

STATUTORY UPDATE No. 02, 2015 / MARCH

APPLICATION OF MSC.1/CIRC.1352 (CSS CODE ANNEX 14) FOR CONTAINER VESSELS AND OTHER VESSELS EQUIPPED FOR CARRIAGE OF CONTAINERS



BACKGROUND

The amendment to the Code of Safe Practice for Cargo Stowage and Securing (CSS Code) Annex 14, "Guidance on Providing Safe Working Conditions for Securing of Containers on Deck", as set out in the annex of MSC.1/Circ.1352, was approved by the IMO in 2010 and revised in 2014 (MSC.1/Circ.1352/Rev.1).

Ships keel-laid on or after 1 January 2015: The IMO has not made the application of MSC.1/Circ.1352 mandatory, but it encourages ship owners, ship operators, shipmasters and crew to apply the annex in its entirety to container vessels and vessels equipped for carriage of containers. DNV GL intends to apply

all the amendments in the annex to these vessels, which will then be given the class notation "SafeLash" in accordance with the upcoming DNV GL joint rule set.

Ships keel-laid before 1 January 2015 are, through MSC.1/Circ.1352, encouraged to apply sections 4.4, 7.1, 7.3 and 8, and to apply the principles in sections 6 and 7.2 so far as practical, on the understanding that existing ships will not be required to be enlarged or undergo other major structural modifications. For ships keel-laid before 1 January 2015, DNV GL will implement the applicable sections as instructed by the flag administration.

RELEVANT DNV GL VESSELS

- 100 A5 vessels of the ship type "container ship" and other ship types with the additional class notation "Equipped for Carriage of Containers"
- 1A1 vessel of the ship type "container ship" and other ship types with the additional class notation "Container"

FLAG STATE REQUIREMENTS

As of January 2015, the flag state administrations of Cyprus, Germany, Malta and the United Kingdom have issued circulars/notes making MSC.1/Circ.1352 mandatory for container vessels and vessels equipped for the carriage of containers that sail under their flags. Please note that flag state administrations may interpret the requirements differently and this will be reflected in the implementation for the relevant ships.

ACTIONS

Container vessels in DNV GL class that were keel-laid before 1 January 2015 and sail under a flag that has made MSC.1/Circ.1352, or parts of it, mandatory, will be addressed as follows: for 1A1 vessel, a Retroactive Requirement, RR Ref 1048, will be issued (see information below). For 100 A5 vessels currently in DNV GL's Fleet Online, a Special Requirement with a similar function and the same content as RR Ref 1048 will be issued. The Special Requirement will be replaced by RR Ref 1048 when the vessel is transferred to the new My DNV GL portal.

Sections 4.4, 7.1 and 7.3 of Annex 14, as described in the RR/Special Requirement information stated below, are the responsibility of the ship owner/manager, while the DNV GL surveyor will perform an assessment of sections 8, 6 and 7.2 in so far as practical during the first safety construction survey. A Statement of Compliance will be issued in connection with the assessment.

The RR/Special Requirement information will be edited and aligned with each flag administration's instructions.

RR Ref 1048/Special Requirement:

Safe working conditions for securing containers on deck:

By <survey/date/text>, Code of Safe Practice for Cargo Stowage and Securing (CSS) Annex 14 (MSC.1/Circ.1352) shall be complied with as instructed by the <flag> flag administration, ref. <flag instruction/date>. This implies implementation of sections 4.4 'Training and familiarisation', 7.1 'Introduction', 7.3 'Maintenance' and 8 'Specialised container safety design' for existing container ships with keel laid before 2015-01-01, and the principles of sections 6 'Design' and 7.2 'Operational procedures' as far as practical. The ship is not required to be enlarged or undergo other major structural modifications in order to comply with sections 6 and 7.2.

ADDITIONAL INFORMATION

From 1 January 2015, owners shall be aware of the following risks relating to ships not in compliance with CSS Code Annex 14:

- Ships may be refused to call at ports where port state authorities require compliance with CSS Code Annex 14
- Ships may be subject to structural alterations in order to be in compliance with CSS Code Annex 14 when changing flag

In order to avoid the above risks, owners of vessels sailing under flags that have not made CSS Code Annex 14 mandatory are strongly advised to contact DNV GL for an assessment and, if necessary, alterations and documentation of compliance.

CONTACT INFO

For questions regarding newbuildings and technical details, please contact:

- MCADE451 Ship Structures and Outfitting, Hamburg
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For questions regarding vessels in service, please contact:

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