



NEWS BRIEF
CCC 9



ABS



NEWS BRIEF: CCC 9

The IMO Sub-Committee on Carriage of Cargo and Containers (CCC) held its 9th session from September 20 to 29, 2023. This Brief provides an overview of the more significant issues discussed at this session, which include developing guidance on the use of hydrogen and ammonia as fuels, guidelines for use of LPG cargo as fuel and the latest updated requirements for carriage of bulk cargoes and dangerous goods. While new regulations developed by the CCC Sub-Committee are not finalized until approved by the Maritime Safety Committee (MSC) or the Marine Environment Protection Committee (MEPC), a review of the Sub-Committee's activity can provide a forecast of future regulatory developments.

KEY DEVELOPMENTS

- Progress on Interim Guidelines for Hydrogen and Ammonia as Fuel
- Revised Workplan for Development of Safety Provisions for Alternative Fuels
- Interim Guidelines for Use of LPG Cargo as Fuel
- Suitability of High-Manganese Austenitic Steel for Ammonia Service

ABS RESOURCES

- ABS Regulatory News ([link](#))
- ABS Regulatory Lessons ([link](#))
- ABS Safety in Minutes Video Series ([link](#))
- 2023 ABS Outlook – Beyond the Horizon: View of the Emerging Energy Value Chains ([link](#))
- ABS Requirements for Hydrogen-Fueled Vessels ([link](#))
- ABS C-LASH® Software for Non-Linear Analysis of Container Securing ([link](#))
- ABS Rules and Guides ([link](#))

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SAFETY OF SHIPS USING ALTERNATIVE FUELS

Use of Hydrogen as Fuel and Carriage of Liquefied Hydrogen in Bulk

At the previous session, the Sub-Committee re-established the Correspondence Group (CG) on Development of Technical Provisions for Safety of Ships using Alternative Fuels, with instructions to further develop the Interim Guidelines for ships using hydrogen as fuel. At this session, the Sub-Committee continued work on the draft guidelines as prepared by the CG (CCC 9/3) with significant development but were not able to finalize them at the current session.

Discussions focused on the Fuel Preparation Rooms (FPR), fuel containment systems, material and general pipe design and bunkering:

- FPRs shall be located on deck with sufficient natural ventilation. Under-deck location is allowed but with special consideration by the Administration to accommodate for the additional risk.
- Fuel containment systems (enclosed, semi-enclosed or portable tanks) shall be arranged on the open deck. Designs allowing tanks to be placed under deck require special consideration by the Administration.
- Regarding materials and general pipe design, the Sub-Committee agreed to delete the tables 3-1 to 3-4 (referring to materials compatible with hydrogen) in Chapter 7 of the draft interim guidelines due to lack of material experts and to the fact that such requirements are usually covered by relevant industry standards and that of classification societies.
- Bunkering operations shall be adequately ventilated to ensure that during bunkering hydrogen leaks can freely escape. However, the Sub-Committee agreed to not exclude arrangement of bunker stations in enclosed or semi-enclosed spaces, provided the additional risks are addressed through adequate mitigation measures.

Furthermore, the Sub-Committee finalized the revised Interim Recommendations for Carriage of Liquefied Hydrogen in Bulk (Resolution MSC.420(97)). These recommendations are intended to provide the basis for future minimum requirements for liquefied hydrogen cargoes, and they will be used to facilitate the establishment of a tripartite agreement among the relevant Administrations for the carriage of liquefied hydrogen in bulk under the International Code of the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (IGC Code). The revised recommendations introduce additional minimum requirements for cargo containment systems of independent cargo tanks using:

- vacuum insulation, or
- insulation materials and hydrogen gas in the inner insulation spaces.

Next Steps: Work on the Interim Guidelines for ships using hydrogen as fuel will continue intersessionally with further discussion during CCC 10 (Sept. 2024). The revised Interim Recommendations for Carriage of Liquefied Hydrogen in Bulk will be presented to MSC 108 (May 2024) for further consideration and approval.

Use of Ammonia as Fuel

Due to time constraints the Sub-Committee discussed briefly the draft Interim Guidelines for the safety of ships using ammonia as fuel developed by the CG (CCC 9/3), and specified overarching principles and directions that will guide the CG during its intersessional work:

- Ships using ammonia as fuel shall be subject to a holistic risk assessment.
- Interim Guidelines shall consider refrigerated and semi-refrigerated ammonia storage options; Pressurized ammonia will be covered through alternative design process.
- Portable tank provisions for ammonia shall not be specifically developed but covered through alternative design process.
- Guidelines will not consider Emergency Shut Down (ESD) principles related to the use of single walled piping. Administrations will need to go through the alternative design process.



- To take into consideration safe haven/refuge on board ships using ammonia as fuel in case of ammonia contamination, application of the interim guidelines could exclude specific ship types.
- Provisions for personnel safety and PPE shall be developed considering class rules and shore-based industry practice.
- Regarding concentration limits for ammonia exposure for personnel, during normal operations there shall be no ammonia present.
- Regarding release of ammonia for safety reasons, release mitigating measures shall be considered in the guidelines.

Next Steps: Work on this subject will continue intersessionally with further discussion during CCC 10 (Sept. 2024).

Use of Oil Fuels with Flashpoint between 52° C and 60° C

Due to time constraints the Sub-Committee did not discuss the draft Interim Guidelines for the use of Oil Fuels with Flashpoint between 52° C and 60° C and instructed the Correspondence Group to further work on this matter intersessionally.

Next Steps: Work on this subject will continue intersessionally with further discussion during CCC 10 (Sept. 2024).

Work Plan for the Development of Safety Provisions for Alternative Fuels

The Sub-Committee agreed to the following timeline for the development of several standards for alternative fuels through the IGF Code. The scope of remaining work extends to 2026 and includes development of standards for Low-Flashpoint Oil Fuels, Hydrogen, Ammonia, Fuel Cells, and Methyl/Ethyl Alcohol fuel standards, and may extend to development of a mandatory instrument for use of Fuel Cells and Methyl/Ethyl alcohols. In addition, the Sub-Committee, recognizing the urgency of providing guidance to Administrations, shipowners, and industry on the safe use of hydrogen and ammonia as fuel, agreed on the establishment of an intersessional working group to meet during the week immediately preceding CCC 10 to advance the development of these guidelines.

Meeting	Objectives	Year
ISWG-AF 1	<ul style="list-style-type: none"> - Further develop/finalize guidelines for ships using hydrogen as fuel - Further develop/finalize guidelines for ships using ammonia as fuel 	9 – 13 Sep 2024
CCC 10	<ul style="list-style-type: none"> - Prepare amendments to the IGF Code → Natural Gas - Finalize guidelines for ships using hydrogen as fuel - Finalize guidelines for ships using ammonia as fuel - If time permits, further develop guidelines for low flashpoint oil fuels - If time permits, start to discuss the development of mandatory instruments regarding methyl/ethyl alcohols 	16 – 20 Sep 2024
MSC 109	<ul style="list-style-type: none"> - Approval of the guidelines for ships using hydrogen as fuel - Approval of the guidelines for ships using ammonia as fuel 	2 – 6 Dec 2024
CCC 11	<ul style="list-style-type: none"> - Further develop/finalize guidelines for low flashpoint oil fuels - If time permits, develop mandatory instruments regarding methyl/ethyl alcohols - If time permits, start to discuss the development of mandatory instruments regarding fuel cells 	Sep 2025
MSC 111	<ul style="list-style-type: none"> - Approval of the guidelines for low flashpoint oil fuels 	May 2026
CCC 12	<ul style="list-style-type: none"> - Further develop/finalize mandatory instruments regarding methyl/ethyl alcohols - Further consider the development of mandatory instruments regarding fuel cells 	Sep 2026

Next Steps: Developments under this Work Plan will continue through at least the next three sessions of the Sub-Committee.



AMENDMENTS TO THE IGF CODE

Amendments to the IGF Code

The Sub-Committee finalized development of numerous proposed amendments to the IGF Code.

- Draft amendments to paragraphs 7.3.1.4, 9.4.2, 13.3.5 and 13.3.8 of the IGF Code addressing pressure relief valves, non-return valves and ventilation requirements.
- Draft amendments to paragraphs 12.5.2, 12.5.2.4 and 12.5.3 of the IGF Code addressing hazardous area zones 1 and 2.
- Draft amendments to paragraphs 11.3.1, 11.3.2, 11.3.2.1 and 11.3.3.1 focus on fire insulation and requirements for boundaries facing fuel tanks.
- Draft amendments to paragraph 5.3.3.5 related to vessels with suction wells in fuel tanks.

Next Steps: These draft amendments will be presented to MSC 108 (May 2024) for consideration and approval. Approved amendments will be presented for adoption at MSC 109 (Sep 2024). Anticipated entry into force of these amendments will be on 1 January 2028.

AMENDMENTS TO THE IGC CODE

Amendments to the IGC Code

The Sub-Committee continued the development of draft amendments to the IGC Code. Discussion was focused on safety provisions for ships carrying CO₂ as cargo where it was agreed that if the table for “Summary of minimum requirements” in Chapter 19 of the IGC Code included a single CO₂ product listed, this shall be called “Carbon Dioxide (high purity and reclaimed quality)”. In addition, the Sub-Committee noted the discussion on whether CO₂ shall be considered as toxic product and stated that the designation of CO₂ as a toxic product has implications on the design requirements such as bow and stern loading and decided that amendments to Chapters 17 and 19 of IGC Code shall be finalized by the Correspondence Group.

Discussion was also focused on toxic products as fuel, noting the proposal to exempt the “Ammonia, anhydrous” from the list of toxic products that can be used as fuels, modifying 16.9.2 of the IGC Code. Additional guidelines shall be developed to ensure the same level of safety as natural gas (methane) for the use of cargoes identified as toxic products which are required to be carried in type 2G/2PG ships, as fuel.

Furthermore, a collection of amendments to the IGC Code was progressed and are to be finalized at CCC 10, with adoption expected at MSC 110 and anticipated entry into force on 1 January 2028. The draft amendments tentatively agreed include:

- A new definition for the term “gastight” under the IGC Code
- New design requirements for type C independent tanks
- Remotely operated valves to be fitted on every cargo tank to facilitate emergency shutdown
- Updated requirements on use of cargo as fuel

Next Steps: Discussions on the above items will continue at CCC 10 (Sept. 2024).

Suitability of High Manganese Austenitic Steel for Cryogenic Service

The Sub-Committee reviewed the results of the completed test of high manganese austenitic steel for ammonia service, which ensured that high manganese steel plate and weldment without post-weld heat treatment was



resistant to ammonia stress corrosion cracking (SCC). In addition, post-weld heat treatment – which can affect material properties - considered as a mitigation against SCC showed no significant improvement. Therefore, the Sub-Committee confirmed that high manganese austenitic steel can be considered resistant to ammonia SCC and therefore can be used for ammonia cargo and/or fuel tanks containing ammonia.

The Sub-Committee, noting the above, agreed with the modifications to *Revised guidelines on the application of high manganese austenitic steel for cryogenic service* (MSC.1/Circ.1599/Rev.2), accepting high-manganese austenitic steel as being suitable for ammonia service, and waived the post-weld stress relief heat treatment in 17.12.2.2 of the IGC Code for ammonia cargo and/or fuel, as contained in draft circular MSC.1/Circ.1599/Rev.3.

In addition, the Sub-Committee considered proposed modifications to the *Guidelines for the acceptance of alternative metallic materials for cryogenic service in ships carrying liquefied gases in bulk and ships using gases or other low-flashpoint fuels* (MSC.1/Circ.1622) that introduce Appendix 2, containing additional compatibility test procedures for ammonia service, as contained in draft circular MSC.1/Circ.1622/Rev.1.

Next Steps: The draft circulars will be presented to MSC 108 (May 2024) for consideration and approval.

LNG Cargo Tank Filling Limits

The Sub-Committee at CCC 8 had considered a proposed amendment to the IGC Code with regard to requirements related to the reference temperature in chapter 15 of IGC Code, *Filling limits for cargo tank*, and decided to keep the consideration on this matter in abeyance while inviting member States and international organizations to submit documents for consideration in CCC 9.

The Sub-Committee at CCC 9, considered additional information related to the filling limits in LNG cargo tanks and instructed the Correspondence Group to prepare draft amendments to the IGC and IGF Codes in relation to filling limits for cargo tanks to minimize safety risks.

Next Steps: Work on this subject will continue intersessionally by a Correspondence Group. Member States and observers are invited to provide draft text amendments.

LPG Cargo as Fuel

The Sub-Committee noted the desirability of the amendments to the IGC Code in lieu of Interim Guidelines for the use of LPG Cargo as fuel and agreed to initially develop guidelines with a view towards the preparation of the draft amendments to the IGC Code in parallel, after gaining experience from their implementation. During the discussion it was raised whether the guidelines shall be limited only to gas carriers complying with the requirements of the IGC Code using LPG cargoes as fuels or could also cover IGC compliant gas carriers carrying cargoes other than LPG, such as gas carriers using LPG as fuel but carrying CO₂. It was agreed that the draft scope of those guidelines shall limit to developing guidance for gas carriers using LPG cargo as fuel, but additional safety provisions shall also be developed in the future for ships using LPG as fuel while carrying cargoes listed in Chapter 19 of the IGC Code other than LPG.

Next Steps: These draft interim guidelines will be presented to MSC 108 (May 2024) for consideration and approval.



Unified Interpretations in Relation to the IGF Code and IGC Code

The Sub-Committee considered several Unified Interpretations (UIs) proposals related to the IGC Code and IGF Code:

1. A draft interpretation of the IGC Code related to secondary barrier testing and effectiveness assessment. The Sub-Committee noted the concerns expressed on an additional requirement to the annual survey introduced the proposed UI and agreed that it would be more appropriate to address this matter through amendments to the IGC Code.
2. Proposals in relations to numerous sections of IGC Code:
 - A) On paragraphs 5.2.2.1 and 9.4.4, clarifying interconnections between inert gas and nitrogen systems and cargo or gas fuel systems containing product liquid or vapors,
 - B) On paragraphs 8.1 and 16.3.4, regarding separation between fuel gas and cargo containment vent systems
 - C) On paragraphs 17.1 and 17.4 regarding refrigeration systems for the carriage of certain products
 - D0) On paragraph 4.23.3.1, reflecting the application of the finite element (FE) method used for type C tank strength check
 - D1) On “finite element analysis of type C cargo tanks” of paragraph 4.23.3.1
 - D2) On “buckling assessment of type C cargo tanks” of paragraph 4.23.3.2
 - D3) On paragraphs 4.23.1.1, 4.23.1.2, 4.23.2.5 and 4.23.4 on safety factors and maximum allowable cumulative fatigue damage ratio on the fatigue assessment of a type C tank
 - E) Draft amendments to MSC.1/Circ.1625 related to cargo piping thermal insulation
 - F) On paragraph 5.12.4 regarding corrosion of cargo piping in the presence of a salt-laden atmosphere on exposed deck

The Sub-Committee instructed the Correspondence Group to further consider the above Uis except D3 which was not accepted as it was impossible to determine a uniform safety factor.

3. A proposal on the clarification of the applicable requirements on the safe location of storage tanks containing liquefied carbon dioxide collected from ship’s exhaust gas emissions. The Sub-Committee decided to keep this proposal in abeyance as it was premature for the Sub-Committee to consider the matter regarding onboard carbon capture and storage.
4. A proposal to add a UI to regulation 10.2.4 of the IGF Code to provide that where an exhaust system needs to serve two or more gas consumers according to the design purpose, an equivalent design plan shall also be considered as satisfying the requirement of regulation 10.2.4. The Sub-Committee agreed that it would be more appropriate to proceed with amendments to the IGF Code and invited member States and international organizations to consider a submission on the draft amendments to the IGF Code to a future session.

Next Steps: The above UI proposals will be progressed as detailed above.

AMENDMENTS TO THE IMDG CODE AND IMSBC CODE

Amendments to the IMDG Code

The Sub-Committee agreed in principle to the draft amendments (42-24) to the IMDG Code, as prepared by Editorial & Technical Group (E&T) 38, noting that there were remaining issues that needed further consideration by E&T 39 for finalization. In addition, the Sub-Committee considered several proposals related to amendment 42-24:



- Replacement of portable tank special provision TP1 (Tank Provision) with TP2, regarding the maximum degree of filling in column 14 of the Dangerous Goods List, for some liquid dangerous goods with properties indicated in 4.2.1.9.3 of the IMDG Code, agreeing to refer the document to E&T 39 for further consideration.
- Draft amendments to chapters 7.4 and 7.6 of the IMDG Code on the stowage and segregation of lithium battery energy storage cabinets, noting that increasing ventilation in case of fire may not be the right way forward, proposing an alternative to require stowage category C, and noting that a more holistic consideration of the matters concerning lithium-ion batteries is needed.

Next Steps: E&T 39 is instructed to finalize the draft amendments (42-24) to IMDG Code with a view to submitting the draft amendments to MSC 108 for consideration and adoption and to submit a written report to CCC 10 (Sept. 2024).

Amendments to the IMSBC Code

The Sub-Committee received the report of the 37th meeting of its Editorial and Technical Group (E&T 37) which met in September 2022. This report provided the finalized draft amendments 07-23 of the IMSBC Code. The Sub-Committee continued the discussion on the new Substance Identification Number (SIDN) for solid bulk cargoes where views were expressed on possible consequences of introducing SIDNs for IT systems. In addition, the Sub-Committee considered several proposals such as:

- Amendments to the IMSBC Code in connection with the carriage requirement of spare charges for SCBAs (self-contained breathing apparatuses), agreeing in principle to deleting superfluous requirements for additional SCBAs, except for Ferrosilicon.
- Amending the Recommendation on the safe use of pesticides in ships applicable to the fumigation of cargo holds (MSC.1/Circ.1264), agreeing to the recommendation of using sleeves for fumigation as a preferred and safer method rather than using loose tables in case a bulk cargo needs to be fumigated using phosphine or another gas-generating agent as treatment of the cargo.
- Annual listing and real-time updating of solid bulk cargoes not listed in the IMSBC Code but shipped based on provisional assessments (tripartite agreements), agreeing to start issuing an annual CCC circular and a dedicated website, listing those tripartite agreements (TPA).
- Amendments to 4.2 of the IMSBC Code on the cargo information to be provided by the shipper and the sample cargo declaration form, aiming to clarify the requirements for the provision of information on subsidiary hazard characteristics and to introduce notational references of Materials Hazardous only in Bulk (MHB), inviting member States and international organizations to submit a proposal to MSC for a new output.

Next Steps: The Sub-Committee instructed E&T 40 to prepare the draft amendments (08-25) to the IMSBC Code and to consider new proposals if submitted and advice CCC 10 (Sep. 2024) accordingly.

OTHER DEVELOPMENTS

Special Provisions for the Transport of Vehicles

The Sub-Committee at CCC 8 had established the Correspondence Group on the *Review of Transport Provisions for Vehicles* to continue work on the development of the new transport provisions in response to recent fire incidents occurring on vehicle carriers. The Sub-Committee noted that it would be appropriate to distinguish the requirements between “in use vehicle” and other “used vehicles” as they constitute different risks from a fire safety point of view. The Sub-Committee decided to re-establish the Correspondence Group on the review of transport provisions for vehicles to continue intersessionally the development of amendments to transport provisions for



vehicles, to develop recommendations for the IMDG Code provisions concerning the transport of vehicles and in more detail:

- provisions for new, used, and damaged vehicles transported in Cargo Transport Units (CTUs)
- provisions for new, in use, used and damaged vehicles transported in vehicle, special category and ro-ro spaces
- provisions for electric and hybrid vehicles.

Next Steps: Work on this subject will be progressed intersessionally and discussed further at CCC 10 (Sept. 2024).

Recommendations for Entering Enclosed Spaces Aboard Ships

The Sub-Committee considered several submissions related to the revision of the *Revised Recommendations for Entering Enclosed Spaces Aboard Ships (resolution A.1050(27))*. The Sub-Committee had substantial discussion on definitions of “enclosed spaces”, “onshore operator”, “shore personnel”, “competent person” and “responsible person”. On CO₂ level requirement for entering enclosed spaces, the Sub-Committee agreed to replace the criterion of 4 percent, that may lead to sudden death, by 0.5 percent which corresponds to workplace exposure limit in most countries. In addition, the Sub-Committee considered the inclusion of Emergency Escape Breathing Devices (EEBDs) in the list of equipment for entering enclosed spaces and decided to not include them in the list. The Sub-Committee had also a lengthy discussion on the list of oxygen-depleting solid bulk cargoes and due to the divergent views, agreed to further consider this in the Correspondence Group.

The Sub-Committee also had discussion on how the outcomes of the revision of resolution A.1050(27) could best contribute to a holistic approach on the human element. In that order, the Sub-Committee invited MSC to note that an effective implementation of the resolution A.1050(27) through the Safety Management System (SMS) is crucial to ensure the safety of enclosed space entry.

Next Steps: Work on the draft recommendations will continue intersessionally with a view of finalization at CCC 10 (Sep 2024).

Consideration of reports of incidents involving dangerous goods or marine pollutants in packaged form on board ships or in port areas

The Sub-Committee noted the consolidated results from 2022 of container inspections programmes, submitted by Canada, Chile, Finland, the United States and Hong Kong, China, through GISIS. Out of the 51,330 Cargo Transport Units (CTUs) inspected, 4,024 CTUs were found with deficiencies, meaning 7.84 percent of the total CTUs inspected. The most commonly found type of deficiencies were placarding and marking, securing/stowage inside the unit, marking and labelling of packages and serious structural deficiencies.

Next Steps: The Sub-Committee urged member States who had not yet carried out container inspection programmes to submit the relevant information to the Organization in accordance with MSC.1/Circ.1649.

Maritime Transport of Plastic Pellets in Freight Containers

In April 2023, the PPR Sub-Committee agreed on the text of a draft MEPC circular providing recommendations for the carriage of plastic pellets by sea in freight containers. Pending the consideration of future mandatory measures for the carriage of plastic pellets in freight containers, this circular provides a short-term measure with the aim of reducing the environmental risks associated with the carriage of plastic pellets in packaged form by sea. The draft circular provides recommendations on packaging, transport information and special stowage considerations so as to minimize the risk of losing freight containers containing plastic pellets. Plastic pellets include, but are not limited to, polymers such as polyethylene, polypropylene, polystyrene, polyethylene terephthalate, or polyvinyl chloride.



For a thorough consideration of cargo packaging recommendations discussed in the draft MEPC circular, the PPR sub-committee requested input from the CCC sub-committee at this session. The Sub-Committee discussed the draft recommendations at length, and ultimately agreed with the high-level guidance of the draft circular, but noted that a future mandatory instrument may reflect more detailed considerations.

Next Steps: The Sub-Committee's feedback will be sent to PPR 11 (Feb. 2024) for consideration and subsequent submission to a future session of the MEPC for approval.

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