

MEMBER ALERT



Shipowners Claims Bureau, Inc., Manager
One Battery Park Plaza 31st Fl., New York, NY 10004 USA
Tel: +1 212 847 4500
Fax: +1 212 847 4599
<https://www.american-club.com>

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STEEL CARGOES STOWED WITH BREAK-BULK, CONTAINERS, OR PROJECT CARGOES ABOARD BULK CARRIERS

It has come to the attention of your Managers that numerous bulk carriers have been loading finished and/or unfinished steel products along with break-bulk, containerized and project cargoes, in the same cargo hold.

Break-bulk containerized and project cargoes include large, heavy, oversized items, machinery parts, crates, and heavy duty wheeled items such as trucks, cranes or pay loaders. Unlike vessels dedicated to carry break-bulk, containerized or project cargoes, bulk carriers are not fitted with suitable lashing and securing arrangements. The irregular sizes, shapes and weights of such non-pure-bulk cargoes are challenging to safely lash and secure, and typically require makeshift arrangements. Furthermore, such arrangements are challenging for crew to supervise for safety's sake when a vessel is at sea.

Wheeled cargoes pose a particular risk due to their higher propensity to shift. The stowage and securing of wheeled cargoes are addressed specifically in Annex 4 of the Cargo Stowage and Securing (CSS) Code.

Similarly, break-bulk or project cargoes are often stowed atop of steel cargoes. While specified finished and semi-finished steel cargoes are subject to a pre-load survey, as stipulated in the August 19, 2024, Club Circular No. 16/24, [Steel Cargo Pre-Load Surveys](#), Members should also consider employing experienced surveyors who are familiar with the stowage and securing of break bulk, containerized and project cargoes intermixed with and/or over stowed on top of other cargoes, given the related risk of damage caused by the excessive weight or improper securing of such non-pure-bulk cargoes.

The cost of utilizing an experienced surveyor outweighs the cost of losses to the cargo, vessel, or injuries to the crew, that may ensue from a lack of expert assistance at the time of loading. An expert surveyor is able to assist the Master and crew in protecting the interests of the Member and the safety of the voyage.

The essential steps that should be in hand and approved by the Master prior to loading of cargo detailed above as follows:

- the vessel's stowage plan should be made available well in advance of loading;
- upon receipt of the stowage plan, the Master should input the relevant data into the loadicator to ensure the vessel' shear force bending moment (SFBM) and stability are within the applicable limits; and
- it should be clear how the cargo is to be secured as per Cargo Securing Manual (CSM), and that relevant stowage and lashing materials and equipment are available aboard the vessel in compliance with the CSS Code.

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Some important points regarding stowing, improper stowage and improper securing of heavy cargoes, containers and project cargoes include:

- vehicles and heavy project/break bulk cargo stowed on top of other cargo may not provide a firm surface for the over-stowed cargo;
- cargo stowed atop of other cargoes may damage or deform the cargoes below due to their weight;
- vehicles or heavy cargo should be provided with securing/lashing points to assist in securing these cargoes. These securing points are usually marked on the vehicles by their manufacturer;
- vehicles should not be secured to each other, but should be secured independently to strong lashing points on the vessel's structure;
- dunnage should be placed under break-bulk/project cargo to provide even surfaces, and to distribute weight so that the maximum load on tank tops is not exceeded;
- lashings should be able to be tightened by the crew during the voyage as cargo settles during the sea passage. The use of turnbuckles is also recommended; and
- an understanding that bulk carriers are 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 specified in the October 4, 2021, Club Alert, [The Carriage of Containers on Non-cellular Vessels](#); and
- attention should be given to the September 30, 2024, Club Circular No. 20/24, [Project Cargoes](#), that recommends that marine warranty surveyors be employed for large, heavy-duty and high value project cargoes.

Shipowners have the responsibility to ensure that the vessel is suitable and fit for purpose to carry break-bulk cargo, containers and project cargoes with due regard to statutory regulations and classification society standards. The flag State approved CSM should be on board the vessel as it provides the approved lashing and securing arrangements, besides detailing lashing devices available on board although the lashing material for break-bulk cargo, containers and project cargoes is usually provided by the charterers.

If specified cargoes are not allowed to be loaded as per the vessel's CSM, the owners should notify the charterers and consult their classification society and/or flag State for further guidance.

The Master ultimately has the responsibility to ensure that the cargo is safely handled, stowed and secured as per applicable regulations. Therefore, the Master is obliged to:

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- decline to load specific cargo that does not comply with regulations. For example, loading vehicles with fuel in fuel tanks if the vessel is not equipped with a fire extinguishing system for cargo holds is not an acceptable practice.
- ensure that the cargo stowage will not result in damage to the vessel during the voyage if there is evidence:
 - of improper securing (e.g., wires passing through sharp objects which is liable to part due to rigors of sea passage); or
 - that the vessel maintains the SFBM and stability within prescribed limits; or
 - that load density of cargo tank top has been exceeded; and
- take advantage of any charter party provisions or clauses that may be to the Master's and/or owner's advantage.

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