

The Circular Letter 12/2024:

Addressing the Risks of Transporting EVs on Indonesian-Flagged Vessels

Indonesia is witnessing a substantial rise in the transportation of electric vehicles (EVs) via its maritime routes as the global trend toward EVs accelerates. Circular Letter No. SE-DJPL 12 of 2024 has been issued by the Directorate General of Sea Transportation under the Ministry of Transportation on 4 April 2024 ("**Circular Letter 12/2024**") in recognition of the distinctive challenges presented by this trend. The letter pertains to the management of Indonesian-flagged vessels that transport EVs.

ASIA BUSINESS LAW JOURNAL'S A-LIST LAWYERS!
TOP 100 LAWYERS IN INDONESIA.

2018, 2019, 2020
VANTAGE ASIA

ETHICAL FINANCE AWARDS 2022:
BEST IMPACT INVESTMENT STRATEGY CONSULTANTS
SOUTH EAST ASIA

VENTURE CAPITAL AWARDS 2022:
BEST JOINT VENTURE & FOREIGN INVESTMENT FIRM
INDONESIA
WEALTH & FINANCE INTERNATIONAL

I Ketut Dharma Putra Yoga, S.H., LL.M.

Partner

M: +62 823 7828 7888

E: yoga@rahayuandpartners.com

Dimas Benovito

Associate

M: +62 878 7860 0055

E: dimas_beno@rahayuandpartners.com

Plaza Asia 18th Floor Jl. Jend Sudirman Kav. 59

Jakarta Selatan 12190 Indonesia

T: +62 21 515 2477

E: contact@rahayuandpartners.com

Services:

Banking and Finance | Tax Law | Wealth and Family Office | Mergers and Acquisitions (M&A) | Capital Market
Money Market | Antitrust, Foreign Investment | General Corporate Commercial | Employment
Shipping and Maritime | International Trade | Logistics and Insurance
Telecommunication, Media and Technology (TMT)
Energy, Power & Cleantech
Environmental
Disputes Resolutions



www.rahayuandpartners.com



[rahayu-and-partners](https://www.linkedin.com/company/rahayu-and-partners)

BACKGROUND

The issuance of the Circular Letter 12/2024 was primarily triggered by the increasing volume of EVs being transported across Indonesian waters, which has raised new safety concerns, particularly the possibility of fires during the shipping process. The fire hazards associated with EVs are distinct from those associated with conventional internal combustion engine vehicles, as they are propelled by large lithium-ion batteries. These hazards encompass the possibility of thermal runaway, which can result in high-intensity fires that are challenging to extinguish and may re-ignite even after initial suppression.

The Circular Letter 12/2024 is aimed at enhancing the safety protocols for ships transporting EVs, ensuring that both the vessels and their crews are adequately prepared to manage these risks.

The Circular Letter 12/2024's Key Provisions

1. Designated Stowage Areas

The Circular Letter 12/2024 requires that EVs be carried in designated stowage areas on the vessel, with a preference for the weather deck (open deck), if it is available. The purpose of this placement is to reduce the likelihood of fire spreading by guaranteeing that there is sufficient ventilation and accessibility.

The storage areas must be equipped with cooling systems to manage the heat generated by the batteries during transport, as well as appropriate ventilation, both natural and mechanical.

2. Fire Detection and Suppression Systems

Vessels conveying EVs must equip thermal imaging devices to monitor vehicle temperatures and identify any indications of overheating. These devices must be monitored centrally to guarantee a prompt response in the event of a fire.

The Circular Letter 12/2024 also underscores the necessity of possessing suitable fire suppression equipment on board, specifically engineered to address fires involving lithium-ion batteries. This encompasses portable fire extinguishers and sprinkler systems with improved drainage capability to handle the substantial amounts of water necessary for cooling burning batteries.

3. Safety Management System (SMS) Adjustments

Ship owners/operators are urged to update their SMS with specialized protocols for handling and carrying EVs. This includes familiarizing crew members with the special risks associated with EVs, as well as providing frequent training and drills on fire prevention and suppression tactics for electric vehicle fires.

4. Operational Protocols During Loading and Voyage

During the loading process, ship operators must verify that EVs are securely lashed and secured in approved stowage spaces. The circular prevents charging the automobiles throughout the cruise and requires all vehicles to be switched off before the ship departs.

During the journey, regular patrols of the stowage compartments are required to check for symptoms of overheating or fire, and all sections must be monitored by CCTV to enable real-time surveillance.

5. Awareness and Training

Port authorities are responsible for informing ship operators about the circular's contents and ensuring compliance through frequent inspections. Crew members should get training on the special dangers and handling methods for EVs.

CONCLUSION

Based on the above, we appreciate that the Indonesian government has taken a proactive move by introducing this Circular Letter 12/2024 to address the rising dangers related to EV maritime transport. By establishing clear norms and safety protocols, the government hopes to avoid maritime tragedies that could have serious effects for both human life and the marine ecosystem.

However, the efficacy of these measures will be heavily dependent on the successful implementation and enforcement of the circular's provisions. This will necessitate careful coordination among the Directorate General of Sea Transportation, port officials, ship operators, and crew members. Regular training, inspections, and drills will be critical to ensuring that all stakeholders are appropriately equipped to deal with the particular issues presented by EVs.

Circular Letter 12/2024 marks a significant step forward in Indonesia's attempts to improve maritime safety in response to the increasing number of EVs. The circular's clear principles and stringent safety measures provide a framework for reducing the hazards involved with moving EVs by water. As the sector adjusts to these new norms, the circular will play a critical role in protecting Indonesia's marine routes and ensuring the safe passage of EVs through its seas.

Disclaimer:

This newsletter aims solely to provide informative content and should not be construed as legal advice. You are encouraged to consult with qualified legal professionals for advice tailored to your specific situation. We do not endorse or guarantee the accuracy, completeness, or reliability of any information provided. Any reliance on the content of our newsletter is at your own risk. Materials in this newsletter may not be reproduced or utilized without prior approval from Rahayu & Partners.