

DMA RO Circular no. 023

Carriage of dangerous goods in packaged form on offshore vessels of less than 500 gross tonnage carrying industrial personnel within the renewable energy offshore sector

1. General

Prior to the carriage of dangerous goods in packaged form, a vessel must comply with the requirements stipulated in SOLAS Reg. II-2/19 or, if applicable, the provisions of part D, chapter 7, of the International Code of Safety for High-Speed Craft, 2000, in regards to construction, and those of the IMDG Code in regards to stowage and transportation.

2. Guidance on transport

2.1 Transport of "carry-onboard-stores"

When dealing with dangerous and polluting goods, there is a clear distinction between stores assigned for the operational use of the ship and the transport of goods covered by SOLAS Chapter II-2, Regulation 19, and the IMDG Code, Chapter VII. In this respect, the Danish Maritime Authority considers that goods, equipment and tools carried by the industrial personnel, when planned to be used solely in connection with their ongoing work assignment, can be considered as stores ("carry-onboard-stores"). Consequently, should "carry-onboard-stores" not be treated as dangerous goods and not be subject to the provisions of the IMDG Code.

"Carry-onboard-stores" shall be:

1. packed in good quality packings sufficiently strong to withstand the shocks normally encountered during transport,
2. stowed in such a way, that the safety and environmental protection is ensured during transport, and
3. segregated to prevent hazards in case of leakage or spillage, or any other accident.

Special consideration should be given to information obtained from the supplier's safety data sheets and the original packaging, labelling and documentation.

The master of the vessel must at all times be informed about the types and quantities of "carry-onboard-stores" and must be given the final authority to reject any "carry-onboard-stores" considered a safety risk or not being within the scope of "carry-onboard-stores".

2.1.2 Risk assessment

Prior to the transportation of any "carry-onboard-stores", an assessment must be performed, in conjunction with the relevant stakeholders, and the vessel operator must ensure that appropriate actions are taken to mitigate any identified risks. If the vessel transports both "carry-onboard-stores" and packaged dangerous goods in accordance with paragraph 2.3, the assessment must take this into consideration.

2.2 *Transport of dangerous goods, not part of ships' stores*

“Carry-onboard-stores” do not include equipment, tools and goods which have been placed and stored permanently or in a similar fashion on board the vessel, e.g. for periods longer than an Industrial Person's working day, and which are not removed from the vessel when the Industrial Person carrying the equipment, tool or goods leaves the vessel at the shore side or signs off.

Such stores are considered dangerous goods and must be treated in accordance with paragraph 2.3 on Dangerous goods.

2.3 *Dangerous goods*

Packaged dangerous goods that are carried on board for shipment as cargo, not being within the scope of “carry-onboard-stores”, are subject to the relevant provisions of SOLAS and the IMDG Code.

Dangerous goods must always be carried in accordance with SOLAS chapter VII, Part A – *Carriage of dangerous goods in packaged form*.

In addition to the EmS Guide and MFAG, a copy of the IMDG Code must be available on board, in accordance with the order on Notice B from the Danish Maritime Authority, chapter VII, regulation 3.4.

The vessel operator must ensure conformity and compliance between the classes of dangerous goods transported and the classes of dangerous goods specified in the document of compliance issued in accordance with paragraph 3 on *Certification*.

Vessels of less than 500 gross tonnage are, due to their size and manning, subject to equivalent requirements, as an alternative to full compliance with SOLAS regulation II-2/19 and the provisions of the HSC Code, Part D, chapter 7, if the dangerous goods are carried on a weather deck.

Compliance with the equivalent requirements listed below is required.

2.3.1 *Fire water supply*

Arrangements must be in place to ensure the immediate availability of a supply of water from the fire main at a sufficient pressure corresponding to the size and layout of the vessel. Equivalent fire protection systems can be applied subject to a risk assessment.

2.3.2 *Personal protective equipment*

Personal protective equipment must be available on board, taking into account the specific hazards associated with the dangerous goods. Operational procedures providing an equivalent to the above can be applied subject to a risk assessment.

Suitable equipment and arrangements for safely extinguishing a fire must be available on board. Vessels that have been exempted from the requirement to carry two self-contained breathing apparatuses as required by Notice B, chapter II-2, part C, regulation 10, due to their size, manning and trade must apply an equivalent solution or fulfil the above requirement. Vessels already equipped with two self-contained breathing apparatuses are exempted from the requirement for an additional apparatus.

2.3.3 *Portable extinguishers*

Additional portable fire extinguishers of a type, number and capacity as found applicable based on the type of dangerous goods carried must be provided on board, be immediately available and ready for use.

2.3.4 *Insulation of machinery boundaries*

Bulkheads forming boundaries to machinery spaces of category A must be insulated to A-60 class standard unless the dangerous goods are stowed at least 3 m horizontally away from such bulkheads. Where this is not possible, an equivalent level of safety can be applied subject to a risk assessment.

2.3.5 *Operational provisions*

The relevant provisions of the IMDG Code must be complied with including, but not limited to, repeated training of all persons involved according to Part 1, chapter 1.3 of the IMDG Code and STCW Section B-V/a-g, Section V-V/c.

2.4 *Dangerous goods transport information*

The master and the crew must at all times be informed of any commodity involving dangerous or polluting abilities, be it cargo, stores or “carry-onboard-stores”.

It must be ensured at all times during the voyage that the master and persons on board the vessel responsible are able to perform a qualified assessment in case of an emergency situation and that information about any dangerous goods carried is readily available ashore, in case of any spillage due to loss of vessel, ensuring protection of the environment and conformity with environmental regulations, such as the act on protection of the marine environment (“Lov om beskyttelse af havmiljøet”) in Danish waters.

The Danish Maritime Authority considers a voyage within a given offshore wind farm are to be from a base port and back to the same base port. Consequently, a new manifest need not be issued (offshore) during that voyage.

3. **Certification**

The transport of “carry-onboard-stores” does not require the issuance of a document of compliance in accordance with SOLAS.

Carriage of packaged dangerous goods shall only be allowed on vessels certified to do so and issued with a document of compliance in accordance with SOLAS.