

MARITIME SAFETY COMMITTEE
101st session
Agenda item 3

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**CONSIDERATION AND ADOPTION OF AMENDMENTS TO
MANDATORY INSTRUMENTS**

Draft amendment to the IGF Code

Submitted by Japan and IACS

SUMMARY

Executive summary: This document proposes to modify the draft amendment to paragraph 11.3 of the IGF Code set out in annex 3 to document MSC 101/3

Strategic direction, if applicable: 2

Output: 2.3

Action to be taken: Paragraph 12

Related documents: CCC 4/3/1, CCC 4/WP.3, CCC 4/12; MSC 99/22; MSC 100/20 and MSC 101/3

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1) and provides comments on document MSC 101/3.

Background

2 The CCC Sub-Committee, at its fourth session, considered the proposal set out in paragraph 18 of document CCC 4/3/1 (IACS), proposing amendments to paragraph 11.3.3 of the IGF Code based on the view that the requirements in paragraph 11.3.3 also apply to fuel preparation rooms and on the understanding that a cofferdam will be required when a type C tank is located directly above machinery spaces of category A and other rooms with a high fire risk. Following discussion, the Sub-Committee instructed the IGF Code Working Group to further consider the draft amendments to paragraph 11.3.3 of the IGF Code and advise the Sub-Committee on how best to proceed (paragraphs 3.32 and 3.33 of CCC 4/12).

3 The Sub-Committee, having considered the part of the report of the Working Group on Amendments to the IGF Code and Development of Guidelines for Low-flashpoint Fuels (CCC 4/WP.3), endorsed the draft amendments prepared by the Working Group and invited the Committee to approve it with a view to adoption at MSC 100 (paragraphs 3.42 to 3.44 of CCC 4/12).

4 MSC 99, having considered the draft amendments to parts A and A-1 of the IGF Code prepared by CCC 4, agreed to hold the approval of the draft amendments in abeyance and instructed CCC 5 to reconsider the draft amendments to regulation 9.5.6 and report the outcome to MSC 100 as an urgent matter (paragraphs 8.4 and 8.5 of MSC 99/22).

5 MSC 100 approved the draft amendments to parts A and A-1 of the IGF Code as prepared by CCC 4 with a view to adoption at MSC 101 (paragraph 11.5 of MSC 100/20). The draft amendments to the IGF Code are set out in annex 3 to document MSC 101/3.

6 The draft amendment to paragraph 11.3 of the IGF Code is to amend regulation 11.3.3 as follows:

"11.3.3 The space containing the fuel containment system shall be separated from the machinery spaces of category A or other rooms with high fire risks. The separation shall be done by a cofferdam of at least 900 mm with insulation of A-60 class. When determining the insulation of the space containing the fuel containment system from other spaces with lower fire risks, the fuel containment system shall be considered as a machinery space of category A, in accordance with SOLAS regulation II-2/9. ~~The boundary between spaces containing fuel containment systems shall be either a cofferdam of at least 900 mm or A-60 class division.~~ For type C tanks, the fuel storage hold space may be considered as a cofferdam."

and to add the following new regulation 11.3.3*bis*:

"11.3.3*bis* Notwithstanding 11.3.3, for ships constructed on or after [date of entry into force], for type C tanks, the fuel storage hold space may be considered as a cofferdam provided the type C tank is not located directly above machinery spaces of category A or other rooms with high fire risk. When the fuel storage hold space is considered as a cofferdam, the minimum distance to the A-60 boundary from the outer shell of the type C tank or the boundary of the tank connection space, if any, shall be at least 900 mm."

Discussion

7 The co-sponsors consider that draft new regulation 11.3.3*bis* can further be clarified from the following three viewpoints:

- .1 the words "notwithstanding 11.3.3" are vague, since the intent can be understood "notwithstanding the last sentence in 11.3.3", taking into account the original proposal in document CCC 4/3/1;
- .2 the first sentence in draft new regulation 11.3.3*bis* says nothing about the cases other than the case of "the type C tank is not located directly above machinery spaces of category A or other rooms with high fire risk", while the intent of this amendment is to restrict the situation for considering the fuel storage hold space as a cofferdam only in the specific case; and
- .3 the last sentence in draft new regulation 11.3.3*bis* is applicable only for ships constructed on or after [date of entry into force].

8 With regard to the first viewpoint, the co-sponsors are of the view that the relevant provision should be specified in the phrase starting with the word "notwithstanding".

9 With regard to the second viewpoint, the co-sponsors are of the view that more clarity can be added by using the words "provided that", etc.

10 With regard to the third viewpoint, the co-sponsors are of the view that it is better to incorporate the last sentence in draft new regulation 11.3.3*bis* into the previous sentence as one of the conditions for considering the fuel storage hold space as a cofferdam.

Proposal

11 The co-sponsors propose to modify the draft new regulation 11.3.3*bis* as follows:

"11.3.3*bis* Notwithstanding the last sentence in 11.3.3, for ships constructed on or after [date of entry into force], for type C tanks, the fuel storage hold space may be considered as a cofferdam provided that:

- .1 provided the type C tank is not located directly above machinery spaces of category A or other rooms with high fire risk; and
- .2 When the fuel storage hold space is considered as a cofferdam, the minimum distance to the A-60 boundary from the outer shell of the type C tank or the boundary of the tank connection space, if any, shall be at least is not less than 900 mm."

Action requested of the Committee

12 The Committee is invited to consider the proposal in paragraph 11 and take action, as appropriate.
