



MARITIME SAFETY COMMITTEE
85th session
Agenda item 23

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WORK PROGRAMME

Subdivision standards for cargo ships

Submitted by the United Kingdom

SUMMARY

<i>Executive summary:</i>	A review of the application of standards deemed equivalent to part B-1 of SOLAS is proposed.
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.1
<i>Planned output:</i>	Harmonized interpretation of Cargo Ship Damage Stability requirements
<i>Action to be taken:</i>	Paragraph 10
<i>Related documents:</i>	Resolutions A.469(XII) amended by MSC.235(82); A.673(16) amended by MSC.236(82); and MSC.216(82)

1 The following proposal is submitted in accordance with the Guidelines on the organization and method of work of the Committees (MSC-MEPC.1/Circ.2), taking into account the High-level Action Plan of the Organization and priorities for the 2008-2009 biennium (resolution A.990(25)), the Strategic Plan for the Organization (for the six-year period 2008 to 2013) (resolution A.989(25)) and circular letter No.2831 regarding the new format for IMO documents.

Need or compelling need

2.1 Subdivision standards for cargo ships were revised by means of resolution MSC.216(82) which shall be deemed to have been accepted on 1 July 2008 and will enter into force on 1 January 2009. This revised standard requires survivability according to a probabilistic damage criterion for cargo ships of 80 metres in length and upwards. Since within MARPOL, SOLAS and ICLL there exist other damage stability requirements for cargo ships, a footnote to regulation 4 of part B provides for the recognition of certain of these as being equivalent to the requirements of part B-1. The regulations in force prior to 1 January 2009 contain similar provisions.

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2.2 In most cases the subdivision standards listed in the footnote to regulation 4 are more onerous than the requirements of part B-1, for most ship lengths. However in the case of item .4 “Guidelines for the Design and Construction of Offshore Supply Vessels” (resolutions A.469(XII) and A.469(XII), as amended by resolution MSC.235(82)) this may not be the case. Resolution A.469(XII) provides for damage of limited horizontal extent (760 mm inboard from the side of the vessel). This dimension is fixed for ships of all lengths to which the standard applies, suggesting that as the length of ship increases it could represent a lesser standard of subdivision than the probabilistic damage of part B-1. The actual standard of subdivision achieved under resolution A.469(XII) will depend on the location of any watertight bulkheads inboard of the 760 mm envelope, for which no requirements presently exist.

2.3 It may be recalled that resolution A.469(XII) was adopted in 1981, a decade before damage survivability requirements were applied to other cargo ships, and that it only applies to ships up to 100 metres in length (L). At lengths above 100 metres the standard of subdivision in this instrument is ‘to the satisfaction of the Administration’. The preamble in the Annex to resolution A.469(XII) suggests that it is a standard equivalent to SOLAS but, as noted above, such words predate the cargo ship damage survivability requirements.

2.4 For the purposes of this document, offshore supply vessels may be taken to include any offshore support vessels, as defined in resolutions A.673(16) and MSC.236(82), which comply with those standards. The latter make reference to the offshore supply vessel standard for support vessels transporting parcels of hazardous and noxious liquid substances.

2.5 For the above reasons resolution A.469(XII) cannot be considered a true equivalent to part B-1. Furthermore, some vessels, other than offshore supply or support vessels, adopt the standard given in resolution A.469(XII) purely as a means of avoiding compliance with part B-1 of the present regulation. This leads to widespread confusion and a dual standard amongst such vessels.

2.6 Accordingly, it is proposed that footnote .4 of regulation 4 be deleted, with the intention that ships built after the date of such deletion should not benefit from the deemed equivalence. The result of the above would be for offshore supply vessels of length:

(L) < 80 m	subdivision is required to satisfy resolution A.469(XII)
80 m < (L) < 100 m	subdivision is required to satisfy resolution A.469(XII) + part B-1
100 m < (L)	subdivision is required to satisfy part B-1 and resolution A.469(XII), as may be modified by the Administration.

2.7 A further consideration of significance is that the footnotes to regulation 4 refer to ‘regulations’ meaning IMO instruments, but only .6 and .7 refer to specific regulation numbers. This may be a reflection of the fact that whilst ICLL applies to virtually all SOLAS ships, regulation 27 is merely an option within it. However it may be argued that, for example, .5 is only available to ships which comply fully with all Special Purpose Ship provisions. It may also be noted that these equivalences are related to SOLAS part B-1 which includes standards for openings in watertight divisions (regulations 25-9 and 25-10 in the soon to be superseded version). The new part B-1 does not contain such regulations, which have been moved to part B-2 and therefore will no longer be part of the equivalence.

2.8 Noting 2.7 above, it might be considered appropriate to include the MODU Code in the list of regulations deemed to confer equivalence to part B-1.

Scope of the proposal

3 To consider the footnotes to regulation 4 of part B of chapter II-1, as adopted by resolution MSC.216(82). To consider deleting footnote .4, and to update references to the remaining footnotes as necessary. This will potentially widen the application of part B-1, for certain ship types.

Cost to the maritime industry

4.1 The proposal will only affect ships (i.e. new ships) built to the probabilistic damage stability standard contained in resolution MSC.216(82), since only the footnotes to regulation 4 adopted by that resolution are proposed to be amended.

4.2 Since one of the two subdivision standards that would become applicable to offshore supply vessels over 80 m in length is a probabilistic one, there should be no inherent conflict in optimizing the positioning of watertight bulkheads to meet both. Hence if the relevant subdivision standards are indeed equivalent, the extra cost will only be that of carrying out an additional damage stability investigation at the time of building of offshore supply vessels over 80 m in length. In fact it is believed that there would be a slight uplift in degree of subdivision due to the application of part B-1 to these ships, to that of cargo ships which are not offshore supply vessels.

Benefits which would accrue from the proposal

5 To ensure consistency of approach in the application of subdivision standards, since once built ships can only be brought into compliance with other such standards with difficulty. The relevant SOLAS amendments are about to enter into force.

Do the benefits justify the proposed action?

6 The benefits are believed to justify the proposed action when taken in full. However the action could be moderated by deleting the footnote only for lengths of ship above a value to be determined by the SLF Sub-Committee.

Priority and target completion date

7 Two sessions of the SLF Sub-Committee may be necessary, principally to provide time to permit interested Governments to submit comparative data.

Is the subject of the proposal within the scope of IMO's objectives and do adequate standards exist?

8 The subject is within the scope of IMO objectives, and is closely related to work recently carried out on revision of the requirements for damage stability of cargo and passenger ships.

How is the proposed item related to the scope of the Strategic Plan for the Organization and fits into the High-level Action Plan?

9 The subject is within item 5.2.1 of the High-level Action Plan.

Action requested of the Committee

10 The Committee is invited to include in the SLF Sub-Committee's agenda a new work programme item on subdivision standards for cargo ships.