

Isle of Man Ship Registry Technical Advisory Notice

Application of OSV Chemical Code – Transitional Period

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Introduction

This TAN applies to operators of Offshore Support Vessels (OSVs) and is to advise of changes to international requirements for the carriage of bulk chemical cargoes.

Background

Regulation 11.2 of MARPOL Annex II permits OSVs to transport bulk cargoes identified in chapter 17 & 18 of the IBC Code, provided they comply with the following codes/guidelines, depending on the type and quantity of cargo carried and the vessel's date of construction:

- IMO Resolution A.673(16) – 'the LHNS Guidelines', which applies to OSVs:
 - With a keel lay date on or after 19 April 1990 and before 1 July 2018; and
 - Carrying only cargoes which are as per clause 1.2.2.1.1, 1.2.2.1.2 and 1.2.2.2 of the LHNS Guidelines in quantities not exceeding 800m³
- IMO Resolution A.1122(30) – 'the OSV Chemical Code', which applies to OSVs:
 - With a keel lay date on or after 1 July 2018; or
 - With a keel lay date on or after 19 April 1990 and carrying cargoes assigned to carriage on a type 3 ship not permitted under the LHNS Guidelines; or carrying cargoes assigned to carriage on a type 2 ship

On 1 January 2021, amendments to the IBC code entered into force which re-classified a number of cargoes which were commonly carried on OSVs under Appendix 1 of the LHNS Guidelines. Many cargoes previously deemed 'pollution-only products' are now also deemed 'safety hazard' productions. In addition a number of previously 'non-toxic' cargoes have been reclassified as 'toxic'. The result of this is that the range of cargoes able to be carried by OSVs certified to the LHNS guidelines is vastly reduced.

Such vessels must decide whether to continue to operate under the LHNS Guidelines with the reduced range of cargoes, or to convert to the OSV Chemical Code. This should be considered in partnership with the vessel's Recognised Organisation. To assist, the Ship Registry can consider application of a transitional period.

Transitional Arrangements

A number of coastal states have stated their willingness to permit a transitional period of one year for vessels affected by the revisions to the IBC Code whilst they consider their options and undertake the necessary modifications to their vessels. This includes the [United Kingdom](#) and [Norway](#). During the transitional period, ships complying with LHNS guidelines may be permitted to continue carrying products listed in Appendix 1 subject to any conditions specified by the coastal state. Any vessel wishing to make use of a transitional arrangement should contact the Ship Registry. A request is likely to be looked upon favourably if it complies with the position of the coastal state(s) where the vessel is operating and is agreed with the relevant authority.

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

