

MEMBER ALERT



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THE CARRIAGE OF CONTAINERS ON NON-CELLULAR VESSELS

There has been a recent rise in enquiries regarding the carriage of containers on board vessels (e.g., bulk carriers) not specifically designed to carry cellularized cargoes. In considering the carriage of containers in whatever number or for whatever duration, it is important to consider the many factors associated with such carriage.

The carriage of containers on board vessels not purpose-built for such trade may represent a material change in the conditions upon which cover has been contracted. Accordingly, to avoid prejudicing their cover, Members considering such trade should contact the Managers' Underwriting Department in advance.

In any event, the following questions should be asked by Members considering such trade, divided into the following key areas of inquiry.

Classification and statutory compliance

- ✓ *Does the vessel have the proper classification and statutory certificates to carry containerized cargoes?* Members should reach out to their classification society and flag state to seek clarification as to whether their current certificates are valid to carry containers.
- ✓ *If containers are to be stowed on deck or on hatch covers, will the vessel comply with SOLAS requirements for Navigation Bridge Visibility as well as visibility of navigation lights?*
- ✓ *To warrant a Document of Compliance issued for multipurpose, dry cargo ship operation, does the Safety Management System need amending to include guidance on the loading, stowage, and carriage of containers?*

Technical considerations

- ✓ *If containers are to be carried on the hatch covers, have the vessel's hatch cover manufacturer and classification society been consulted to determine if the hatch covers are strong enough or require modifications?*
- ✓ *If containers are to be carried below deck, has the maximum load for tank tops been considered to ensure container stack weights do not exceed permissible tank top loads?*
- ✓ *Has the vessel's stability been considered for the stowage of containers, considering the potential increase in the vessel's metacentric height (GM)?*

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- ✓ *Does the vessel's loading computer's software accommodate stability and stress calculations for the stowage of containers?*
- ✓ *Are the vessel's cranes adequate and equipped for loading and discharging containers?*

Operational considerations

- ✓ *Has the vessel been supplied with the appropriate equipment, including lashings and fittings, to accommodate the number of containers to be carried? Members should also consider hiring qualified marine cargo surveyors to conduct load surveys and to validate the lashing and stowage arrangements.*
- ✓ *If wooden dunnage is to be used, is it adequate to prevent sliding of the containers, support appropriate weight distribution, and not susceptible to becoming crushed such that lashings might become loose?*
- ✓ *Has the vessel's Cargo Securing Manual (CSM) been approved by the flag state or classification society and does it provide sufficient details on the securing of containers?*
- ✓ *Has the crew been trained how to properly secure containers per the approved CSM?*
- ✓ *During the voyage, will the crew be able to gain safe access in order to check and tighten the lashings?*
- ✓ *Will twistlocks, stackers and bridge fittings be used to prevent movement/sliding of containers in intermediate and upper tiers?*
- ✓ *Are there dedicated locations to safely store lashing gear and twistlocks when not in use?*
- ✓ *Is a process in place to monitor and ensure that container weights do not exceed the maximum limits for tank top or hatch cover loading?*
- ✓ *Will the containers carry hazardous or reefer cargoes? If so, has the vessel been equipped to carry such cargoes? Modifications such as electrical connections for reefer containers or additional generators must be approved by the flag state or classification society.*
- ✓ *Are the vessel's holds properly equipped to detect and extinguish container fires?*
- ✓ *Has the crew been trained on the appropriate response to a fire in a container or to an unknown liquid leaking from a container?*

Contractual considerations

- ✓ *Will the containers be loaded on deck? If so, it should be made clear on the face of the bill(s) of lading the precise cargo which is to be so loaded together with express*

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provisions making it clear that the carrier will not have any responsibility whatsoever for any such cargo carried on deck. Ideally, the Member should check any proposed wording with the Managers.

- ✓ *Are there other issues which Members should consider in regard to their charter party arrangements?* The charter party should:
 1. contain express provisions dealing with the party which is liable for proper securing, lashing etc. of the containers; and
 2. set out clearly which party is therefore liable for damage to containers and if appropriate making a distinction between on and under deck carriage.

Your Managers recommend that Members take note of this information and be guided accordingly.