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SHIP SYSTEMS AND EQUIPMENT

Comments on the draft revised unified interpretation of SOLAS regulations II-1/28, II-1/29 and II-1/30

Submitted by IACS

SUMMARY

Executive summary: This document provides comments on the proposed application date for the draft revised unified interpretation of SOLAS regulations II-1/28, II-1/29 and II-1/30, which was agreed at SSE 6 and is now before the Committee with a view to its approval

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 9

Related documents: SSE 6/12; SSE 6/18, paragraphs 12.42 and 12.43 and annex 8 and MSC 101/14, paragraph 2.13

Introduction

1 This document is submitted in accordance with the provisions of 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 the draft revised unified interpretation of SOLAS regulations II-1/28, II-1/29 and II-1/30, which is before the Committee for approval (MSC 101/14, paragraph 2.13).

Background

2 The annex to document SSE 6/12 (IACS) provides a draft revised version of IACS Unified Interpretation (UI) SC242 of SOLAS regulations II-1/28, II-1/29 and II-1/30.

3 SSE 6, having agreed that the latest version of this IACS UI was considered acceptable as an interim measure, decided a new output proposal with a holistic approach encompassing all types of modern steering systems would be necessary (SSE 6/18, paragraph 12.42).

4 Subsequently, the Sub-Committee, having concurred with the content of the draft revised version of UI SC 242 and that a revised version of MSC.1/Circ.1416 should be issued as a new circular, agreed to draft unified interpretation of SOLAS regulation II-1/28, II-1/29 and II-1/30 and the associated MSC circular, for submission to MSC 101 for approval (SSE 6/18, paragraph 12.43 and annex 8).

Discussion

5 Paragraph 3 of the draft MSC circular (SSE 6/18, annex 8) reads:

"Member Governments are invited to use the annexed interpretations from ~~21 May 2012~~ [... June 2019] when applying the relevant provisions of SOLAS regulations II-1/28, and II-1/29 and II-1/30, and to bring them to the attention of all parties concerned."

6 IACS notes the application date in the draft MSC circular is proposed as a date in June 2019 while IACS is planning to implement its revised UI SC242 to ships contracted for construction on or after 1 January 2020.

7 IACS considers that applying this revised unified interpretation from June 2019 may cause difficulty to the industry. Designers, manufacturers and shipyards need to be properly informed in advance of the date of application of the unified interpretation in order for them to be able to take due account of these new provisions.

Proposal

8 To avoid the difficulties indicated in paragraph 7 above, IACS proposes to modify the application date in the draft MSC circular to 1 January 2020, so that paragraph 3 reads as follows:

"3 Member Governments are invited to use the annexed interpretations from 1 January 2020 when applying the relevant provisions of SOLAS regulations II-1/28, and II-1/29 and II-1/30, and to bring them to the attention of all parties concerned."

Action requested of the Committee

9 The Committee is invited to consider the above, in particular the proposal in paragraph 8 above, and take action, as appropriate.