

IMSBC CODE

OUR LOSS PREVENTION TEAM REGULARLY RECEIVES ENQUIRIES RELATING TO THE ACTIONS TO TAKE WHEN LOADING DIFFERENT BULK CARGOES TO MEET THE REQUIREMENTS OF THE INTERNATIONAL MARITIME SOLID BULK CARGOES (IMSBC) CODE.

The shipper is responsible for providing sufficient information to the master (or their representative) in advance to allow preparations to be made for safe loading, stowage, and carriage of the nominated cargo. The IMSBC Code describes the information that should be supplied by the shipper in Section 4.2.2, and this information should be supplied along with a declaration (example format provided in Section 4.2.3). Arguably the most important piece of information to be provided is the "Bulk Cargo Shipping Name" (BCSN).

Once the BCSN has been provided, it is generally a straightforward case of identifying the appropriate schedule contained in Appendix 1 for the cargo presented for carriage and confirming that any requirements for safe carriage can be complied with. It is also common for ships that are engaged in the carriage of bulk cargoes to have obtained a Statement of Compliance or similar from their Classification Society indicating the BCSN of cargoes that can be carried, along with any additional conditions as required.

However, difficulty arises when the name of the cargo supplied does not match any of the BCSN listed within the schedules of the IMSBC Code. When this happens, the schedules contained in the IMSBC Code cannot be used directly and alternative steps must be taken to confirm the safety of the cargo to be carried.

There are some quick confirmatory checks that can be made should this occur.

CHECK FOR SYNONYMS

When provided with a BCSN that does not appear within Appendix 1, check if the same name is being referenced in Appendix 4. It is possible that a synonym has been used, for example a cargo declared as "Chrome Ore" directs the user to review the schedule under a BCSN of "CHROMITE ORE". This only provides the master and crew with the correct references they require to understand the characteristics of the cargo sufficiently in advance of loading to enable the precautions which may be necessary for proper stowage and safe carriage of the cargo to be put into effect. However, it still does not fulfil the requirement of Section 4.1.3 and Section 4.2 of the Code, if such a circumstance does occur, we recommend that clarification is sought from the shipper, and ultimately the correct BCSN should be inserted in the cargo declaration and not the synonym. It is also recommended to compare the cargo with the description and characteristics described within the individual schedule, and should notable differences be found, contact the Club for further advice.

CHECK FOR GROUPINGS

Some BCSNs have been grouped under a single schedule. A good example is the schedule for "Mineral concentrates", which contains the information required for 25 different BCSNs.

CHECK LANGUAGE

It may be that the BCSN has been provided in a language different from that which is expected. Appendix 5 provides BCSNs translated into three different languages: English, French, and Spanish.

If, however, the name of the cargo cannot be conclusively matched to a BCSN listed in the IMSBC Code, then the standalone procedure in Section 1.3 – "Cargoes not listed in this Code" shall be followed.

In the first instance, the shipper must supply the required information on the cargo's characteristics and properties to the Competent Authority at the Port of Loading (CA-PL). The CA-PL will assess the suitability of the cargo for safe carriage by sea.

The next step depends upon whether the cargo is assessed as possessing any of the hazards that would classify it as Group A or Group B.

- **GROUP A** cargoes which possess a hazard due to moisture that may result in liquefaction or dynamic separation if shipped at a moisture content in excess of their transportable moisture limit.
- **GROUP B** cargoes which possess a chemical hazard which could give rise to a dangerous situation on a ship.
- **GROUP C** cargoes which are classified as neither Group A nor Group B

If this is the case, a 'Tripartite Agreement' must be obtained. This means that details of the cargo and its assessment are shared with the Competent Authority at the Port of Discharge (CA-PD) and the ships Flag State. Together the three bodies will agree upon the conditions that must be followed to allow safe carriage.

If the cargo is assessed by the CA-PL to meet the standards of a Group C cargo, then they can simply authorise the cargo for carriage. This authorisation should be communicated to the CA-PD and ships Flag State also.

Regardless of the outcome of the cargo assessment, if the cargo is authorised for carriage, the CA-PL must provide the ships master with a certificate containing the information contained in Section 1.3.2 of the Code.

BIMCO have produced a step-by-step user chart for this scenario amongst others, that can be found here.

Lists of the current competent authorities can be found in the IMO <u>GISIS</u> and we recommend that this is consulted whenever faced with this situation.

We recommend that any cargo presented by the shipper with insufficient information is not accepted for loading until further guidance has been obtained.

Where it is found that a cargo is not listed in the IMSBC Code, great caution must be exhibited, and strict observance of the procedure contained in section 1.3 of the IMSBC Code must be followed.

FOR FURTHER INFORMATION

Members requiring any further guidance are advised to contact the Britannia Loss Prevention Department: lossprevention@tindallriley.com.

DISCLAIMER

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