



Date: April 9, 2015

To: Owners/Operators of Container Vessels and Vessels Equipped for Carriage of Containers

Subject: " The amendment to the Code of Safe Practice for Cargo Stowage and Securing (CSS Code) Annex 14"

Reference: Code of Safe Practice for Cargo Stowage and Securing (CSS Code)- MSC.1/Circ.1352/Rev.1

The amendment to the **Code of Safe Practice for Cargo Stowage and Securing** (CSS Code) Annex 14, "Guidance on Providing Safe Working Conditions for Securing of Containers on Deck", as set out in the annex of MSC.1/Circ.1352, was approved by the IMO in 2010 and revised in 2014 (MSC.1/Circ.1352/Rev.1).

Ships keel-laid on or after 1 January 2015: The IMO has not made the application of MSC.1/Circ.1352 mandatory, but it encourages ship owners, ship operators, shipmasters and crew to apply the annex in its entirety to container vessels and vessels equipped for carriage of containers.

Ships keel-laid before 1 January 2015 are, through MSC.1/ Circ.1352, encouraged to apply sections 4.4, 7.1, 7.3 and 8 in Annex 14, and subject to the provisions of sections 6 and 7.2 in Annex 14 as far as practical.

As of January 2015, the flag state administrations of Cyprus, Germany, Malta and the United Kingdom have issued circulars/ notes making MSC.1/Circ.1352 mandatory for container vessels and vessels equipped for the carriage of containers that sail under their flags. Please note that flag state administrations may interpret the requirements differently and this will be reflected in the implementation for the relevant ships.

In particular, existing containerships should comply with the following requirements at the first survey after or on 1 January 2015:

1. Vessels not equipped with lashing platforms need to be fitted. - (6.1.2);
2. All relevant deck surfaces used for movement about the ship and all passageways and stairs must have non-slip surfaces. - (6.2.1.2);
3. The sides of lashing bridges and platforms onboard of existing ships are to be fitted with toe boards along the sides of such lashing bridges and platforms. - (6.2.2.5);
4. Lashing bridges or platforms onboard existing vessels are to be provided with sufficient fencing in line with annex 14. - (6.2.3);
5. Onboard of existing ships, appropriate actions must be arranged to get over permanent obstructions. - (6.2.4.8);



6. The rod's length in conjunction with the length and design of the turnbuckle should be such that the need of extension is eliminated when lashing high cube (9'6") containers. - The approval of new lashing rods and extensions designs must be carried out by vessel's class or any other IACS Member Classification Society. - (6.3.3.5).

Owners shall be aware of the following risks relating to ships not in compliance with CSS Code Annex 14:

- Ships may be refused to call at ports where port state authorities require compliance with CSS Code Annex 14
- Ships may be subject to structural alterations in order to be in compliance with CSS Code Annex 14 when changing flag.

If you have any questions and/or concerns, please feel free to contact me directly at nbmarine.consultant.com, +1(504) 520-9540 or visit our web site at www.nbmarine-consultants.com

Respectfully Yours,

Myla Bobina
Principal Consultant/CEO