



MARITIME SAFETY COMMITTEE
84th session
Agenda item 22

MSC 84/22/23
17 March 2008
Original: ENGLISH

WORK PROGRAMME

Specific ship stability requirements for ro-ro passenger ships

Submitted by the Community of European Shipyards' Associations (CESA)

SUMMARY

Executive summary:	This document provides comments on the proposed new work programme item on specific ship stability requirements for ro-ro passenger ships. In order to take an informed decision on the proposal to review chapter II-1 of SOLAS 2009, CESA recommends to make available the relevant studies referred to in document MSC 84/22/12. The scope of the review proposed should also address the issue of compatibility of SOLAS 2009 damage stability requirements with other legislation still regulating the design of ro-ro passenger ships.
Strategic direction:	2 and 5
High-level action:	2.1.1; 5.1.1; and 5.2.1
Planned output:	Not applicable
Action to be taken:	Paragraph 12
Related documents:	MSC 84/22/12; and resolution MSC.216(82), annex 2

Introduction

1 This document is submitted in accordance with 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 (MSC-MEPC.1/Circ.1) and provides comments on document MSC 84/22/12 on specific ship stability requirements for ro-ro passenger ships, submitted by Austria *et al.*

Discussion

2 CESA shares, with the submitting Governments of document MSC 84/22/12, the intention of pursuing ship stability standards assuring the highest level of safety for all ship types and, in particular, for those ships carrying passengers on board.

For reasons of economy, this document is printed in a limited number. Delegates are kindly asked to bring their copies to meetings and not to request additional copies.

3 Document MSC 84/22/12 expresses concerns regarding the level of safety provided by the new SOLAS 2009 rules for ro-ro passenger ships. In particular, attention is brought to the fact that new SOLAS 2009 rules do not explicitly address the possible presence of water on deck of ro-ro ships.

4 Based on the experience gained through the application of the SOLAS 2009 requirements to a considerable number of newbuilding projects, the European shipbuilders, however, are convinced that the SOLAS 2009 provisions establish an at least equivalent level of safety compared to the combined use of requirements of SOLAS 90 and the Stockholm Agreement.

5 CESA would like to remind that in the course of the IMO development of the probabilistic damage stability provisions implemented through SOLAS 2009, the requirements were calibrated in order to match the current safety level provided by the deterministic SOLAS 90 provisions plus the Stockholm Agreement. After this task has been accomplished IMO decided to increase the safety level for larger passenger ships and agreed that the topic of free water surfaces on deck of ro-ro ships is implicitly but adequately covered by the probabilistic damage stability provision of SOLAS 2009.

6 The main text of document MSC 84/22/12 envisages the possibility of a coexistence of the new SOLAS 2009 framework with the relevant combined SOLAS 90 and Stockholm Agreement requirements.

7 CESA would like to point out that the combined use of SOLAS 2009 and the Stockholm Agreement is not appropriate as they are based on totally different concepts. The new probabilistic design approach is the state-of-the-art assessment of damage stability, which simulates the ship stability processes most accurately and allows for design flexibility and optimal results from the safety point of view.

8 Ship designs developed with this method would, however, have to be modified according to the provisions of the Stockholm Agreement afterwards, which is based on methods which do not adequately reflect the state-of-the-art in damage stability and do not provide the necessary design flexibility. This might result in consequential alterations of the original design since the modifications requested by the Stockholm Agreement requirements will alter the results of the probabilistic damage calculations. This circle process might have to be performed several times. Moreover, it can not be guaranteed that this iterative process will converge in all cases. At least it is evident that the final design will deviate from the optimum with regard to both safety and efficiency due to the different nature of the stability assessment concepts used.

9 In order to address the concerns expressed in document MSC 84/22/12 and in order to solve the compatibility problems induced through the parallel use of probabilistic and deterministic requirements, CESA in general supports the proposal to review ship stability requirements for ro-ro passenger ships thoroughly. Before taking the decision on the scope and goal of the new agenda item, however, all relevant technical studies should be made available to this Organization. Unfortunately the technical background documents referred to in e.g., paragraph 7.4 of document MSC 84/22/12, are not clearly identified.

Specific proposals

10 CESA is of the opinion that the decision on this new work programme item could be taken only after the technical background of the proposal is made available to all IMO Members.

11 The scope of the new work programme item should cover also the issue of compatibility of SOLAS 2009 damage stability requirements with other legislation still regulating the design of ro-ro passenger ships.

Action requested of the Committee

12 The Committee is invited to consider the views presented and take action as appropriate.
