



Technical Circular

No.: 025/2024

Date: 25th November 2024

Subject: New IMO/ILO Requirements coming into force until 2025

Enclosed herewith please find the new IMO/ILO requirements coming in to force in 2025.



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Summary of new IMO/ILO requirements coming into force in 2025

Sr. No	Convention/Regulation	Resolution	New Ship			Existing Ship			Subject Remarks
			Ship type	Size	Compliance date	Ship type	Size	Compliance date	
1	MLC, 2006	The International Labour Conference-110th session	All	All	23 December 2024	All	All	23 December 2024	<p>2022 Amendments to MLC, 2006:</p> <p>The 110th Session of the International Labour Conference held in June 2022 approved the amendments to Maritime Labour Convention (MLC), 2006 and will enter into force from 23 December 2024.</p> <p>The amendments cover seafarer welfare issues, such as:</p> <ul style="list-style-type: none"> • Social connectivity, including guidance to shipowners on providing internet access; • Ensuring that seafarers are informed of their rights prior to engagement; • Requirements for balanced and nutritious meals; • Disembarkation for medical care; • Prompt repatriation, including of the deceased; and • Providing appropriately sized personal protective equipment. <p>The amendments also:</p> <ul style="list-style-type: none"> • Clarified that the required certificates of financial security can be issued in the name of the registered owner, if different from the shipowner; and • Require Member States to ensure seafarer fatalities are adequately investigated, recorded, and reported to the ILO. <p>Ship Masters and the Company is to take note of above amendments to MLC, 2006 and are advised as follows:</p> <p>a. Review their processes to ensure they include the amended requirements no later than 23 December 2024, as the rights and obligations of the seafarers and shipowners as effected by the 2022 amendments to MLC, 2006 apply from the date of entry into force.</p> <p>b. Ensure timely renewal of existing Maritime Labour Certificates and DMLC Part I & Part II in consultation with the vessel's Flag Administration or their RO.</p> <p>Private RPS is required to establish a system of protection, by way of insurance or an equivalent appropriate measure to compensate seafarers for monetary loss that they may incur as a result of the failure of RPS or the relevant ship owner under the SEA to meet its obligation to them. Further, wef 23 December 2024, Seafarers are to be informed, prior to or in the process of engagement, of their rights under above system and same is to be incorporated in the RPS procedures.</p> <p>For details, refer IRS Technical Circular No. 021/2024, dated 16 September 2024.</p>
2	IMSBC Code	MSC.539(107)	Ships carrying IMSBC Cargo	All	1 January 2025. Administrations may apply it on a	Ships carrying IMSBC Cargo	All	1 January 2025. Administrations may apply it on a voluntary	<p>The amendments (07-23) to IMSBC Code includes (but is not limited to);</p> <ol style="list-style-type: none"> 1. Inclusion of definitions for “dynamic separation” and “Cargoes which may undergo dynamic separation” (the formation of a liquid slurry (water and fine solids) above the solid material, resulting in a free surface effect which may significantly affect the ship's stability) into the forms

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					voluntary basis as from 1 January 2024.			basis as from 1 January 2024.	<p>specifying the characteristics of the cargo and the required conditions for carriage and handling of that cargo.</p> <p>2. Revisions to various existing individual schedules for solid bulk cargoes.</p> <p>3. Following new schedules have been added to Appendix 1 of the Code:</p> <table border="1" style="margin-left: 40px; border-collapse: collapse; width: 100%;"> <thead> <tr> <th>Cargo</th> <th>Group</th> </tr> </thead> <tbody> <tr><td>CELESTINE CONCENTRATE</td><td>A</td></tr> <tr><td>BARYTE, FLOTATION CHEMICAL GRADE</td><td>A</td></tr> <tr><td>BROWN FUSED ALUMINA</td><td>C</td></tr> <tr><td>CRUSHED GRANODIORITE FINES</td><td>A</td></tr> <tr><td>DIRECT REDUCED IRON (D) (By-product fines with moisture content of at least 2%)</td><td>A & B</td></tr> <tr><td>DUNITE</td><td>C</td></tr> <tr><td>DUNITE FINES</td><td>A</td></tr> <tr><td>ELECTRIC ARC FURNACE DUST, PELLETIZED</td><td>A & B</td></tr> <tr><td>FISH MEAL (FISH SCRAP), STABILIZED Anti-oxidant treated</td><td>B</td></tr> <tr><td>GROUND GRANULATED BLAST FURNACE SLAG POWDER</td><td>A</td></tr> <tr><td>MAGNESITE FINES</td><td>A</td></tr> <tr><td>POTASSIUM NITRATE</td><td>C</td></tr> <tr><td>SODIUM NITRATE</td><td>C</td></tr> <tr><td>SODIUM NITRATE AND POTASSIUM NITRATE MIXTURE</td><td>C</td></tr> </tbody> </table> <p>4. Existing individual schedule - FISH MEAL (FISH SCRAP), STABILIZED UN 2216 Anti-oxidant treated is deleted. (alignment of the stabilization requirements for fish meal with the IMDG Code, and classification as MHB (SH) instead of class 9).</p> <p>5. The amendments (07-23) also expressly identified “bulk density (as required by SOLAS regulation XII/10)” as one of the cargo information which needs to be provided by shippers to ships before loading.</p> <p>6. MSC.1/Circ.1395/Rev.6 was adopted – Lists of solid bulk cargoes for which a fixed gas fire extinguishing system may be exempted or for which a fixed gas fire extinguishing system is ineffective.</p> <p>Following new cargo is added in MSC.1/Circ.1395/Rev.6</p> <ul style="list-style-type: none"> • ELECTRIC ARC FURNACE DUST, PELLETIZED <p>Where a vessel intends to carry any of above cargo(es) and seeks exemption from a fixed gas fire extinguishing system, IRS may be contacted for issuance of necessary exemption certificate in</p>	Cargo	Group	CELESTINE CONCENTRATE	A	BARYTE, FLOTATION CHEMICAL GRADE	A	BROWN FUSED ALUMINA	C	CRUSHED GRANODIORITE FINES	A	DIRECT REDUCED IRON (D) (By-product fines with moisture content of at least 2%)	A & B	DUNITE	C	DUNITE FINES	A	ELECTRIC ARC FURNACE DUST, PELLETIZED	A & B	FISH MEAL (FISH SCRAP), STABILIZED Anti-oxidant treated	B	GROUND GRANULATED BLAST FURNACE SLAG POWDER	A	MAGNESITE FINES	A	POTASSIUM NITRATE	C	SODIUM NITRATE	C	SODIUM NITRATE AND POTASSIUM NITRATE MIXTURE	C
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Summary of new IMO/ILO requirements coming into force in 2025

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									<p>concurrency with the Flag Administration.</p> <p>For details, refer IRS Technical Circular No. 037/2023, dated 06 November 2023.</p>
3	BWM Convention, Appendix II	MEPC 369 (80)	All	All	01 February 2025	All	All	01 February 2025	<p>Amendments to the format of Ballast Water Record Book (BWRB):</p> <p>Amendments to the form used for BWRB set out in Appendix II of the Ballast Water Management Convention and a guidance providing sample entries of an amended BWRB were adopted.</p> <p>On or after the effective date, the amended BWRB is to be used to record ballast water management in accordance with this guidance. Same will be verified by the Surveyors at the first periodical survey for the Ballast Water Management Convention on or after the effective date (01 February 2025).</p> <p>The BWRB is to be maintained on board the ship for a minimum period of two years after the last entry has been made and to remain thereafter in the Company's control for a minimum period of three years.</p>
4	MARPOL Annex VI, Reg. 27, Appendix IX	MEPC. 385(81) MEPC.1/Circ. 913	All	5,000 GT and above	1 August 2025 Administrations may apply it on a voluntary basis as from 1 January 2025.	All	5,000 GT and above	1 August 2025 Administrations may apply it on a voluntary basis as from 1 January 2025.	<p>Amendments to MARPOL Annex VI on IMO Ship Fuel Consumption Database (IMO DCS):</p> <ol style="list-style-type: none"> The IMO vide Resolution MEPC.385(81), adopted amendments to Appendix IX of MARPOL Annex VI – “Information to be submitted to the IMO Ship Fuel Oil Consumption Database (Regulation 27)” introducing increased data granularity requirements. These amendments make mandatory the reporting of the: <ul style="list-style-type: none"> Fuel oil consumption per consumer type (Main engine(s), Auxiliary engine(s), Oil-fired boilers, and Others) Total amount of onshore power supplied expressed in kWh Fuel oil consumption per consumer type (Main engine(s), Auxiliary engine(s), Oil-fired boilers, and Others) when the ship is not underway. In addition, there is a new entry to report the laden distance travelled – on a voluntary basis - and the installation of any innovative technology according to the 2021 Guidance on treatment of innovative energy efficiency technologies for calculation and verification of the attained EEDI and EEXI (MEPC.1/Circ.896). Ships to which Regulation 28 of MARPOL Annex VI applies, shall also report the transport work using tonne-mile, TEU-Mile and/or passenger-mile data, whereas container ships especially must report both tonne-mile and TEU-mile data. The amendments will enter into force on 1 August 2025. Noting the fact that the aforementioned amendments are entering into force in the middle of a

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									<p>calendar year, which would result in two distinct levels of granularity for the data gathered in that calendar year, MEPC 82 approved a Unified Interpretation vide MEPC.1/Circ.913 regarding the application of these amendments.</p> <p>7. Based on the above interpretation, ship owners and managers are advised as follows:</p> <ul style="list-style-type: none"> For ships flying the flag of the Administration that implements the amendments on the entry-into-force date (1 August 2025), the SEEMP is to be revised and verified prior to 1 January 2026 and data to be collected with existing level of granularity for the entire year of 2025, and with increased granularity from 1 January 2026. Those planning to retrofit flow meters or employ other methodologies should complete these actions within the same time frame. For ships flying the flag of the Administration that implements the amendments early (1 January 2025), the SEEMP is to be revised and verified prior to 1 January 2025 and data to be collected with increased granularity throughout the entire year of 2025 and beyond. Those planning to retrofit flow meters or employ other methodologies should complete these actions within the same time frame. For ships delivered on or after 1 August 2025 data, SEEMP is to be developed to include a description of data collection methodology and the data is to be collected at the enhanced level of granularity from the date of delivery and onwards. <p>For details, refer IRS Technical Circular No. 024/2024, dated 18 November 2024.</p>
5	MARPOL Annex VI, Reg. 2, 14, 18, Appendix I	MEPC. 385(81)	All	All	1 August 2025	All	All	1 August 2025	<p>Amendments to MARPOL Annex VI related to low-flashpoint fuels and gas fuels:</p> <p>1. The IMO adopted Resolution MEPC.385(81) - Amendments to MARPOL Annex VI concerning low-flashpoint fuels and other fuel oil related issues, marine diesel engine replacing steam system, accessibility of data and inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS), introducing amendments to Regulations 2, 13, 14, 18, 27 and Appendix I of MARPOL Annex VI.</p> <ul style="list-style-type: none"> In Regulation 2, the definition of fuel oil is revised as “any fuel delivered to and intended for use on board a ship”. Additionally, an additional paragraph 1.33 is added for the definition of gas fuel, aligned with the definition of ‘gas’ in IGF Code, to read “Gas fuel means a fuel oil with a vapor pressure exceeding 0.28 MPa absolute at a temperature of 37.8°C”. Paragraph 2.2 of Regulation 13 is revised to clarify that the installation of a marine diesel engine replacing a steam system shall be also considered a replacement engine while also introducing a footnote referring to the 2024 Guidelines as required by regulation 13.2.2 of MARPOL Annex VI in respect of non-identical replacement engines not required to meet the Tier III limit (Resolution MEPC.386(81)). Revision of Paragraph 12 in Regulation 14, states that the in-use/onboard sampling points

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									<p>requirements in Paragraphs 10 and 11 shall not apply to gas/low-flashpoint fuels.</p> <ul style="list-style-type: none"> Furthermore, Regulation 18 is amended, and a new paragraph 5.2 is added, to apply BDN requirements with minimum content to gas/low-flashpoint fuels. The BDN shall at least contain the information specified in items 1 to 6 of Appendix V of Annex VI, the density determined by a test method appropriate to the fuel type along with the associated temperature along and a signed and certified declaration that the fuel oil conforms with the fuel oil quality requirements of paragraph 3, Regulation 18. <p>Low-flashpoint/gas fuels in principle have very low sulphur content, however it was agreed that this information shall still be documented in the BDN by the supplier either in terms of actual value determined by a suitable test method or with the agreement of the appropriate authority at the port of supply that the sulphur content is less than 0.001 percent m/m.</p> <ul style="list-style-type: none"> In Regulation 27, Collection and Reporting of ship fuel oil consumption data, two new paragraphs are added. These state that the Secretary-General of the Organization, under strict confidentiality, may share data with analytical consultancies and research entities and, on the request of a company, shall grant access to the fuel oil consumption reports of the company's owned ship(s) in a non-anonymized form. In addition, Paragraph 2.3.5, in Appendix I, Form of International Air Pollution Prevention (IAPP) Certificate (Reg. 8) is modified to provide that the requirement for fitting or designating sampling point(s) is not applicable for a fuel oil service system used for a low-flashpoint fuel or a gas fuel. <p>Ship owners are advised to take note of above requirements and are advised to ensure that the Bunker Delivery Note includes information specified in Appendix V of MARPOL Annex VI for all the fuel carried onboard including for gas fuel.</p> <p>Revised IAPP Certificate a/with Supplement will be issued to the ship at the first renewal IAPP survey on or after 1 August 2025.</p>
6	Ballast Water Management Convention	MEPC. 383(81)	All	All	1 October 2025	All	All	1 October 2025	<p>Amendments to BWM Convention on Electronic Record Book Format:</p> <ol style="list-style-type: none"> The IMO vide MEPC Resolution MEPC.383(81), adopted Amendments to the International Convention for the Control and Management of Ship's Ballast Water and Sediments, 2004 (Use of Electronic Record Books), amending the International Convention for the Control and management of Ship's Ballast Water and Sediments, 2004, Appendix II (Form of Ballast Water Record Book). Regulation A-1 - Definitions is amended to insert a new paragraph 9, which defines an Electronic Record book as "a device or system, approved by the Administration, used to electronically record the entries for each ballast water operation as required under this Convention in lieu of a hard copy record book."

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									<p>3. Further, Regulation B-2 Ballast Water Record Book is amended to allow the Ballast Water Record Book to be an electronic record book which shall at least contain the information specified in Appendix II and It also provides that in case the record book entries are in electronic form, each group of electronic entries is to be verified by the master in a timely manner.</p> <p>4. The use of electronic record keeping systems for Ballast Water Record Books is permitted subject to Administration's / Recognized Organization's approval and is based on the software confirming with IMO Resolution MEPC. 372 (80).</p> <p>5. When approved, a "Declaration of BWM Convention Electronic Record Book" will be issued by the Administration / Recognized Organization which is to be kept onboard.</p> <p>Ship owners/ managers intending to use electronic BWRB are advised to be guided by above and may contact IRS HO for further guidance in this regard.</p>
7	Hong Kong International Convention for the Safe and Environment ally sound Recycling of Ships, 2009	SR/CONF/45	All	5,00 GT and above	Ships for which the building contract is placed on or after 26 June 2025; OR in the absence of a building contract, the keel of which is laid, or which is at a similar stage of construction on or after 26 December 2025; OR ships the delivery of which is on or after 26 December 2027	All	5,00 GT and above	From 26 June 2025 till 26 June 2030; or before going for recycling whichever is earlier	<p>Hong Kong International Convention for the Safe and Environmentally sound Recycling of Ships, 2009:</p> <p>The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (HKC) will enter into force on 26 June 2025.</p> <p>This Convention shall apply to:</p> <ul style="list-style-type: none"> (i) Ships of 500 GT and above, and (ii) Ship recycling facilities. <p>The Convention shall not apply to the following:</p> <ul style="list-style-type: none"> (i) Ships of less than 500 GT (ii) ships operating throughout their life only in waters subject to the sovereignty or jurisdiction of the State whose flag the ship is entitled to fly. <p>Accordingly, From 26 June 2025, all new ships will be required to be delivered with an approved Inventory of Hazardous Materials (IHM) (Part I) and corresponding Certificate.</p> <p>Existing Ships - No later than 25 June 2030 (or before going for recycling if this is earlier), all existing ships will be required to have an approved IHM (Part I), developed and hold a corresponding valid Certificate on board.</p> <p>Ships to which Convention applies are to be recycled in a ship recycling facility holding valid Document of Authorization to Conduct Ship Recycling (DASR) from 26th June 2025 onwards.</p> <p>Ship builders, Ship Owners/ Managers and Ship Recycling Companies are advised to take note of above.</p>

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									For details, refer IRS Technical Circular No. 032/2023, dated 09 October 2023.
8	IMDG Code	MSC.556(108)	Ships carrying IMDG Cargo	All	1 January 2026 Administrations may apply it on a voluntary basis as from 1 January 2025.	Ships carrying IMDG Cargo	All	1 January 2026 Administrations may apply it on a voluntary basis as from 1 January 2025.	<p>Amendments to the IMDG Code:</p> <p>The IMDG Code is regularly reviewed to take into account new requirements for existing substances or new substances.</p> <p>In addition to the regular updates to classification, segregation, packing and markings of dangerous goods, Amendment 42-24 includes;</p> <ul style="list-style-type: none"> • Segregation requirements for alcoholates. • Amendments to SG 53 and SG 48 regarding liquid organic substances. • Amendments to UN 1362 PG II and UN 1362 to clarify the differences between carbon-related substances particularly with regard to charcoal. • A new special provision and handling code for medical waste. • Amendments have also been made to the footnotes in the IMDG Code. Several footnotes in the IMDG Code were found to use mandatory language. These have now been included in the main body of the Code. <p>The amendments are pertaining to operational requirements and are to be complied with when carrying dangerous goods.</p>