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CARGOES AND CONTAINERS  
7th session  
Agenda item 3

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## AMENDMENTS TO THE IGF CODE AND DEVELOPMENT OF GUIDELINES FOR LOW-FLASHPOINT FUELS

Comments on document CCC 7/3

Submitted by IACS

### SUMMARY

*Executive summary:* This document comments on the report contained in document CCC 7/3 submitted by Germany as the coordinator of the Correspondence Group on the Development of Technical Provisions for the Safety of Ships Using Low-flashpoint Fuels

*Strategic direction, if applicable:* 2

*Output:* 2.3

*Action to be taken:* Paragraph 11

*Related document:* CCC 7/3

### 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 comments on document CCC 7/3.

### Background

2 IACS appreciates the work performed by the coordinator and members of the Correspondence Group to, inter alia, develop the draft interim guidelines for the safety of ships using fuel cell power installations and finalize the draft amendments of the *International Code of Safety for Ships using Gases or other Low-flashpoint Fuels* (IGF Code). Having carefully reviewed the report, IACS offers the following technical comments to assist the Sub-Committee in progressing its work.

## Discussion

### Paragraph 19 of CCC 7/3

3 IACS understands that various positions on the boundary conditions for further work on the safety assessment of fuels were expressed in the Correspondence Group. However, IACS maintains its view that the ambient reference conditions of 32°C seawater and 45°C air with electrical equipment operation up to 55°C should be used in the IGF Code; these standard boundary conditions are applied in a number of IACS instruments, e.g. unified requirements UR M28 and M40.

### Paragraph 25 of CCC 7/3 relating to the draft revised regulation 9.4.7 of the IGF Code

4 The text of regulation 9.4.7 of the IGF Code states:

*"9.4.7 In cases where the master gas fuel valve is automatically shutdown ..."*

5 IACS understands that in the context of the IGF Code this statement means an emergency for the specific gas fuelled machinery. Although activation of the block and bleed valves can be part of a normal operation, and of a fuel switching between gas and oil modes, an automatic trip of the master gas fuel valve (and block and bleed) is undertaken in accordance with table 1 of the IGF Code, which requires an automatic shutdown of the gas fuel supply under the defined parameters.

6 Therefore, IACS considers that the issue of whether the proposed amendment shall be mandatory for all automatic shutdown cases or only for emergency shutdown, can be relatively easily resolved. However, the difference between natural venting and purging should be further considered, taking into account that when the trip of the master gas fuel valve is automatically triggered, the complete piping downstream of the master gas fuel valve to the consumer is vented.

### Paragraphs 28 and 29 of CCC 7/3 relating to the proposed new regulations 12.5.3.3 and 12.5.2.2bis of the IGF Code

7 IACS considers that the proposed regulations 12.5.3.3 and 12.5.2.2bis of the IGF Code need to be considered together with document CCC 6/3/3 (IACS) proposing amendments to section 12.5 of the IGF Code. IACS's proposals in document CCC 6/3/3 have been partially agreed, and the regulations should take into account some of the proposed amendments which remain outstanding.

8 Furthermore, IACS observes that discussions on regulations 12.5.3.3 and 12.5.2.3bis seem to be connected, as both regulations relate to proposed amendments which increase the hazardous area zones 1 and 2 distances around the vent outlets, with a view to aligning them with the IGC and the IBC Code requirements. IACS understands that now the discussion is confined to the clarification on what are considered "large" or "small" discharges from the vent mast, and therefore IACS supports further discussion through the mechanisms to be established.

**Paragraph 33 of CCC 7/3 relating to the application of the draft amendments to regulations 9.6.1 and 11.6.2 of the IGF Code agreed at CCC 6**

9 Although IACS understands that the issue of application of regulations rests with Member States, in IACS' opinion regulation 9.6.1 should be applied to all ships covered by the IGF Code, while regulation 11.6.2 should be applied to new ships for providing portable dry powder fire extinguisher.

**Paragraph 36 of CCC 7/3 related to the draft unified interpretation on paragraph 9.2.2 of the IGF Code**

10 IACS generally supports the draft unified interpretation as given in annex 6 to document CCC 7/3.

**Action requested of the Sub-Committee**

11 The Sub-Committee is invited to consider the foregoing and take action, as appropriate.

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