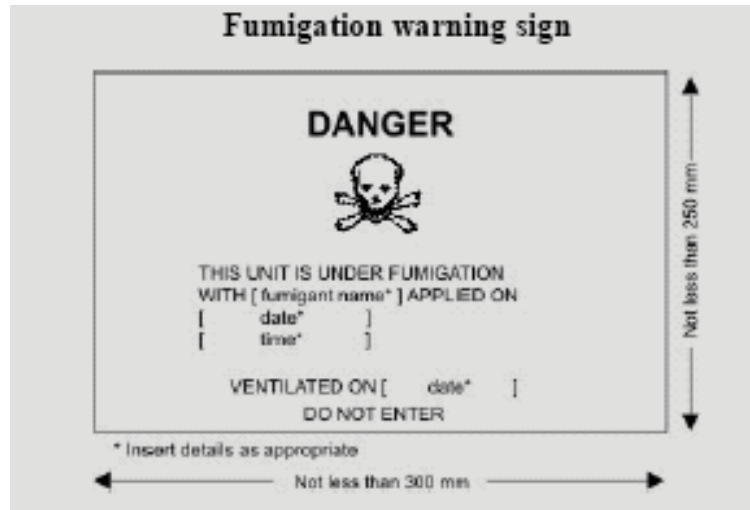
3.2 *Phosphine*

3.2.1 A variety of Phosphine-generating formulations are used for in-ship in-transit or at-berth fumigations. Application methods vary widely and include surface-only treatment, probing, perforated tubing laid at the bottom of spaces, recirculation systems and gas-injection systems or their combinations. Treatment times will vary considerably depending on the temperature, depth of cargo and on the application method used.

3.2.2 Any discharge of active packages producing Phosphine gas represents a significant risk to the public who may encounter them at sea. It should therefore be ensured that all waste and residues are disposed of in an appropriate manner, either by incineration or by disposal on shore, as recommended by the manufacturer. **Clear written instructions must be given to the master of the ship, to the receiver of the cargo and to the authorities at the discharging port as to how any powdery residues are to be disposed of.**

3.2.3 These will vary with each formulation and the method of application. Prior to discharge, ventilation must be done, forced if necessary, to reduce the gaseous residues below the occupational exposure limit values set by the flag State regulations in the free spaces (see procedures for ventilation in 3.3.2.17 to 3.3.2.19). For safety aspects during the voyage see 3.3.2.3.

APPENDIX 2



APPENDIX 3
MODEL CHECKLIST FOR IN-TRANSIT FUMIGATION

Date:
 Port: Terminal/Quay:
 Ship's name:
 Type of fumigant: Method of application:
 Date & time fumigation commenced:
 Name of fumigator/company:

The master and fumigator-in-charge, or their representatives, should complete the checklist jointly. The purpose of this checklist is to ensure that the responsibilities and requirements of 3.3.2.11, and 3.3.2.12 are carried out fully for in-transit fumigation under section 3.3.2.9.

Safety of operations requires that all questions should be answered affirmatively by ticking the appropriate boxes. If this is not possible, the reason should be given and agreement reached upon precautions to be taken between ship and fumigator-in-charge. If a question is considered to be not applicable write "n/a", explaining why, if appropriate.

PART A: BEFORE FUMIGATION

	SHIP	FUMIGATOR- IN-CHARGE
1 The inspection required before loading has been performed (3.3.2.4)	[]	[]
2 All the cargo holds to be fumigated are satisfactory for fumigation	[]	[]
3 Spaces, where found not to be satisfactory, have been sealed	[]	[]
4 The master or his trained representatives have been made aware of the specific areas to be checked for gas concentrations throughout the fumigation period	[]	[]
5 The master or his trained representatives have been made familiar with the fumigant label, detection methods, safety procedures and emergency procedures (refer to 3.3.2.6)	[]	[]
6 The fumigator-in-charge has ensured that gas-detection and respiratory protection equipment carried on the ship is in good order, and that adequate fresh supplies of consumable items for this equipment are available to allow sampling as required by 3.3.2.13.	[]	[]
7 The master has been notified in writing of:		
(a) the spaces containing cargo to be fumigated	[]	[]
(b) any other spaces that are considered unsafe to enter during the fumigation	[]	[]

PART B: AFTER FUMIGATION

The following procedure should be carried out after application of fumigant and closing and sealing of cargo holds.

	SHIP	FUMIGATOR- IN-CHARGE
8 Presence of gas has been confirmed inside each hold under fumigation	[]	[]
9 Each hold has been checked for leakage and sealed properly	[]	[]
10 Spaces adjacent to the treated cargo holds have been checked and found gas-free	[]	[]
11 The responsible crew members have been shown how to take gas readings properly when gas is present and they are fully conversant with the use of gas-detection equipment provided	[]	[]
12 Methods of application:		
(a) Surface application method	[]	[]
Initial rapid build-up of the gas in the upper regions of hold airspace with subsequent penetration downward of the gas over a longer period		
or		
(b) Deep probing	[]	[]
More rapid dispersion of gas than in (a) with lower concentrations in upper regions of airspace in the hold		
or		
(c) Recirculation	[]	[]
Rapid dispersion of gas throughout hold but at lower initial gas levels with subsequent build-up of gas levels which, however, may be lower due to even distribution		
or		
(d) Other	[]	[]
13 The master or trained representatives have been briefed fully on the method of application and the spread of the gas throughout the hold	[]	[]
14 The master or trained representatives have been made:		
(a) aware that even though the initial check may not indicate any leaks, it is essential that monitoring is to be continued in the accommodation, engine-room, etc. because gas concentrations may reach their highest levels after several days	[]	[]
(b) aware of the possibility of the spreading of gas throughout the duct keel and/or ballast tanks	[]	[]
15 The fumigator-in-charge has supplied a signed statement to the master conforming to the requirements of 3.3.2.12 for his retention	[]	[]
The above has been agreed:		
Time:		Date:
For Ship:		Fumigator-in-charge:
Rank:		

4 ALBERT EMBANKMENT
LONDON SE1 7SR
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

MSC.1/Circ.1396
16 June 2011

AMENDMENT TO THE RECOMMENDATIONS ON THE SAFE USE OF PESTICIDES IN SHIPS APPLICABLE TO THE FUMIGATION OF CARGO HOLDS (MSC.1/CIRC.1264)

1 The Maritime Safety Committee, at its eighty-fourth session (7 to 16 May 2008), approved the Recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo holds (MSC.1/Circ.1264), which apply to the carriage of solid bulk cargoes, including grain, in pursuance of the requirement of SOLAS regulation VI/4.

2 The Maritime Safety Committee, at its eighty-ninth session (11 to 20 May 2011), approved the following amendment to section 5 (Safety Precautions – General) of the aforementioned Recommendations, as prepared by the Sub-Committee on Dangerous Goods, Solid Cargoes and Containers (DSC) at its fifteenth session:

"5.3 Fire risk

5.3.1 When Phosphine generating formulations are used to fumigate, any collected residue may ignite."

3 Member Governments are invited to bring the above amendment to the Recommendations to the attention of competent authorities, seafarers, fumigators, fumigant and pesticide manufacturers and others concerned.