



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

**File No 13-39/7/2020-ENGG-DGS**

**Date: 11-01-2021**

**Merchant Shipping Notice 01 of 2021**

**Subject: 2019 Amendments to the IBC/BCH Code & Annex II of MARPOL**

1. Preface

Carriage and handling requirements of dangerous chemical cargoes and noxious liquid substances when carried in bulk on ships are governed by Annex-II of the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the 1978 and 1997 Protocols (MARPOL). The IBC /BCH code provides the requirements for construction and equipment for ships and are certified accordingly. As an alternative to IBC/BCH Code, Offshore Support Vessels (OSVs) carrying Noxious Liquid Substances in bulk are required to meet carriage and handling requirements as stated in LHNS Guidelines /OSV Chemical Code and are certified accordingly.

The International Maritime Organization (IMO) has adopted 2019 amendments to the IBC Code vide *MSC. 460(101) & MEPC.318 (74)*, BCH Code vide *MSC.463 (101) & MEPC.319 (74)* and amendments to Annex II of MARPOL vide *MEPC.315 (74)*. This amendments has entered into force on 1 January 2021 and applies to new and existing vessels which have IBC Code Certificates of Fitness and Noxious Liquid Substances Certificates. Offshore supply vessels with Certificates of Fitness in compliance with 'LHNS Guidelines' (IMO Res. A.673 (16)) or 'OSV Chemical Code' (IMO Res. A.1122 (30)), also are affected.

2. Purpose

This Merchant Shipping Notice provides instructions regarding revised compliance requirements in respect of amendments to Annex II of MARPOL & IBC/ BCH Code which has entered into force from 01-01-2021.

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### 3. Applicability

This Notice applies to

- Indian ships certified based on requirements Annex II of MARPOL, IBC/BCH Code
- Indian OSVs certified based on LHNS Guidelines or OSV chemical code

### 4. Requirements

I. Amendments to Annex II of MARPOL, vide MEPC.315 (74) deals with cargo residues and tank washings of persistent floating products (Refer Annexure A to this notice). The amendments requires following:

*a. Prewash requirements for persistent floating products:*

Amendments impose prewash requirements in the port of unloading for certain high-viscosity or low-melting-point persistent floating products. For persistent floaters with a viscosity equal to or greater than 50 mPas at 20°C and/or with a melting point equal to or greater than 0°C (substances that are identified by '16.2.7' in column 'o' of chapter 17 of the IBC Code), a prewash procedure is to be applied in certain areas (e.g. North West European waters). The residue/water mixture generated during the prewash is to be discharged to a reception facility at the port of unloading until the tank is empty. These new requirements will be applicable to products such as Fish oil, Olive oil, Palm oil, Paraffin wax highly-refined, Rice bran oil, sunflower seed oil, etc. A complete list of the identified persistent floating products is enclosed (Annexure A).

*b. Revision of the standard format of P&A Manual:*

The standard format of the P&A (Procedures and Arrangements) manual has been revised to incorporate prewash procedures and instructions on how to deal with tank washings for persistent floating products.

Compliance and Verification: The ship-owner /manager shall submit P&A manual corresponding to the revised standard format to the respective recognised organisation at the earliest for approval. The Recognized Organization shall review and approve the standard format so that same can placed on board.

- II. Amendments to IBC Code / BCH Code (460 (101) & MEPC.318 (74)), BCH Code (MSC.463 (101) & MEPC.319 (74)) deals with Revision of carriage requirements. Due to the revision of criteria for assigning appropriate carriage requirements for products, the carriage requirements for all products have been reassessed, and have been revised. Further new products have been listed under Chapter 17 and few products have been shifted from Chapter 18 to Chapter 17. These amendments modify the carriage requirements for some products (e.g. some products currently categorized as non-toxic cargoes will become toxic cargoes). As a result, the range of products a ship is certified to carry will differ before and after 01-Jan-2021. Revised carriage requirements include,
- a. The ship type requirement has changed from Ship Type 2 to Ship Type 1, requiring enhanced preventive measures to preclude an escape of cargoes such as Acetone cyanohydrin, Carbon disulphide, etc.
  - b. A controlled venting arrangement is now required in place of open vents for products such as Undecyl alcohol, urea / Ammonium phosphate, Vinyl Neodecanoate, Xylenol, etc.
  - c. Inerting of cargo tank is now required for products such as Ammonium sulphide solution (45% or less), Motor fuel anti-knock compounds (containing lead alkyls), etc.
  - d. Temperature class requirement of electrical equipment is enhanced from Class T1 to Class T3 for products such as Butyl methacrylate, Turpentine, etc.
  - e. Closed gauging arrangements is now required instead of restricted gauging arrangements for products such as Adiponitrile, Alkanes (C6-C9), etc.
  - f. The installation of Hydrogen sulphide (H<sub>2</sub>S) detection equipment has been added as special requirements for the carriage of products such as – Sodium hydrosulphide/Ammonium sulphide solution, Sodium hydrosulphide solution (45% or less), Offshore contaminated bulk liquid S (O)
  - g. Alcohol-resistant foam or multi-purpose foam fire extinguishing medium is now required for products such as Alkylated (C4-C9)

hindered phenols, Alkyl (C8-C10) polyglucoside solution (65% or less), etc.

- h. Requirement of – ‘separate piping system, not to be stowed adjacent to oil fuel tanks and to have tank vent systems separate from tanks containing non-toxic products’ is now extended for few more products such as Diethylbenzene, Diethylaminoethanol, 1, 2-Dichloropropane, etc.
- i. The pollution hazard category is increased from Category Z to Category Y for few products such as Benzene sulphonyl chloride, Calcium hydroxide slurry, etc.

Compliance and Verification: Shipowner / Managers shall communicate to their respective recognised organisation with the list of products intended to be carried on their ships already issued with Certificates of Fitness under IBC Code / BCH Code. It may be noted that for some products, only operational changes is sufficient to comply with the new carriage requirements, while, for some products, important modifications to the ship’s structure or equipment or tank type is necessary to carry such chemicals after 1 January 2021. Alternatively, the Owners may opt not to carry such products and hence get them deleted from the Certificate of Fitness. However, where any alterations/modifications to the ship’s structure or equipment is undertaken to comply with the revised requirements, relevant plan approval and subsequent survey of the ship maybe required for verification, and these are to be submitted to RO’s at the earliest.

A new Certificate of Fitness based on the amendments may be issued by the RO based on compliance.

### III. Offshore Support vessels (OSVs) certified in accordance with OSV Chemical Code or as per LHNS Guidelines

The OSV Chemical Code (Res. A.1122 (30)) and LHNS Guidelines (Res. A. (673(16))), which provide an alternative to IBC/BCH Code for OSVs carrying noxious liquid substance in bulk, refers to various requirements in the IBC/BCH Code. Therefore amendments to IBC/BCH Code also impact the OSVs carrying noxious liquid substances in bulk. The OSV Chemical Code (IMO Resolution A.1122 (30)) supersedes the LHNS Guidelines (IMO Resolution A.673 (16)). However, in accordance with DGS Engineering

Circular No. 03 of 2018, existing OSVs not carrying Type 2 products were allowed to continue with certification as per LHNS guidelines.

LHNS guidelines does not permit carriage of 'Toxic' products, however, due to the amendments to IBC code, following products which were allowed as per LHNS guidelines have now been re-assessed as 'Toxic' product.

- Methyl Alcohol
- Hydrochloric acid
- Sodium Silicate Solution
- Toluene

Existing OSVs certified under LHNS Guidelines and intending to carry above products post 01 January 2021 are not permitted to carry above toxic products till they are re-assessed, surveyed and certified as per OSV Chemical Code.

Compliance and Verification: Ship-owner/Manager of existing OSVs (issued with Certificate of Fitness under OSV Chemical Code / LHNS Guidelines) shall communicate to their respective recognised organisations with the list of products intended to be carried on their OSVs for necessary amendments to their existing Certificate of Fitness as required. In case the existing OSVs are not able to comply with all the provisions of OSV Chemical Code in respect of new carriage requirements, the ship-owner/manager may provide their alternative proposal for compliance to the RO and who shall verify and forward with their recommendation to DGS for exemption/s which shall be analysed on a case to case basis.

5. This M.S Notice comes into force with immediate effect and is issued with the approval of the Director General of Shipping and Additional Secretary to the Govt. of India.



(J. Senthil Kumar)

Engineer and Ship Surveyor cum Dy. DGS (Tech)

To,

1. The Principal Officers/ Mercantile Marine Department, Mumbai /Kolkata/ Chennai/ Kandla /Cochin.
2. Surveyor-in-charge, Mercantile Marine Department Office Noida, Jamnagar, Mormugao, Mangalore, Tuticorin, Visakhapatnam, Haldia, Paradip, Port Blair.
3. All Recognized Organizations
4. All Shipping Companies

Copy to:

1. INSA / FOSMA /MASA
2. Chief Surveyor with the Govt. of India
3. Nautical Adviser(I/C)to the Govt. of India
4. Chief Ship Surveyor with the Govt. of India
5. Surveyors of Engineering /Nautical and Naval Architecture wings of DGS.
6. Hindi Cell
7. Guard file.
8. Computer Cell

**Annexure -A**

**List of persistent floating products as identified by 16.2.7 in column 'o' of Chapter 17 of IBC Code.**

S. No	Product Name
1	Acid oil mixture from Soyabean, corn (maize) and sunflower oil refining
2	Camelina oil
3	Cashew nut shell oil (untreated)
4	Castor oil
5	Cocoa butter
6	Coconut oil
7	Coconut oil fatty acid
8	Corn Oil
9	Cotton seed oil
10	Fatty acids, (C12+)
11	Fish oil
12	Grape Seed Oil
13	Groundnut oil
14	Illipe oil
15	Jatropha oil
16	Lard
17	Mango kernel oil
18	Non-edible industrial grade palm oil
19	Olive oil
20	Palm acid oil
21	Palm fatty acid distillate
22	Palm kernel acid oil
23	Palm kernel fatty acid distillate
24	Palm kernel oil
25	Palm kernel olein
26	Palm kernel stearin
27	Palm mid-fraction
28	Palm oil
29	Palm olein