



Blending of bulk liquid cargoes prohibited

The IMO Maritime Safety Committee (MSC) adopted resolution MSC.325(90) during its 90th session in May 2012. The resolution sets out the amendments to the SOLAS Convention that entered into force on 1 January 2014 and Members and clients may already be aware that the following new requirements have been added in SOLAS regulation VI/5-2 on the “Carriage of Cargoes”:

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Prohibition of the blending of bulk liquid cargoes and production processes during sea voyages

1. The physical blending of bulk liquid cargoes during sea voyages is prohibited. Physical blending refers to the process whereby the ship's cargo pumps and pipelines are used to internally circulate two or more different cargoes with the intent to achieve a cargo with a new product designation. This prohibition does not preclude the master from undertaking cargo transfers for the safety of the ship or protection of the marine environment.
2. The prohibition in paragraph 1 does not apply to the blending of products for use in the search and exploitation of seabed mineral resources on board ships used to facilitate such operations.
3. Any production process on board a ship during sea voyages is prohibited. Production processes refer to any deliberate operation whereby a chemical reaction between a ship's cargo and any other substance or cargo takes place.
4. The prohibition in paragraph 3 does not apply to the production processes of cargoes for use in the search and exploitation of seabed mineral resources on board ships used to facilitate such operations.*

----- * Refer to the Guidelines for the transport and handling of limited amounts of hazardous and noxious liquid substances in bulk in offshore support vessels (resolution A.673(16), as amended).

Following the entering into force of the new regulation, Gard has received a number of queries concerning further details of their application, queries that are mainly related to “where/when” blending can be performed and if adding various additives to a cargo, and subsequent circulation by the ship’s pumps, is still permitted during sea voyages. Unfortunately, formal interpretations and clarification on this matter seem still sparse but Gard has learnt the following:

- **Blending operations in port**

: the MSC has agreed that blending operations (and assumingly any production processes) would be permitted on board when conducted in port or while moored, for example, where it is presupposed that safer conditions would exist and additional spill response equipment would be readily available.[1]

- **Prohibition of physical blending during sea voyages**

: SOLAS defines physical blending as

“the process whereby the ship's cargo pumps and pipelines are used to internally circulate two or more different cargoes with the intent to achieve a cargo with a new product designation”.

The MSC has further agreed that prohibition of the blending of cargoes does not apply where cargo is recirculated within its cargo tank or through an external heat exchanger during the voyage for the purpose of maintaining cargo homogeneity or temperature control, including when two or more different products have previously been loaded into the same cargo tank within port limits.[1]

- **Prohibition of production processes during sea voyages**

: SOLAS defines production processes as

“any deliberate operation whereby a chemical reaction between a ship's cargo and any other substance or cargo takes place”

. As far as Gard is aware, no additional information have been provided on the type of activities undertaken in this context and it is not clear to us how this wording will influence on previously accepted practices involving use of additives. Hence, only if it can be documented that no chemical reaction will take place between the specific cargo and additive, and after consulting the vessel's flag state, should this type of blending operation be attempted during a sea voyage.

Gard will continue to seek advice from our industry partners on this matter and in the meantime, Members and clients are strongly advised to contact the vessel's flag state and coastal state for guidance and assistance prior to commencing any type of on board blending operations or activities that may be defined as production processes.

Members and clients should also note that blending will most likely affect the P&I cover.

[1] Source: [Marine Safety Advisory No.73-13](#) from the Republic of the Marshall Islands