



The Society of Naval Architects and Marine Engineers

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April 30, 2004

Mr. Richard Nicholls
Director, Professional Affairs
Royal Institution of Naval Architects
10 Upper Belgrave Street
London, England London SW1X 8BQ

Dear Mr. Nicholls:

The 78th session of the Maritime Safety Committee (MSC 78) at IMO is scheduled for May 12-21. Questions and guidance from the Sub-Committee on Stability and Load Lines and on Fishing Vessels Safety (SLF) have been posed with regard to the outcome of the Harmonization effort specifically in relation to large passenger ships. On this subject, as a sister professional Society we wish to advise you of our views, which we hope you share. Our position has been developed through our Ad Hoc Panel on Passenger Ship Safety, working under the auspices of SNAME's Technical and Research Committee. Furthermore, as a recognized NGO at IMO, we look forward to your taking our views into account at MSC 78.

SLF has been studying many aspects of damage stability for large passenger ships, both separately, and as part of a larger, multi-year activity, to harmonize the damage stability standards for all ship types. Results from these studies have shown that the survivability levels (as evaluated using the currently proposed methodologies for calculating damage stability) decrease with increasing ship size. It is our understanding the majority of the SLF Sub-Committee was of the opinion that this was a completely unacceptable trend.

Based on the studies performed to date, and the potentially catastrophic consequences of a casualty resulting from loss of stability, we are strongly of the opinion that MSC should instruct SLF to develop a survivability index for large passenger ships that increases with ship length and numbers of persons on board. This approach is clearly in keeping with the intent of existing SOLAS regulation II-1/6.1, which specifies "...the degree of subdivision shall vary with the length of the ship and with the service, in such manner that the highest degree of subdivision corresponds with the ships of greatest length, primarily engaged in the carriage of passengers."

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We are aware of the two papers (from Italy and ICCL) that have been submitted to MSC 78 asking that this important issue be given “full” consideration before the final “R” is determined, and asking for additional time to study the matter. The SNAME Ad Hoc Panel is in substantial agreement with the above. Also, SLF has asked for an extension of the due date until the 47th session of SLF, scheduled for September 2004. Our view at present is that it will be possible to complete the Harmonization – setting “R” – at SLF 47 as we anticipate the studies that Italy initiated will be completed this month, or in early June. Our view is that it is very important to upgrade the survivability of these very large passenger ships as soon as possible.

May we offer our help and support in vetting this issue through all the Societies of the RINA IMO Naval Architecture Group? We suggest that a single paragraph “intervention” could be written and through Email sent to the other Group members in time for discussion on this issue at MSC. We will of course work with you on drafting the “intervention”.

Thank you for the opportunity to share our views and if you should have any questions please do not hesitate to contact the undersigned.

Sincerely,



DR. JOHN C. DAIDOLA, P.E.
Chairman, Technical and Research Steering Committee
Society of Naval Architects and Marine Engineers

cc: Mr. Trevor Blakely