

Clarifying what Members need to do to prepare for 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.

IMCA Information Note 1655 explains the process to get existing ships certified under the IP Code. Please be reminded that the necessary Flag State authorisation needs to be in place before 1 July 2024.

But apart from the Flag State authorisation, existing ships intending to carry Industrial Personnel will need to comply with the following requirements of the IP Code by the first intermediate or renewal survey, whichever occurs first, after 1 July 2024:

- ◆ **III/1 IP personnel qualifications**
 - Minimum age 16 years.
 - Certified physically and medically fit.
 - Able to communicate in the working language of the ship.
 - Having received approved basic safety training prior to boarding.
 - Be provided with ship-specific familiarisation on board.
 - Be familiarised with the transfer arrangements and procedures before being transferred.
- ◆ **III/2 Safe transfer arrangements (except for paragraph 2.1.7)**
 - Transfer arrangements to be kept in safe condition and properly maintained/inspected.
 - Proper supervision on the rigging and use of the transfer arrangements.
 - Communication established between the supervisor and the Bridge.
 - Transfer arrangements to be marked for identification and a record of use and maintenance kept on board.
 - Pre-use checks performed.
 - Safe and unobstructed passage between the transfer arrangements and the area where the Industrial Personnel are being transported.
 - Designated deck area for the transfer arrangements, free of obstructions.
 - Job Safety Analysis to be carried out before executing transfers at sea, to include environmental conditions as well as operational and equipment limitations.
 - Failure analysis (QFA / FMEA) to be performed on the transfer arrangements and associated systems.

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- Transfers follow guidance provided by IMO and IMCA¹.
- Evaluation of the ship's position-keeping capabilities/requirements.
- Procedures to be in place to ensure correct number and identity of persons on board at all times.

◆ **IV/7 or V/7 Life-saving appliances**

- For ships carrying more than 60 persons on board, the requirements of SOLAS chapter III for passenger ships engaged on international voyages apply (same requirement as in the 2008 SPS Code).
- Vessels not previously certified under the 2008 SPS Code, but grandfathered by the Flag State on the basis of equivalence to the 2008 SPS Code may have to apply several additional requirements to comply with this part of the IP Code. Members are advised to prepare a gap analysis and discuss with their Classification Society and Flag State.

◆ **IV/8 or V/8 Dangerous goods**

When simultaneously carrying industrial personnel and dangerous goods

- **In packaged form:**
 - Two additional self-contained breathing apparatus and spare charges required as per SOLAS regulation II-2/19.3.6.2.
 - Ships carrying > 240 persons on board are considered passenger ships for purposes of applying the IMDG Code.
- **In solid form in bulk:**
 - Two additional self-contained breathing apparatus and spare charges required as per SOLAS regulation II-2/19.3.6.2.
 - For the purpose of the requirements of the IMSBC Code, industrial personnel shall be considered as personnel in the context of personnel protection.
- **In liquid form** (dangerous liquid chemicals, liquefied gases, and oil) in bulk:
 - The ship shall be certified in accordance with the requirements of parts B or C of SOLAS chapter VII.
 - Carriage of toxic products, low-flashpoint products or acids shall not be allowed when the total number of persons on board exceeds 60.
 - The areas and spaces on ships where industrial personnel are not permitted to enter shall be clearly marked.
 - The arrangements for personnel transfer shall be located outside the cargo area.
 - Access to the arrangements for personnel transfer shall, as far as practicable, be located outside the cargo area.
 - Embarkation or personnel transfer and loading or unloading of cargo shall not take place simultaneously.

When all of the above are in place, the vessel can be issued with an IP Code Certificate.

¹ IMO *Guidance on safety when transferring persons at sea* (MSC-MEPC.7/Circ.10) and IMCA M202 *Guidance on the transfer of personnel to/from offshore vessels and structures*.

Key takeaways

Attention to members is drawn to:

- ◆ Existing ships can only take advantage of the grandfathering provisions in case they are authorised to carry Industrial Personnel before 1 July 2024. Discuss requirements with Flag State and/or Classification Society, especially if the Flag State has not issued instructions yet.
- ◆ In addition to the Flag State Authorisation, existing ships will need to comply with specific requirements of the IP Code by the first intermediate or renewal survey, whichever occurs first, after 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 ensure they are covered by the grandfathering provisions. 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.
- ◆ Further information on the requirements and implications of the IP Code is available in IMCA's guidance document [REG005 – Guidance on the Industrial Personnel \(IP\) Code](#).

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

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