

Preparing for the implementation of the International Code of Safety for Ships Carrying Industrial Personnel (IP Code)

On 1 July 2024, the new SOLAS Chapter XV and *International Code of Safety for Ships Carrying Industrial Personnel* (IP Code) will enter into force. This new, mandatory, legislation covers the carriage of persons ('Industrial Personnel') on board for the purpose of offshore industrial activities performed on board other ships and/or offshore facilities.

From July 2024, ships > 500 gross tonnage will require an Industrial Personnel Safety Certificate (IP Certificate) if they carry more than 12 Industrial Personnel, or a combination of Industrial Personnel, Special Personnel (as per SPS Code) and passengers.

While more detail and guidance on the IP Code, its requirements and its implications is provided in IMCA REG005 *Guidance on the Industrial Personnel (IP) Code*, this information note is intended to emphasise the effects that the IP Code will have on existing ships.

Existing vessels – grandfathering

As stated in Regulation 3 of SOLAS Chapter XV, existing ships are eligible to apply for an IP Code Certificate if they are authorised by their Flag State to carry Industrial Personnel before 1 July 2024, **and** comply with the following requirements of the IP Code:

- ◆ III/1 IP personnel qualifications
- ◆ III/2 Safe transfer arrangements
- ◆ IV/7 or V/7 Life-saving appliances
- ◆ IV/8 or V/8 Dangerous goods.

Existing ships that have not been authorised by their Flag State before 1 July 2024, will not be able to take advantage of this grandfathering provision and will have to comply with the IP Code requirements IN FULL in order to obtain an IP certificate.

Flag State authorisation shall be in accordance with IMO's Interim recommendations on the safe carriage of more than 12 industrial personnel on board vessels engaged on international voyages [Resolution MSC.418(97)]. These interim recommendations provide that, in order to be authorised:

- ◆ Industrial personnel on board shall be medically fit, familiarised on board, and appropriately trained:
 - STCW A-VI/1 Basic Training
 - GWO, OPITO, or equivalent basic training, if accepted by the Flag State.
- ◆ Transfer of personnel shall be in accordance with IMO guidelines MSC-MEPC.7/Circ.10.
- ◆ The ship shall be certified under the 2008 SPS Code (or another standard accepted by the Flag State).

Flag State instructions

Only a few Flag States have yet provided instructions on the implementation of the IP Code and more specifically on how to deal with existing vessels under the interim recommendations. IMCA is aware of the following and is providing links to these on its website:

- ◆ Isle of Man [Technical Advisory Notice 003-23](#)
- ◆ Liberia [Marine Notice SAF-013](#)
- ◆ Malta [Technical Notice SLS.36](#)
- ◆ Marshall Islands [Marine Notice 2-011-36](#)
- ◆ Norway [Circular IC 5-2017 rev.1](#)
- ◆ Singapore [Shipping Circular No.4 of 2023](#)
- ◆ Vincent & Grenadines [Saint Vincent and Grenadines Maritime Administration](#)
- ◆ United Kingdom [MGN 674\(M\)](#)

Flag state instructions vary considerably in scope, requirements for compliance and also on how to indicate authorisation. Members are advised to discuss requirements for their ships with their Flag State and/or their Classification Society, especially if their Flag State has not yet issued instructions.

Key takeaways

Members' attention is drawn to the following:

- ◆ Existing ships can only take advantage of the grandfathering provisions in case they are authorised to carry Industrial Personnel before 1 July 2024.
- ◆ Due to the aggregation of Industrial Personnel, Special Personnel and passengers, the IP Code is likely to apply to the majority of existing Special Purpose Ships at some point during their operational life. For those ships, it is especially important to act now and to obtain authorisation to carry IP on board before 1 July 2024.
- ◆ Discuss requirements Flag State and/or Classification Society, especially if the Flag State has not issued instructions yet.
- ◆ Existing ships that have not been authorised by their Flag State before 1 July 2024, will not be able to take advantage of this grandfathering provision and will have to comply with all IP Code requirements to obtain an IP certificate.

For more information, please contact Margaret.Fitzgerald@imca-int.com.

References

- ◆ IMO Resolution MSC.521(106) – SOLAS Chapter XV
- ◆ IMO Resolution MSC.527(106) – International Code of Safety for Ships Carrying Industrial Personnel (IP Code)
- ◆ IMO Resolution MSC.418(97) – Interim Recommendations on the Safe Carriage of more than 12 Industrial Personnel on Board Vessels Engaged on International Voyages
- ◆ IMO Circular MSC-MEPC.7/Circ.10 – Guidance on Safety when Transferring Persons at Sea
- ◆ [IMCA REG005](#) – Guidance on the Industrial Personnel (IP) Code