Technical Information

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To : Whom It May Concern
Subject : Summary Report on IMO Sub-committee of Carriage of Cargoes and Containers 12th Session (CCC 12)

Summary

This Technical Information summarizes the result of 12th Session of the IMO Carriage of Cargoes and Containers Sub-Committee (CCC 12) that was held from 14 to 18 September 2026, at the IMO headquarters in London.

Information

1. The information provided in this Technical Information are the ones which have high relevance with the work of BKI or considered as an essential information for interested parties.
2. The following agenda are among those discussed during the meeting

Agenda Number	Topic
3	Amendments to the IGF Code and development of guidelines for alternative fuels and related technologies
4	Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels
5	Amendments to the IMSBC Code and supplements
6	Amendments to the IMDG Code and supplements
7	Revision of the Revised guidelines for the preparation of the Cargo Securing Manual (MSC.1/Circ.1353/Rev.2) to include a harmonized performance standard for lashing software to permit lashing software as a supplement to the Cargo Securing Manual
8	Consideration of reports of incidents involving dangerous goods or marine pollutants in packaged form on board ships or in port areas
9	Unified interpretation of provisions of IMO safety, security, environment, facilitation, liability and compensation-related conventions
10	Biennial status report and provisional agenda for CCC 13
11	Election of Chair and Vice-Chair for 2027
12	Any other business
13	Report to the Committees

3. The Agenda above are several technical issues discussed during the meeting. A brief coverage among the issues are expressed in the attached document.

More info

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BRIEF INFORMATION ON IMO MEETING OF SUB-COMMITTEE OF CARRIAGE OF CARGOES AND CONTAINERS 12TH SESSION (CCC 12), WG 1 – AMENDMENTS TO THE IGF CODE AND DEVELOPMENT OF GUIDELINES FOR ALTERNATIVE FUELS AND RELATED TECHNOLOGIES

A. REVISED INTERIM GUIDELINES FOR THE SAFETY OF SHIPS USING METHYL/ETHYL ALCOHOL AS FUEL

Entry into force : May be determined at MSC 113th in 2027
Applicability : Ships to which part G (ships using low-flashpoint fuels) of SOLAS chapter II-1 applies

Summary of Working Group (WG) result

In accordance with the Terms of Reference (ToR) of the Intersessional Working Group on the Development of Safety Regulations for Alternative Fuels and New Technologies (ISWG-AF3), a revision of the Interim Guidelines for the Safety of Ships Using Methyl/Ethyl Alcohol as Fuel (MSC.1/Circ.1621), approved on 7 December 2020, is required. The revision should take into account the documents submitted to ISWG-AF3, as well as the relevant documents submitted to CCC 12, including CCC 12/3 (Norway), CCC 12/3/2 (Japan), CCC 12/3/4 (China), CCC 12/3/5 (China), CCC 12/3/6 (Brazil et al.), CCC 12/3/7 (Japan), and CCC 12/INF.15 (Brazil et al.), together with operational experience gained from the application of the interim guidelines.

WG decission

The sub-committee is requested to agree to the draft revised Interim Guidelines for the safety of ships using methyl/ethyl alcohol as fuel, with a view to approval by MSC 113.

Chapter 4 - General Provisions

Risk assessment

The WG decided not to endorse the proposal contained in paragraph 4.2.1 of document CCC 12/3/6 to establish a differentiated risk assessment approach for ethanol and methanol fuels.

The WG agreed to retain the existing risk assessment requirements. However, the WG agreed to explicitly expand the list of hazards to be considered in the risk assessment in order to address potential safety concerns identified during the discussions and in the comments submitted by WG participants. The hazards to be explicitly considered include:

- ignition sources;
- flame visibility;
- vapour accumulation and explosion hazards;
- temperature-dependent evaporation characteristics; and
- toxic vapour accumulation and personnel exposure.

The WG further agreed that the risk assessment should remain conservative in nature and should not be restricted to specific provisions of the IGF Code. In reaching this conclusion, the WG noted that operational experience with methanol and ethanol as marine fuels remains limited and is not yet considered sufficiently mature to support a more targeted or reduced risk assessment approach.

Chapter 5 – Ship Design and Arrangement

Alternative Cofferdam Arrangements

Based on the comments provided by participants regarding cofferdams, the WG concluded as follows:

- the function of the cofferdam should be more clearly defined;
- a new functional requirement should be introduced;
- a definition of cofferdam, aligned with the IGC Code and the IBC Code, should be incorporated; and
- alternative arrangements should continue to be permitted through the application of alternative design and risk assessment methodologies.

Ballast Water Tank as an Alternative to a Cofferdam

The proposal to use a ballast water tank as an alternative to a cofferdam was not supported by the WG, taking into account the comments received from participants and the following key considerations:

- the potential for chemical reactions in the event of methanol or ethanol leakage into the ballast tank;
- the risk of pollution associated with ballast water discharge; and
- the supporting technical evidence was considered insufficient to justify the proposed arrangement.

Fuel Tank Location

- The WG did not support the proposal submitted by Japan regarding additional fuel tank locations.
- The WG agreed to delete the phrase "and forward of the aft bulkhead" in paragraph 5.3.3 in order to align the provision with the IGF Code and to avoid imposing a requirement for separated fuel tank arrangements.

Drain Tank

The WG agreed to retain the existing requirement that drain tanks should not be located adjacent to freshwater tanks and should not be located adjacent to exhaust gas treatment fluid tanks.

Airlock Alarm

The WG agreed that the alarm requirements for airlocks in paragraph 5.12.4 should be harmonized with the corresponding provisions of the IGC Code.

Chapter 6 – Fuel Containment System

Underwater Venting

The WG discussed the use of pressure/vacuum (P/V) valves with pressure relief outlets discharging below the water surface.

- Submerged discharge arrangements may be accepted as an alternative arrangement and should not be permitted for normal operational use.
- Where a submerged discharge arrangement is proposed as an alternative arrangement, it should be subject to a dedicated assessment. As a minimum, the assessment of outlets located below the water surface should address, but not be limited to, the following:
    - biofouling;

— proximity to other inlets;
— vapour concentration at the water surface;
— back pressure;
— tank and piping structural strength; and
— valve sizing.

Pipe Chapter 7 – Material and General Design

The WG agreed to retain the term "set pressure" to ensure consistency with the IGF Code and to avoid unnecessary additional complexity in the design of relief piping arrangements.

Chapter 8 – Bunkering

Bunkering Station

The WG agreed to introduce a new classification of bunkering stations, consisting of open deck bunkering stations, semi-enclosed bunkering stations, and enclosed bunkering stations.

Vapour Return Line

The WG agreed that a vapour return line should be retained in order to ensure that no vapour is released to the atmosphere during bunkering operations. At the same time, the arrangement should not impose operational limitations where shore-side facilities are not equipped with a vapour return system.

In addition, the WG agreed on the following enhancements:

- the provision of leak detection at the bunkering station;
- automatic closure of the bunkering valve upon detection of a leak; and
- alignment of manifold requirements with the corresponding provisions of the IGF Code.

Chapter 9 – Fuel Supply to Consumer

Ventilasi Double Wall Pipe

The WG agreed to revise the ventilation capacity requirements for the annular space between the inner and outer pipes by adopting a two-stage approach, as follows:

Condition	Ventilation capacity
Normal	10 ACH
Emergency	30 ACH

ACH: Air change per hour

The WG considered the proposal to maintain the inert gas pressure in the annular space at a level higher than the fuel pressure in the inner pipe. The WG concluded, however, that a lower pressure in the annular space would provide a more effective means of leak detection

Fuel Preparation Equipment

The WG agreed that equipment normally required to be located within a fuel preparation space may be installed in a machinery space of Category A, subject to the provision of a secondary enclosure designed to achieve an equivalent level of safety.

Chapter 11 – Fire Safety

The WG agreed to retain the 600 mm cofferdam width, considering it sufficient to provide the required level of fire protection and consistent with established industry practice. The WG further considered that the 900 mm width specified in the IGF Code did not provide sufficient justification for increasing the existing requirement.

Fire Extinguishing System

Recognizing that the FSS Code does not yet contain comprehensive provisions addressing fires involving alcohol fuels, the WG agreed to incorporate additional technical requirements into the interim guidelines. The WG further agreed to invite the SSE Sub-Committee to take these provisions into consideration in the future development of the FSS Code.

CO_2 System

The WG agreed that the CO_2 fire-extinguishing system should be permanently installed and capable of discharging at least 85% of the required gas quantity.

- A CO_2 concentration of 50% was considered necessary for methanol and ethanol fuel fires, compared with 35% for conventional fuel fires.
- A minimum of 85% of the required CO_2 quantity should be discharged within 3 minutes (rather than 2 minutes as required by the FSS Code), based on the following considerations:
  - the larger required CO_2 volume can still be delivered effectively;
  - excessively high discharge rates are not necessary;
  - the risk of overpressure is reduced; and
  - the required 50% CO_2 concentration can still be achieved.
- The WG concluded that discharging 85% of the required CO_2 quantity within 3 minutes would provide a level of safety equivalent to that achieved by the existing requirements for conventional fuels.

Chapter 13 – Ventilation

The WG agreed to align all ventilation requirements applicable to fuel preparation spaces, enclosed bunkering stations, ventilated ducts, and double-wall piping systems, with a view to ensuring a consistent and uniform safety approach throughout the interim guidelines.

Ventilation Rate

The WG agreed on a two-stage approach, comprising the following elements:

Condition	Ventilation capacity
Normal	10 ACH
Emergency conditions upon detection of a fuel leak	30 ACH

ACH: Air change per hour

Enclosed Bunkering Station

The WG agreed to introduce additional requirements specific to enclosed bunkering stations, including:

- the provision of mechanical extraction ventilation;
- the arrangement of ventilation air inlets and outlets in safe locations; and
- harmonization of the requirements with the provisions on area classification and airlock arrangements.

Chapter 15 – Control, Monitoring and Safety Systems

The WG agreed to revise Table 15.1 to align it with the amendments adopted in relation to bunkering arrangements, fuel containment, ventilation, leak detection, and personnel protection requirements.

Self-Monitoring Detector

To maintain consistency with the IGF Code, the WG agreed that a single self-monitoring gas detector could be accepted in lieu of two independent gas detectors.

Alarm dan Shutdown LEL

Following its deliberations and taking into account the views expressed by members, the WG agreed on the preliminary requirements for fuel vapour concentration limits under the following conditions:

Action	% of LEL
Alarm on	20% LEL
Trigger safety action	40% LEL

LEL: Low Explosion Limit

Toxicity Monitoring

Having considered documents CCC 12/3/6 and CCC 12/3/7, the WG agreed to distinguish between gas leak detection systems, intended for the activation of safety functions, and toxicity monitoring systems, intended for personnel protection.

The WG further agreed to introduce a new requirement for ethanol fuel, requiring a local alarm or visual indication to be provided when a concentration of 200 ppm is detected in enclosed spaces readily accessible to ship personnel. The requirement should apply to all relevant enclosed spaces and should not be limited to fuel preparation spaces.

Chapter 16 – Training, Drills and Emergency Exercises

The WG agreed to amend paragraph 16.6 to ensure consistency with the approach set out in MSC.1/Circ.1687 on the use of ammonia as fuel. In particular, the WG agreed that personnel should comply with the applicable requirements of the STCW Convention, undergo fuel-specific training for methanol and ethanol fuels, and demonstrate knowledge of the hazards and safety considerations specific to alcohol-based fuels.

Chapter 17 – Operation

Exposure and toxicity Ethyl/ Ethyl alcohol

The WG did not support the inclusion of the toxicity values proposed by members, on the grounds that such values could lead to inappropriate interpretations of the hazards associated with exposure to methyl and ethyl alcohol fuels.

The primary concern was that the toxicity and safety characteristics of the supplied fuel may vary due to the presence of denaturants or other additives, thereby limiting the applicability of fixed toxicity values.

Consequently, the WG agreed to include additional text in Chapter 1 (Introduction) highlighting the potential health risks associated with exposure to methyl and ethyl alcohol fuels and emphasizing the need for appropriate safety precautions when handling such fuels.

Electrical Bonding

The WG agreed to amend the electrical bonding requirements in order to achieve consistency with paragraph 18.4.4 of the IGF Code. In reaching this decision, the WG noted the importance of maintaining a harmonized approach to bunkering safety and ensuring adequate safeguards against the accumulation and discharge of static electricity during fuel transfer operations.

Chapter 18 – Personnel Protection

Emergency Equipment

The WG agreed to introduce additional requirements for:

- the provision of oxygen resuscitation equipment;
- portable gas detectors capable of monitoring methanol exposure; and
- suitable personal protective equipment to ensure adequate personnel protection when handling alcohol fuels.

Escape Respirator

The WG did not support the adoption of the provision from the ammonia guidelines requiring emergency escape respirators to be provided for all personnel on board. The WG considered that such a requirement would be overly conservative for liquid alcohol fuels and not commensurate with the associated risk profile of methanol and ethanol fuel systems.

Portable Gas Detector

The WG agreed to include portable gas detectors capable of detecting methyl alcohol concentrations among the required emergency equipment. However, the WG did not agree to prescribe a specific detection capability of 200 ppm and instead favoured a goal-based requirement.

In this regard, the WG agreed that portable gas detectors should be capable of detecting methanol concentrations at levels relevant to the protection of personnel, while avoiding the specification of a fixed concentration threshold.

B. INTERIM GUIDELINES FOR SHIPS USING LOW-FLASHPOINT OIL FUELS

Entry into force : May be determined at MSC 113th in 2027

Applicability : Ships using low-flashpoint fuels as defined in 2.2.1 to which part G of SOLAS chapter II-1 applies

CCC 12 continued its work on the development of Interim Guidelines for Ships Using Low-Flashpoint Oil Fuels. The Sub-Committee considered two alternative machinery space concepts to support future regulatory development:

- A **temperature-controlled machinery space approach**, offering simpler implementation and lower compliance costs; and
- A **fuel-safe machinery space approach**, consistent with the safety philosophy of the IGF Code and providing a higher level of risk reduction.

The Sub-Committee agreed that the **fuel-safe machinery space concept** should serve as the primary safety approach for the development of the guidelines. Nevertheless, alternative solutions may still be accepted through the established alternative design and arrangement process. Further technical development will be undertaken by the Correspondence Group.

C. DRAFT AMENDMENTS TO INTERIM GUIDELINES FOR THE SAFETY OF SHIPS USING FUEL CELL POWER INSTALLATIONS

Due to time constraints, CCC 12 was unable to progress amendments to the Interim Guidelines for the Safety of Ships Using Fuel Cell Power Installations (MSC.1/Circ.1647). The Correspondence Group was tasked with further developing the work by:

- establishing fuel cell subcategories; and
- providing technical justification for differentiated safety requirements based on the characteristics of various fuel cell technologies.

D. TARGETED AMENDMENTS TO THE IGF CODE FOR NATURAL GAS FUEL SYSTEMS

CCC 12 considered a package of eight proposed amendments to Part A-1 of the IGF Code. The proposals aim to resolve inconsistencies in terminology, cross-references, and operational requirements, thereby supporting uniform implementation while maintaining existing safety objectives for vessels using natural gas as fuel.
The proposals were referred to the Correspondence Group for further review and development.

E. DEVELOPMENT OF A SAFETY REGULATORY FRAMEWORK TO SUPPORT THE REDUCTION OF GHG EMISSIONS FROM SHIPS USING NEW TECHNOLOGIES AND ALTERNATIVE FUELS (ITEM 4)

Interim Guidelines for Ships Using Onboard Carbon Capture and Storage Systems (OCCS)

CCC 12 agreed to initiate the development of Interim Guidelines for the Safety of Ships Using Onboard Carbon Capture and Storage Systems (OCCS), with completion anticipated in 2029.

The Sub-Committee endorsed the proposed approach, scope, and structure of the guidelines. The future framework will be goal-based and technology-neutral, accommodating a wide range of ship types and OCCS configurations while ensuring an acceptable level of safety for carbon handling, processing, and storage activities. The guidelines will not address:

- carbon capture performance;
- carbon accounting methodologies; or
- environmental considerations.

To preserve technological neutrality, references to "CO_2" were replaced with the broader term "Carbon", allowing the framework to encompass non-gaseous carbon management technologies such as mineralization and solid carbon separation.

Key Safety Considerations

CCC 12 agreed that the guidelines should address, among others, the following safety-related issues:

- prevention of dry ice formation and transfer system blockages during liquid carbon transfer operations;
- management of incidental operational venting of captured carbon and determination of whether such venting should be permitted;
- development and maintenance of an OCCS Operations Manual covering operational procedures, training, drills, and emergency response;
- hazards associated with OCCS technologies beyond carbon dioxide itself, including amines, refrigerants, alkaline solutions, and chemical degradation products.

Regulatory Implications of Captured Carbon CO_2 Onboard

The Sub-Committee noted a potential regulatory ambiguity under SOLAS Regulations VII/11 and VII/13 whereby a ship equipped to capture and store liquefied CO_2 in bulk could be interpreted as a gas carrier and therefore subject to the requirements of the IGC Code.

CCC 12 recalled that a similar regulatory challenge had previously been addressed through the development of the IGF Code, which established a dedicated framework for gaseous fuels. The Sub-Committee recognized that a comparable regulatory solution may be required for temporary onboard storage of captured carbon. The matter will require further consideration by MSC, while CCC continues the technical development of the OCCS guidelines.

Unified Interpretation of SOLAS Regulation VI/5-2 - Production Processes During Sea Voyages

CCC 12 did not support a proposed Unified Interpretation intended to clarify that emerging hydrogen and carbon capture technologies would not fall under the SOLAS prohibition on production processes conducted during sea voyages.

AMENDMENTS TO THE IMSBC CODE AND SUPPLEMENTS (ITEM 5)

IMSBC Code Draft Amendment 09-27

CCC 12 reviewed the report of the Editorial and Technical Group (E&T 44) concerning draft Amendment 09-27 to the IMSBC Code.

New Cargo Schedules Approved

The following cargo schedules were approved for inclusion:

- Bituminous Granulates Coarse;
- Mullite;
- Kaolinite;
- Tabular Alumina;
- Direct Shipping Ore Spodumene.

In addition, **Seed Cake** was reinstated as a Group C cargo.

Cargoes Requiring Further Review

The following proposals were referred to E&T 45 for additional consideration:

- Lime Mud;
- Untreated Incinerator Bottom Ash (U-IBA);
- Contaminated Soil;
- Polymetallic Nodules;
- Amorphous Graphite;
- Amorphous Graphite Fines; and
- Ulexite.

The classification of **Bituminous Granulates Fines** remains under review due to unresolved questions relating to liquefaction testing and transport moisture limits.

Introduction of Bulk Cargo Identification Numbers (ID)

CCC 12 endorsed the introduction of **Bulk Cargo Numbers (BC Nos. 001-262)** to complement existing Bulk Cargo Shipping Names and enhance the consistency of cargo identification across languages and IMO information systems.

Publication of Non-Listed Cargo on GISIS

The Sub-Committee supported the publication of provisional assessments of non-listed cargoes through GISIS pending their formal inclusion in the IMSBC Code amendment process.

IMSBC Code Amendments to Cargo Documentation Requirements

CCC 12 supported proposed amendments to Section 4.2 of the IMSBC Code aimed at strengthening cargo declarations by requiring:

- identification of subsidiary hazards;
- use of Materials Hazardous only in Bulk (MHB) notation codes; and
- submission of applicable moisture content, TML, weathering, and exemption certificates.

Ventilation Requirements Guidance for Group B Cargoes Under IMSBC Code

The Sub-Committee agreed to issue a CCC circular clarifying the relationship between ventilation requirements under the IMSBC Code and the design requirements contained in SOLAS and the Load Line Convention. The guidance emphasizes that these requirements are complementary and should be applied consistently.

Transport of Plastic Pellets in Bulk

CCC 12 concluded that introducing an IMSBC Code schedule solely to prohibit the carriage of plastic pellets would be inappropriate, as the IMSBC Code is intended to address safety considerations rather than pollution-related concerns.

Amendments to the IMDG Code *and Supplements (Item 6)*

Amendment 42-24 Editorial Corrections

CCC 12 approved editorial corrections to IMDG Code Amendment 42-24. A corrigendum will be issued before the amendment enters into force on 1 January 2026.

Amendment to paragraph 5.4.1.4.3.8 of the IMDG Code

The Sub-Committee considered amendments requiring transport documents for sodium-ion batteries to include supplementary descriptions such as:

- "DAMAGED/DEFECTIVE";
- "FOR DISPOSAL"; or
- "FOR RECYCLING".

The proposal was referred to E&T 46 for further consideration.

Safety Gap under SP188 Battery Exemptions

CCC 12 considered a safety gap related to Special Provision 188 (SP188) which exempts individual battery packages from hazard communication requirements when transported by sea. Multiple exempt packages can be loaded into a single container, creating cumulative hazards (e.g., 4,200 laptops = 416 kWh equivalent energy) that remain invisible to carriers, ports, and coastal states. This risk was illustrated by the MV X-Press Godavari incident where a container with 7,540 kg of lithium-ion batteries caught fire at sea while the crew remained unaware of cargo content for 90 minutes which prevented appropriate emergency response.

To address this gap CCC 12 considered a proposal to adopt a container-level threshold to SP188 (e.g., maximum gross mass or watt-hours per container) which would trigger hazard communication and placarding requirements, similar to existing SP963 provisions.

CCC 12 instructed the E&T 46 (spring 2027) to consider the amendments with a validation by CCC 13 and publication of an MSC resolution in 2028 alongside UN CTDG (December 2026).

Amendments to IMDG Code Paragraph 7.3.7.2

CCC 12 considered a proposal to relocate the explosion hazard requirement for self-reactive substances, organic peroxides, and polymerizing substances present in current paragraph 7.3.7.2.1 to section 7.3.3 as new paragraph 7.3.3.19. This relocation would clarify that these explosion hazard requirements apply to all self-reactive substances and not only to those that require temperature control during transport.
CCC 12 instructed the E&T 46 (spring 2027) to consider the amendments for validation by CCC 13 and publication of a MSC resolution in 2028.

Revision of the Revised guidelines for the preparation of the Cargo Securing Manual (MSC.1/Circ.1353/Rev.2) to include a harmonized performance standard for lashing software to permit lashing software as a supplement to the Cargo Securing Manual (Item 7)

SOLAS regulation VI/5.6 reads, "All cargoes, other than solid and liquid bulk cargoes, cargo units and cargo transport units shall be loaded, stowed and secured throughout the voyage in accordance with the Cargo Securing Manual (CSM) approved by the Administration" and that the CSM should be drawn up in accordance with the recommendations contained in the Revised guidelines for the preparation of the Cargo Securing Manual contained in MSC.1/Circ.1353/Rev.2.

However, existing guidelines do not provide harmonised standards for lashing software despite increasing use of onboard lashing software on containerships. As a result, different software solutions may use differing methodologies, assumptions and outputs, potentially leading to inconsistencies in assessing container securing arrangements. To address this, CCC 12 now has finalised the draft amendments to the MSC.1/Circ.1353/Rev.2 to include a draft interim performance standard for lashing software as a dedicated Appendix, thereby permitting the use of lashing software as a supplement to the Cargo Securing Manual. The draft performance standards establish harmonised requirements relating to software functionality, operational manuals, human-machine interface, calculation methods, tolerances, approval, testing, surveys, data exchange and integration with external systems.

Application provisions: The revised guidelines are expected to apply to container ships as follows:

- Keel laid date, or at a similar stage of construction, on or after 1 July 2027: the revised Guidelines, including the new appendix containing performance standards for lashing software, are to be applied;
- Keel laid date, or at similar stage of construction, on or after 01 January 2015 but before 1 July 2027: the revised Guidelines apply in full, except for the new appendix on lashing software performance standards;
- Keel laid date, or at similar stage of construction, before 01 January 2015: only chapters 1 to 4 of the revised Guidelines apply;
- Voluntary application: Administrations are encouraged to apply the entire revised Guidelines, including the appendix, to any container ship regardless of keel laid or construction date. However, the Cargo Securing Manual would have to be re-approved in its entirety by the Administration.

The draft Revised guidelines are expected to be approved by MSC 113 in June 2027.

Furthermore, CCC 12 agreed to a proposal to include a new annex in the CSS Code with a standardised method to assess the efficiency of securing arrangements for containers on containerships, with the target completion year of 2030. The proposal will be submitted to MSC 113 for further consideration.

Unified interpretation of provisions of IMO safety, security, and environment-related conventions (Item 9) Direct Reduced Iron (D) Ventilation Requirements

CCC 12 considered IACS Unified Interpretation SC 308/Rev.1 clarifying ventilation requirements for Direct Reduced Iron (DRI) cargo under SOLAS regulation II-2/5.2.1.1 and the IMSBC Code. The interpretation resolves potential conflicts between fire safety closure requirements and cargo ventilation needs, applicable from 1 January 2025 following resolution MSC.539(107). IACS members will uniformly implement UI SC 308/Rev.1 on or after 1 July 2027, unless directed otherwise by the Administration under which they operate as recognized organizations.

Since IACS's UI pertains to SOLAS regulation II-2, the Sub-Committee noted that its content does not fall within its remit and therefore invited IACS to submit it to the SSE Sub-Committee. It also recalled that IACS UIs are not submitted to the same guard rail procedures approved during MSC 108.

Any Other Business *(Item 12)*

IGF Code Pressure Relief System Requirement

CCC 12 considered a proposal to relocate an operational requirement concerning tank loading restrictions following loss of pressure-relief capacity. The Sub-Committee concluded that the proposal constituted a substantive amendment rather than an editorial correction and should therefore be submitted through the formal IMO amendment process.

Revision of the CTU Code

CCC 12 agreed in principle to the comprehensive revision of the IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code).

The revision:

- updates the Code to reflect current regulatory and industry practices;
- incorporates modern cargo handling equipment and operational methods; and
- establishes a structure that enables more efficient future updates.

The Sub-Committee also supported the establishment of a permanent Technical Body comprising representatives of IMO, ILO, UNECE, industry organizations, and technical experts to maintain the Code's relevance and facilitate future revisions.