



# The Bahamas Maritime Authority

## BMA INFORMATION BULLETIN No. 94

### APPLICATION OF MARPOL ANNEX I TO FLOATING PRODUCTION STORAGE AND OFFLOADING FACILITIES (FPSO) AND FLOATING STORAGE UNITS (FSU)

**Guidance and Instructions for Ship-Owners, Managers, Masters, Bahamas  
Recognised Organisations and Bahamas Approved Nautical Inspectors**

*Note: This Bulletin replaces BMA Instruction to Classification Societies no. 19.  
The Bulletin is to be read in conjunction IMO Resolutions MEPC.139(53),  
A.744(18) and IMO Circular MEPC/Circ.406.*

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#### 1. General

IMO Resolution MEPC.139(53), which replaces IMO Circular MEPC/Circ.406 addresses the application of numerous MARPOL Annex I Regulations to specialised vessels in the offshore industry. This Bulletin gives guidance on Bahamas policy relating to this resolution.

#### 2. Implementation

The BMA notes the intent of the “Guidelines to Floating Production, Storage and Offloading Facilities (FPSOs) and Floating Storage Units (FSUs)” as a special case, when considering the application of MARPOL 73/78 Annex I requirements. Accordingly the Bahamas gives full effect to IMO Resolution MEPC.139(53), which shall be applied in accordance with paragraph 3 below.

#### 3. Application

- 3.1. Effective 01 January 2007, IMO Resolution MEPC.139(53) “Guidelines for the application of revised MARPOL 73/78 Annex I requirements to Floating Production, Storage and Offloading Facilities (FPSOs) and Floating Storage Units (FSUs)” shall apply in its entirety.

- 3.2. Existing vessels (newbuild or conversion contract placed after 01 August 2005) which comply with IMO Circular MEPC.Circ.406, made effective by the superseded Instructions to Classification Societies no. 19, shall continue to comply with IMO Resolution MEPC.139(53). Pre-existing vessels need not be upgraded to comply with the provisions of the Resolution where this would require structural changes. However Recognised Organisations are reminded that these provisions must be taken into consideration, wherever practicable, for retrofit or modification of equipment and structure of existing vessels.
- 3.3. It is noted that Enhanced Survey Programme requirements, IMO Resolution A.744(18), are referred to in the Resolution as a means of ensuring that a satisfactory survey regime is implemented for such vessels. It is also noted that a continuous hull survey is often better suited to these vessels' mode of operation.
- 3.4. The robustness and scope of the survey requirements of Bahamas Recognised Organisations are such that they are considered to be an acceptable means of ensuring a satisfactory standard of structural integrity. The Bahamas therefore agrees that the Classification Society hull survey may deviate from the requirements of ESP, while taking account of those requirements wherever practicable.

#### **4. Certification**

The Bahamas recognises that the amended Record of Construction and Equipment in Annex 2 of the Resolution is appropriate to be used for FPSOs and FSUs. Recognised Organisations are requested to use this to replace forms A and B of the IOPP Supplement for vessels to which the Resolution applies.

#### **5. Exceptions**

The specialised nature of construction and mode of operation of this class of vessel is noted. Consequently it is accepted that there may be individual cases which may deviate from the Guidelines contained in the Resolution. Any application for exemption or acceptance of equivalent arrangements must be put forward for consideration on a case by case basis, in accordance with the procedures detailed in BMA Information Bulletin no. 8.