IMO Training for Shippers of Dangerous Goods by Vessel

What are the regulations? What training is required?

The International Maritime Organization (IMO) is an agency of the United Nations that regulates the international transportation of dangerous goods by vessel. You must comply with IMO’s Dangerous Goods Code (IMDG Code) if you ship dangerous goods by vessel in international waters.

Subsection 1.3.1.1: “Shore-based personnel engaged in the transport of dangerous goods intended to be transported by sea shall be trained in the contents of dangerous goods provisions commensurate with their responsibilities.”

IMDG Code training must be provided prior to performing a regulated function unless that person is “…under the direct supervision of a trained person.” and at least every three years thereafter.

What must be included in IMDG Code training?

The IMDG Code requires that dangerous goods training include:

- General Awareness/Familiarization.
- Function-Specific Responsibilities.
- Safety/Emergency Response (recommended)
- Security General Awareness.

The last two components may be addressed by the HazMat Employee training required by the USDOT.

The purpose of IMDG Code training is for any employee involved in the transportation of a dangerous good by vessel to be knowledgeable of the regulations applicable to its transportation and is able to safely offer a dangerous good for transport by vessel.
Dangerous good is the term used by the international community to describe what USDOT defines as a hazardous material. For the most part they are very similar and include many common articles and substances used by industry: paints, resins, solvents, acid, adhesives, plating solutions, bleach, floor cleaners, wastewater treatment chemicals, process water additives, pesticides, welding gases, aerosols, lithium batteries, and more…

There are differences, however, between the IMDG Code and the regulations of the USDOT for the classification and identification of a hazardous material/dangerous good. One significant difference between the two is in how a marine pollutant is identified, with the IMDG Code having a classification that is much more stringent and broad than that of the USDOT.

The IMDG Code is an international regulation that is updated every two years and is authorized by most nations—including the U.S.—for the international transportation of dangerous goods by vessel. By treaty, and codified at 49 CFR 171.25, USDOT authorizes the IMDG Code for the transportation of HazMat within the U.S.—by any mode: water, rail, air, and highway—as long as certain restrictions and limitations are met. Therefore, it is quite possible that a shipment of dangerous goods that never leaves the U.S. is transported in compliance with the IMDG Code and not the Hazardous Material Regulations (HMR) of the USDOT. However, the international transportation by vessel of a dangerous good must comply with the IMDG Code.

Are dangerous goods under IMO the same as hazardous materials?

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What are shore-side personnel (aka: shore-based personnel)?

Shore-side personnel are those involved in the transport of a dangerous good by sea but are not crew members of the vessel, i.e. they stay on shore. It includes those who prepare a dangerous good for transportation by vessel and those working at the docks both loading and unloading vessels. The IMDG Code mandates that shore-side personnel correctly complete the following for all dangerous goods offered for international transportation by vessel:

- Classify and identify the dangerous good.
- Select, fill, & close the packaging.
- Mark, label, and placard all packages.
- Complete the necessary documentation.
- Determine segregation and vessel stowage requirements.

IMDG Code and the Hazardous Material Regulations

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