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## **Ship Construction and Equipment: Use and application of IMO Codes and Guidelines for Offshore Vessels**

**Notice to all Shipowners, Masters, Managers, Crew, Charterers, Shipbuilders, Project Managers, and Employers, Surveyors, Contractors and other providers of ship-based services to the offshore industries**

*This notice replaces MGN390. For guidance on Special Purpose Ships refer to MGN 515*

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### **Summary**

Provides guidance where, for the United Kingdom, the full extent of the application of the Regulations contained in IMO international conventions are considered inappropriate for many ships operating offshore. It is indicated where ships may be partially exempted and/or accepted as meeting equivalent standards in compliance with specified IMO Codes and Guidelines. For Special Purpose Ships – refer to MGN 515(M).

### **1. Introduction**

- 1.1 This guidance is applicable to ships engaged in offshore operations, meaning support for or involvement in activities in a territorial sea or areas designated a Continental Shelf or Exclusive Economic Zone used for offshore civil engineering, exploration or production of hydrocarbons, production of energy from water, wind or other emerging energy technologies.
- 1.2 The IMO Codes and Guidelines accepted as providing equivalent standards in this notice are the Guidelines for the Design and Construction of Offshore Supply Vessels (OSV); Guidelines for the Transport and Handling of Limited Amounts of Hazardous and Noxious Liquid Substances in Bulk on Offshore Support Vessels (LHNS); and Code for the Construction and Equipment of Mobile Offshore Drilling Units (MODU) Code. Guidance on application of the IMO Special Purpose Ships (SPS) Code is given in Marine Guidance Note MGN 515(M).
- 1.3 The MCA also recognises the contents of IMO Circular (MSC-MEPC.2/Circ.9) of 25 May 2010 - *Guidance circular from the IMO for the application of safety, security and environmental protection provisions to FPSOs and FSUs* as additional guidance on the



application of Regulations to Floating Production Storage and Offloading Facilities/Floating Storage Units (FPSOs/FSUs).

- 1.4 In addition, the MCA Workboat Code or Small Commercial Vessels Code (MGN 280(M)) provide an effective safety regime for the regulation of small vessels in commercial use for the carriage of cargo and up to 12 passengers.

## **2. General Conditions**

- 2.1 The standards referred to are for non-passenger ships (i.e. cargo ships); and are without prejudice to UK laws and regulations made to secure the health, safety and welfare of people at work and to protect the public from dangers arising from work activities including those under the Health and Safety at Work etc. Act 1974. A memorandum of understanding between the MCA, Marine Accident Investigation Branch (MAIB) and the Health and Safety Executive exists to ensure effective co-ordination of those organisations where their duties for health and safety enforcement and accident investigation overlap at the UK “water margin or offshore”.
- 2.2 In accordance with, and as an update to, the preceding version of note MGN 390(M), this guidance is primarily addressed to new UK ships, but has implications for non-UK ships calling at UK ports or anchorages under the principle of *no more favourable treatment*.
- 2.3 Ships complying with dual or multiple operating modes, (i.e. different standards during different phases or modes of operation) and new or innovative ship designs not covered in existing codes and guidelines, will require special consideration. Those with dual or multiple operating modes will be expected to comply with standards appropriate to each distinct standard when that mode is being undertaken; these also being clearly identified in the ship’s Safety Management System and stability booklet, if applicable. Policy on the application of new standards to ships undergoing conversion or modification where this is not explicitly contained in the relevant IMO code or guideline, will as far as practicable be applied in respect of Convention ships in accordance with the relevant SOLAS regulations.
- 2.4 Given a request from the vessel owner, a statement of compliance or relevant certification, in the formats prescribed in the IMO codes or guidelines may be issued.
- 2.5 References to “constructed”, “built” or to “new” or “existing ships” in this MGN refer to the dates at which the keel was laid or which are at a similar stage of construction for the purposes of construction under SOLAS Chapter II-1. Changes made to ships to comply with codes or guidelines referred to in this MGN, may be considered as constituting *alterations and modifications of a major character* as the alterations required to the structure and equipment in order effect the change would inevitably be substantial (effecting substantial alterations to a ship’s dimensions, increased numbers of persons carried together with increased accommodation, fitting additional lifesaving appliances, fire protection, and subdivision etc.).

## **3. Guidelines for the Design and Construction of Offshore Supply Vessels (OSV Guidelines)**

### **3.1 The OSV Guidelines:**

(a) of 1981 - A.469(XII), were adopted on 19 November 1981, and therefore entered force on 19 May 1982; or

(b) of 2006 - MSC.235(82), (superseding the 1981 Guidelines) were adopted on 01/12/2006 and therefore entered force on 01/06/2007; being also subsequently amended by Resolution MSC.335(90).



3.2 These Guidelines may be applied only to offshore supply vessels (sometimes also referred to as platform supply vessels) that are:

(a) without prejudice to the conditions stated in MGN 515(M), applied to ships “primarily engaged in the transport of stores, materials and equipment to offshore installations” and for the carriage of not more than 12 “industrial personnel” or special personnel;

(b) ‘designed with accommodation and bridge erections in the forward part of the vessel and an exposed cargo deck in the after part for the handling of cargo at sea’;

(c) operating in the risk environment envisaged in the Guidelines, i.e. where the primary risk is of low speed collisions with the supporting structure of rigs, leading to minor penetration of the hull below the main deck level; and

(d) designed for anchor handling and towing, and in view of standards being developed for the IMO Intact Stability Code 2008, the stability of such ships will be given additional consideration (see also MGN 468(M)), or for the transport and handling of limited amounts of hazardous and noxious liquid substances in bulk (LHNS) known as Offshore Support Vessels – See section 4 below.

3.3 Stability related parts of the OSV Guidelines apply to ships of a Load Line length of 24 metres up to 100 metres. Alternative or additional stability standards for ships exceeding 100 metres in length are left to the discretion of Administrations. OSVs exceeding 100 metres in length may meet the equivalent intact stability criteria of part B, paragraph 2.4.5.2 of the Intact Stability Code, 2008 (the same standards as those of up to 100 metres) “where a vessel’s characteristics render compliance with part A.2.2 impracticable”. The subdivision and damage stability of OSVs exceeding 100 metres in length should comply with SOLAS regulations of Chapter II-1, part B (not as in the OSV Guidelines).

3.4 Owners building to the OSV Guidelines, if over 80m subdivision length are recommended to consider the risks and the best safety options by additionally commissioning a damage stability analysis according to SOLAS II-1/4 and to record the results. Although this is not mandatory, the results including additional loading conditions may be included as supplementary information in the ship’s stability information book. Such an analysis would provide a comparison of the overall damage survivability of the ship with the requirements of other cargo ships.

3.5 The OSV Guidelines are not mandatory (except as indicated in section 4 below), with ships otherwise being required to meet the Load Line and SOLAS requirements in full.

3.6 The UK does not apply or recognise the use of provisions available for “near coastal voyages” in the OSV Guidelines and as defined in paragraph 1.2.8 of the Guidelines, for UK ships or for other ships while in UK waters.

#### **4. Guidelines for the Transport and Handling of Limited Amounts of Hazardous and Noxious Liquid Substances in Bulk on Offshore Support Vessels - (LHNS) Vessel Guidelines**

4.1 The LHNS Guidelines, Resolution A.673(16) were adopted on the 19 October 1989. They apply to ships built from 19 April 1990 or before, as stated in paragraph 1.1.2 of the Guidelines, and are made statutory regardless of size and voyage for UK ships and by MSN 1458(M) (refer to that MSN for details of the requirements). The Guidelines were amended by MSC.236(82) and MEPC.158(55) on 1 December 2006.



4.2 The Guidelines apply to Offshore Support Vessels that while not constructed or adapted primarily to carry them in bulk, does permit bulk cargoes subject to the Guidelines, in limited amounts. The Guidelines apply when the cargoes or their residues are carried. These Guidelines define Offshore Support Vessels as vessels:

(a) 'primarily engaged in the transport of stores, materials and equipment to and from mobile offshore drilling units, fixed and floating platforms and other similar offshore installations'; or

(b) including 'well stimulation vessels, but excluding mobile offshore drilling units, derrick barges, pipe laying barges and floating accommodation units, which are otherwise primarily engaged in supporting the work of offshore installations'.

4.3 Consequently, for such ships, compliance with the OSV Guidelines (1981 or 2006 as applicable – see section 3 of this MGN above) are pre-conditions for compliance with the LHNS Vessel Guidelines. Therefore the LHNS Guidelines may be applied to special purpose ships, derrick and pipelay barges, accommodation units and mobile offshore drilling units, that also meet the requirements of the OSV Guidelines.

4.4 When new offshore support vessels are constructed, it is recommended that the damage stability analysis referred to in 3.4 above for the OSV Guidelines is also commissioned.

## **5. Code for the Construction and Equipment of Mobile Offshore Drilling Units - (MODU) Code**

5.1 The MODU Code:

(a) of 1979, Resolution A.414(XI) was adopted by IMO on the 15 November 1979 (subsequently amended by Res.MSC.38(63); and will be amended by MSC.357(92) entering into force on 1 January 2015);

(b) of 1989, Resolution A.649(16), superseding the 1979 Code, was adopted on the 19 October 1989 and entered into force for units built on or after 1 May 1991 (subsequently amended by Resolutions MSC/Circ.561, MSC.38(63) and MSC.187(79); and will be amended by MSC.358(92) entering into force on 1 January 2015); and

(c) of 2009, Resolution A.1023(26), superseding the 1989 Code, was adopted on 2 December 2009 and entered into force for units built on or after 1 January 2012 (will be amended by Res.MSC.359(92) entering into force on 1 January 2015).

5.2 The survey and certification of MODUs are delegated to UK Recognised Organisations (RO), except in respect of the stability information of units which are not column stabilised. The arrangements under which this work is carried out are subject to a memorandum of understanding between the MCA and the RO, and therefore are not covered in this MGN. Owners should liaise with their RO on matters of interpretation.

5.3 MODUs as defined, 'have the capability of 'engaging in drilling operations.....'. Surveys of similar offshore ships lacking such a capability are subject to case by case authorisations of ROs by the MCA for the statutory survey and certification of such units.

## **6. The status of persons carried on board affecting the above standards**

6.1 Other than in emergency situations or *force majeure*, UK regulations and the SOLAS Convention allow a cargo ship to carry up to 12 passengers in addition to the crew. However, the term 'special personnel' has introduced another category of personnel distinct from passenger or crew within the context of either:



(a) Section 1.3 of the 1983 or 2009 Special Purpose Ships Code, guidance on which is provided in MGN 515(M); or

(b) on ships designed primarily for, and while conducting operations in a stationary or near-stationary mode at sea (within the scope of the operations described in paragraph 1.1) and as agreed by the MCA, including mobile installations (with reference to the Offshore Installations (safety case) Regulations 2005) e.g. jack-up drilling rigs, Flotels and FPSOs), or MODUs.

6.2 Vessel operators are responsible for the safety of all persons carried, including effective procedures to verify their numbers and status on board.

6.3 The status of persons on board for the purposes of the Maritime Labour Convention should be considered against the criteria contained in MGN 471(M) – Maritime Labour Convention 2006: Definitions.

## More Information

Vessel Standards Branch  
Maritime and Coastguard Agency  
Bay 2/29  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG

Tel : +44 (0) 23 8032 9100  
Fax : +44 (0) 23 8032 9104  
e-mail: [shipping.safety@mcga.gov.uk](mailto:shipping.safety@mcga.gov.uk)

General Inquiries: [infoline@mcga.gov.uk](mailto:infoline@mcga.gov.uk)

MCA Website Address: [www.gov.uk/government/organisations/maritime-and-coastguard-agency](http://www.gov.uk/government/organisations/maritime-and-coastguard-agency)

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