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SHIP DESIGN AND CONSTRUCTION

Comments on the draft amendments to the unified interpretations in MSC.1/Circ.1535/Corr.1

Submitted by Japan, United States and IACS

SUMMARY

Executive summary: This document proposes a clarification to the draft amendments to the unified interpretations pertaining to ventilation system openings as per the 1966 LL Convention, regulation 27(13)(e) in MSC.1/Circ.1535/Corr.1, as shown in annex 8 to document SDC 6/13

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 10

Related documents: SDC 3/14/3; SDC 6/9/2, SDC 6/13, paragraphs 9.13 to 9.18 and annex 8 and MSC 101/12/Rev.1, paragraph 2.13

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 paragraph 2.13 of document MSC 101/12/Rev.1 and the associated draft revised MSC circular, as set out provided in annex 8 to document SDC 6/13.

Background

2 Based on the Sub-Committee's consideration of document SDC 6/9/2 (United States), paragraph 2.13 of document MSC 101/12/Rev.1 invites the Committee to approve the revised *Unified interpretations relating to the Protocol of 1988 relating to the International Convention on Load Lines, 1966* (MSC.1/Circ.1535) and the associated draft MSC circular, for dissemination as MSC.1/Circ.1535/Rev.1 (paragraph 9.18 and annex 8 of SDC 6/13).

Discussion

3 The co-sponsors note that MSC.1/Circ.1535 has been corrected to include the interpretation of LL regulation 27(13)(e).

4 The proposed revision to the unified interpretation of LL regulation 27(13)(e) as shown in annex 8 to document SDC 6/13, is limited to "unprotected openings":

"Unprotected openings include ventilators (complying with regulation 19(4) of the International Convention on Load Lines, 1966) that for operational reasons have to remain open to supply air to the engine room, ~~or~~ emergency generator room or closed ro-ro and vehicle spaces (if the same is considered buoyant in the stability calculation or protecting openings leading below) for the effective operation of the ship. Where it is not technically feasible to treat some closed ro-ro and vehicle space ventilators as unprotected openings, Administrations may allow an alternative arrangement that provides an equivalent level of safety."

5 However, the co-sponsors note that LL regulation 27(13)(e) refers to both "protected" and "unprotected" openings:

"The Administration shall give consideration to the potential hazard presented by protected or unprotected openings which may become temporarily immersed within the range of residual stability".

6 In reviewing the initially impetus for developing this unified interpretation, the co-sponsors note that the executive summary of the initiating document SDC 3/14/3 (IACS) states:

"This document provides, in the annex, draft IACS unified interpretations with respect to the treatment of ventilators, fitted with weathertight closing appliances, serving machinery spaces which are required to remain open and are, therefore, considered as a point of downflooding".

7 From the above, it is clear that ventilators that are not fitted with weathertight covers (i.e. those ventilators exempted from being fitted with weathertight covers under LL regulation 19(3) due to their excessive height) are to be considered as downflooding points and therefore do not need an interpretation.

8 However, as noted in document SDC 3/14/3, the concern is with respect to the treatment of ventilators as a downflooding point that:

- .1 are fitted with weathertight closing appliances (as per LL regulation 19(4), excluding the exemption provided therein); and
- .2 for operational reasons, must remain open to supply air to the space they serve.

Proposal

9 Based on the above discussion and to provide consistency with the two types of ventilators (protected and unprotected) addressed by MSC.1/Circ.1537 and MSC.1/Circ.1539, which refer to "openings which cannot be or are incapable of being closed weathertight", the co-sponsors propose that the draft unified interpretation of LL regulation 27(13)(e), as per annex 8 of document SDC 6/13, is revised so as to delete the first reference to the term "Unprotected" so that it would read:

~~"Unprotected~~ Openings include ventilators (complying with regulation 19(4) of the International Convention on Load Lines, 1966) that for operational reasons have to remain open to supply air to"....

Action requested of the Committee

10 The Committee is invited to note the discussion in paragraphs 3 to 8 above, consider the proposal in paragraph 9 above and take action, as appropriate
