

Isle of Man Ship Registry Technical Advisory Notice

Industrial Personnel Code

Ref. 003-23 (Rev. 1)
Issued: 10/11/2023

1. Introduction

The Industrial Personnel Code and associated SOLAS Chapter XV are due to enter into force on 1 July 2024. These instruments apply to cargo ships and high-speed cargo craft that are over 500gt on international voyages and that carry more than 12 industrial personnel. Such ships are required to comply with the code by the first intermediate or renewal survey after entry into force.

For purposes of these instruments and this notice, industrial personnel are defined as 'all persons transported or accommodated on board for the purpose of offshore industrial activities performed on board other ships and/or offshore facilities.'

Although industrial personnel are a class of persons distinct from passengers or special personnel, it is important to note that these groups are aggregated for purposes of determining the application of the code. For example an applicable cargo ship carrying 12 special personnel and 1 industrial personnel would have to comply with the IP code.

The code does not apply to ships not carrying any Industrial Personnel.

2. Grandfathering

The existing standards for the carriage of more than 12 industrial personnel on board vessels engaged on international voyages are stated within MSC.418(97) – the 'Interim recommendations on the safe carriage of more than 12 industrial personnel on board vessels engaged on international voyages'. Cargo ships constructed before the entry into force of the IP Code, and holding an authorisation under MSC.418(97) prior to the entry into force of the IP Code, may comply with a reduced version of the Code (i.e. only regulations III/1, III/2 (except for paragraph 2.1.7), IV/7 and IV/8.

Cargo ships that are constructed after the entry into force and cargo ships that are constructed prior to the entry into force but do not hold an authorisation under MSC.418(97) must comply with the full version of the Code.

Isle of Man-registered ships which carry Industrial Personnel, or are likely to in the near future, are therefore urged to consider whether they ought to obtain evidence of compliance with MSC.418(97) prior to the entry in force date of the Code.

Paragraph 6 of MSC.418(97) refers to the standard of vessel to which an authorisation may be granted. At the present time 2008 SPS Code ships may be authorised (subject to compliance with the remaining conditions of MSC.418(97)). Vessels complying with other standards will be considered on a case by case basis by the Ship Registry – please email marine.survey@gov.im for consideration.

3. Form of Evidence of Compliance with MSC.418(97)

It will be necessary to obtain documentary evidence of compliance with MSC.418(97) in order to benefit from the grandfathered version of the code. It is understood that most ROs do not currently issue any documentary evidence of compliance with MSC.418(97), however some ROs may be in the process of developing a Statement of Compliance for the Carriage of Industrial Personnel or similar titled document.



For those ROs that do not have a Statement of Compliance, the Isle of Man Ship Registry has developed a template Statement of Compliance (Form Ref S085) which can be found [here](#). For the avoidance of doubt, either option may be used by Isle of Man ships, but in either case the Statement of Compliance should be issued by the RO and not the Ship Registry.

4. Authorisation for ROs

This TAN shall be taken as an authorisation for Isle of Man ROs stated in MSN 020 to:

- Undertake the relevant surveys and issuance of the Industrial Personnel Safety Certificate and Record of Equipment
- Undertake issuance of the Statement of Compliance relating to MSC.418(97) referred to in Section 3 above

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.

