

SOUTH AFRICAN
MARITIME SAFETY
AUTHORITY



2nd National Dangerous Goods Awareness Day

IMDG Code

Presented by Capt. Winston Lobo

29 October 2025

SAFE SHIPS • CLEAN SEAS



Introduction - IMDG Code

The carriage of dangerous goods at sea is primarily governed by the International Maritime Dangerous Goods (IMDG) Code.

SOLAS, Chapter VI - Carriage of Cargoes and Oil Fuels, Part A Carriage of Dangerous Goods in Packaged Form makes provisions for the IMDG Code “IMDG Code” to be made mandatory.

The Code mandates standards for classification, documentation, packaging, and emergency response, and is legally binding for all signatories of the SOLAS Convention.

Furthermore, Annex III of the International Convention for the Prevention of Pollution from Ships, 1973, (MARPOL), contains regulations relating to the prevention of pollution by harmful substances carried by sea in packaged form, which also extends to the IMDG Code.





South African Maritime Safety Authority (SAMSA)

The South African Maritime Safety Authority (“SAMSA”) was established in terms of SAMSA Act, 1998 as a juristic person on 1 April 1998.

The objectives of the Authority are -

- (a) to ensure safety of life and property at sea;
- (b) to prevent and combat pollution of the marine environment by ships; and
- (c) to promote the Republic’s maritime interests.

The Authority's mandate is to ensure compliance with international conventions domesticated in local legislation on board ships calling at ports within the Republic.



International Maritime Organization (IMO)



IMO Objectives:

Safe, Secure and Efficient Shipping on Clean Oceans



International Maritime Organization (IMO)

The IMO is a specialized agency of the United Nations, responsible for measures to improve the safety and security of international shipping and to prevent pollution from ships.

Established by means of a Convention adopted under the auspices of the United Nations in Geneva on 17 March 1948 and met for the first time in January 1959.

Membership of the IMO:

176 Member States, 3 Associate Members,

67 IGOs and 88 NGOs have consultative status

Observers from inter-governmental organizations (e.g. IHO, EC,...)

Observers from non-governmental organizations in consultative status (e.g. ISO, IACS, ICS, etc.)



What does IMO do?

When IMO first began operations, its chief concern was to develop international treaties and other legislation concerning safety and marine pollution prevention.

By the late 1970s, however, this work had been largely completed, though a number of important instruments.

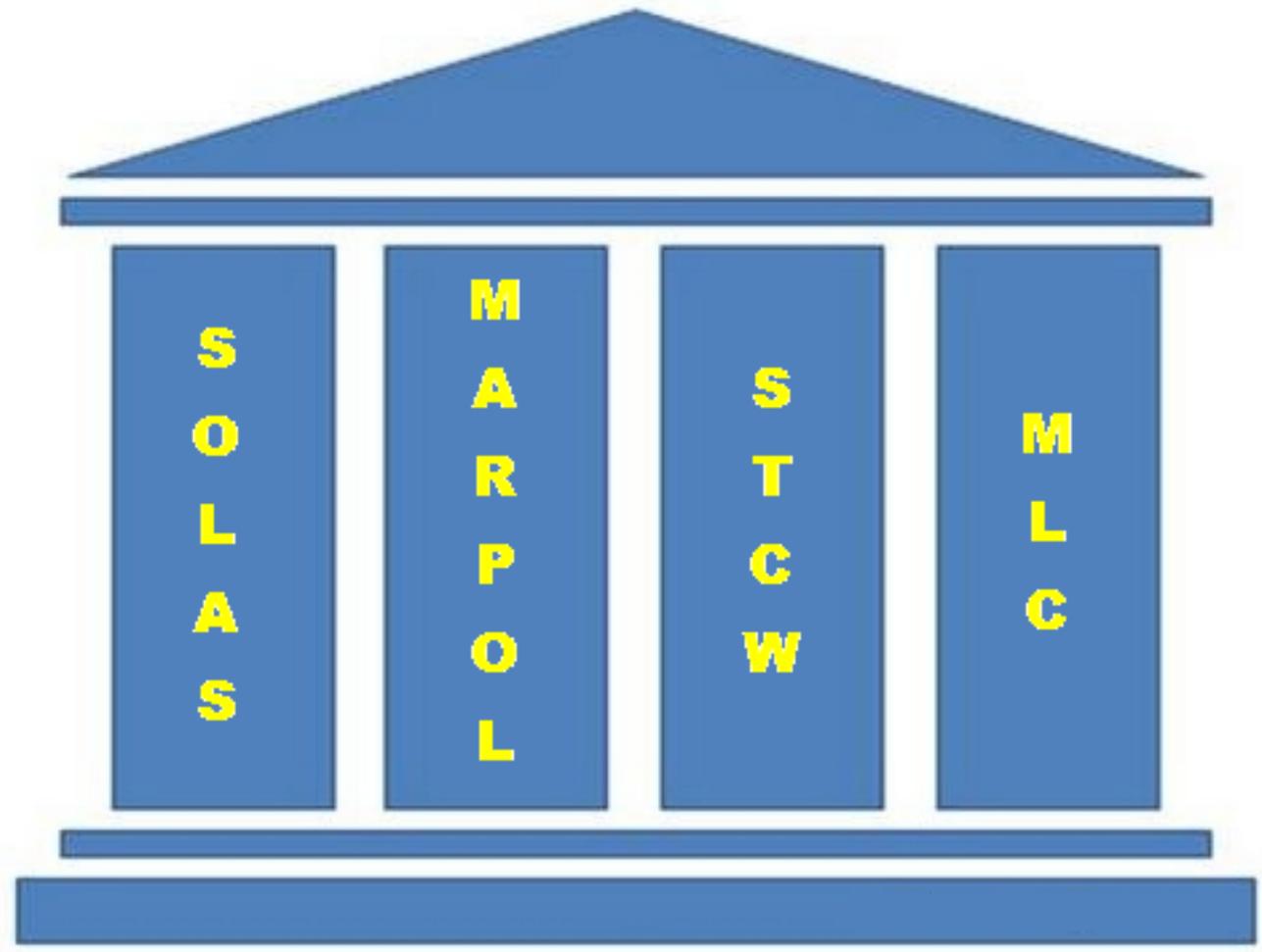
IMO is now concentrating on keeping legislation up to date and ensuring that it is ratified by as many countries as possible. This has been so successful that many Conventions now apply to more than 98% of world merchant shipping tonnage.

Currently the emphasis is on ensuring these conventions and other treaties are properly implemented by the countries that have ratified them.



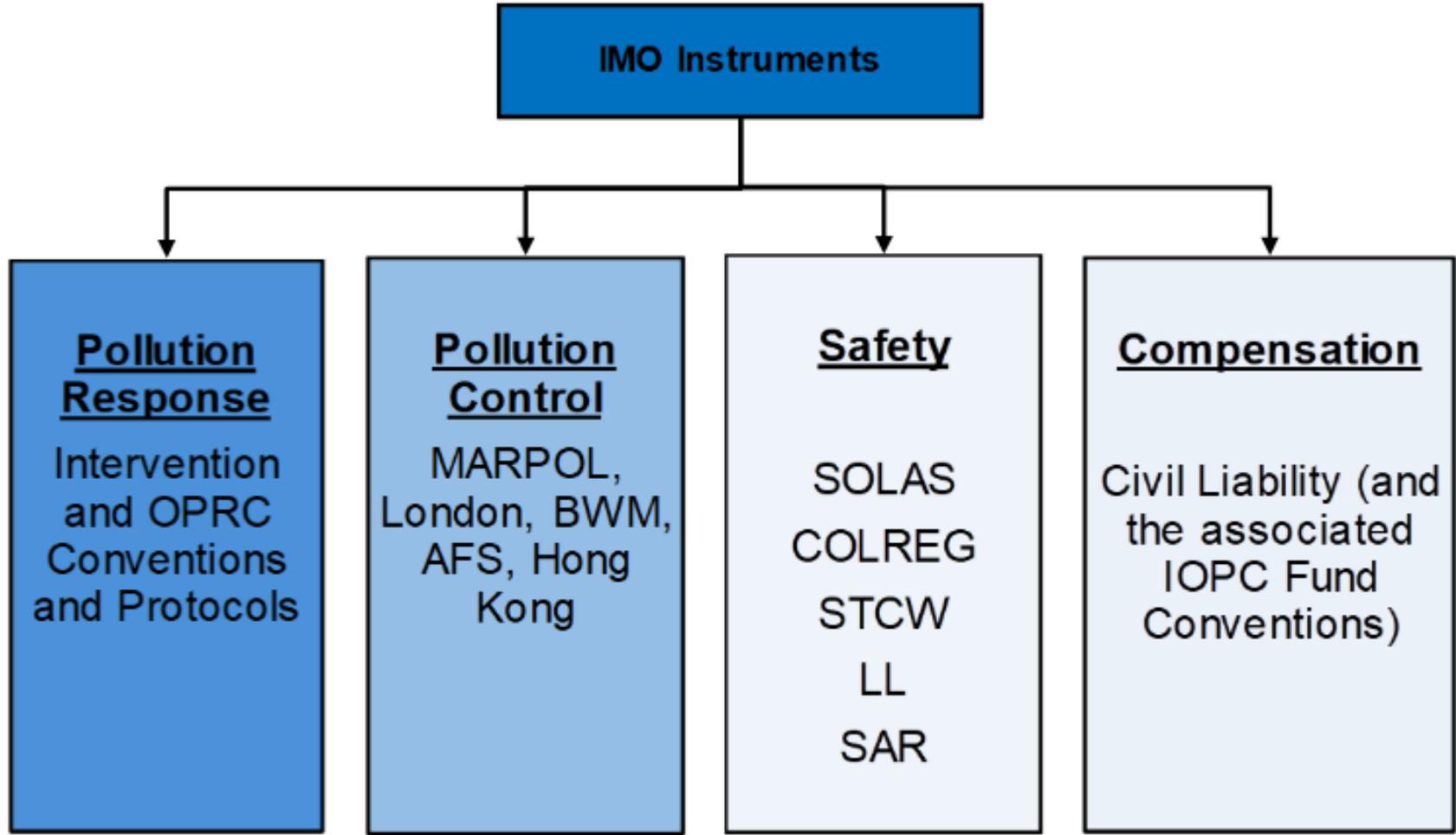


Main Shipping Conventions



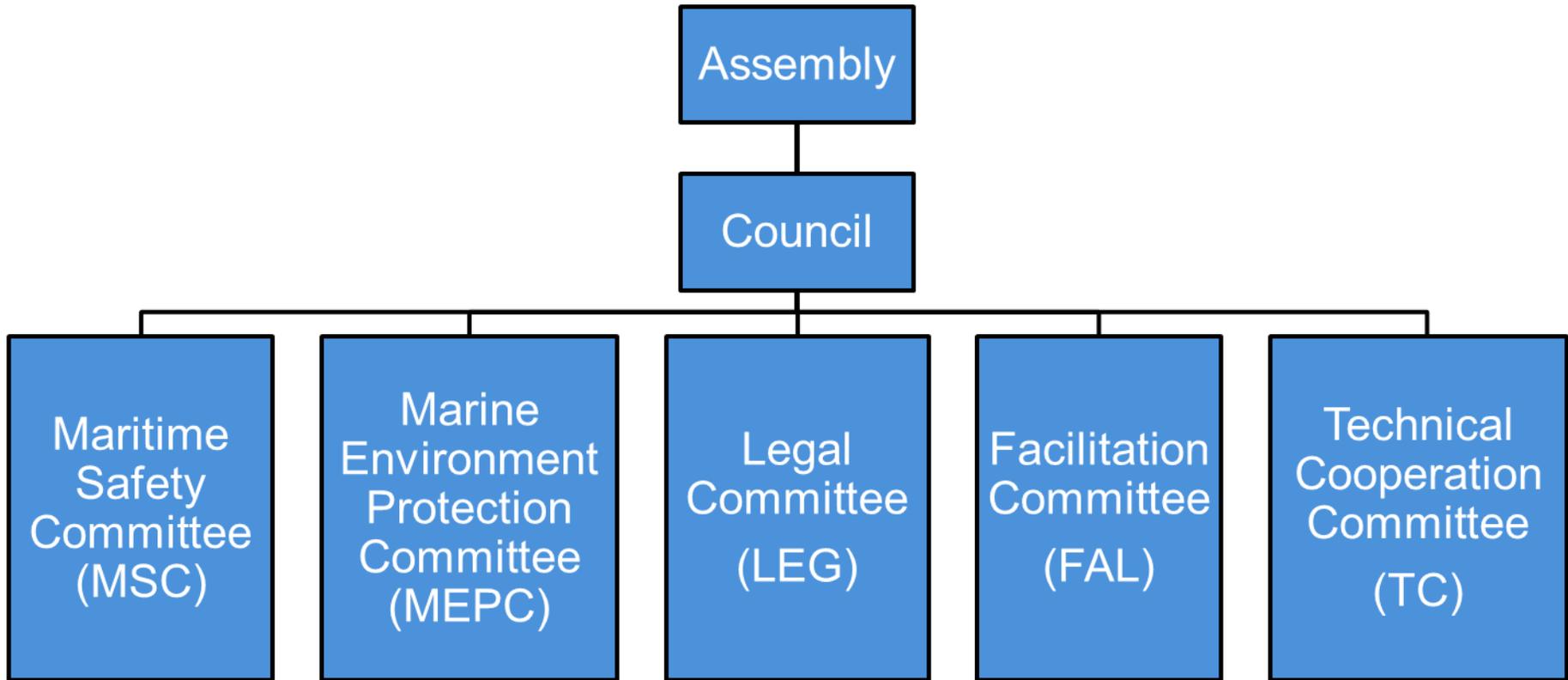


IMO Instruments





IMO Structure



Sub-Committees: HTW, III, NCSR, PPR, SDC, SSE, **CCC**
Intersessional Working Groups (ex: ESPH, GHG, **E&T**, etc.)

How does IMO implement legislation?

It doesn't.

IMO was established to adopt legislation through a collaborative process where member states first develop and adopt conventions.

Contracting Governments (Member States) are responsible for incorporating these conventions into their own national laws and enforcing them just like any other law.

The problem is that some countries lack the expertise, experience and resources necessary to do this properly. Others perhaps put enforcement fairly low down their list of priorities.



National Legislation

South Africa is a signatory to both the SOLAS Convention and MARPOL Convention.

The Merchant Shipping (Dangerous Goods) Regulations, 1997 makes provision for the implementation and enforcement of the IMDG Code, the regulations are made under Merchant Shipping Act 1951 (Act 1951/57), section 356.

The Dangerous Goods) Regulations is divided in 4 parts and contains 24 regulations.

Part 1 - General, contains 8 regulations viz. definitions; application; exemptions; document of compliance, inspection and certification; duty to report certain incidents involving packaged dangerous goods; general duties of shipowner, employer and master; general duties of employee aboard ship and conduct endangering the ship or persons aboard ship.

2 Application

Subject to section 235(4) of the Act, these regulations apply to every ship carrying dangerous goods in bulk or packaged form.

National Legislation

Part 2 - Carriage of packaged dangerous goods, contains 8 regulations viz. documentation; packing certificates; list, manifest or stowage plan; packaging; marking and labelling; stowage; carriage of explosives and carriage of packaged dangerous goods in passenger ships.

Part 3 - Carriage of dangerous goods in bulk, deals with carriage of DG in bulk.

Part 4 - Enforcement, repeal of regulations, and short title and commencement, deals with power to detain; penalties and defences and offences due to fault of another person.

The Authority produced a set of draft amendments to the Merchant Shipping (Dangerous Goods) Regulations, 1997. The Minister of Transport gazetted the amendments for public comments in 2023.

IMDG Code

The International Maritime Dangerous Goods Code (IMDG Code), was initially adopted in 1965 as a recommendatory instrument. It was in 2002 that the general Assembly at its seventeenth session adopted by resolution A.716(17) the IMDG Code, and decided to give it a mandatory status under the umbrella of SOLAS Convention, from 1 January 2004. However, some parts of the Code remain recommendatory.

The IMDG Code was developed as an international code for the maritime transport of dangerous goods in packaged form, in order to enhance and harmonize the safe carriage of dangerous goods and to prevent pollution to the environment.

The Code sets out in detail the requirements applicable to each individual substance, material or article, covering matters such as packing, marking and labelling, stowage and documentation, with particular reference to the segregation of incompatible substances.



IMDG Code

The IMDG code contains detailed technical specifications to enable dangerous goods to be transported safely by sea.

The IMDG Code contains information on:

- classification of dangerous goods based on the hazards they present;
- specific requirements for packaging dangerous goods for sea transport which are of appropriate strength and to prevent the goods escaping/leaking;
- labelling and other identifying marks to identify dangerous goods in cargo transport units;
- documentation to be provided the transport of dangerous goods;
- segregation requirements to ensure dangerous goods that react dangerously are kept apart;
- stowage requirements on board to ensure safe transport; and
- advice on emergency response involving dangerous goods in a fire or spillage on board a ship.



Upkeep of the Code

The IMO reviews and updates the IMDG Code every two years.

The IMDG Code (like the IMSBC Code) is ever evolving and is kept updated biennially to account for:

- the inclusion of proposals to add new dangerous goods;
- take into account new technology and methods of working with or handling dangerous goods.
- safety concerns which arise as a result of experience based on reports of incidents; and
- alignment with the UNTDG (United Nations Recommendations on the Transport of Dangerous Goods) (The "Orange Book").

The Editorial & Technical Group (IMDG) is the subject matter expert group that meets biennially, once in the fall and again soon after the meeting of the CCC Sub-committee to finalise amendments to the IMDG Code.



Upkeep of the Code

Amendment adoption: The IMO's Maritime Safety Committee (MSC) adopts amendments to the code. The latest version, Amendment 42-24, was adopted in 2024.

Voluntary implementation: A one-year period is provided for countries and industries to voluntarily implement the new changes, starting January 1st of the following year. For example, Amendment 42-24 became available for voluntary use starting January 1, 2025.

Mandatory implementation: The new amendment becomes mandatory after the voluntary period ends. For Amendment 42-24, this will be on January 1, 2026.

The last meeting of the E&T Group held from 22 to 26 September 2025, finalised the draft amendments 43-26 and will be considered for adoption by the MSC at its next session for voluntary implementation from January 1, 2027, and mandatory implementation from January 1, 2028.



Training

Merchant Shipping (Dangerous Goods) Regulations – Reg 6 (2)(a)(ii) requires shipowners, employers or Master, in particular to provide the necessary training and supervision as is necessary to ensure, as far as is reasonably practicable, the health and safety aboard ship of all employees in connection with the handling, stowage and carriage of dangerous goods in the ship.

(the definition of employee, excludes dock workers or shore-based repair or other workers temporarily employed on board the ship).

Marine Notice No. 28 of 2009, titled “Dangerous Goods - Training of Shore Side Personnel”, advises industry that each person shall receive training designed to provide familiarity with the general provisions of the dangerous goods transport provisions.

Every person involved in the handling and transportation of dangerous goods shall receive function-specific training concerning specific dangerous goods transport provisions which are applicable to the function that person performs. The requirements for such training function-specific training is given in paragraph 1.3 of the IMDG code.



Enforcement

Enforcement of the Dangerous Goods) Regulations is carried out by SAMSA's Port State Control Inspections, the provisions for such inspections are provided SOLAS and MARPOL Conventions.

A PSC inspection entails a detailed check of a foreign-flagged vessel's compliance with requirements of the IMO and ILO Conventions relating to safety, security, pollution, and crew living conditions. Inspections can range from an initial check of documents to a more detailed inspection of a ship, its equipment, and its crew.

If a vessel is found not to be complaint with the requirements of the IMDG Code, a Port State Control Officer will issue a deficiency, which the ship will have to fix before departure or if the deficiency is of a serious nature that warrants a detention, the PSCO may detain the vessel and may additionally issue an Admission of Contravention.



Enforcement

SAMSAs' mandate is limited to whilst the CTU is onboard the ships and until it is off the ships rail.

Unlike other government departments and agencies who may be responsible for the enforcement of many international conventions / regulations / codes, like the UN TDG Model Regulations, Orange books etc. SAMSA can only ensure compliance with IMO Conventions which are legislated in the Republic.



SOUTH AFRICAN
MARITIME SAFETY
AUTHORITY



Thank You!

SAFE SHIPS • CLEAN SEAS

