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**GUIDANCE FOR THE APPLICATION OF SAFETY, SECURITY AND ENVIRONMENTAL  
PROTECTION PROVISIONS TO FPSOs AND FSUs**

1 The Marine Environment Protection Committee, at its fifty-ninth session (13 to 17 July 2009) and the Maritime Safety Committee, at its eighty-seventh session (12 to 21 May 2010), recognizing that there is a need to provide guidance to Member States such that they may develop regulations on safety, pollution prevention and security of Floating Production Storage and Offloading Facilities (FPSOs)/Floating Storage Units (FSUs), approved the guidance, as set out in the annex, with a view to providing more clear and specific information, for the application of safety, security and environmental protection provisions to FPSOs and FSUs.

2 Member Governments are invited to use the annexed guidance when applying relevant provisions of the SOLAS Convention, including requirements contained in the ISM Code, the Load Lines Convention, MARPOL Convention and the STCW Convention and to bring it to the attention of all parties concerned.

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## ANNEX

### GUIDANCE FOR THE APPLICATION OF SAFETY, SECURITY AND ENVIRONMENTAL PROTECTION PROVISIONS TO FPSOs AND FSUs

#### General

1 This circular intends to provide guidance to Member States such that they may develop regulations on safety, pollution prevention and security of Floating Production Storage and Offloading Facilities/Floating Storage Units (FPSOs/FSUs). In the vast majority of cases an adequate safety and pollution prevention regime established by national legislation exists based on provisions of the SOLAS Convention, including requirements contained in the ISM Code, the Load Lines Convention, MARPOL Convention and the STCW Convention, implemented together with exemptions, and industry guidelines.

2 The circular also provides guidance to industry with a view to improving safety, pollution prevention and security of FPSOs/FSUs through recommendations concerning competence of marine operations personnel, manning, safety management systems, operations off location, security, pollution prevention and emergency response of FPSOs/FSUs.

#### Jurisdiction and administration

3 In reviewing the current safety regime for FPSOs/FSUs, it is essential to recognize the sovereign rights that the coastal State has over:

- .1 non-disconnectable FPSOs/FSUs, which are designed to be permanently moored in the waters under the jurisdiction of the coastal State and have no mechanical means to transit under their own propulsion; and
- .2 disconnectable FPSOs/FSUs, self-propelled or non-propelled, while operating on location.

4 Flag States and coastal States should cooperate with a view to ensuring the compliance of FPSOs/FSUs with applicable international standards on maritime safety, marine environment protection, enforcement and control measures such as survey and certification, maritime search and rescue, casualty investigation and emergency response.

#### Principle of application

5 Compliance with relevant Conventions such as SOLAS (including the ISM Code), Load Lines, STCW and MARPOL, Assembly resolutions<sup>1</sup> and industry guidelines<sup>2,3</sup> contribute from different perspectives to safety and pollution prevention of FPSOs/FSUs, being disconnectable or non-disconnectable, self-propelled or non-propelled. Therefore a comprehensive and pragmatic approach should be taken when considering the applicability of the above-mentioned instruments and documents to FPSOs/ FSUs given their unique operations.

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<sup>1</sup> Recommendations on Training of Personnel on Mobile Offshore Units (MOUs), resolution A.891(21).

<sup>2</sup> Competence Assurance Guidelines for FPSOs, developed by OCIMF.

<sup>3</sup> Guidelines for Managing Marine Risks Associated with FPSOs, developed by OGP.

## Operations on location

6 For both disconnectable and non-disconnectable units, the SOLAS, STCW and the Load Line Conventions do not apply as the FPSO/FSU is neither underway nor engaged in an international voyage. However, the Annexes of MARPOL apply in light of the definition of a ship in article 2(4) of the MARPOL Convention, which includes floating platforms, and the general applicability of the Convention to ships not engaged in international voyages. MARPOL Annex I should be applied to the extent recommended by resolutions MEPC.139(53) and MEPC.142(54).

7 To ensure that disconnectable self-propelled FPSOs/FSUs can be readily and efficiently disconnected in the event of severe environmental conditions, it is recommended that they should possess a level of safety equivalent to that afforded by the SOLAS and Load Line Conventions. In instances where hardware and arrangements of marine-related systems are impacted by production systems, arrangements which may be more properly addressed by other standards (e.g., based on the MODU Code) may be accepted by the flag State with the concurrence of the coastal State.

8 An approved safety management system, including a maintenance programme particularly for essential marine systems and equipment, should remain effective at all times<sup>3,4,5</sup>. Competence of onboard personnel, both marine and production, should be maintained to an adequate level<sup>2</sup>.

## Operations off location

9 Depending on the mooring and riser system capabilities relative to selected design environmental conditions at the location under question, it may be necessary for self-propelled FPSO/FSUs to disconnect and move off location to avoid adverse environmental conditions/loads. Additionally, FPSOs/FSUs may need to be taken off location for dry-docking, repair or maintenance work.

10 When it is necessary to disconnect and undertake an international voyage under its own propulsion (e.g., the FPSO/FSU is flying the flag of a State other than the coastal State in whose waters the FPSO is transiting), it would therefore be subject to the SOLAS (including ISM), STCW, and Load Line Conventions, in addition to MARPOL.

11 In such cases where it is necessary to disconnect, attention is drawn to SOLAS article IV and regulation I/4(a) in the event that limited exemptions from the requirements for physical arrangements or hardware are deemed appropriate.

## Security

12 In order to facilitate the interaction between FPSOs/FSUs and other ships, FPSOs/FSUs should comply with SOLAS chapter XI-2 and the ISPS Code, as applicable<sup>6</sup>.

## Emergency response

13 An emergency response procedure is recommended to be developed for the FPSO/FSU to address the safety and pollution risks associated with marine and production systems and operations, taking into account the MARPOL Convention, the ISM Code and appropriate guidelines.

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<sup>4</sup> International Safety Management Code.

<sup>5</sup> American Petroleum Institute API 75 Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities.

<sup>6</sup> MSC/Circ.1111.