



FLEET PRESERVE
— MARINE CONSULTANTS —

TECHNICAL ADVISORY · FP-TA 04/2026

IMSBC Code Amendment 08-25

What changes for solid bulk cargoes on 1 January 2027

Resolution MSC.575(110) adds twelve new cargo schedules, amends eleven more, returns fish meal to Class 9 and revises the segregation table. What the office, the Master and the cargo documentation must be ready for before the first loading in 2027.

1 Jan 2027

Mandatory entry into force · voluntary application allowed since 1 Jan 2026

12 + 11

New individual schedules + amended schedules

Class 9

Fish meal UN 2216 — dangerous goods
Document of Compliance required

From **1 January 2027** Amendment 08-25 of the IMSBC Code becomes mandatory under SOLAS chapters VI and VII. Most changes are cargo-specific — but some of them change **what a ship is allowed to carry** (fish meal now needs a dangerous-goods Document of Compliance), and others change **how the cargo must be accepted, monitored and entered**.

12

New individual schedules — 2 in Group A, 2 in Group B, 8 in Group C

11

Existing schedules amended — DRI, fish meal, castor beans, ferrosilicon, aluminium by-products, iron ore pellets and others

0 days

Transition after 1 Jan 2027 — the shipper's declaration and the Master's checks must already follow 08-25

Five things every Operations Manager needs to know

- 1 Fish meal is dangerous goods again.** FISH MEAL (FISH SCRAP), STABILIZED UN 2216 is Class 9 (MHB "not applicable"). A ship may only load it if her **Document of Compliance for Dangerous Goods** (SOLAS II-2/19) covers Class 9 solid bulk. Separate new Group C schedules (FISH MEAL, STABILIZED and FISH SCRAP, STABILIZED) apply to product that does not meet the UN 2216 description — check which schedule the shipper declares.
- 2 Two new liquefaction cargoes.** APATITE CONCENTRATE and PHOSPHATE ROCK FINES (uncalcined) are **Group A**: TML certificate, moisture certificate and the full Section 4 and 7 regime apply.
- 3 Heavy and "special" Group C cargoes.** IRON ORE BRIQUETTES (extremely high density, may affect magnetic compasses), PEA PROTEIN CONCENTRATE PELLETS (dust explosion risk when loaded with blowers) and coarse quartz-bearing cargoes (granodiorite, tuff) with dust limits.
- 4 Breathing apparatus duplication removed.** The "two additional SCBA sets" requirement is deleted for several schedules (e.g. UN 2793, UN 3170) where SOLAS II-2/10.10 already applies; the hold-entry exception for UN 2793 is removed.
- 5 Paperwork follows the cargo.** Updated cargo names (e.g. CASTOR BEANS UN 2969), revised DRI (A) loading criteria, new iron-ore-pellet density and stowage factor, revised segregation table 9.3.3 and new references (MSC.1/Circ.1395/Rev.7, MSC.1/Circ.1264/Rev.1).

At a glance

New Group A schedules	2
New Group B schedules	2
New Group C schedules	8
Amended schedules	11
Code sections amended	3, 9, 13 + Appendices 3–5

Our recommendation

Before December 2026: check each ship's DG Document of Compliance against the cargoes you trade, put the IMSBC 2025 Edition (incl. 08-25) on board, brief Masters with the one-page acceptance checklist in this advisory, and tell chartering which cargoes now carry new conditions.



Twelve new cargo schedules

Groups and key carriage requirements from the schedules annexed to Resolution MSC.575(110). The schedule itself always prevails — read it in full before loading.

Group	Bulk Cargo Shipping Name	Key hazards and carriage requirements
GROUP A	APATITE CONCENTRATE	May liquefy above its TML. TML and moisture certificates; trimming; no ventilation during voyage.
GROUP A	PHOSPHATE ROCK FINES (uncalcined)	May liquefy above its TML. Abrasive and dusty. Full Group A regime (Sections 4, 7, 8).
GROUP B	ALUMINIUM SULPHATE GRANULAR	Hygroscopic; cakes if wet; causes serious eye damage. Keep dry, segregate from metals. Exempt from fixed gas fire-extinguishing (MSC.1/Circ.1395/Rev.7).
GROUP B	FERRIC SULPHATE GRANULAR	Hygroscopic; acidic and corrosive to metals when wet; harmful if swallowed. No handling during precipitation.
GROUP C	ASPHALT GRANULATES	Non-combustible. Segregate from alkalis, oxidisers and acids. Consider tank-top loading.
GROUP C	CRUSHED GRANODIORITE, COARSE	Respirable quartz <0.1 %; fines <2 mm limited to 7 %. Abrasive dust — minimise generation.
GROUP C	FISH MEAL, STABILIZED	Oxygen depletion in the hold; temperature limit 35 °C or ambient +5 °C; O ₂ check before entry; anti-oxidant certificate.
GROUP C	FISH SCRAP, STABILIZED	As above — anti-oxidant (ethoxyquin, BHT or tocopherol) at minimum residual levels.
GROUP C	IRON ORE BRIQUETTES	Extremely high density — tank-top strength, loading rate, trimming. May affect magnetic compasses.
GROUP C	PEA PROTEIN CONCENTRATE PELLETS	Dust-explosion risk when loading dry pellets by blower. Flows like grain; cakes if wet.
GROUP C	TUFF, COARSE	Respirable quartz <0.1 %; particle-size criteria (D ₁₀ > 1 mm or D ₅₀ > 10 mm). Abrasive dust.
GROUP C	ZINC SLAG (COARSE)	Abrasive; highly permeable (≥80 % particles >10 mm). Pump bilges regularly.

Why Group A matters most. Apatite concentrate and phosphate rock fines join the cargoes that can liquefy and shift. A ship must not load them without a valid TML certificate (test within 6 months) and a moisture-content certificate (sampling within 7 days of loading), and the Master can and should carry out the can test (§8.4) on site.



Amended schedules and Code sections

Schedule	Change	Impact
FISH MEAL (FISH SCRAP), STABILIZED UN 2216	Class 9; MHB "not applicable"; moisture and fat limits in the name; anti-oxidant applied within 12 months; residual ≥ 100 ppm ethoxyquin, ≥ 100 ppm BHT or ≥ 250 ppm tocopherol	MAJOR
DIRECT REDUCED IRON (A) — hot-moulded briquettes	Total Fe ≥ 88 %, moulded > 650 °C; certificate: apparent density $> 5,000$ kg/m ³ , fines < 5 %, moisture ≤ 1.0 %, temperature ≤ 65 °C. Adding fines/loose pellets prohibited	MAJOR
DIRECT REDUCED IRON (B)	Description clarified: porous lumps, pellets, cold-moulded briquettes, or $\leq 5,000$ kg/m ³	CHANGED
CASTOR BEANS UN 2969	Single BCSN replaces "castor beans / meal / pomace / flake"; MHB "TX and/or CR"	CHANGED
FERROSILICON (25–30 % or ≥ 90 % Si)	Two SCBA sets in addition to SOLAS II-2/10.10	CLARIFIED
FERROSILICON UN 1408 (30–90 % Si)	General-requirements paragraph deleted, renumbered	CLARIFIED
FERROUS METAL BORINGS ... UN 2793	Additional SCBA requirement deleted; exception for entering the hold removed	CHANGED
ALUMINIUM SMELTING / REMELTING BY-PRODUCTS UN 3170	Additional SCBA requirement deleted	CLARIFIED
ALUMINIUM FERROSILICON POWDER UN 1395 · ALUMINIUM SILICON POWDER UN 1398	Last sentence of "Precautions" deleted	CLARIFIED
IRON ORE PELLETS	Bulk density 1,900 → 1,800 kg/m ³ ; stowage factor 0.42–0.56 m ³ /t	CHANGED
Code sections and appendices		
Section 3 — personnel safety	In-transit fumigation guidance aligned with MSC.1/Circ.1264/Rev.1	CLARIFIED
Section 9.3.3 — segregation table	Table between bulk dangerous goods and packaged DG restructured; "MHB" removed; Divisions 1.3/1.6 added; radioactive material revised	CHANGED
Section 13 — references	MSC.1/Circ.1395/Rev.7 (fixed gas exemptions); MSC.1/Circ.1264/Rev.1 (pesticides)	CLARIFIED
Appendix 3 — non-cohesive list	New entries added (incl. aluminium sulphate, ferric sulphate, asphalt granulates, crushed granodiorite, pea protein pellets)	NEW
Appendices 4–5 — index & names	Castor flake / meal / pomace deleted; UN 2216 added to fish meal; 12 new entries	CLARIFIED

The Document of Compliance check

Pull the DG DoC of every ship that may be fixed for fish meal. If Class 9 solid bulk is not listed, the ship cannot load UN 2216 from 1 January 2027 — or earlier, where the load port applies 08-25 voluntarily. Adding Class 9 normally needs a Class/Flag review of hold ventilation, fire detection, electrical equipment and bilge arrangements.

DRI (A) — new loading certificate

The shipper's certificate must state apparent density, fines, moisture and temperature against the new limits. A cargo that fails any criterion is not DRI (A). Mixing in fines or loose pellets is now expressly prohibited.

Spotlight — the cargoes that need attention

GROUP A

Apatite concentrate · Phosphate rock fines

- Shipper's declaration with TML and moisture content (Section 4).
- TML test ≤6 months old; moisture sampling ≤7 days before loading.
- Master's can test on suspect lots; refuse if free moisture appears.
- Trim reasonably level; no ventilation in voyage; monitor for wet base / free water.

CLASS 9 · UN 2216 / GROUP C

Fish meal & fish scrap, stabilized

- UN 2216 (Class 9): DG Document of Compliance covering Class 9 solid bulk.
- Certificate of anti-oxidant treatment and residual levels.
- Temperature limits per the declared schedule (Group C: ≤35 °C or ambient +5 °C); record daily.
- Oxygen depletion — test the atmosphere before any entry (Rev. A.1050 / SOLAS XI-1/7).

GROUP C

Iron ore briquettes · pellets

- Very high density: check tank-top permissible load and alternate-hold limits in the loading manual.
- Agree loading rate and pour sequence with the terminal (stress, trim).
- Briquettes may affect magnetic compasses — record deviation.
- Pellets: use the new 1,800 kg/m³ / SF 0.42–0.56 in planning.

GROUP C

Pea protein concentrate pellets

- Dust-explosion risk with pneumatic (blower) loading — control ignition sources, hot work, electrical equipment on deck.
- Flows like grain — trim to minimise shifting.
- Keep dry — cakes when wet; hatch covers weathertight.

Quartz-bearing cargoes and dust

CRUSHED GRANODIORITE, COARSE and TUFF, COARSE are only Group C when respirable crystalline silica is below 0.1 % and the particle-size criteria are met. The shipper must demonstrate this — otherwise the cargo does not meet the schedule and must not be shipped under it. Provide crew with dust masks and minimise time in the hold during loading.

Voluntary early application

Contracting Governments may apply 08-25 from 1 January 2026. Ships calling at ports that already do so can be presented with cargo declared under the new schedules today. Have the 2025 Edition (incl. Amendment 08-25) on board now, together with the previous edition until 31 December 2026.



Cargo acceptance checklist — from 1 January 2027

For the Master and Chief Officer before every solid bulk loading. Any "No" = do not load until resolved with the office.

#	Check	Yes	No	Ref.
1	Bulk Cargo Shipping Name matches an IMSBC 08-25 schedule (or competent-authority conditions under §1.3)	☐	☐	Section 1.3 / 4.2
2	Shipper's cargo information received before loading: group, UN No./class, MHB, properties	☐	☐	§4.2
3	Group A: TML certificate ≤6 months and moisture certificate ≤7 days; can test done	☐	☐	§4.3, 8.4
4	Group B: DG Document of Compliance covers the class; segregation per new table 9.3.3	☐	☐	SOLAS II-2/19, §9.3
5	Special certificates: DRI (A) density/fines/moisture/temp; fish meal anti-oxidant	☐	☐	Schedules
6	Loading plan within tank-top and hull strength limits (dense cargoes)	☐	☐	Loading manual
7	Ventilation, temperature, gas and O ₂ monitoring as per schedule; instruments calibrated	☐	☐	Schedules, §3
8	Enclosed-space entry procedure and atmosphere testing before any hold entry	☐	☐	SOLAS XI-1/7
9	Fixed CO ₂ system — exempt cargo per MSC.1/Circ.1395/Rev.7 or system ready	☐	☐	SOLAS II-2/10.7
10	Fumigation in transit — per MSC.1/Circ.1264/Rev.1; crew informed; gas detection	☐	☐	§3

Office actions

#	Action	Owner	Target
1	Supply IMSBC Code 2025 Edition (incl. 08-25) and supplement to all ships	Purchasing / DPA	Nov 2026
2	Review DG Documents of Compliance against cargoes traded (fish meal, Group B)	Technical	Nov 2026
3	Update SMS cargo procedures, checklists and enclosed-space entry references	HSSQE / DPA	Dec 2026
4	Brief chartering / operations on cargoes with new conditions; review CP cargo-exclusion clauses	Operations	Dec 2026
5	Fleet circular and Master briefing (this checklist)	Operations / HSSQE	Dec 2026
6	Verify gas detectors, O ₂ meters and thermometers on board and calibrated	Superintendents	Q1 2027



How Fleet Preserve can help

Fleet Preserve is an independent marine surveying and technical consultancy in Athens, Greece. Our naval architects and marine engineers have more than 18 years of hands-on experience with bulk carriers and general cargo ships — loading, dry-docking, PSC, vetting and ISM.

01

Fleet IMSBC readiness review

Desktop review of DG Documents of Compliance, cargo manuals and SMS procedures against Amendment 08-25, with a ship-by-ship list of cargoes allowed and actions.

02

DoC upgrade support

Technical gap check for adding Class 9 / Group B cargoes (ventilation, detection, electrical, bilge) and preparation of the Class/Flag submission.

03

Pre-loading & cargo surveys

Attendance for Group A cargoes (sampling witness, can test), hold condition and pre-loading surveys, draft and loading-sequence checks.

04

SMS & crew briefing

Updated cargo-acceptance procedure and checklists, enclosed-space entry and fumigation guidance, and a short Master/C/O briefing.

Ask for a readiness review

Send us your fleet list and the cargoes you trade. We will reply with a scope, programme and quotation.

WEB

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EMAIL

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REFERENCES

IMO Resolution MSC.575(110) — Amendments (08-25) to the IMSBC Code · SOLAS chapters II-2/19, VI, VII and XI-1/7 · MSC.1/Circ.1395/Rev.7 · MSC.1/Circ.1264/Rev.1 · Lloyd's Register Class News 02/2026 · West of England P&I, "SOLAS – Amendments to the IMSBC Code (Amendment 08-25)" · UK P&I Club, IMO Regulatory Update 2026 · DNV, IMO MSC 110 summary.

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