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MARITIME SAFETY COMMITTEE  
78th session  
Agenda item 5

MSC 78/5/2  
18 March 2004  
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## BULK CARRIER SAFETY

### Comments on documents MSC 78/5/1 and MSC 78/INF.6

### Submitted by the International Chamber of Shipping (ICS)

#### SUMMARY

**Executive summary:** This document comments on the findings of the comparative study of single and double side skin bulk carriers provided in MSC 78/5/1 and MSC 78/INF.6, and questions the appropriateness of mandatory double hull requirements for bulk carriers

**Action to be taken:** Paragraph 9

**Related documents:** MSC 78/5/1, MSC 78/INF.6, DE 47/16/3 and DE 47/WP.5

1 This paper provides comment on documents MSC 78/5/1 and MSC 78/INF.6 (Greece) and is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC/Circ.1099).

2 The critical review of the bulk carrier FSA commissioned by Greece concludes that the introduction of double-side skin as a RCO for bulk carriers is unjustified on both CBA and technical grounds.

3 At DE 46, the Sub-Committee noted the concerns expressed by ICS in its submission DE 47/16/5, regarding the decision of MSC 76 to require double-side skin construction for all new bulk carriers, and agreed to invite the attention of the Committee to this matter. ICS restates the concerns raised at the DE Sub-Committee's session for the attention of the Committee, as these may be relevant to the Committee's discussion on this matter.

4 ICS has increasingly come to question the wisdom of the provisional agreement gained at MSC 76 to require double side-skin construction for all new bulk carriers over 150 m length. There does not appear to be any compelling evidence that a double hull construction provides increased levels of safety over the current single hull standards that have been progressively developed and enhanced through experience; in fact, the current indications are that the converse may apply.

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5 It should be stressed that the factors that led to the mandating of double hulls for oil tankers are entirely different from the arguments relevant to bulk carriers. The essential purpose of the double hull for tankers is to protect the environment from oil spillage whereas the principal consideration for bulk carrier is to enhance survivability and safety of life. Whilst it is acknowledged that original standards for pre-SOLAS chapter XII bulk carriers were found insufficient, it is believed that new single hull bulk carriers in compliance with the enhanced class rules, SOLAS and Load Line requirements will provide the required enhanced level of safety.

6 ICS fully supports the goal of ensuring the safety of bulk carriers. However, it is believed that at the present time, for bulk carriers, there is neither sufficient experience with double hull construction nor sufficient development of double hull rules to ensure an improvement in safety. Greece has already advised the Maritime Safety Committee of concerns on this issue during debate and recommended that until and unless double-side skin designs prove their safety superiority versus established and tested single-side skin designs, double-side skin designs should be accepted as alternatives only (MSC 77/26, paragraph 5.41).

7 Due to these genuine concerns, ICS believes that the safest course of action for IMO to take would not be to mandate double hull construction, but to allow development of double hull requirements in parallel with continued single hull construction. Time and experience would permit the effectiveness of both single hull and double hull constructions to be monitored in parallel and an informed comparison of safety to be developed.

8 ICS believes that its initial concerns support, and are entirely complementary to, the Greek submission and therefore also recommends that the draft SOLAS regulation on double-side skin construction should provide the basic requirements for such designs, without making this type of construction mandatory.

#### **Action requested of the Committee**

9 The Committee is invited to consider this document and take action as appropriate.

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