



**REPUBLIC OF
THE MARSHALL ISLANDS**
MARITIME ADMINISTRATOR

Marine Notice

No. 2-011-23

Rev. Jan/2024

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF
MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

SUBJECT: Carriage of Solid Bulk Cargoes

- References:**
- (a) **SOLAS**, *International Convention for the Safety of Life at Sea, Consolidated Edition 2020*
 - (b) **MARPOL**, *International Convention for the Prevention of Pollution from Ships, Consolidated Edition, 2022*
 - (c) **IMSBC Code**, *International Maritime Solid Bulk Cargoes Code, 2023 Edition*
 - (d) **IMDG Code**, *International Maritime Dangerous Goods Code 2022, 41st Edition*
 - (e) **IMO Resolution [MSC.539\(107\)](#)**, *Amendments to the International Maritime Solid Bulk Cargoes (IMSBC) Code*, adopted 8 June 2023
 - (f) **IMO Circular [CCC.1/Circ.2/Rev.1](#)**, *Carriage of bauxite which may liquefy*, issued 20 September 2017
 - (g) **IMO Circular [CCC.1/Circ.4](#)**, *Carriage of ammonium nitrate based fertilizer (non-hazardous)*, issued 22 September 2017
 - (h) **IMO Circular [MSC.1/Circ.1395/Rev.6](#)**, *Lists of solid bulk cargoes for which a fixed gas fire-extinguishing system may be exempted or for which a fixed gas fire-extinguishing system is ineffective*, issued 26 June 2023
 - (i) **IMO Circular [MSC.1/Circ.1453/Rev.2](#)**, *Guidelines for the submission of information and completion of the format for the properties of cargoes not listed in the international maritime solid bulk cargoes (IMSBC) code and their conditions of carriage*, issued 26 June 2023
 - (j) **IMO Circular [MSC.1/Circ.1454/Rev.2](#)**, *Guidelines for developing and approving procedures for sampling, testing, and controlling the moisture content for solid bulk cargoes which may liquefy or undergo dynamic separation*, issued 26 June 2023
 - (k) **IMO Circular [MSC.1/Circ.1664](#)**, *Revised Form for Cargo Information for Solid Bulk Cargoes*, issued 26 June 2023(i)
 - (l) **RMI [Maritime Regulations](#)** (MI-108)
 - (m) **RMI Marine Notice [2-013-5](#)**, *MARPOL Annex V - Prevention of Garbage Pollution from Ships*

PURPOSE

This Marine Notice (MN) implements the International Maritime Solid Bulk Cargoes Code (IMSBC Code or “the Code”) and the Republic of the Marshall Islands (RMI) Maritime Administrator’s (the “Administrator”) requirements governing the transport of certain solid bulk cargoes. It covers the mandatory requirements under the 2023 IMSBC Code for:

- procedures to be followed when loading cargoes that may be subject to liquefaction or dynamic separation, safety, and cargo declaration information, including the need to potentially determine the flow moisture point (FMP), transportable moisture limit (TML), and actual moisture content (MC) of the cargo to be loaded (§2.5 below); and
- the cargo residues management depending on a solid bulk cargo’s classification as to whether it is harmful to the marine environment (HME) or non-HME. The responsibility for classifying and declaring, whether a solid bulk cargo is HME or not lies with the shipper (§5.0 below).

This MN supersedes Rev. Oct/2022 and incorporates International Maritime Organization (IMO) Resolution [MSC.539\(107\)](#) In addition to amending various schedules, it also contains other modifications, including for those cargoes that may undergo dynamic separation and cargo density declarations. It has a mandatory entry into force (EIF) date of 1 January 2025, though it may be applied, in whole or in part, on a voluntary basis from 1 January 2024.

BACKGROUND

The IMSBC Code became mandatory on 1 January 2011. Although the IMSBC Code is mandatory under the provisions of the International Convention for the Safety of Life at Sea (SOLAS), some parts of the IMSBC Code continue to remain recommendatory or informative. These sections are:

- a. Section 11: Security provisions (except subsection 11.1.1);
- b. Section 12: Stowage factor conversion tables;
- c. Section 13: References to related information and recommendations;
- d. Appendices, other than Appendix 1: Individual schedules of solid bulk cargoes, and Appendix 5: Bulk Cargo Shipping Names in three languages (English, Spanish, and French); and
- e. the sections titled: “Description,” “Characteristics” (other than “Class”, “Subsidiary Risk” and “Group”), “Hazard”, and “Emergency Procedures” of individual schedules of solid bulk cargoes in Appendix 1.

APPLICABILITY

This MN is applicable to all ships to which SOLAS applies, which carry solid bulk cargoes, other than grain, according to SOLAS Regulation VI/1-2, and in compliance with relevant provisions of the IMSBC Code.

The latest amendments (Amendment 07-23) to the IMSBC Code, along with IMO Resolution [MSC.539\(107\)](#), are mandatory upon their EIF, which is expected 1 January 2025.

REQUIREMENTS

1.0 IMSBC Code

Shipowners and ship operators to which the IMSBC Code applies must comply. All ships carrying solid bulk cargoes must carry a copy of the IMSBC Code on board.

2.0 RMI National Requirements

- 2.1 All ships carrying solid bulk cargoes must comply, as appropriate, with the fire protection, detection, and extinction requirements incorporated into SOLAS II-2.
- 2.2 Shipowners, ship operators, companies, and charterers transporting solid bulk cargoes must:
 - .1 obtain current valid information from the shipper on the cargo's physical and chemical properties (see IMSBC Code, section 4);
 - .2 consult the IMSBC Code when transporting any solid bulk cargo;
 - .3 provide the Master with all relevant information on the cargo to be loaded in accordance with Chapters VI, *Carriage of Cargoes and Oil Fuels* and VII, *Carriage of Dangerous Goods* of SOLAS, and the provisions of the IMSBC Code and the IMDG Code, if applicable; and
 - .4 inform the Administrator when seeking exemption for carrying solid bulk cargoes for which a fixed, gas fire-extinguishing system may be exempted or for which such a system is ineffective, according to the list of those cargoes and the associated guidance in IMO Circular [MSC.1/Circ.1395/Rev.6](#) and its Table 1 (in the Annex).
 - .5 The Administrator retains the right to grant an exemption for cargoes not included in Table 1 or to impose conditions when granting these exemptions under the provisions of SOLAS Regulation II-2/10.7.1.4.

- 2.3 Shippers and shipmasters are required:
- .1 to ensure the suitability of the hold and its equipment for transporting the product, by physical inspection, by the Master, shipowner representative, or independent cargo surveyor, before loading;
 - .2 to ensure, by physical inspection, by the Master, shipowner representative, or independent cargo surveyor as deemed necessary, before loading, the suitability of the product for transportation;
 - .3 to seek advice in accordance with §4.0 below, before loading any solid bulk cargo not specifically listed in IMSBC Code, Appendix 1; and
 - .4 to only commence loading if all the relevant safety criteria contained in the IMSBC Code are met.
- 2.4 Shipowners, operators, and companies must ensure that ship Masters and crews involved in the transport of solid bulk cargoes are trained in the provisions of the IMSBC Code, including the safety measures they contain, and to incorporate them into their safety management system procedures.
- 2.5 Cargoes that May Liquefy or Undergo Dynamic Separation
- .1 Group A Cargoes
 - a. IMSBC Code, Appendix 4, *Index*, lists all cargoes currently included in the Code and identifies those cargoes that have the potential to liquefy or undergo dynamic separation as Group A cargoes.
 - b. *Appendix 1, Individual Schedules of Solid Bulk Cargoes*, identifies the cargo group as well as all other pertinent characteristics of each cargo including carriage requirements.
 - c. The requirements of the IMSBC Code, sections 7 and 8, must be carefully followed for the loading and carriage of all Group A cargoes.
 - d. *Appendix 2, Laboratory test procedures, associated apparatus and standards*, presents test procedures for materials which may liquefy.
 - e. Any solid bulk cargo proposed for carriage which is not listed in the IMSBC Code, Appendix 1 must be carried in accordance with subsection 1.3 of the Code.

.2 Bauxite

IMO Circular [CCC.1/Circ.2/Rev.1](#) warns of the dangers of carrying bauxite due to liquefaction risk and possible capsizes under certain conditions. All concerned parties must consider the advice in that Circular, including that:

- a. Masters should be aware that an atypical ship's motion (wobbling) can indicate cargo movement in the holds leading up to ship stability issues.
- b. IMSBC Code, Appendix 1, contains two different schedules for bauxite:
 - (1) BAUXITE - a Group C cargo; and
 - (2) BAUXITE FINES - a Group A Cargo.

.3 Independent Testing

Where there is any doubt about cargo declaration information, or suspicion that it has been misrepresented, independent testing must be carried out to determine the FMP, TML, and actual MC of the cargo to be loaded.

3.0 Cargoes Listed in the IMSBC Code

- 3.1 The individual schedules in the IMSBC Code cover typical cargoes shipped in bulk, with advice on their properties and methods of handling. These schedules are not exhaustive, and the properties attributed to the cargoes are given only for guidance. Before loading, current valid information from the shipper must be obtained on the physical and chemical properties of the cargoes presented for shipment.
- 3.2 Solid bulk cargoes specifically listed in an individual schedule (IMSBC Code, Appendix 1), must be transported according to those provisions. In addition, the transportation must be in accordance with the provisions in sections 1 through 10 and 11.1.1.
- 3.3 The Master, or on their behalf, the ship operator, must consult with the competent authorities at the loading and discharge ports, as necessary, about the requirements which may be in force and applicable for transporting the cargo.

4.0 Cargoes Not Listed in the IMSBC Code

- 4.1 **Not Listed:** If a solid cargo is proposed for carriage in bulk and it is not listed in IMSBC Code, Appendix 1, then the shipper must, before loading, provide the competent authority of the loading port with the characteristics and properties of the cargo in accordance with the IMSBC Code, section 4. Based on the information received, the competent authority of the loading port will assess the acceptability of the cargo for safe shipment.

- 4.2 **When Hazard May be Present:** When it is determined that the solid bulk cargo proposed for carriage **may present hazards** such as those defined by Group A or B (IMSBC Code, section 1.7), the competent authority of the loading port must seek advice from the competent authority of the unloading port and the Administrator (the flag State). These three competent authorities (loading port, unloading port, and the Administrator) are together to set the preliminary suitable conditions for this cargo carriage.
- 4.3 **No Specific Hazards:** When it is assessed that the solid bulk cargo proposed for carriage **presents no specific hazards** for transportation, the cargo carriage is to be authorized. The competent authority of the loading port will advise the Administrator (the flag State) and the unloading port's competent authority of this authorization.
- 4.4 The loading port's competent authority must provide the Master with a certificate stating the cargo characteristics and the required conditions for the shipment's carriage and handling.
- .1 If this certificate is not provided, the Master must not load the cargo.
 - .2 When deemed necessary, the ship operator or Master must consider engaging the services of an independent cargo surveyor to determine the cargo's suitability for carriage and handling.
- 4.5 The loading port's competent authority must also apply to the IMO within one year from issuing the certificate to incorporate this solid bulk cargo into IMSBC Code, Appendix 1.
- .1 The application format is outlined in IMSBC Code, section 1.3.3.
 - .2 IMO Circular [MSC.1/Circ.1453/Rev.2](#) provides guidelines for submitting the information and completing the format for the cargo properties not listed in the IMSBC Code for Amendment 06-21. It also describes how to determine the transport risk, type, and their carriage conditions, according to section 1.3.3 of the IMSBC Code.
 - .3 IMO Circular [MSC.1/Circ.1664](#) provides the revised form which must be used in conjunction with [MSC.539\(107\)](#) for Amendment 07-23.
- 4.6 Any interference on the part of the loading port's competent authority in surveys conducted by shipowner's representative or independent cargo survey must be immediately reported to the Administrator.

5.0 HME Cargo Residues

- 5.1 The IMSBC Code requires shippers to identify solid bulk cargoes as HME or non-HME. That determination is made using the seven criteria in Appendix I of MARPOL Annex V (See also paragraph 3.2 of IMO Resolution [MEPC.295\(71\)](#)). A declaration whether or not a solid bulk cargo is HME must be included in the information required to be provided per section 4.2 of the IMSBC Code.
- 5.2 Discharge of HME cargo residues at sea is not permitted under MARPOL Annex V. This includes cargo residues contained in washwater as well as cargo residues not contained in washwater. Handling and disposal of HME cargo residues must comply with the applicable requirements of MN [2-013-5](#).
- 5.3 Under MARPOL Annex V, subject to certain described restrictions, discharge of non-HME cargoes is permitted including cargo residues contained in washwater as well as cargo residues not contained in washwater. MN [2-013-5](#) has the requirements for properly handling non-HME cargo residues.

6.0 Carriage of Ammonium Nitrate-Based Fertilizer (non-hazardous)

IMO Circular [CCC.1/Circ.4](#) refers to the potential risks associated with this cargo from decomposition including the release of toxic gases. In the event of this occurring, Masters must follow the advice contained in §8 of that Circular. See the IMSBC Code, Appendix 1 for regulations governing nitrate-based fertilizer.

7.0 Documentation

The following documentation must be kept on board each ship carrying dangerous goods in solid bulk cargo form:

- 7.1 special list or manifest setting forth the dangerous goods on board and the location of them, in accordance with SOLAS Regulation VII/7-2.2;
- 7.2 appropriate instructions on emergency response to incidents involving the cargoes; and
- 7.3 Document of Compliance per SOLAS Regulation II-2/19.4.