

- **Change to IMDG Code Amendment 35 – Vehicles with combustion engine, fuelled with petrol or diesel to be declared as hazardous cargo**

November 14, 2011

Dear Customer,

We would like to inform you about an IMDG Code rule change that will become effective **January 1, 2012**. Articles with an internal combustion engine will fall within the scope of the IMDG Code and must be notified to carriers as dangerous goods, UN 3166, Class 9. A dangerous goods declaration and document will be required.

UN 3166 can apply to a wide range of articles including cars, vehicles, plant, boats and any equipment with an internal combustion engine that has either a connected battery or fuel tank containing flammable liquid (petrol or diesel) or flammable gas such as propane.

For IMDG/ADR hazard classification UN 3166, Class 9, Special Provisions 312, 356 and 962 are applicable in the IMDG Code and assist in determining the classification requirements for various types of equipment.

Special Provision 961 describes technical measures that can be taken to neutralise the hazard of fuel and batteries and allow the articles to be consigned as non-hazardous, but that involves isolating the battery and removing the fuel from the tanks – technically difficult to achieve in many cases.

To provide further details we have attached the Special Provisions 312, 356, 961 and 962 from the IMDG Code Amendment 35 and the Dangerous Goods List on the following pages.

For further information please contact your local Hapag-Lloyd sales representative.

Kind regards,

Hapag-Lloyd AG

■ Observation from Dangerous Goods List Entry – UN 3166

“Types of articles transported under this entry include internal combustion engines, compression/ignition engines, fuel cell powered engines, motor vehicles, hybrid vehicles, motorcycles and boats.”

Special Provision 312:

“Vehicles or machinery powered by a fuel cell engine shall be consigned under the entries:

UN 3166, VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED, or
UN 3166, VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, or
UN 3166, ENGINE, FUEL CELL, FLAMMABLE GAS POWERED, or
UN 3166, ENGINE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate.

These entries include hybrid engine vehicles powered by both a fuel cell and an internal combustion engine and wet batteries, sodium batteries or lithium batteries, transported with the batteries installed.

Other vehicles which contain an internal combustion engine shall be consigned under the entries:

UN 3166, VEHICLE, FLAMMABLE GAS POWERED, or
UN 3166, VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate.

These entries include hybrid electric vehicle powered by both an internal combustion engine and wet batteries, sodium batteries or lithium batteries, transported with the batteries installed.”

Special Provision 356:

“Metal hydride storage systems installed in conveyances or in completed conveyance components or intended to be installed in conveyances shall be approved by the competent authority before acceptance for transport. The transport document shall include an indication that the package was approved by the competent authority or a copy of the competent authority approval shall accompany each consignment.”

Special Provision 962:

Vehicles or equipment powered by internal combustion engines, fuel cells or batteries not meeting the conditions of Special Provision 961 shall be assigned to Class 9 and shall meet the following requirements:

1. Vehicles and equipment shall not show signs of leakage from batteries, fuel cells, compressed gas cylinders or accumulators, or fuel tank(s) when applicable;
2. For flammable liquid powered engines and equipment, the fuel tank(s) containing the flammable liquid shall not be more than one fourth full and in any case the flammable liquid shall not exceed 250 litres;
3. For flammable gas powered vehicles and equipment, the fuel shut-off valve of the fuel tank(s) shall be securely closed;
4. Installed batteries shall be protected from damage, short circuit, and accidental activation during transport. Lithium ion or lithium metal batteries shall meet the requirements of the United Nations Manual of Tests & Criteria, part III, subsection 38.3, unless otherwise approved by the competent authority; and
5. Dangerous goods required for the operation of the vehicle or equipment such as fire extinguishers, compressed gas accumulators, airbag inflators, etc., shall be securely mounted in the vehicle or equipment.

The marking, labelling and placarding requirements provisions of this Code shall not apply.

Special Provision 961:

“Vehicles and equipment are not subject to the provisions of this Code (IMDG Code Amndt. 35) if they are stowed on a roll-on/roll-off ship or in another cargo space designated by the Administration (flag state) as specifically designed and approved for the carriage of vehicles and equipment and there are no signs of leakage from the battery, engine, fuel cell, compressed gas cylinder or accumulator, or fuel tank when applicable.

In addition, vehicles and equipment are not subject to the provisions of this Code if any of the following conditions are met:

1. The fuel tank(s) of the vehicle or equipment powered by a flammable liquid fuel is empty and installed batteries are protected from short circuit;
2. The fuel tank(s) of the vehicle or equipment powered by a flammable gas is emptied of liquefied or compressed gas and the, the positive pressure in the tank does not exceed 2 bar, the fuel shut-off or isolation valve is closed and secured, and installed batteries are protected from short circuit; or
3. The vehicle or equipment is solely powered by a wet or dry storage battery or a sodium battery, and the battery is protected from short circuit.”