



IMO SDC 7 Meeting Summary

February 3 - 7, 2020

The Sub-Committee on Ship Design and Construction (SDC) of the International Maritime Organization met for its 7th session in London during 3-7 February 2020.

Liberia was represented throughout SDC 7 in the plenary session and in the working groups on Industrial Personnel, Subdivision and Damage Stability and Non-SOLAS Ships operating in Polar Waters.

STABILITY AND SUBDIVISION

Finalization of second generation intact stability criteria

After several years of work developing the second generation intact stability criteria, the Sub-Committee considered the final report of the Correspondence Group on Intact Stability (IS), and agreed to:

- finalize the draft Interim guidelines on the second generation intact stability criteria;
- keep the Interim guidelines under review for future amendments; and
- forward a draft MSC circular to the Maritime Safety Committee, for approval by the next session.

The Sub-Committee also agreed to establish a correspondence group to further develop the draft explanatory notes, using a structure reflecting the numbering system of the Interim guidelines for ease of use. The draft explanatory notes will be issued as a draft MSC Circular (separate to the Interim guidelines) to facilitate their future amendment.

Amendments to the Explanatory Notes to SOLAS chapter II-1 subdivision and damage stability regulations (resolution MSC.429(98))

Continuing the work that had been undertaken by the Correspondence Group on Subdivision and Damage Stability (SDS), the Sub-Committee considered the various actions items of that Group and related submission to this session of the Sub-Committee.

After lengthy discussions in the plenary sessions and working groups, the Sub-Committee agreed:

- to the draft consolidated Revised Explanatory Notes and associated draft MSC resolution;

- to the draft amendments to section 3 of MSC.1/Circ.1572, on watertight door requirements in SOLAS chapter II-1, part B-1;
- to note that MSC.1/Circ.1572 will need to be reviewed and updated when the future SOLAS chapter II-1 amendments enter into force on 1 January 2024 (paragraph 17); and
- that there is no need to develop guidance for SOLAS regulation II-1/22.3 related to opening of watertight doors during navigation on cargo ships.

The draft resolution and amendments will be submitted to the next session of the Maritime Safety Committee for approval and eventual adoption.

Water level detectors on cargo ships, other than bulk carriers and tankers, with multiple cargo holds

The Sub-Committee considered a proposal to amend SOLAS chapter II-1 with regard to water level detectors in new cargo ships with multiple cargo holds other than bulk carriers and tankers. The current SOLAS regulation, II-1/25, applies only to non-bulk carrier cargo ships with single cargo holds. Therefore, a draft new SOLAS regulation II-1/25-1 was agreed, which will require water level detectors on multiple hold cargo ships other than bulk carriers and tankers.

The draft new regulation will be submitted to the next session of the Maritime Safety Committee for approval and eventual adoption. It is anticipated that the new regulation to enter into force on 1 January 2024 and affect only ships constructed on or after that date.

The IMO Secretariat was authorised to complete the corresponding check/monitoring sheet for the draft new SOLAS regulation.

Watertight doors on cargo ships

The Maritime Safety Committee had instructed the Sub-Committee to resolve any inconsistencies in mandatory requirements, relating to watertight doors on cargo ships, of the SOLAS, MARPOL and Load Line Conventions and the IBC and IGC Codes.

Following extensive discussion of the documents submitted, including the proposal co-sponsored by Liberia (SSE 7/12) to align the various instruments with the requirements of the SOLAS convention and include hinged watertight doors that are normally closed at sea in the amendments, the Sub-Committee agreed that amendments to the following instruments should only apply to new ships:

- regulation 28.3.1 of MARPOL Annex 1,
- regulation 27(13)(a) of the Protocol of 1988 relating to the International Convention on Load Lines, 1966,
- paragraph 2.9.2.1 of the IBC Code, and
- paragraph 2.7.1.1 of the IGC Code,

The draft amendments were submitted to the Maritime Safety and Marine Environmental Protection Committees for approval and subsequent adoption.

INDUSTRIAL PERSONNEL

Following on from the work of the previous session of the Sub-Committee and that undertaken intersessionally and the decisions of other IMO committees on Carriage of more than 12 Industrial Personnel on board Vessels engaged on International Voyages (IP Code), the Sub-Committee finalised the draft new SOLAS chapter XV. It was also agreed that the new chapter will apply only to ships constructed on or after the date of entry into force of the new chapter and to ships constructed prior to the entry into force date starting to carry industrial personnel after the entry into force date.

Additionally, the Sub-Committee will invite the Maritime Safety Committee to consider the application of the draft new chapter XV of SOLAS to ships currently transporting industrial personnel in accordance with the provisions of the *Interim Recommendations on the safe carriage of more than 12 industrial personnel on board vessels engaged on international voyages* (resolution MSC.418(97)).

In relation to high-speed craft, progress was made on the development of the draft new SOLAS chapter XV. However, it was agreed that in the case that this is not finalised as the next session of the Sub Committee, a two-phase approach

will be adopted to progress the work on the development of mandatory provisions addressing safety standards for the carriage of industrial personnel.

The Sub-Committee agreed in principle to the draft new SOLAS chapter XV, noting that Part III of the check/monitoring sheet for the process of amending the SOLAS convention was yet to be prepared.

Work continues on the finalisation to parts I to V of the draft IP Code and this will be done intersessionally.

In relation to the carriage of dangerous goods on ships transporting industrial personnel, the Sub-Committee agreed that with respect to the goals, functional requirements and regulations for the carriage of dangerous goods in the draft IP Code, it would seek input from the Sub-Committees on Pollution Prevention and Response (PPR) and the Carriage of Cargoes and Containers (CCC).

2011 ESP CODE AMENDMENTS

A comprehensive set of amendments to the 2011 ESP Code were adopted at the last session of the Maritime Safety Committee (resolution MSC.461(101)) which are anticipated to come into effect on 1 January 2021. In order to keep the Code up to date with associated IACS unified requirements, further amendments to the 2011 ESP Code were submitted for consideration.

Provisions for Remote Inspection Techniques (RITs)

One proposal was to allow the use of Remote Inspection Techniques (RITs), such as Remotely Operated Vehicles (ROVs) and real-time sensing devices that are carried by drones in the survey of existing ships as an alternative to a close-up survey.

The Sub-Committee agreed that, whilst the use of RIT for surveys under the 2011 ESP Code is generally supported, this is a matter which requires broader consideration which may include the amendment of other instruments. Proposals from interested parties were invited to future sessions of the Sub-Committee and it was made clear that the intention is to allow the surveyor the freedom to use RIT when appropriate and not to diminish the requirements of the 2011 ESP Code.

Thickness measurements at the first renewal survey of double hull oil tankers

After analysing data from more than 150 oil tankers, a proposal was put forward to amend the 2011 ESP Code in order that only suspect areas of double hull oil tankers need be considered for thickness measurements at the first

renewal survey.

The Sub-Committee agreed to this proposal and drafted amendments to annex 2 of part A of annex B of the 2011 ESP Code, as amended, which will be submitted to the Maritime Safety Committee for approval and eventual adoption.

PERFORMANCE STANDARDS FOR PROTECTIVE COATINGS (PSPC)

Mandatory application of the performance standard for protective coatings for void spaces on bulk carriers and oil tankers

The Sub-Committee, on considering the findings of one analysis into the mandatory application of PSPC for void spaces on bulk carriers and oil tankers, noted that no information had been received for over 30 years with respect to any failures. Furthermore, the analysis also indicated that some of the current provisions may be inadequate and that the mandatory application of resolution MSC.244(83) may result in an increased cost of shipbuilding.

Consequently, the Sub-Committee did not support the mandatory application of the Performance Standard at this time and agreed to consider the matter again at its next session (SDC 8). If no further submissions are received, the Sub-Committee will invite the Maritime Safety Committee to delete this work output from its agenda.

PSPC void spaces all ships

The Sub-Committee received no submissions on this agenda item. Similar to its consideration on the mandatory application of PSPC for void spaces on bulk carriers and oil tankers, the Sub-Committee will invite the Maritime Safety Committee to consider deleting this work output from its agenda, if no further submissions are made.

NON-SOLAS SHIPS IN POLAR WATERS

The Sub-Committee considered the report of the Correspondence Group on Safety Measures for Non-SOLAS Ships Operating in Polar Waters together with other relevant documents and agreed:

- to the draft Guidelines for fishing vessels of 24m in length and over operating in polar waters.
- in relation to the training requirements, to invite comments from the Human Element, Training and Watchkeeping (HTW) Sub-Committee on the

terminology used and identify any conflicts of the text with existing IMO instruments,

- to submit a draft MSC circular, directly to MSC 103 for approval, pending any comments from HTW;
- that pleasure yachts of 300GT and above, but less than 500GT, engaged in trade, i.e. commercial yachts and cargo vessels 300GT to 500GT, were not covered in the draft pleasure yacht guidelines, or under the SOLAS Convention, and invite the Maritime Safety Committee to note this regulatory gap; and invite proposals from interested parties on how to address this; and
- to the draft Guidelines for pleasure yachts of 300 gross tonnage and above not engaged in trade operating in polar waters
- a draft MSC circular relating to the guidelines for pleasure yachts, with a view to submission to MSC 103 for approval;
- that there were no consequential amendments needed to *Cold Water Survival Guidelines* (MSC.1/Circ.1185/Rev.1). Guidance for survival on the ice and remote cold areas could be developed at a future stage, if required.

No further intersessional work was agreed at this session of the Sub-Committee.

OTHER MATTERS

Correction to the *Guidelines for safe access to tanker bows* (resolution MSC.62(67)) with regard to foot-stops

Noting that *Guidelines for safe access to tanker bows* (resolution MSC.62(67)) were approved before the adoption of the amendments to the International Convention on Load Line, 1966, (regulations 25-1(2)(e) and (f), adopted by resolution MSC.143(77)) there is now a discrepancy in the Guidelines in relation to the mandatory provision of foot-stops. In order to rectify this, the Sub-Committee considered and agreed to draft amendments to the *Guidelines for safe access to tanker bows* (resolution MSC.62(67)), for submission to, and adoption as a minor correction, MSC 102.

Minor correction to the 1988 LL Protocol

The Sub-Committee considered and agreed to a proposed minor editorial correction to regulation 22 (1)(g) of the 1988 Load Lines Protocol, as amended, to delete the reference to "inlets". The draft amendments will be submitted to the next session of the Maritime Safety Committee for approval and adoption.

Clarification on the minimum width of the double-side skin construction of general dry cargo ships of less than 150 m in length which occasionally carry dry cargoes in bulk

The Sub-Committee sought to clarify the application of the minimum width of double-side skin construction to general dry cargo ships, which are less than 150 m in length, and which occasionally carry dry cargoes in bulk.

Following a lengthy discussion, the Sub-Committee agreed, in principle, that the application for the minimum width should be applied for ships of 150m and over but that the proposed amendments to *Clarification of the term "bulk carrier" and guidance for application of regulations in SOLAS to ships which occasionally carry dry cargoes in bulk and are not determined as bulk carriers in accordance with regulation XII/1.1 and chapter II-1 (resolution MSC.277(85))* were not considered to be minor corrections.

Therefore, in order to progress this issue, the Sub-Committee invited interested parties to submit proposals for a new output to the Committee.

Guidelines for wing-in-ground craft

Noting that the SOLAS and LSA Code references in the *Guidelines for wing-in-ground craft (MSC.1/Circ.1592)* are outdated, the Sub-Committee invited interested parties to draft a proposal to a future session of the Committee for a new output to update and revise the Guidelines.

UNIFIED INTERPRETATIONS

Service tank arrangements

The Sub-Committee noted that revision 3 of IACS Unified Interpretation SC123 on Machinery Installations - Service Tank Arrangements (SOLAS Reg. II-1/26.11), remains in effect and that a new revision 4, aimed at clarifying that fuels with different sulphur contents were not considered as different types of fuels with respect to SOLAS safety requirements, was under development.

Protection of Crew - International Convention on Load Lines (Reg. 25(3))

Although noting the importance of a proposal to develop a unified interpretation relating to the arrangement of guard rails on large ship open deck superstructures, the Sub-Committee agreed that a unified interpretation was not an appropriate solution at this time. Interested parties were invited to submit a new proposal to the Maritime Safety Committee to progress this work.

The following correspondence groups, due to report to SDC 8, were established:

- Finalization of Explanatory Notes to the *Interim guidelines on second generation intact stability criteria*;
- Carriage of more than 12 industrial personnel on board vessels engaged on international voyages

The next meeting of the Sub-Committee, SDC 8, is scheduled for: 25-29 January 2021.

For further information please contact: imo@liscr.com

SDC 7 – Summary of Major Decisions

PROVISIONAL LIST OF DRAFT RESOLUTIONS AND CIRCULARS

- MSC.429(98)/Rev.1** *Revised explanatory notes to the SOLAS Chapter II-1 Subdivision and damage stability regulations*
- MSC.1/Circ.1572/Rev.1** *Unified interpretations of SOLAS Chapters II-1 and XII, of the technical provisions for means of access for inspections (resolution MSC.158(78)) and of the performance standards for water level detectors on bulk carriers and single hold cargo ships other than bulk carriers (resolution MSC.188(79)):*
- MSC.1/Circ.xxx** *Guidelines for safety measures for fishing vessels of 24 m in length and over operating in Polar Waters*
- MSC.1/Circ.xxx** *Guidelines for pleasure yachts of 300 gross tonnage and above not engaged in trade operating in Polar Waters*
- MSC.1/Circ.xxx** *Interim guidelines on the second generation intact stability criteria*

Note: the above circulars will be submitted to MSC for adoption and so are yet be numbered.