

Circular From NORTH

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Fumigating Cargoes at Sea During the COVID-19 Pandemic

Guidance on fumigating bulk cargoes on vessels is provided in the IMO Circular MSC.1/Circ.1264 – *Recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo holds*, and it is always recommended that these are strictly followed. It requires fumigation to be conducted by qualified operators and states that the crew should not handle fumigants.

Fumigation in-transit

Fumigation in-transit is common and designated crew receive basic training from the fumigator-in-charge. In these cases, the fumigator-in-charge will initiate fumigation and remain on board long enough to allow the gas concentrations to build up to a level where testing for leaks can be carried out. Once it has been confirmed that the vessel is safe and no leaks are present, then the fumigator in charge will formally hand over the operation to the Master.

However, particular trades sometimes require ‘top-up’ fumigation to be carried out during the voyage. This is most typical with the carriage of logs, and ordinarily the fumigators will sail with the vessel to apply the top-up fumigant. But what happens when fumigators cannot sail with the vessel because of travel restrictions caused by COVID-19?

Leave it to the crew?

If qualified fumigators are not permitted to sail with the vessel and topping-up is required, it is likely that the crew will be requested to carry out this task.

This may be at odds with the IMO guidance, which recommends against crew handling fumigants. But there have been reported instances where topping-up has been carried out successfully and safely by the crew after receiving specialist training from the fumigation company.

Getting approval

The vessel and the fumigation company should together develop a plan which is then presented to the

vessel's Flag State and the relevant Port States for approval. The plan should provide details of how the operation will be conducted (based on a thorough risk assessment), address what training will be given to the selected crew members and contingency plans.

Crew training

The training requirements for the crew to be able to safely apply top-up fumigant is far more comprehensive than the basic safety training for in-transit fumigation, where the crew only monitor the process that is already underway. Envirofume, a fumigation company in New Zealand, has developed a two-day course for crew on the safe use of aluminium phosphide fumigant, and have kindly shared with us an outline of their training programme.

The training is delivered to an officer and a rating as a minimum, and they must ensure language is not a barrier. In the case of New Zealand, the crew under training must have a high standard of English.

Training covers the following aspects:

- Fumigant properties
- Safety protocols
- Actions required in the event of an incident
- Fumigation-related tasks covering all aspects of the fumigation process, including application, gas monitoring and conducting leak tests.
- Necessary documentation

The crew undergo a final assessment before they are deemed competent by the fumigation company.

Learn in port

The topping-up procedure to be carried out during the voyage by the trained crew members should be the same as the procedure followed by the specialist fumigators during initial fumigation at the load port. Therefore, the crew can run through the entire process with a technician, before they conduct the fumigation themselves during the voyage.

Once the vessel departs the load port, the trained crew liaise closely with the fumigation company, including sending daily the results of safety checks.

Topping-up safely

On a set date during the voyage, the trained crew can then carry out the top-up fumigation in accordance with the fumigation company's step-by-step procedure.

Take great care: ensure there is a suitable weather window, carry out a pre-fumigation briefing, know how to safely handle the fumigants, and know the actions to take after applying the fumigant such as handling used PPE and cleaning.

The fumigation company should always be available to offer any additional guidance if the crew encounter any issues during the operation or subsequent monitoring.

Find out more about safe fumigation with our briefing [here](#).

Source of Information: The North P&I Club