

## Update – The loading of DDGS in US ports

### Background

In May 2010, Gard addressed the carriage of Distillers' Dried Grain (DDG and DDGS),<sup>1</sup> focusing on the regulations and the risks involved.

Gard has received further requests for advice related to the shipment of Distillers' Dried Grain with Solubles (DDGS) from the United States – one of the main exporters – following charterers'/shippers' provision of a letter of authorisation issued by the USCG. This letter purports to authorise the carriage of DDGS as non-hazardous (Group C) cargo pursuant to section 1.3 of the International Maritime Solid Bulk Cargoes Code (IMSBC Code).<sup>2</sup>

The purpose of this loss prevention circular is to provide information on the latest developments with respect to loading DDGS cargo authorized by the USCG in US ports.

### US submission to the IMO

Section 1.3 of the Code permits the competent authority of the port of loading to assess whether a solid bulk cargo not currently listed in Appendix 1 of the Code, such as DDGS, presents no specific hazards for transportation. When it is assessed to have no such hazards, the carriage of the cargo shall be authorised and the competent authorities of the port of unloading and of the Flag State shall be advised of that authorisation. This section of the Code goes on to provide that the competent authority of the port of loading shall provide to the master a certificate stating the characteristics of the cargo and the required conditions for carriage and handling of the shipment and that they shall also submit an application to the IMO to incorporate this solid bulk cargo into Appendix 1 of the Code.

The United States has submitted an application to the IMO to incorporate DDGS into the Code and to list it as a Group C cargo. In its submission, which is supported by sample testing and vessel shipment monitoring, it is stated that DDGS has been shipped in bulk as non-hazardous cargo for more than 25 years without any incidents. The submission goes on to state that DDGS is a cargo that may exhibit minor self-heating properties when transported in bulk by vessel but evidence suggests that the probability of a fire within this cargo is very low and furthermore that DDGS itself is cohesive and will not liquefy or shift during carriage.

### IMO approval of Group C classification

IMO approval of Group C classification is expected later this year, but subject to the DDGS cargo having a maximum moisture content of 13% and a maximum oil content of 11%. These parameters are also stated in the USCG's letter of authorisation, which also provides that a copy of the authorisation is to remain on board the vessel and must accompany the shipping papers required under Section 4 of the Code. Section 4 of the Code sets out the information and documentation that the shipper is required to provide to the master sufficiently in advance of loading.

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<sup>1</sup> [Loss Prevention circular No. 07-10: Carriage of Distillers' Dried Grain](#)  
<sup>2</sup> <http://www.imo.org/ourwork/safety/regulations/pages/bulkcarriers.aspx>

→ more

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#### Your contacts

Senior Manager, Loss Prevention  
Terje R. Paulsen  
→ [terje.paulsen@gard.no](mailto:terje.paulsen@gard.no)

Senior Loss Prevention Executive  
Marius Schønberg  
→ [marius.schonberg@gard.no](mailto:marius.schonberg@gard.no)

Loss Prevention Executive  
Kristin Urdahl  
→ [kristin.urdahl@gard.no](mailto:kristin.urdahl@gard.no)

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Once approved, the DDGS amendment to the Code, amongst others, is likely to enter into force on 1 January 2013. In the meantime, it remains questionable whether the USCG's authorisation letter strictly fulfils the requirements of the Code since, in versions seen by Gard, the letter is addressed to the US Grains Counsel. Arguably therefore, it is not a certificate provided by the competent authority to the master as described in section 1.3.2 of the Code.

### Recommendations

The recommendations set out in Gard's Loss Prevention circular no. 07-10 remain valid as concerns shipments of DDGS falling outside the USCG authorisation and for shipments other than from the United States which have not been similarly authorised by the relevant competent authority. The recommendations also remain valid for DDG cargoes, which were not included in the United States submission to amend the Code.

Until such time as the Code has been amended to include DDGS, Gard advises members that before agreeing to carry DDGS from the United States as a Group C cargo, they request charterers/shippers to provide, in addition to the USCG's letter of authorisation to the US Grains Counsel, the certificate by the competent authority to the master as described in section 1.3.2 of the Code as well as the information and documentation set out in section 4 of the Code (including certificates of moisture and oil content showing the cargo is within above stated parameters). We would also recommended to monitor/record temperatures of the cargo within the stow until the Code is amended.

It remains unclear, however, who, in accordance with section 1.3 of the Code, shall inform the competent authorities of the port of unloading and of the Flag State and this should be checked with the charterers/shippers. It is recommended that the shippers inform the former and the ship the latter.

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#### Your contacts

Senior Manager, Loss Prevention  
Terje R. Paulsen  
➔ [terje.paulsen@gard.no](mailto:terje.paulsen@gard.no)

Senior Loss Prevention Executive  
Marius Schønberg  
➔ [marius.schonberg@gard.no](mailto:marius.schonberg@gard.no)

Loss Prevention Executive  
Kristin Urdahl  
➔ [kristin.urdahl@gard.no](mailto:kristin.urdahl@gard.no)

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