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BLG.1/Circ.33
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**DECISIONS WITH REGARD TO THE CATEGORIZATION
AND CLASSIFICATION OF PRODUCTS**

1 The Sub-Committee on Bulk Liquids and Gases (BLG), at its fifteenth session (7 to 11 February 2011), approved the issuance of a BLG Circular on Decisions with regard to the categorization and classification of products, as set out at annex, which was subsequently endorsed by the Maritime Safety Committee, at its eighty-ninth session, and the Marine Environment Protection Committee, at its sixty-second session.

2 Member Governments are invited to bring the attached information on Decisions with regard to the categorization and classification of products to the attention of all stakeholders concerned with the classification of Noxious Liquid Substances.

ANNEX

DECISIONS WITH REGARD TO THE CATEGORIZATION AND CLASSIFICATION OF PRODUCTS

Reference is made to documents BLG/Circ.15, BLG 11/3/2, BLG 12/3, BLG 14/3 and BLG 15/3 for further background on the relevant decisions.

- .1 "NI" in column A2 should be regarded as "NR" (Not Readily Biodegradable).
- .2 "NI" in column B2:
 - .1 if, in the GESAMP Hazard Profile, column B2 is "NI" or column A1 is "NI" or column A2 is "NI" then there is not enough data to apply the GHS criteria and so the product is deemed to have chronic toxicity to aquatic organisms; but
 - .2 if the aquatic LC₅₀ is <100 mg/l (column B1 is 2, 3, 4, 5 or 6) and the product is Not Readily Biodegradable (column A2 is "NR") or the product is bioaccumulative (column A1 is 4, 5 or 6), then the product is deemed to have a chronic toxicity of <1 mg/l which is equivalent to a "1" in column B2. Otherwise, the product is deemed not to have chronic toxicity.
- .3 "NI" in column E2 should be regarded as "F" or "S" (Floater or Sinkers), however, during the classification revision process it was agreed to qualify floaters, based on their properties, either as an F or as an Fp (persistent floater). Since an F alone has no impact on the assignment of ship typing, NI in column E2 should be regarded as Fp.
- .4 "NI" in other columns used for classification purposes should be regarded as insufficient data to permit proper classification.
- .5 GESAMP Hazard Profiles with ratings in brackets (indicating estimated values) are treated in the same manner as ratings without brackets for the purposes of product classification.
- .6 Only the ratings "R" and "NR" are used in column A2 for categorization purposes and so it is necessary to translate the notation "Inorg" into a rating that can be used for categorization. The rating of "Inorg," is taken to mean a product would be readily biodegradable.
- .7 When a material has floater characteristics but this is combined with dissolution or evaporation properties (having an FD, FE or FED rating for column E2 in the GESAMP Hazard Profile), consideration of this combined rating should not trigger a Pollution Category Y on the basis of the F reference presented in column E2 of the hazard profile in view of the substance's associated properties and behaviour.
- .8 When assigning the pollution category of a product in relation to the condition "not Fp, F or S (if not organic)" as set out in rule 13 of Appendix 1 to MARPOL Annex II, it was confirmed that "if not organic" has the same meaning as "unless inorganic".

- .9 Procedures for estimating acute inhalation toxicity ratings are reflected in the report of the forty-first session of the GESAMP/EHS Working Group (BLG/Circ.15, annex 3). The decision table utilized for this purpose which is based on C1/C2 and D1/D2 ratings is shown below:

Highest Oral and/or Dermal ratings for Columns C1 and/or C2	Highest Skin and/or Eye irritation ratings for Columns D1 and/or D2	Proposed estimated Acute Inhalation Toxicity rating for Column C3
0	0	0
	1	1
	2	2
	3	3
1	0	1
	1	2
	2	
	3	3
2	0	2
	1	
	2	3
	3	
3	0	3
	1	4
	2	
	3	
4	0	4
	1	
	2	
	3	

- .10 In the case of inorganic brines where it can be shown that the salts concerned are non-volatile and that there is a minimal risk of generating aerosols or mists from solutions during transport and transfer, the provisions in chapter 21 of the IBC Code (paragraph 21.1.3), where human factors or other factors indicate a need for alternative arrangements to be followed when assessing carriage requirements, should be considered. Based on the following criteria:

- .1 the substance itself has low volatility and high stability under ambient temperature and pressure conditions; and
- .2 the solution does not produce toxic vapours,

it may be appropriate that a requirement for controlled venting or gauging or operational requirements in relation to the inhalation toxicity (C3) rating are not required. If this approach is followed, to formalize this position, a footnote/reference indicating this by using the wording below, should be associated with the product entry:

"With reference to chapter 21 of the IBC Code (paragraph 21.1.3) deviations from the normal assignment criteria used for some carriage requirements have been implemented."

It should be noted that use of the above reference is not intended for tripartite agreements but only for products which have been assessed and agreed by the ESPH Working Group.

- .11 When products are shipped not in pure form but only as components in mixtures it is only necessary to have ratings in columns A1, A2, B1, B2, D3 and E2. The Ship Type of these products can be established based on the GESAMP/EHS report, after which the entry will be included in annex 5 to the MEPC.2/Circ. and can be used for mixture calculation purposes. If the component presents a safety hazard this should be taken into account. Submissions to GESAMP/EHS should clearly state the application relates to a reduced hazard profile for annex 5 purposes.
- .12 In cases where products which contain mineral oil are proposed as entries for List 1 but the products are not conventional mixtures since the oil is a diluent which is present as a necessary consequence of manufacture and hence effectively integral to the product concerned, the term mineral oil does not need to be reflected in the product name.
- .13 As the boiling point of a product is not always less than its autoignition temperature, boiling point should not be used to estimate flammability criteria. Additionally,
 - .1 if the autoignition temperature is $>200^{\circ}\text{C}$, then an accurate value does not need to be provided unless the flash point is $\leq 60^{\circ}\text{C}$, when it is required to assign electrical apparatus; and
 - .2 if the autoignition temperature is $\leq 200^{\circ}\text{C}$, then an accurate value is needed to assign certain carriage requirements.
- .14 Column "I" of chapter 17 of the IBC Code should list all suitable fire-fighting media in order to allow an appropriate type to be selected for the range of products to be carried on a ship. Although in paragraph 21.4.12.1 of the IBC Code it states that "all appropriate media shall be listed", with respect to the need to specify Dry Chemical (D) usage, this should not be used unless the Water Reactivity Index (WRI) condition is invoked (WRI to be ≥ 1).
