

SUB-COMMITTEE ON SHIP DESIGN AND  
CONSTRUCTION  
10th session  
Agenda item 10

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY,  
AND ENVIRONMENT-RELATED CONVENTIONS**

**Draft unified interpretation on the harmonization of the Industrial Personnel  
Safety Certificate with SOLAS safety certificates**

**Submitted by IACS**

**SUMMARY**

*Executive summary:* This document proposes a unified interpretation of SOLAS chapter XV and the IP Code to clarify with which SOLAS safety certificates the IP Safety Certificate should be harmonized in terms of validity, survey dates and endorsements, with a view towards universal and uniform implementation.

*Strategic direction, if 7  
applicable:*

*Output:* 7.1

*Action to be taken:* Paragraph 16

*Related documents:* MSC 97/16/2 and MSC 106/3/4

**Introduction**

1 The Maritime Safety Committee (MSC), at its 106th session, adopted a new SOLAS chapter XV (resolution MSC.521(106)) and a new Code of safety for ships carrying industrial personnel (the IP Code) (resolution MSC.527(106)) to establish safety requirements for the transportation of more than 12 industrial personnel on cargo ships and high-speed cargo craft of 500 gross tonnage and upwards. The SOLAS amendments and the IP Code will enter into force on 1 July 2024.

2 IACS proposes a unified interpretation to clarify how to harmonize the Industrial Personnel Safety Certificate with various SOLAS safety certificates when their validity or endorsement differs.

## Discussion

3 SOLAS regulation XV/5.1, as adopted by resolution MSC.521(106), requires ships subject to SOLAS chapter XV to be certified to comply with the IP Code, in addition to the requirements of SOLAS regulations I/8, I/9 and I/10, as follows:

- "1 Ships and high-speed craft to which this chapter applies shall:
- .1 be certified as a cargo ship or high-speed cargo craft in accordance with either chapter I or chapter VIII or chapter X, as applicable;
  - .2 meet the requirements of the IP Code; and
  - .3 in addition to the requirements of regulations I/8, I/9 and I/10 or of sections 1.5 to 1.9 of the HSC Code, as applicable, be surveyed and certified, as provided for in the IP Code."

4 In this regard, SOLAS regulations I/8, I/9 and I/10 respectively require that Cargo Ship Safety Equipment Certificate, Cargo Ship Safety Radio Certificate and Cargo Ship Safety Construction Certificate shall be endorsed upon the completion of related surveys.

5 Every ship to which the IP Code applies shall have on board a valid Industrial Personnel Safety Certificate in accordance with paragraph 3.1 of part I of the IP Code. Furthermore, the validity, survey date and endorsement of the Industrial Personnel Safety Certificate shall be harmonized with those of relevant SOLAS certificates in accordance with paragraph 3.5 of part I of the IP Code, as follows:

"The Industrial Personnel Safety Certificate validity, survey dates and endorsements shall be harmonized with the relevant SOLAS certificates in accordance with the provisions of SOLAS regulation I/14 or X/3.2, as appropriate."

6 IACS notes that for ships under the 1988 SOLAS Protocol and thereby subject to the harmonized system of survey and certification (HSSC) (resolution A.1156(32)), the relevant SOLAS certificates should be harmonized to the same survey window in terms of validity, survey dates and endorsements. However, there may be some exceptional cases, for example the anniversary dates of SOLAS safety certificates deviate from the survey window as per SOLAS regulation I/14(h), or that the completion and endorsement dates of surveys linked to relevant SOLAS safety certificates could differ within the harmonized survey window, i.e. with the same anniversary date. The latter case sometimes happens when a certain survey item may not be completed at the time of survey due to ship's operation, unavailability of certain survey resources, unexpected deficiencies identified during a survey, etc.

7 Given the wide range of safety provisions in the IP Code, IACS is of the opinion that clarification is needed with respect to which SOLAS safety certificate should have a priority for the harmonization with the Industrial Personnel Safety Certificate. In case of the issued High-Speed Craft Safety Certificate or the Cargo Ship Safety Certificate (CSSC), it may be evident that those single safety certificates should be a precondition for the issuance or endorsement of the Industrial Personnel Safety Certificate. However, where various SOLAS safety certificates coexist, the priority may not be clear.

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**Comparable unified interpretation of the Polar Code (MSC.1/Circ.1562)**

8 IACS recalls its document MSC 97/16/2 which was submitted to seek clarification on the similar issue pertaining to SOLAS chapter XIV and Part I-A of the Polar Code (add-on to other SOLAS requirements similar to the IP Code). At that time, MSC 97 approved MSC.1/Circ.1562 based on the proposed interpretations annexed in document MSC 97/16/2.

9 MSC.1/Circ.1562, amongst others, provides a clarification that for cargo ships, the Polar Code Certificate should be endorsed in line with the Cargo Ship Safety Certificate, or in line with the Cargo Ship Safety Construction Certificate, provided that valid Safety Equipment and Safety Radio certificates are held by the ship.

10 Similar to the Polar Code, the IP Code provides a wide range of safety requirements, such as subdivision and stability, machinery installation, electrical installation, fire safety, life-saving appliances, etc. As such, IACS considers that the harmonization of survey and certification relating to the IP Code may take a similar approach as already clarified in MSC.1/Circ.1562.

11 However, unlike the Polar Code Certificate, the validity of the Industrial Personnel Safety Certificate need not be affected by that of the Cargo Ship Safety Radio Certificate, as the IP Code does not include additional requirements for radio communications.

12 Therefore, IACS considers that for cargo ships, the Industrial Personnel Safety Certificate may be endorsed in line with the Cargo Ship Safety Certificate, or in line with the Cargo Ship Safety Construction Certificate provided that a valid Cargo Ship Safety Equipment Certificate is held by the ship.

13 Furthermore, as already reported in paragraph 7 of document MSC 97/16/2, IACS has reviewed the case of those ships not under the HSSC scheme for which an intermediate survey in relation to the Cargo Ship Safety Construction Certificate is applicable only for tankers of 10 years of age and over. In the view of IACS, it is still possible that, for a cargo ship that is not a tanker of 10 years of age or over, a period of a maximum of five years may elapse, depending on the validity of the non-harmonized Cargo Ship Safety Construction Certificate, before compliance with the requirements of the IP Code is verified. A ship that will have its Cargo Ship Safety Construction Certificate renewed on 30 June 2024 will be required to verify compliance with requirements of the IP Code by 30 June 2029.

14 However, a cargo ship under the HSSC scheme to which the IP Code is applicable shall carry out the initial IP Code survey by 30 September 2027, i.e. the maximum time frame allowed for the execution of the intermediate survey for a renewal survey carried out on 30 June 2024. Noting paragraph 13 above, IACS considers it would be appropriate that all non-HSSC cargo ships to which the IP Code is applicable shall meet the relevant requirements of the IP Code by a common deadline of 30 September 2027.

**Proposal**

15 In light of paragraphs 3 to 14 above and with reference to MSC.1/Circ.1562, IACS proposes draft unified interpretations of SOLAS regulation XV/5.1 and paragraph 3.5 of Part I of the IP Code, as contained in the annex to this document.

**Action requested of the Sub-Committee**

16 The Sub-Committee is invited to consider the proposal in paragraph 15 above and take action as appropriate.

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**ANNEX**

**DRAFT UNIFIED INTERPRETATIONS OF SOLAS REGULATION XV/5.1 AND PARAGRAPH 3.5 OF PART 1 OF THE IP CODE ON THE HARMONIZATION OF THE INDUSTRIAL PERSONNEL SAFETY CERTIFICATE WITH SOLAS SAFETY CERTIFICATES**

The implementation of initial and maintenance surveys as required in SOLAS regulations XV/3.2, XV/3.3 and XV/5.1 (resolution MSC.521(106)) and paragraph 3 of part I of the IP Code (resolution MSC.527(106)) should be interpreted as indicated in the following table:

**Initial and maintenance surveys pertaining to SOLAS chapter XV and the IP Code**

<b>1 SHIPS UNDER HARMONIZED SYSTEM OF SURVEY AND CERTIFICATION (HSSC) SCHEME</b>			
Type of ship	Initial survey for issuance of the Industrial Personnel Safety Certificate	Surveys for the maintenance of the Industrial Personnel Safety Certificate	Surveys for renewal of the Industrial Personnel Safety Certificate
Cargo ship	First Safety Construction intermediate survey or renewal survey, as required by SOLAS regulation I/10, whichever occurs first after 1 July 2024.	a) Aligned with maintenance survey (annual or intermediate) related to the Cargo Ship Safety Certificate. The Industrial Personnel Safety Certificate should be endorsed upon satisfactory results of the maintenance survey related to the IP Code and Cargo Ship Safety; or  b) Aligned with maintenance survey (annual or intermediate) related to the Cargo Ship Safety Construction Certificate. The Industrial Personnel Safety Certificate should be endorsed upon satisfactory results of the maintenance survey (annual or intermediate) related to the IP Code and Safety Construction, provided that valid Cargo Ship Safety Equipment Certificate is held by a ship.	a) Aligned with renewal survey related to the Cargo Ship Safety Certificate. The Industrial Personnel Safety Certificate should be issued upon satisfactory results of the renewal survey related to the IP Code and Cargo Ship Safety; or  b) Aligned with renewal Survey of Safety Construction. The Industrial Personnel Safety Certificate should be issued upon satisfactory results of the renewal survey related to the IP Code and Safety Construction, provided that valid Cargo Ship Safety Equipment Certificate is held by a ship.
High-speed cargo craft	The third periodical or first renewal survey, as required by the 2000 HSC Code, paragraph 1.5, whichever occurs first after 1 July 2024.	Aligned with periodical survey related to the High-Speed Craft Safety Certificate. The Industrial Personnel Safety Certificate should be endorsed upon satisfactory results of the periodical survey related to the IP Code and High-Speed Craft Safety.	Aligned with renewal survey related to the High-Speed Craft Safety Certificate. The Industrial Personnel Safety Certificate should be issued upon satisfactory results of the renewal survey related to the IP Code and High-Speed Craft Safety.

<b>2 SHIPS NOT UNDER THE HSSC SCHEME</b>			
Type of ship	Initial Survey for issuance of the Industrial Personnel Safety Certificate	Surveys for the maintenance of the Industrial Personnel Safety Certificate	Surveys for renewal of the Industrial Personnel Safety Certificate
Cargo ship	First Safety Construction renewal survey as required by SOLAS regulation I/10, which occurs after 1 July 2024 but, in any case, not later than 30 September 2027.	Aligned with maintenance survey (annual or intermediate) related to the Cargo Ship Safety Construction Certificate. The Industrial Personnel Safety Certificate should be endorsed upon satisfactory results of maintenance survey (annual or intermediate) related to the IP Code and Safety Construction, provided that valid Cargo Ship Safety Equipment Certificate is held by a ship.	Aligned with renewal Survey of Safety Construction. The Industrial Personnel Safety Certificate should be issued upon satisfactory results of the renewal survey related to the IP Code and Safety Construction, provided that valid Cargo Ship Safety Equipment Certificate is held by a ship.
High-speed cargo craft	The third periodical or first renewal survey, as required by the 2000 HSC Code, paragraph 1.5, whichever occurs first after 1 July 2024.	Aligned with periodical survey related to the High-Speed Craft Safety Certificate. The Industrial Personnel Safety Certificate should be endorsed upon satisfactory results of the periodical survey related to the IP Code and High-Speed Craft Safety.	Aligned with renewal survey related to the High-Speed Craft Safety Certificate. The Industrial Personnel Safety Certificate should be issued upon satisfactory results of the renewal survey related to the IP Code and High-Speed Craft Safety.

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