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MAIN DECISIONS OF MSC 109

The scope of the Marine Information Notice publication is to provide the Shipping Sector with information relevant to RINA, its organization, initiatives and services as well as to disseminate information of a general nature which in RINA view may be of interest. The information provided does not intend to be exhaustive and is given for reference only.

The 109th session of the IMO Maritime Safety Committee (MSC 109) was held from 2 to 6 December 2024. The main decisions taken are summarized below on the basis of the information obtained while following the debate.

AMENDMENTS TO MANDATORY INSTRUMENTS

Amendments to IGC Code

The amendments to the IGC Code introduce modifications to Ch. 16 “use of cargo as fuel” permitting the use as fuel of toxic products in column “f” of Ch.19 (e.g. ammonia) carried in type 2G/2PG ships, provided that the same level of safety as natural gas is ensured in accordance with IGC Code and taking into account the guidelines (still to be developed), after special consideration has been given by the Administration. The use of cargoes requiring carriage in type 1G ships, as identified in column “c” of Ch.19 shall not be permitted.

The amendments will enter into force on 1 July 2026, however Administration can early implement them on a voluntary basis.

Amendments to the IGF Code

The amendments to the IGF Code introduce requirements for new ships (i.e. contracted for construction on or after 1 January 2028; or keel laid on or after 1 July 2028; or delivered on or after 1 January 2032), in relation – inter alia – to:

- design of suction wells installed in fuel tanks;
- piping design, providing the requirement that pressure relief valves of piping shall discharge liquid or gas from the piping system into the fuel tanks;
- fitting of non-return valves on fuel tank inlets from safety relief valve discharge lines;
- fire protection of boundary facing the fuel tank on the open deck;
- consideration of fuel storage hold space as cofferdam to Type C tanks
- additional areas to be considered as “hazardous area zone 1” (i.e. open deck or semi-enclosed spaces on open deck above and in the vicinity of fuel tank vent mast outlet within a vertical cylinder of unlimited height and 6m radius centred upon the outlet, and within a hemisphere of 6m radius below the outlet);
- additional areas to be considered as “hazardous area zone 2” (i.e. spaces 4m beyond the cylinder and 4m beyond the hemisphere);
- gas-tightness and pressure of ventilation ducts serving non-hazardous spaces and passing through a hazardous space; and
- gas-tightness and pressure of ventilation ducts serving hazardous spaces and passing through less hazardous spaces.

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DRAFT AMENDMENTS APPROVED IN VIEW OF THEIR ADOPTION BY MSC 110 (JUNE 2025)

Draft amendments to SOLAS Convention

The approved draft SOLAS amendments modify the following:

1. Reg. II-1/2, including the definition of "Gaseous fuel" meaning any fluid used as fuel which:
 - has a vapour pressure exceeding 0.28 MPa absolute at a temperature of 37.8°C; or
 - is completely gaseous at 20°C at a standard pressure of 101.3 kPa;
2. Reg.s II-1/56 and II-1/57, applying the IGF Code also to gaseous fuel;
3. Reg. II-2/11, correcting references to tables for passenger and cargo ships which were unintentionally wrongly included in the comprehensive previous review of Ch. II-2;
4. Reg. V/23, requiring pilot transfer arrangements installed on or after 1 January 2028 (i.e. contractual delivery date or – in the absence - the actual delivery date on or after 1 January 2028) to be designed, manufactured, constructed, secured and installed in accordance with the revised performance standards (which will be adopted in conjunction with such SOLAS amendments). Such pilot transfer arrangements shall be approved by the Administration.
Pilot transfer arrangements installed before 1 January 2028 shall comply with the revised performance standards not later than the first survey on or after:
 - 1 January 2029 for ships engaged on international voyages; and
 - 1 January 2030 for ships engaged on other voyages.Regardless of the installation date, all pilot transfer arrangements shall comply with the inspection, stowage, maintenance, replacement and familiarization requirements set in the revised performance standards;
5. Record of equipment for passenger (Form P), Record of equipment for cargo ship safety (Form E) and Record of equipment for cargo ship safety (Form C) including new items on pilot transfer arrangements.

Draft amendments to the 1994 and 2000 HSC Codes

- The draft amendments to the 1994 and 2000 HSC Codes include modifications to:
- lifejacket carriage requirements (Ch.8), harmonizing them with those in SOLAS Chapter III in order to ensure that the same level of safety. Existing craft (i.e. constructed before 1 January 2028) shall comply with this requirement not later than the first renewal survey on or after 1 January 2028;
 - pilot transfer arrangements requirements, in line with the draft SOLAS requirements (see above);
 - Record of Equipment for HSC Safety Certificate, including a new entry "number suitable for infants" in the "Details of life-saving appliances" and new items on pilot transfer arrangements in the "Details of navigational systems and equipment".

Draft amendments to the IGC Code

The draft amendments to the IGC Code concern both structural and operational elements, related to issues such as:

- pipe insulation and pipe design pressure;
- application of recognized standards and minimum design pressure to bellows expansion joints;

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- cargo tank filling limits;
- the use of LPG and ethane cargo as fuel;
- carriage of CO₂;
- emergency shutdown systems; and
- application of finite element analysis as an alternative design criterion for type C tanks.

The design and construction requirements will be applicable to new ships only (i.e. constructed on or after the date of entry into force of the amendments), while the operational provisions will be applicable to new and existing (i.e. constructed on or after 1 January 2016) ships.

The draft Code includes also many UIs which will, however, remain applicable for existing ships (i.e. constructed prior to the entry into force of these amendments).

RECOMMENDATORY INSTRUMENTS ADOPTED/APPROVED

Interim Guidelines for the safety of ships using ammonia as fuel

The interim Guidelines provides an international standard for ships using ammonia as fuel other than IGC Code ships in relation to arrangement, installation, control and monitoring of machinery, equipment and systems to minimize the risk to the ship, its crew and the environment.

The interim Guidelines are a goal-based instrument providing goals and functional requirements. However, where no specific ship design details are included, industry and Administrations should take into account, and apply where relevant, the corresponding IGF Code regulations. Where such regulations are determined not to be fit for purpose, the principles set out in SOLAS Reg.II-1/55 on alternative design arrangement should be used to determine appropriate alternative performance criteria that align with the goals and functional requirements provided in these Interim Guidelines.

Clarifications on MF radio installation requirement for sea area A3

In relation to the implementation of SOLAS Reg.s IV/10 and IV/15, the Committee agreed to modify footnote No.6 in COMSAR.1/Circ.32/Rev.2, clarifying that for operating in sea area A3, a single MF/HF radio installation may be accepted both as a primary MF radio installation and a duplicated MF/HF radio installation as provided in the COMSAR Circular.

Guidance on the validity of radiocommunications equipment installed and used on ships (MSC.1/Circ.1460/Rev.5)

To ensure radiocommunication capability in the ship-to-ship, ship-to-shore and shore-to-ship directions, the revised Guidance clarifies that:

- all VHF radiocommunication equipment on board ships required by SOLAS Reg.s IV/7.1.1, IV/7.1.2 and IV/7.1.6, including the duplicated equipment in accordance with Reg.s IV/15.6 and IV/15.7, should comply with the latest channel arrangements in Appendix 18 of the ITU Radio Regulations (RR), by the first radio survey scheduled on or after 1 January 2028, or earlier, as appropriate;
- ships should be capable of transmitting and receiving VHF radiotelephony with the shore facilities in their area of operation, noting that some Administrations may have already implemented the new available channels prior to 1 January 2028.

Unified interpretations (UI)

The approved UIs clarify – inter alia - the following:

- arrangements requirements for single essential propulsion components (e.g. single electric propulsion motor) applicable only to passenger ships constructed on or after 1 January 2026 (SOLAS Reg. II-1/26.2);
- alarm setting requirements for pressure sensors fitted in each tank as an alternative secondary means of venting (SOLAS Reg.s II-2/4.5.3.2.2 and II-2/11.6.3.2)
- definition of the term "crown of a machinery space of category A" (SOLAS Reg. II-2/11.4.1);
- arrangements requirements for cargo/vapour piping and related gas-freeing piping/ducts installed on tankers on or after 1 January 2026 (SOLAS Reg.II-2/4.5.6.1 and IBC Code para.s 3.1.2, 3.1.4 and 3.5.3); and
- application of maintenance requirements to inflated rescue boats (SOLAS Reg. III/20.11 and related Res. MSC.402(96)).

Amendments to the Revised recommendation on testing of life-saving appliances (Res. MSC.81(70))

The amendments specify that the assumed average mass of a person while conducting self-righting tests for totally enclosed lifeboats should be 75 kg for a lifeboat intended for a passenger ship and 82.5 kg for a lifeboat intended for a cargo ship. Such amendments are reflected also in the Revised standardized life-saving appliance evaluation and test report forms (survival craft).

MARITIME AUTONOMOUS SURFACE SHIPS (MASS)

The Committee progressed on the development of the draft non-mandatory MASS Code - expected to be adopted at MSC 111 in May 2026 – working on the requirements relevant to risk assessment (Ch. 7), connectivity (Ch. 12), remote operation (Ch. 18).

Additional work will be intersessionally carried out in relation to several chapters which are still to be finalized and at MSC 110 submissions are expected on the framework for "Concept of Operations". The preliminary proposal – to be further discussed - foresees the inclusion in the framework of ship's physical characteristics, planned operational waters, modes of operation, Operational Envelope, fallback states, contingency plans, Remote Operations Centre functions, crew responsibilities and special and local rules to provide clearer and more detailed guidance for Administrations and stakeholders, in support of the safe and efficient operation of MASS.

OTHER RESOLUTIONS AND CIRCULARS ADOPTED/APPROVED

The following Resolutions and circulars – other than those described above - were adopted/approved (please note that the number of new Resolutions and Circulars have not been included in the draft report of the Committee published during MSC 109 session and will be provided once the final report is issued)

- MSC Res. on Performance standards for the reception of Maritime Safety Information and Search and Rescue related information by MF and HF digital navigational data (NAVDAT) system
- MSC Res. on Performance standards for a universal shipborne Automatic Identification System (AIS)
- MSC Res. on Interim Guidance to assist in the implementation of the Cape

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- Town Agreement of 2012
- MSC.509(105)/Rev.1 on Provision of radio services for the Global Maritime Distress and Safety System (GMDSS)
 - MSC.1/Circ. on Amendments to the IAMSAR manual
 - MSC.1/Circ. on Recommendations to national administrations to prevent collisions with fishing vessels
 - MSC.1/Circ.677/Rev.1 on Revised standards for the design, testing and locating of devices to prevent the passage of flame into cargo tanks in tankers
 - MSC.1/Circ.797/Rev.41 on List of competent persons maintained by the Secretary General pursuant to Section A-I/7 of the STCW Code
 - MSC.1/Circ.1164/Rev.29 on International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978
 - MSC.1/Circ.1628/Rev.3 on Revised standardized life-saving appliance evaluation and test report forms (personal life-saving appliances)
 - MSC.1/Circ.1630/Rev.3 on Revised standardized life-saving appliance evaluation and test report forms (survival craft)
 - MSC.1/Circ.1631/Rev.1 on Revised standardized life-saving appliance evaluation and test report forms (rescue boats)
 - MSC.1/Circ.1632/Rev.1 on Revised standardized life-saving appliance evaluation and test report forms (launching and embarkation appliances)
 - COLREG.2/Circ. on Traffic separation schemes and associated measures
 - MSC-FAL.1/Circ. on Guidelines concerning the recovery of deceased persons and of death after recovery
 - SN.1/Circ. on Routeing measures other than traffic separation schemes
 - SN.1/Circ.296/Rev.1 on IALA risk management toolbox for aids to navigation and vessel traffic services
 - SN.1/Circ.297/Rev.1 on IALA maritime buoyage system