



REPUBLIC OF
THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Notice

No. 2-011-2

Rev. Dec/2016

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS

SUBJECT: International Maritime Dangerous Goods Code and Medical Oxygen Cylinder Requirements

- References:**
- (a) SOLAS, *International Convention for the Safety of Life at Sea*, Consolidated Edition 2014, as amended
 - (b) **IMDG Code**, *International Maritime Dangerous Goods Code*, 2016 Edition, as amended
 - (c) **IMDG Code**, *Supplement 2014 Edition*, as amended
 - (d) **IMSBC Code**, *International Maritime Solid Bulk Cargoes Code*, 2016 Edition, as amended
 - (e) **IGC Code**, *International Code for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk*, 2016 Edition, as amended
 - (f) **RMI Maritime Act** ([MI-107](#)), Chapter 4, Part I, §404
 - (g) **RMI Maritime Regulations** ([MI-108](#)), §2.13.4

PURPOSE

This Notice provides the International Maritime Dangerous Goods Code (“IMDG Code” or “Code”) requirements for Republic of the Marshall Islands (RMI)-flagged vessels; including requirements for oxygen cylinders. This Notice supersedes Rev. 01/15. It reflects amendments from the International Maritime Organization (IMO)’s 96th meeting of the Marine Safety Committee (MSC 96); including 38-16, which replaces the IMDG Code in its entirety. In accordance with the [IMDG Code Amendment Cycle](#), these measures may be voluntarily applied starting **01 January 2017**, and will become mandatory on **01 January 2018**.

APPLICABILITY

The provisions contained in the IMDG Code are applicable to all vessels to which the International Convention for the Safety of Life at Sea (SOLAS), as amended, applies and which are carrying dangerous goods (as defined in Chapter VII-1, Part A of that Convention). Dangerous goods means the substances, materials, and articles covered by the IMDG Code.

All vessels, regardless of type and size, carrying substances, material, or articles identified in the IMDG Code as marine pollutants are subject to the provisions of this Code. Marine pollutants mean substances which are subject to the provisions of the International Convention for the Prevention of Pollution from Ships, 1973 (MARPOL), Annex III (*Regulations for the Prevention of Pollution by Harmful Substances Carried by Sea in Packaged Form*), as amended.

REQUIREMENTS

1.0 General

- 1.1 Dangerous goods and marine pollutants shall be carried and shipped in accordance with the IMDG Code, as amended.
- 1.2 The IMDG Code is legally treated as a mandatory instrument under Chapter VII of SOLAS. However, certain provisions of the Code remain recommendatory and should be treated as such. These recommendatory provisions are contained in Chapter 1.1 of the IMDG Code, and are as follows:
- paragraph 1.1.1.8 (Notification of infringements);
 - paragraphs 1.3.1.4 to 1.3.1.7 (Training);
 - chapter 1.4 (Security provision) except 1.4.1.1, which is mandatory;
 - section 2.1.0 of chapter 2.1 (class 1-explosives, introductory notes);
 - section 2.3.3 of chapter 2.3 (Determination of flashpoint);
 - columns (15) and (17) of the Dangerous Goods List in chapter 3.2;
 - the segregation flow chart and example in the annex to chapter 7.2;
 - section 5.4.5 of chapter 5.4 (multimodal Dangerous Goods Form), as far as the layout of the form is concerned;
 - chapter 7.8 (Special provisions in the event of an incident and fire precautions involving dangerous goods);
 - section 7.9.3 (Contact information for the main designated national competent authorities); and
 - appendix B.
- 1.3 Compliance with all relevant requirements of SOLAS, Chapter II-2: *Construction – Fire Protection, Fire Detection, and Fire Extinction*, as amended, is required.

2.0 Carriage of Publications

- 2.1 The IMDG Code (Volume 1, Volume 2, and the Supplement) shall be carried on board all RMI vessels to which the IMDG Code applies. Electronic or hard copy versions are acceptable. Notwithstanding, as a result of the IMDG Code Amendment Cycle, during 2017 (a transition year), the 2014 or 2016 edition may be carried, as applicable. During 2018, only the 2016 version, which becomes mandatory that year, shall be carried.

3.0 Medical Oxygen Cylinders

- 3.1 The Medical First Aid Guide (MFAG) refers to the substances, material, and articles covered by the IMDG Code, and the materials covered by Appendix 1 of the International Maritime Solid Bulk Cargoes (IMSBC) Code, for those cargoes identified as being in Group B (cargoes which possess a chemical hazard). Section 1, paragraph 1.7 of the IMSBC Code provides full definitions for cargo Groups A, B, and C.
- 3.2 Vessels that fall under Column A or B of the MFAG Appendix 14 (IMDG Code) – List of Equipment, are required to carry a minimum of 44 liters/200 bar oxygen as follows:
- one (1) 40 liter/200 bar medical oxygen cylinder located in the vessel's hospital, assembled for direct use, equipped with one (1) flowmeter unit (two (2) ports) for supplying oxygen for two (2) persons simultaneously; and
 - one (1) complete portable set, ready for use, with a 2 liter/200 bar medical oxygen cylinder and a spare cylinder (also 2 liter/200 bar).
- 3.3 The single 40 liter/200 bar medical oxygen cylinder may be substituted with either two (2) 20 liter/200 bar cylinders or four (4) 10 liter/200 bar cylinders, provided the equipment/flowmeter units are arranged to supply oxygen to two (2) persons simultaneously.
- 3.4 The cylinders are to be hydrostatically tested every five (5) years, or at an interval specified by the manufacturer, whichever occurs sooner.
- 3.5 The contents of the cylinders are to be checked and changed as required per manufacturer's requirements, or every three (3) years, whichever occurs sooner.
- 3.6 The entire system is to be inspected annually by a competent person in accordance with manufacturer's instructions.
- 3.7 It would be acceptable for a vessel which has been issued with a valid Document of Compliance for Dangerous Goods not to carry the medical oxygen cylinders while the vessel does not actually load, carry or discharge any such dangerous goods. Under these circumstances however, the shipboard Safety Management System (SMS) shall include provisions which ensure that the cylinders/system will be provided onboard before the vessel commences any of the above operations with dangerous goods.
- 3.8 The RMI Maritime Administrator (the "Administrator") interprets the MFAG as being applicable to all vessels carrying cargoes which have a United Nations (UN) number. In this respect, it is noted that the introduction to the MFAG states that it should be used in conjunction with the information provided in the IMDG Code, the IMSBC Code, the Emergency Procedures for Ships Carrying Dangerous Goods (EmS), the International Bulk Chemical (IBC) Code, and the International Code for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (IGC Code). The revised IGC Code, adopted by IMO Resolution [MSC.370\(93\)](#), *Amendments to the International Code*

for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (IGC Code), which entered into force on 01 January 2016 for new ships, refers to the MFAG in the text of paragraph 14.2.2, effectively making it mandatory for gas carriers:

14.2 First-aid equipment

14.2.2 The ship shall have onboard medical first aid equipment, including oxygen resuscitation equipment, based on the requirements of the Medical First Aid Guide (MFAG) for the cargoes listed on the International Certificate of Fitness for the Carriage of Liquefied Gases in Bulk shown in appendix 2.

Because of the revised text, the Administrator considers that the intention of IMO was that the medical oxygen carriage requirements of the MFAG should be applied to gas carriers and chemical tankers as well.

3.9 In accordance with IMO Resolution [MSC.370\(93\)](#), the IGC Code became applicable to ships whose keels were laid, or which were at a similar stage of construction where:

- construction identifiable with the ship began; and
- assembly of that ship commenced, comprising at least 50 tonnes or 1% of the estimated mass of all structural material, whichever is less,

on or after **01 July 2016**.

3.10 Therefore, compliance with the requirements of §3.0 of this Notice on Medical Oxygen Cylinders shall apply to new gas carriers and chemical tankers constructed on and after **01 July 2016**.

3.11 For existing gas carriers and chemical tankers, which are not currently provided with medical oxygen, compliance shall be required at the next intermediate or renewal survey after **01 July 2016**.