

EDITORIAL AND TECHNICAL GROUP OF
THE SUB COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
25th session
Agenda item 3.2

E&T 25/3/8
6 January 2016
ENGLISH ONLY

PREPARATION OF DRAFT AMENDMENT 04-17 TO THE IMSBC CODE

**New proposals of amendments to the Code, new individual
schedules or amendments to existing ones**

**New individual schedule for
Monoammonium Phosphate (M.A.P.) – Mineral Enriched**

Submitted by the European Chemical Industry Council (CEFIC)

SUMMARY

Executive summary: This document comments on documents CCC 2/5/18 and CCC 2/INF.13 (Australia) regarding the proposal on a new individual schedule for Monoammonium Phosphate (M.A.P.) – Mineral Enriched

Strategic direction: 5.2

High-level action: 5.2.3

Output: 5.2.3.2

Action to be taken: Paragraph 8

Related documents: CCC 2/5/18 and CCC 2/INF.13

Introduction

1 In document CCC 2/5/18, Australia proposed the inclusion of a new individual schedule for Monoammonium Phosphate (M.A.P.) – Mineral Enriched for inclusion in appendix 1 of the IMSBC Code. In document CCC 2/INF.13, the relevant cargo information and shipper's questionnaire used to develop the tentative schedule have been provided.

Discussion

2 Whilst CEFIC recognizes the need for a separate schedule for such a product, it wishes to raise certain potential safety issues.

3 The safety issues of concern arise from the typical and wide spread use of M.A.P. in the fertilizer industry. It is used as a raw material for making compound, i.e. NPK type fertilizers. M.A.P. can be physically mixed with other raw materials (e.g. urea, ammonium nitrate and potash) to make blends or can be incorporated in complex granular or prilled NPK fertilizer. In the latter case it could be mixed with hot melt of ammonium nitrate and the product heated in a drier to remove moisture.

4 The described Monoammonium Phosphate (M.A.P.) – Mineral Enriched contains sulphur and zinc sulphate according to the cargo information provided. Sulphur is reactive with ammonium nitrate. It is likely that zinc sulphate may also react when heated. For this reason care needs to be taken to avoid the processing of Monoammonium Phosphate (M.A.P.) – Mineral Enriched with incompatible materials in the fertilizer industry.

5 "Mineral Enriched" appears to be a fairly generic type name. It can give the impression of allowing different additives or same additives at different concentrations. A way should be found not to deviate from the specified composition.

6 Regarding the draft schedule as set out in the annex to document CCC 2/5/18, CEFIC wishes to recommend that:

- .1 it must be made clear in the description that the product contains Zinc sulphate, sulphur and ammonium sulphate and that it must not be mixed with ammonium nitrate when making NPK fertilizers; and
- .2 wherever the cargo is mentioned it should be described by the new name and not by the description "M.A.P." It is important to ensure that users do not regard this cargo as an alternative to normal M.A.P. for making NPK fertilizers.

7 Furthermore, in Safety Data Sheet (CCC 2/INF.13, annex 1), references to "Monoammonium dihydrogen phosphate" and "Monoammonium phosphate" in 1.1 Synonyms should be deleted in order to avoid any likely misunderstanding.

Action requested of the group

8 The group is invited to consider the comments in paragraphs 5, 6 and 7 and take action as appropriate.
