

**KISH P & I LOSS PREVENTION CIRCULAR KPI-LP-148-2014**  
**(Prohibition of Blending and Production Processes During Sea Voyages)**

► **Start Point:**

In August 2009, IMO published [MSC-MEPC.2/Circ.8](#) which agreed that the physical blending of bulk liquid MARPOL cargoes during the sea voyage for the purpose of creating new product blends should be prohibited. This was an interim measure pending the adoption of mandatory regulations following concerns that such a practice presented clear hazards to the safety of the ship and the protection of the marine environment.

► **Next & Now:**

In May 2012, Maritime Safety Committee issued [Resolution MSC.325 \(90\)](#); *Adoption of Amendments to the International Convention for the Safety of Life at Sea, 1974, as Amended*. The Resolution incorporated a new mandatory regulation in SOLAS Chapter VI – Carriage of Cargoes, prohibiting the blending of bulk liquid cargoes and production processes during sea voyages; which has entered into force on 1 January 2014:

► **Regulation 5-2 – Prohibition of the blending of bulk liquid cargoes and production processes during sea voyages:**

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.

The prohibition in above paragraph 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.

Any production process onboard 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.

\*Also 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).

Ship owners & operators should therefore consider the new mandatory provisions when entering into fixtures that may involve additional activities involving bulk liquid cargoes onboard their vessels. If it is unclear whether or not a particular operation would fall within the ambit of the new regulation or would be deemed to be a "production process", the vessel's flag Administration should be contacted for advice.