



Instruction to ROs No. 29

Inspection of gastight bulkheads and approval of bilge pumping arrangements for solid bulk cargoes mentioned in the IMSBC code

Date entry into force: 01 October 2016

1 Application

This instruction to recognized organizations applies to all ships to which the IMSBC Code applies.

2 Introduction

2.1 Section 1.2.2 of the International Maritime Solid Bulk Cargoes Code (IMSBC Code) prescribes that where a solid bulk cargo is specifically listed in appendix 1 to the Code (individual schedules for solid bulk cargoes), it shall be transported in accordance with the provisions in its schedule in addition to the provisions in sections 1 to 10 and 11.1.1 of the Code.

2.2 The following solid bulk cargoes specifically listed in appendix 1 to this Code are hazardous, requiring the indicated related precautions:

- **ALUMINIUM SILICON POWDER, UNCOATED UN 1398,**
- **ALUMINIUM FERROSILICON POWDER UN 1395**
"The bulkheads between the cargo spaces and the engine-room shall be gastight and shall be inspected and approved by the Administration."
- **ALUMINIUM SMELTING BY-PRODUCTS or**
ALUMINIUM REMELTING BY-PRODUCTS UN 3170
"Bulkhead between the cargo spaces and the engine-room shall be gastight."
- **FERROSILICON UN 1408 with 30% or more but less than 90% silicon (including briquettes)**
"Prior to loading, the bulkhead to the engine-room shall be inspected and approved by the competent authority as gastight and the safety of the bilge pumping arrangements shall be approved by the competent authority."
- **FERROSILICON 25% to 30% silicon, or 90% or more with silicon (including briquettes)**
"Prior to loading, the bulkhead to the engine-room shall be inspected and approved by the competent authority as gastight. Satisfaction with the safety of the bilge pumping arrangements shall be approved by the competent authority."

2.3 The individual schedules in the IMSBC Code of the aforementioned solid bulk cargoes do not further substantiate the way in which the inspection and approval of gas-tightness of the concerned bulkhead and the bilge pumping arrangements are to be conducted, nor the interval of inspection and approval. In that respect also the wording 'prior to loading' does not give full clarity on which particular moment in time the inspection and approval are to be conducted, as it is not worded as 'prior to each loading'.



3 Interpretation Netherlands flag State Administration

3.1 Bearing in mind that:

- .1 the SOLAS Convention, Chapter II-2, part C, prescribes, in principle, gas-tight and water-tight bulkheads;
- .2 the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2015 describe that the annual, periodical, intermediate and renewal surveys in relation to bulkheads are all based on visual inspections,

the Netherlands flag State Administration maintains the following interpretation concerning the inspection and approval of bulkheads between cargo spaces and the engine-room and the approval of bilge pumping arrangements, in case solid bulk cargoes, as specified in section 2.2 of this instruction to ROs, are carried:

- .1 The inspection of:
 - .1 bulkheads between cargo spaces and the engine-room for gas-tightness;
 - .2 the bilge pumping arrangements for a satisfactory level of safety, shall be conducted during the construction of a new ship or a major conversion of an existing ship as part of the initial survey related to the Safety Construction Certificate or Safety Certificate, by physical testing to the satisfaction of the RO. In practice the regular procedures are followed and no additional tests are required. Gastight bulkheads and safe bilge pumping arrangements shall subsequently be approved by the RO;
- .2 The bulkheads between cargo spaces and the engine-room shall be visually inspected for tightness and the bilge pumping arrangements tested as part of the annual, periodic, intermediate and renewal surveys related to the Safety Construction Certificate or Safety Certificate.

The inspection, approval and testing of bulkheads and bilge pumping arrangements are all within the scope of the existing procedures.
- .3 The safety management system of the ship, as required by the ISM Code, shall include procedures ensuring that:
 - the quantitative measurements of hydrogen, phosphine, arsine, silane, ammonia and acetylene are being taken, relevant to the cargo.
 - the concentration of these gases in the cargo spaces carrying these cargoes are being measured regularly during the voyage and the results of the measurements shall be recorded and kept on board.
 - continuous mechanical ventilation is being conducted during the voyage for the cargo spaces carrying these cargoes.

4 Withdrawal

This Instruction to RO no. 29 supersedes the letter issued by the Netherlands flag State Administration (reference ILT-2013/12641) concerning IMSBC gas-tightness approval, which is withdrawn.

5 References

- SOLAS Convention, Chapters II-2, VI and VII.
- IMSBC Code, regulation 1.2.2.
- Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2015.

For an overview of the complete regulatory framework reference is made to [EasyRules](#).
