

# IMSBC and Coal – 1 January 2019

By 1 January 2019, coal will not only be categorized as a chemical hazard cargo (Group B) but will also fall into Group A (liquefaction) by default following IMO Resolution MSC.426(98).

## Group A - Liquefaction

For a Group A cargo TML and FMP always need to be established by the shipper and provided to the vessel in accordance with the Code before loading. Please note the intervals (in **bold**) between sampling/testing and loading:

*"4.5.1 The shipper shall be responsible for ensuring that a test to determine the TML of a solid bulk cargo is conducted within **six months** to the date of loading the cargo. Notwithstanding this provision, where the composition or characteristics of the cargo are variable for any reason, the shipper shall be responsible for ensuring that a test to determine the TML is conducted again after it is reasonably assumed that such variation has taken place.*

*4.5.2 The shipper shall be responsible for ensuring that sampling and testing for moisture content is conducted as near as practicable to the date of commencement of loading. The interval between sampling/testing and the date of commencement of loading shall never be more than **seven days**. If the cargo has been exposed to significant rain or snow between the time of testing and the date of completion of loading, the shipper shall be responsible for ensuring that the moisture content of the cargo is still less than its TML, and evidence of this is provided to the master as soon as practicable."*

## Exception - larger particles

If the particles are large enough (preventing liquefaction) it will not be a Group A cargo, but it may be difficult to get within the exception. No more than 10% can be less than 1 mm and no more than 50% can be less than 10 mm. Both criteria must be met.

Without a cargo certificate showing particle distribution that meets the criteria, we fall back on the starting point of coal automatically being a Group A cargo, requiring TML and FMP to be established for safe loading.

## Practically

This means that the vessel should either receive (i) a cargo certificate that meets the criteria for the exception or (ii) be handed a "TML certificate".

Without one of the two documents, loading cannot commence. Time will be lost, and since this is legal requirement linked with loading of cargo, vessels will likely stay on-hire, and the Time Charterers will claim against Voyage Charterers and they will in turn claim against Shippers.

## Modified Proctor/Fagerberg

Testing *coal* for TML requires the use of a modified Proctor/Fagerberg procedure that along with knowledge also requires new equipment.

## Spica

Spica (Indonesia) are making enquiries in Indonesia to see if they are making upgrades to meet the new standard.

At this stage, the number of laboratories is limited, and their location may not be nearby and perhaps available for testing when needed.

We may foresee that the number of laboratories that will be available for testing will increase as the new requirement comes into play. For a current situation update and other updates you may require, please contact Spica's local office in Indonesia.

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