GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
DIRECTORATE GENERAL PORTS & SHIPPING
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Karachi, 1st December' 2025

No.3 (3)/2021-CNS

Circular No. 010/2025

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Notice to all ship owners, Operators, Classification Societies, Recognized Organizations, All shipping Companies, All port Authorities, All Maritime Training Institutes, and All those concerned with Maritime Trade

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SUBJECT: Legal Implementation of the 1988 Protocol to the Load Line Convention, 1966 and MARPOL Amendments (2001-2019)

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1. LEGAL AUTHORITY

1.1 This Marine Notice is issued under the authority of the Pakistan Merchant Shipping Ordinance, 2001 (LII of 2001) which provides the legal framework for the implementation of international maritime conventions to which Pakistan is a Party.

1.2 Section 2(19) of the Pakistan Merchant Shipping Ordinance, 2001 defines:
"Load Line Convention" means the International Convention on Load Lines, 1966, as amended from time to time.

1.3 Section 552(b) of the Pakistan Merchant Shipping Ordinance, 2001 defines:
"Pollution Convention" means the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL 73/78), as amended from time to time.

2. PAKISTAN'S INTERNATIONAL OBLIGATIONS

2.1 Pakistan acceded to the 1988 Protocol to the International Convention on Load Lines, 1966 on February 3, 2000, and the said Protocol entered into force for Pakistan on July 25, 2002.

2.2 Pakistan is a Party to the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 (MARPOL 73/78), having acceded on Novemeber, 1994, with entry into force on February 22, 1995.

2.3 Pakistan has accepted all Annexes to MARPOL 73/78 (Annexes I through VI) and is bound by amendments adopted through the tacit acceptance procedure.

3. PURPOSE

3.1 The purpose of this Marine Notice is to provide clarity and legal certainty regarding the domestic implementation of:

a) The 1988 Protocol to the International Convention on Load Lines, 1966; and
b) All amendments to MARPOL 73/78 and its Annexes I to V adopted from 2001 to 2019.

3.2 This Notice confirms that the aforementioned instruments have full legal force and effect in Pakistan under the ambulatory reference provisions of the Pakistan Merchant Shipping Ordinance, 2001 as amended.

4. CONFIRMATION OF LEGAL EFFECT

4.1 LOAD LINE CONVENTION 1966 AND 1988 PROTOCOL

In accordance with Section 2(19) of the Pakistan Merchant Shipping Ordinance, 2001, which defines "Load Line Convention" as the International Convention on Load Lines, 1966, "as amended from time to time," this Notice confirms that:

a) The definition of "Load Line Convention" under Pakistani law includes and encompasses:
   (i) The International Convention on Load Lines, 1966;
   (ii) The 1988 Protocol to the International Convention on Load Lines, 1966; and
   (iii) All subsequent amendments adopted through the tacit acceptance procedure.

b) The 1988 Protocol introduced the Harmonized System of Survey and Certification and is fully incorporated into Pakistan's national maritime legislation by virtue of:
   (iv) Pakistan's accession to the Protocol on February 3, 2000;
   (v) The Protocol's entry into force for Pakistan on July 25, 2002; and
   (vi) The ambulatory reference provision in Section 2(19) of PMSO 2001.

c) All provisions of the Load Line Convention, 1966, as modified by the 1988 Protocol, are legally binding and enforceable under Pakistani law.

4.2 MARPOL 73/78 AND ITS AMENDMENTS

In accordance with Section 2(28) of the Pakistan Merchant Shipping Ordinance, 2001, which defines "Pollution Convention" as MARPOL 73/78, "as amended from time to time," this Notice confirms that:

d) The definition of "Pollution Convention" under Pakistani law includes and encompasses:
   (vii) MARPOL 73/78 (the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978);
   (viii) All Annexes to MARPOL 73/78 (Annexes I through VI); and
   (ix) All amendments to MARPOL 73/78 and its Annexes adopted through the tacit acceptance procedure.

e) All amendments to MARPOL Annexes I to V adopted from 2001 to 2019 are fully incorporated into Pakistan's national maritime legislation by virtue of:
   (x) Pakistan's status as a Party to MARPOL 73/78 and all its Annexes;
   (xi) The tacit acceptance procedure by which amendments enter into force internationally; and
   (xii) The ambulatory reference provision in Section 2(28) of PMSO 2001.

f) Without limitation, the following significant amendments are confirmed as having full legal force and effect in Pakistan: MARPOL Annexes I, II, III, IV, and V amendments adopted by MEPC resolutions from 2001 to 2019, including enhanced survey programs, discharge criteria, special area designations, and the revised Annex V that entered into force on January 1, 2013.

5. APPLICABILITY AND ENFORCEMENT

5.1 This Marine Notice applies to:
   c) All ships registered under the Pakistan flag;
   d) All ships operating in Pakistani territorial waters and ports; and
   e) All persons and entities subject to Pakistan's maritime jurisdiction.

5.2 The requirements of the Load Line Convention, 1966, as modified by the 1988 Protocol, and MARPOL 73/78, as amended, are mandatory and enforceable under Pakistani law.

5.3 Non-compliance with the requirements of these instruments may result in:
   f) Detention of the vessel;
   g) Prohibition of departure from Pakistani ports;

h) Penalties as prescribed under the Pakistan Merchant Shipping Ordinance, 2001;
i) Cancellation or suspension of certificates; and
j) Other enforcement actions as deemed appropriate by the Maritime Administration.

6. SURVEY AND CERTIFICATION REQUIREMENTS

6.1 All Pakistani-flag ships subject to the Load Line Convention must:

a) Undergo surveys in accordance with the Harmonized System of Survey and Certification as prescribed in the 1988 Protocol;
b) Hold valid International Load Line Certificates issued or endorsed by the Pakistan Maritime Administration or its Recognized Organizations;
c) Maintain compliance with all applicable load line requirements at all times.

6.2 All Pakistani-flag ships subject to MARPOL 73/78 must:

d) Undergo surveys as required by the applicable MARPOL Annexes;
e) Hold valid MARPOL certificates (IOPP, NLS, IAPP, ISPP, etc.) issued or endorsed by the Pakistan Maritime Administration or its Recognized Organizations;
f) Maintain pollution prevention equipment and procedures in accordance with MARPOL requirements;
g) Maintain required record books (Oil Record Book, Garbage Record Book, etc.);
h) Implement Shipboard Marine Pollution Emergency Plans (SMPEP) where required.

7. RECOGNIZED ORGANIZATIONS

7.1 Recognized Organizations (ROs) authorized by the Pakistan Maritime Administration are hereby directed to:

a) Conduct surveys and issue certificates in accordance with the Load Line Convention, 1966, as modified by the 1988 Protocol;
b) Conduct surveys and issue certificates in accordance with MARPOL 73/78, as amended.
c) Verify compliance with all applicable amendments that have entered into force.
d) Report to the Pakistan Maritime Administration any instances of non-compliance.

8. TRAINING AND FAMILIARIZATION

8.1 All maritime training institutions in Pakistan shall ensure that:

a) Course curricula reflect the requirements of the 1988 Protocol to the Load Line Convention.
b) Course curricula reflect all current MARPOL requirements and amendments.
c) Seafarers are adequately trained in pollution prevention procedures.
d) Refresher training is provided as necessary to keep pace with regulatory changes.

9. INFORMATION AND GUIDANCE

9.1 Further information and guidance on the implementation of the Load Line Convention, 1966, as modified by the 1988 Protocol, and MARPOL 73/78, as amended, may be obtained from:

Directorate General Ports & Shipping
Ministry of Maritime Affairs
Government of Pakistan
Karachi, Pakistan

9.2 Copies of the relevant conventions, protocols, and amendments are available:

a) At the office of the Directorate General Ports & Shipping;
b) On the IMO website: www.imo.org;
c) Through the IMO-Vega Database.

10. REPORTING TO IMO

10.1 In accordance with Pakistan's obligations under the IMO Instruments Implementation Code (III Code), this Marine Notice shall be:

a) Communicated to the International Maritime Organization;

b) Uploaded to the IMO Global Integrated Shipping Information System (GISIS);
c) Made available to all interested parties and stakeholders.

11. SUPERSESSION

11.1 This Marine Notice supersedes all previous circulars, notices, or instructions that are inconsistent with the provisions herein.

12. EFFECTIVE DATE

12.1 This Marine Notice takes immediate effect from the date of issue and shall remain in force until further notice.

12.2 The legal force and effect of the 1988 Protocol to the Load Line Convention and MARPOL amendments described herein derive from Pakistan's international obligations and the ambulatory reference provisions of the Pakistan Merchant Shipping Ordinance, 2001, and have been in effect since their respective dates of entry into force for Pakistan.

12.3 This Marine Notice serves as formal confirmation and clarification of the existing legal status of these instruments under Pakistani law.

This Circular is issued with the approval of Director General Port & shipping, Karachi



(Capt. Arif Jawaid)
Chief Nautical Surveyor

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