



INTERCARGO

INTERNATIONAL ASSOCIATION
OF DRY CARGO SHIPOWNERS

PRE-BRIEF



For the twelfth session of the Sub- Committee on Carriage of Cargoes and Containers (CCC 12)

Monday 14 to Friday 18 September 2026

And

Forty-fifth meeting of the Editorial and Technical Group (E&T 45)

Monday 21 to Friday 25 September 2026

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INTRODUCTION

The IMO's Sub-Committee on Carriage of Cargoes and Containers will be followed by E&T 45 at which cargo related matters, referred to by the CCC Sub-Committee will be discussed in further detail.

Key Topics

Key topics discussed at CCC 12¹ include:

1. Cargoes

- Amendments to the IMSBC Code
- Ventilation Requirements in Cargo Holds

2. New Fuels/Alternative Fuels

- Amendments to the IGF Code and development of guidelines for alternative fuels and related technologies
- Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels

The agenda for E&T 45 is:

1. Adoption of the agenda
2. Incorporation of proposals agreed in principle by CCC 12 and finalization of draft amendment 09-27 to the IMSBC Code
3. Consideration of proposals referred to E&T 45 by CCC 12
4. Any other business
5. Report to the Sub-Committee

INTERCARGO Submissions

CCC 12/3/8 **Comments on document CCC 12/3 Submitted by ICS, WSC, INTERCARGO, BIMCO and IPTA**

Provides comments on document CCC 12/3 containing the report of the Correspondence Group on Development of Technical Provisions for Safety of Ships using Alternative Fuels regarding low-flashpoint oil fuels. The document highlights concerns regarding proposals to include provisions that could lead to increased risk to ships and crew, and proposes that the Sub-Committee agree to base the interim guidelines on the fuel safe machinery space concept.

CARGOES

AGENDA ITEM 5 - AMENDMENTS TO THE IMSBC CODE AND SUPPLEMENTS

Report of E&T 44

CCC 12/5 **Report of the forty-fourth session of the Editorial and Technical Group (E&T 44) Note by the Secretariat**

¹ The full provisional agenda can be found in the Appendix

This document contains the report of the Editorial and Technical Group at its forty-fourth session. INTERCARGO's brief for E&T 44 can be found [here](#).

CCC 12/5/15 Comments on document CCC 12/5 (Secretariat) Submitted by Australia

E&T 44 agreed to include the draft individual schedule for BITUMINOUS GRANULATES FINES as a Group A cargo in the draft amendments (09-27). However Australia is of the view that further information related to the testing of the bulk properties of this cargo are required.

Proposed New Cargo Schedules

CCC 12/5/1 New individual schedule for ULEXITE Submitted by Türkiye
CCC 12/INF.2 Information to support the proposed new individual schedule for ULEXITE Submitted by Türkiye

Türkiye proposes a new individual schedule for a *Group C* Cargo ULEXTE.

CCC 12/5/2 New individual schedule for DIATOMITE Submitted by Türkiye
CCC 12/INF.3 Information to support the proposed new individual schedule for DIATOMITE Submitted by Türkiye

Türkiye proposes a new individual schedule for a *Group C* Cargo DIATOMITE

CCC 12/5/3 Draft new individual schedule for soil, contaminated with any/or a combination of hydrocarbons, PFAS, asbestos and heavy metals Submitted by Finland and Ireland

At CCC 11 Finland and Ireland proposes a new individual schedule for contaminated soil perfluoroalkyl and polyfluoroalkyl substances (PFAS). CCC 11 noted that, at that stage, there was no consensus to include the proposed schedule in draft amendment (09-27) to the IMSBC Code. However, CCC 11 agreed to refer documents to E&T 44 for consideration with a view to providing advice to CCC 12 subject to the submission of clarifications on the views expressed.

Finland and Ireland submit a revised schedule for a *Group A and B, MHB (TX)* Cargo, SOIL, CONTAMINATED WITH ANY/OR A COMBINATION OF HYDROCARBONS, PFAS, ASBESTOS AND HEAVY METALS

CCC 12/5/4 Draft new individual schedule for UNTREATED INCINERATOR BOTTOM ASH (U-IBA) Submitted by Finland and Ireland

At CCC 11 Finland and Ireland proposed a new individual schedule UNTREATED INCINERATOR BOTTOM ASH (U-IBA). CCC 11 agreed to refer document CCC 11/5/3 to E&T 44 for consideration with a view to providing advice to CCC 12, and requested the submitters to provide additional supporting information in order to clarify the views expressed.

Finland and Ireland submit a revised schedule for a *Group A and B, MHB (WF and TX)* Cargo UNTREATED INCINERATOR BOTTOM ASH.

CCC 12/5/5 New individual schedule for lime mud Submitted by Sweden

Sweden proposes a new individual schedule for a *Group A* Cargo LIME MUD (OR MESA). Originally discussed at CCC 11 and E&T 44, it was considered that further information was needed to clarify:

1. whether the cargo is cohesive or non-cohesive (free flowing);
2. whether the cargo is hygroscopic;

3. what "Volatile" means (what gases may be generated); .
4. whether there is a hazard related to moisture other than liquefaction; and .
5. whether there is a specific hazard related to dust, and whether requirements for personal protection and/or precautions against the ingress of dust into an engine room or living quarters are necessary

Sweden was invited to provide the above information to this session.

CCC 12/5/6 New individual schedule for POLYMETALLIC NODULES Submitted by the United States

CCC 12/INF.5 Information to support the new individual schedule for POLYMETALLIC NODULES Submitted by the United States

The USA proposes a new individual schedule for a *Group C* Cargo POLYMETALLIC NODULES

CCC 12/5/16 Comments on document CCC 12/5/6 (United States) Submitted by Australia

Australia is of the view that:

- The test reports supporting the cargo information questionnaire and the proposed individual schedule itself will need to be provided
- The information currently provided suggests that the proposed individual schedule is required to allow polymetallic nodules to be loaded from the mining ship to a cargo ship at sea, Australia understands that the operation could get underway with the mining ship loading the polymetallic nodules into its own holds and proceeding to a port where the cargo can be unloaded.
- Loading a solid bulk cargo at sea in compliance with the IMSBC Code would require amendments to mandatory areas of that Code – for example to identify the entity that would be the competent authority (CA) for the "port of" loading.

CCC 12/5/7 New individual schedule for AMORPHOUS GRAPHITE Submitted by China

CCC 12/INF.10 Information to support the new individual schedule for AMORPHOUS GRAPHITE Submitted by China

China proposes a new individual schedule for a *Group C* Cargo AMORPHOUS GRAPHITE

CCC 12/5/8 New individual schedule for AMORPHOUS GRAPHITE FINES Submitted by China

CCC 12/INF.11 Information to support the new individual schedule for AMORPHOUS GRAPHITE FINES Submitted by China

China proposes a new individual schedule for a *Group A* Cargo AMORPHOUS GRAPHITE FINES

CCC 12/5/9 New individual schedule for TABULAR ALUMINA Submitted by China

CCC 12/INF.12 Information to support the proposed new individual schedule for TABULAR ALUMINA Submitted by China

China proposes a new individual schedule for a *Group C* Cargo TABULAR ALUMINA

CCC 12/5/13 New individual schedule for DIRECT SHIPPING ORE SPODUMENE Submitted by Australia

CCC 12/INF.16 Supporting Documentation for a New Individual Schedule for DIRECT SHIPPING ORE SPODUMENE Submitted by Australia

Australia proposes a new individual schedule for a *Group C* Cargo DIRECT SHIPPING ORE SPODUMENE

Reinstatement of schedule

CCC 12/5/14 **Reinstatement of a group C individual schedule for four seedcake species in anticipation of the forthcoming amendment to the UN Model Regulations Submitted by Argentina and the Grain and Feed Trade Association (GAFTA)**

The UN Sub-Committee of Experts on the Transport of Dangerous Goods (UNTDG) at its 67th session (December 2025) agreed in principle, pending formal adoption at the end of the current biennium (December 2026), to amend special provision 142 of the UN Model Regulations to exempt seedcake of soybean, rapeseed, sunflower seed and cotton seed containing not more than 4% oil and not more than 13% moisture from classification as a dangerous good under UN 1386.

The Co-sponsors propose, in anticipation of the forthcoming formal adoption, the reinstatement in the IMSBC Code of a group C individual schedule for those four seed cakes within those thresholds, consistent with the former SEED CAKE (non-hazardous) schedule deleted under amendment 05-19, with thresholds updated to align with the UNTDG determination.

Proposed changes to the Code

CCC 12/5/10 **Updates to standards and circulars referenced in the IMSBC Code Submitted by China**

Numerous circulars and standards are referenced throughout the IMSBC Code as the basis for testing and the determination of transport conditions for solid bulk cargoes. However, several referenced in amendment 08-25 have expired, and this paper suggests some updates.

CCC 12/5/11 **Proposal to amend section 4.2 of the IMSBC Code Submitted by China**

China proposes to amend section 4.2 of the International Maritime Solid Bulk Cargoes (IMSBC) Code on the cargo information and sample declaration form to be provided by the shipper to further specify the documentation requirements for cargo transported in bulk:

1. Explicitly requiring the shipper to provide information on subsidiary hazards of the cargo;
2. Introducing the notational references to MHB hazards as set out in paragraph 9.2.3.1.5 of the Code; and
3. Adding requirements for the provision of additional certificates, such as the weathering certificate and the exemption certificate to the existing paragraph 4.2.2.10 on the certificate for moisture content and transportable moisture limit.

Ventilation Requirements

CCC 12/5/12 **Guidance on ventilation requirements under the IMSBC Code Submitted by Liberia**

The IMSBC Code contains ventilation requirements for certain Group B cargoes. However, ventilation may not always be safe where its operation would endanger the ship or cargo, such as during a cargo hold fire. This document provides guidance on the relationship between ventilation requirements under the IMSBC Code, SOLAS and the Load Line Convention and provides amendments to circular MSC.1/Circ.1434 and a new draft circular.

AGENDA ITEM 9 UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, ENVIRONMENT, FACILITATION, LIABILITY AND COMPENSATION-RELATED CONVENTIONS

CCC 12/9 **IACS unified interpretation of requirements for the cargo space ventilation, as contained in SOLAS regulation II-2/5.2.1.1 and in the IMSBC Code (IACS UI SC 308/Rev.1) Submitted by IACS**

IACS UI SC308/Rev.1 of the requirements for the cargo space ventilation, as contained in SOLAS regulation II-2/5.2.1.1 and in the IMSBC Code, applicable when carrying the new cargo type DIRECT REDUCED IRON (D), in accordance with the amendments to the IMSBC Code (resolution MSC.539(107)).

NEW/ALTERNATIVE FUELS

AGENDA ITEM 3 AMENDMENTS TO THE IGF CODE AND DEVELOPMENT OF GUIDELINES FOR ALTERNATIVE FUELS AND RELATED TECHNOLOGIES

CCC 12/3 **Report of the Correspondence Group Submitted by Norway**
Provides the report of the Correspondence Group on Development of Technical Provisions for the Safety of Ships Using Alternative Fuels regarding methyl/ethyl alcohol, low-flashpoint oil fuels, fuel cells, ammonia and hydrogen.

INTERCARGO's Emissions WG participated in the Correspondence Group on Development of Technical Provisions for the Safety of Ships Using Alternative Fuels.

CCC 12/3/1 **Proposed amendments and considerations for developing regulations for onboard fuel cell power installations Submitted by ZESTAS**

ZESTAS provides proposals for modifications to the Interim guidelines for the safety of ships using fuel cell power installations (MSC.1/Circ.1647) and discusses considerations behind the proposed modifications.

CCC 12/3/2 **Comments on document CCC 12/3 (part 1) Submitted by Japan**
Japan comments on annex 1 to document CCC 12/3 (Norway) regarding chapters 2 to 6 of the draft revised Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel.

CCC 12/3/3 **Draft amendments to paragraphs 5.9.2, 5.12.3, 6.5.10, 8.5.5, 13.3, 13.4.1, 13.6.3 and 13.8 of the IGF Code Submitted by IACS**

IACS proposes amendments to paragraphs 5.9.2, 5.12.3, 6.5.10, 8.5.5, 13.3, 13.4.1, 13.6.3 and 13.8 of part A-1 of the IGF Code to promote uniform implementation of the IGF Code and to maintain its safety objectives

CCC 12/3/4 **Comments on the draft revised Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel in the report of the Correspondence Group (CCC 12/3) Submitted by China**

China provides comments on the safety technical provisions set out in annex 1 (draft revised Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel) of the report of the Correspondence Group. Proposals include amendments to:

- Bunkering of portable fuel tanks (paragraph 5.5)
- Airlock sill height (paragraph 5.12.1)
- Drainage measures for the open deck drip trays (paragraph 8.3.1.5)
- Requirements for inert gas pressure in the annular space (paragraph 9.4.3)
- Requirements for certified safe type electrical equipment (paragraph 12.3)
- Relevant requirements for liquid detection (paragraph 15.7.6)

CCC 12/3/5 Proposal to introduce fuel tank type definitions in the Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel (MSC.1/Circ.1621) Submitted by China

China proposes to replace two fuel tank type definitions, so as to provide further guidance to the fuel tank design and facilitate application of the Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel:

"2.2.3bis Gravity tank means a tank having a design pressure not greater than 0.07 MPa gauge at the top of the tank. A gravity tank may be independent or integral. A gravity tank shall be constructed and tested according to recognized standards, taking account of the temperature of carriage and relative density of the fuel."

"2.2.3bis1 Pressure tank means a tank having a design pressure greater than 0.07 MPa gauge. A pressure tank shall be an independent tank and shall be of a configuration permitting the application of pressure-vessel design criteria according to recognized standards."

"2.2.6 Independent tanks are self-supporting, do not form part of the ship's hull and are not essential to the hull strength. An independent tank may be a gravity tank or a pressure tank."

CCC 12/3/6 Proposed amendments to MSC.1/Circ.1621 reflecting the technical differences between ethanol and methanol as marine fuel Submitted by Brazil, IBIA and CEA

CCC 12/INF.15 Technical characterization of the differences between ethanol and methanol as marine fuel Submitted by Brazil, IBIA and CEA

CCC 12/3/6 presents the proposed amendments to the Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel (MSC.1/Circ.1621), shown as revisions to the relevant text. The amendments operationalize the technical reasoning set out in document CCC 12/INF.15 (Brazil), calibrating detection, ventilation, protection and segregation measures according to the governing hazard of each fuel, each installation and the vessel's certification envelope, through a proportional, risk-based approach

CCC 12/3/7 Comments on document CCC 12/3 (part 2) Submitted by Japan

Japan comments on annex 1 to document CCC 12/3 regarding chapters 8, 9, 11, 13, 15 and 18 of the draft revised Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel.

CCC 12/3/8 Comments on document CCC 12/3 Submitted by ICS, WSC, INTERCARGO, BIMCO and IPTA

Provides comments on document CCC 12/3 containing the report of the Correspondence Group on Development of Technical Provisions for Safety of Ships using Alternative Fuels regarding

low-flashpoint oil fuels. The document highlights concerns regarding proposals to include provisions that could lead to increased risk to ships and crew, and proposes that the SubCommittee agree to base the interim guidelines on the fuel safe machinery space concept.

AGENDA ITEM 4 - DEVELOPMENT OF A SAFETY REGULATORY FRAMEWORK TO SUPPORT THE REDUCTION OF GHG EMISSIONS FROM SHIPS USING NEW TECHNOLOGIES AND ALTERNATIVE FUELS

Onboard Carbon Capture and Storage System

CCC 12/4 Proposed interim guidelines for the safety of ships using carbon capture and storage systems Submitted by IACS

IACS proposes interim guidelines for the safety of ships using onboard carbon capture and storage systems (OCCS). While OCCS are considered a potential means to reduce CO₂ emissions from ships, their installation and integration introduce additional safety considerations related to ship integration, CO₂ processing and storage, and the use of chemical treatment fluids. The proposed interim guidelines adopt a goal-based and risk-based approach to address these hazards, allowing flexibility to accommodate the wide variety of ship types and OCCS arrangements while ensuring an acceptable level of safety.

CCC 12/4/1 Proposed draft interim guidelines for the safety of ships fitted with an onboard carbon capture and storage system Submitted by the Republic of Korea

ROK provides draft interim guidelines for the safety of ships fitted with an onboard carbon capture and storage (OCCS) system, together with the proposed approach for their development. The proposed interim guidelines address safety risks to ships and persons on board that are introduced or increased by the installation, integration and operation of OCCS, while excluding matters related to carbon capture performance, carbon accounting and similar environmental or commercial considerations from their scope.

CCC 12/4/3 Proposal for the development of interim safety guidelines for carbon capture and storage systems on ships Submitted by China

China proposes to develop interim safety guidelines for carbon capture and storage systems (hereinafter referred as the interim safety guidelines) that are independent of the classification of captured CO₂ on ships, based on the "safety first" principle and goal-based standards (hereinafter referred as GBS), focusing on the risk control of CO₂ capture, storage, transfer and cargo spaces.

CCC 12/4/5 Comments on document CCC 12/4 concerning technology-neutral safety requirements and ship-shore interface for onboard carbon capture and storage systems Submitted by Türkiye

Türkiye supports the development of interim guidelines for the safety of ships using onboard carbon capture and storage (OCCS) systems. It provides technical observations based on Türkiye's previous document to MEPC 84 concerning a pre-combustion onboard CO₂ capture concept for LNG carriers, and invites the Sub-Committee to ensure that the interim guidelines remain technology-neutral and address different OCCS architectures, including pre-combustion and solvent-free systems

CCC 12/4/6 Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and

alternative fuels Comments on proposed interim guidelines for the safety of ships using carbon capture and storage systems Submitted by IBIA

IBIA provides comments on the draft interim guidelines proposed by IACS.

CCC 12/INF.19 Information on the results from a study on onboard carbon capture technologies Submitted by the European Commission

The EC provides preliminary safety-related considerations for onboard carbon capture and storage systems based on a recent study by the European Maritime Safety Agency. It is intended to provide information for the development of the interim guidelines for ships using OCCS technologies

Other Technologies and Alternative Fuels

CCC 12/4/2 Unified interpretation of SOLAS regulation VI/5-2 on the prohibition of production processes during sea voyages Submitted by Japan and ZESTAs

The co-sponsors propose a solution to remove the barrier arising from SOLAS regulation VI/5-2 related to fuel blends/mixtures. Ships that produce and store hydrogen on board are being developed to reduce greenhouse gas (GHG) emissions, and a demonstration project successfully conducted a green hydrogen production trial in Tokyo Bay in 2025. In this context, certain onboard activities may fall within the scope of SOLAS regulation VI/5-2 as VI/5-2 prohibits production processes where production processes refer to any deliberate operation whereby a chemical reaction between a ship's cargo and any other substance or cargo takes place.

CCC 12/INF.4 Quantitative risk assessment findings of a liquefied hydrogen carrier Submitted by Italy

This document provides a summary of the key findings from a comprehensive quantitative risk assessment conducted as part of the LH2CRAFT project. The assessment supports the development of innovative design solutions for a 180 m³ liquid hydrogen (hereafter referred to as "LH2") carrier vessel, in line with the alternative design approach recommended by the IGF Code. Further information on the LH2CRAFT can be found here (https://lh2craft.eu/the-project/#key_objectives).

CCC 12/INF.14 Report on experimental study of ventilation and water mist spray absorption in ammonia fuel spaces Submitted by China

China provides the complete report on an experimental study of the effectiveness of ventilation and water mist spray measures in enclosed spaces that may contain ammonia fuel on board ships.

APPENDIX 1

PROVISIONAL AGENDA

Adoption of the agenda

1. Decisions of other IMO bodies
2. Amendments to the IGF Code and development of guidelines for alternative fuels and related technologies
3. Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels
4. Amendments to the IMSBC Code and supplements
5. Amendments to the IMDG Code and supplements
6. 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
7. Consideration of reports of incidents involving dangerous goods or marine pollutants in packaged form on board ships or in port areas
8. Unified interpretation of provisions of IMO safety, security, environment, facilitation, liability and compensation-related conventions
9. Biennial status report and provisional agenda for CCC 13
10. Election of the Chair and Vice-Chair for 2027
11. Any other business
12. Report to the Committees