



भारत सरकार/ GOVERNMENT OF INDIA
पत्तन, पोत परिवहन और जलमार्ग मंत्रालय
MINISTRY OF PORTS, SHIPPING AND WATERWAYS
नौवहन महानिदेशालय, मुंबई
DIRECTORATE GENERAL OF SHIPPING, MUMBAI

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Date – 16.07.2025

Merchant Shipping Notice No. 06 of 2025

Sub.: Compliance Advisory to all Marine Laboratories engaged in testing of Solid Bulk Cargoes under IMSBC Code - reg.

1. The International Convention for the Safety of Life at Sea, 1974 (SOLAS Convention, under Chapter VI mandates the adherence to the provisions under the International Maritime Solid Bulk Cargoes (IMSBC) Code (hereinafter referred to as 'IMSBC Code'). The same was amended in 2023 vide the MSC Resolution (MSC.539(107)) in respect to the test procedures and criteria(s) laid under the IMSBC Code.
2. The Merchant Shipping (Carriage of Cargo) Rules, 1995, under the Merchant Shipping (MS) Act, 1958, highlights the testing procedures provided in the IMSBC Code. The Ministry of Shipping, Government of India, vide their letter No PT.11033/67/2010- PT dated 28.05.2010 addressed to Chairman of all major ports, inter-alia has required that the assessing organization (i.e. Marine Laboratories) be approved by the Directorate General of Shipping.
3. Therefore, the paramount importance of ensuring the highest standards of technical integrity, ethical practice, and procedural compliance by all laboratories approved under [MS Notice No. 17 of 2014](#) dated 03.09.2014 for testing of solid bulk cargoes in accordance with IMSBC Code. The amendments to the said Code and the revised assessment & approval of laboratories engaged in the testing of cargo carriage on merchant ships has been incorporated under [MS Notice No. 14 of 2016](#) dated 28.11.2016 which superseded the 2014 MS Notice.
4. Accordingly, the list of approved marine laboratories carrying out tests and the withdrawal order(s) of laboratories carrying out fraudulent practices are provided on the

Directorates website (link herein provided: <https://www.dgshipping.gov.in/Content/IMSBC.aspx>).

5. The Directorate notes with concern that during recent inspections and surveillance, instances have come to light indicating that some laboratories may have deviated from the approved norms, including but not limited to:
 - i. Conducting tests outside of the approved premises;
 - ii. Use of uncalibrated or non-compliant equipment for TML/FMP testing;
 - iii. Involvement of unauthorized personnel in core testing processes;
 - iv. Issuance of certificates that may not be based on verifiable testing protocols.
6. Furthermore, kind attention of all stakeholders and laboratories is drawn to a recent incident that has been highlighted before the Directorate, wherein certain marine laboratories are engaging in fraudulent practices by issuing test reports/certificates without proper authorization, which fall under the purview of **Appendix 2** of the **(IMSBC) Code**.
7. Subsequently, it has been observed that these laboratories often issue test reports on the letterheads of their local or affiliated branches, using report numbering systems that are inconsistent and potentially misleading. This approach falsely projects these laboratories as officially recognized or exclusively approved laboratories for the relevant testing activities, thereby misleading stakeholders and undermining the integrity of the regulatory framework.
8. In view of the **MSC Resolution (MSC.539(107))** and the provisions provided in the IMSBC Code, the laboratories are directed to adhere to the relevant amendments curated under the said resolution and the procedural requirements with respect to various test procedures and criteria, test reports, sampling methods, and standards used in test procedures.

Furthermore, the marine laboratories are hereby reminded that such practices, whether intentional or inadvertent, result in undermining the credibility of the IMSBC certification regime, compromising maritime safety, and violating the conditions of their approval. Subsequently, the Directorate reiterates and reaffirms that:

- i. That all testing must be conducted strictly within the premises of the laboratories approved by the Directorate during their initial assessment and are notified through the jurisdictional Mercantile Maritime Department (MMD).



- ii. The TML/FMP testing and certification shall be carried out only through qualified and designated personnel based on the qualifications and experience criteria prescribed during the certification process.
- iii. That all testing equipment must be maintained in a calibrated state, traceable to the NABL standards, with valid calibration records readily accessible.
- iv. No subcontracting, outsourcing, or offsite testing shall be undertaken unless explicitly approved by the Directorate in writing.
- v. The chain of custody for samples, as well as the integrity of test data, must be documented comprehensively and be auditable at any time.

Additionally, such discrepancies are not only deceptive in nature but also amounts to a prima facie violation of the IMSBC Code, which operates under the regulatory framework of the **International Convention for the Safety of Life at Sea (SOLAS)** specifically under **Chapter VI** which mandates the adherence to the said code, therefore, any deviation from its provisions is considered a breach of international maritime safety obligations.

9. It is pertinent to note that any laboratory found violating the conditions of approval shall face immediate suspension or cancellation of its approval without further notice. The Directorate shall not hesitate to initiate punitive measures, which may include, but are not limited to, suspension and direct action against the personnel concerned, if any lapses are found in complying with the provisions of the Code and/or the Executive Orders.
10. In view of the foregoing, the Directorate advises all stakeholders, other maritime professionals, and maritime laboratories to exercise due diligence before engaging any marine laboratory for cargo testing & certification and Laboratories are encouraged to treat this notice as a proactive compliance directive and take immediate steps to review their practices and rectify any deviations.
11. Stakeholders especially the Ports are strongly urged to verify the credentials and authorization status of such laboratories and to report any suspicious or non-compliant activities. Additionally, any identification of such unauthorized maritime laboratories shall be reported immediately to the Directorate.
12. In addition to the above, it is reiterated that any marine laboratory or associated entity found to be involved in such non-compliant or fraudulent practices shall be liable for stringent regulatory action under the applicable provisions of the Merchant Shipping Act,



1958 and other relevant legal instruments. This may include, but shall not be limited to, monetary penalties, suspension or cancellation of approval, blacklisting of the entity from future engagements, and initiation of legal proceedings against the responsible personnel.

This is issued with the approval of competent authority.



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