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AMENDMENTS TO THE 2011 ESP CODE

Proposed amendments to the 2011 ESP Code

Submitted by IACS

SUMMARY

Executive summary: This document proposes draft amendments to the 2011 ESP Code regarding applicability to oil tankers carrying oil in independent tanks not part of ship's hull, tank testing of ballast holds of bulk carriers and examination of ballast tanks at annual surveys, for consistent implementation; further, the document updates references to IACS documents

*Strategic direction, 6
if applicable:*

Output: 6.22

Action to be taken: Paragraph 16

Related documents: None

Introduction

1 IACS considers that requirements of the *International Code on the Enhanced Programme of Inspections During Surveys of Bulk Carriers and Oil Tankers, 2011* (the 2011 ESP Code) regarding the applicability to oil tankers carrying oil in independent tanks not part of ship's hull, the tank testing of ballast holds of bulk carriers and the examination of ballast tanks at annual surveys need to be amended for their consistent implementation. Further, the opportunity should be taken to update the references to IACS documents.

Discussion

Oil tankers carrying oil in independent tanks not part of ship's hull

2 The definition of a double-hull oil tanker in paragraph 1.2.1 of part A of annex B reads as follows:

"Double-hull oil tanker is a ship which is constructed primarily for the carriage of oil in bulk, which has the cargo tanks protected by a double-hull which extends for the entire length of the cargo area, consisting of double sides and double-bottom spaces for the carriage of water ballast or void spaces."

3 At the same time, IACS notes the application clause of paragraph 1.1.1 of part B of annex B as follows:

"The Code shall apply to self-propelled oil tankers of 500 gross tonnage and above other than double-hull oil tankers, as defined in 1.2.1 of part A of annex B;"

4 Also, IACS notes that there is no definition of "tanks" in the ESP Code and recalls the following definition in regulation 1 of MARPOL Annex I:

"13 *Tank* means an enclosed space which is formed by the permanent structure of a ship and which is designed for the carriage of liquid in bulk;"

5 While there is no definition of a "tank" in the ESP Code, on the basis of the definition of a "tank" in regulation 1 of MARPOL Annex I, IACS opines that the ESP Code does not apply to oil tankers carrying oil in independent tanks not part of ship's hull such as, for instance, asphalt carriers.

6 In consideration of the above, IACS has developed its unified requirement UR Z11, according to which:

- .1 the notation "ESP" is to be assigned to seagoing self-propelled ships, which are constructed generally with integral tanks and intended primarily to carry oil in bulk; and
- .2 the notation is to be assigned to tankers of both single and double hull construction, as well as tankers with alternative structural arrangements, e.g. mid-deck designs.

7 For classification purposes, the "ESP" notation is not mandatory for oil tankers carrying oil in independent tanks not part of ship's hull such as, for instance, asphalt carriers. With the aim of consistent implementation and to clarify the same within the ESP Code, the annex to this document contains proposed changes to paragraphs 1.2.1 of parts A and B of annex B.

Tank testing of ballast holds of bulk carriers carried out by crew

8 IACS notes that paragraphs 2.6.1 of parts A and B of annex B allow the acceptance of the testing of cargo tanks of oil tankers, which are carried out by the ship's crew under the direction of the master; however, the tank testing of ballast holds of bulk carriers, which is similar to the tank testing of cargo tanks of oil tankers, is not allowed.

9 IACS could not identify any technical reason to disallow the tank testing of ballast holds of bulk carriers by crew and believes that the same approach should be applied to bulk carriers as applied to oil tankers. Respective changes to paragraphs 2.6.1 of parts A and B of annex B and paragraphs 2.7.1 of parts A and B of annex A are offered in the annex to this document.

Examination of ballast tanks at annual surveys

10 IACS notes that there is a possible misunderstanding of the following requirement contained in the condition evaluation report (executive hull summary report) of respective annexes:

- .1 annexes 7 to part A and B of annex A contain the following statement:
- "If coating condition POOR is given, extended annual surveys shall be introduced. This shall be noted in part 8 of the Contents of condition evaluation report (executive hull summary report)."
- .2 annex 10 to part A and annex 9 to part B of annex B contain the following statement:
- "If coating condition less than GOOD is given, extended annual surveys shall be introduced. This shall be noted in part 9 the Contents of condition evaluation report (executive hull summary report)."

11 These requirements are applicable to ballast tanks only, not cargo tanks/holds. However, they are located under "tank/hold corrosion prevention system", which may cause the misunderstanding that cargo tanks/holds fall within the scope of application. Therefore, the changes proposed to these sections of the ESP Code, as contained in annex to this document, aim to clarify the requirements.

Updates of references

12 IACS informs that the following references in parts A and B of annex A have become IACS Recommendation 76 *"Bulk Carriers: Guidelines for Surveys, Assessment and Repair of Hull Structures"*. IACS has a similar document, Recommendation 96 *"Double Hull Oil Tankers: Guidelines for Surveys, Assessment and Repair of Hull Structures"*, which could be applicable to double-hull oil tankers in part A of annex B.

13 Further, for consistency with other parts of the ESP Code, IACS proposes to delete reference 1 of annex 7 to part B of annex A.

14 The above suggested changes are offered in the annex to this document.

Proposal

15 Following the above discussion, the amendments to the 2011 ESP Code are proposed in the annex to this document for the consideration of the Sub-Committee.

Action requested of the Sub-Committee

16 The Sub-Committee is invited to consider the foregoing, the proposal in paragraph 15 and take action, as appropriate.

ANNEX

PROPOSED DRAFT AMENDMENTS TO THE 2011 ESP CODE

The following amendments are proposed:*

Oil tankers carrying oil in independent tanks not part of ship's hull

Paragraph 1.2.1, part A of annex B:

"*Double-hull oil tanker* is a ship which is constructed primarily for the carriage of oil in bulk, which has cargo tanks forming an integral part of the ship's hull and protected by a double-hull which extends for the entire length of the cargo area, consisting of double sides and double-bottom spaces for the carriage of water ballast or void spaces."

Paragraph 1.2.1, part B of annex B:

"*Oil tanker* is a ship which is constructed primarily to carry oil in bulk in cargo tanks forming an integral part of the ship's hull, which ~~and~~ includes ship types such as combination carriers (ore/oil ships, etc.) but excludes ships carrying oil in independent tanks not part of ship's hull such as, for instance, asphalt carriers."

Tank testing of ballast holds of bulk carriers carried out by crew

Paragraphs 2.7.1 of parts A and B of annex A:

"2.7.1 All boundaries of water ballast tanks, deep tanks and cargo holds used for water ballast (ballast holds) within the cargo length area shall be pressure tested. For fuel oil tanks, only representative tanks shall be pressure tested.

Ballast hold testing carried out by the ship's crew under the direction of the master may be accepted by the surveyor, provided the following conditions are complied with:

- .1 a ballast hold testing procedure specifying fill heights and ballast holds being filled has been submitted by the owner and reviewed by the Administration prior to the testing being carried out;
- .2 the ballast hold testing is carried out prior to overall survey or close-up survey;
- .3 the ballast hold testing is carried out within the special survey window and not more than three months prior to the date on which the overall or close-up survey is completed;
- .4 the ballast hold testing has been satisfactorily carried out and there is no record of leakage, distortion or substantial corrosion that would affect the structural integrity of the ballast hold;
- .5 the satisfactory results of the testing is recorded in the ship's logbook; and

* Tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight all modifications and new insertions, including deleted text.

- .6 the internal and external condition of the ballast holds and associated structure are found satisfactory by the surveyor at the time of the overall and close-up survey."

Paragraphs 2.6.1 of parts A and B of annex B:

"2.6.1 The minimum requirements for ballast tank pressure testing at the renewal survey are given in 2.6.3 and in annex 3.

The minimum requirements for cargo tank testing at the renewal survey are given in 2.6.4 and annex 3.

Cargo tank testing carried out by the vessel's ship's crew under the direction of the master may be accepted by the surveyor, provided the following conditions are complied with:

- .1 a tank testing procedure, specifying fill heights, tanks being filled and bulkheads being tested, has been submitted by the owner and reviewed by the Administration prior to the testing being carried out;
- .2 the tank testing is carried out prior to overall survey or close-up survey;
- .3 the tank testing is carried out within the special survey window and not more than three months prior to the date on which the overall or close up survey is completed;
- ~~.2.4~~ the tank testing has been satisfactorily carried out and there is no record of leakage, distortion or substantial corrosion that would affect the structural integrity of the tank;
- ~~.3~~ the tank testing has been satisfactorily carried out within special survey window not more than 3 months prior to the date of the survey on which the overall or close up survey is completed;
- ~~.4.5~~ the satisfactory results of the testing is recorded in the vessel's logbook; and
- ~~.5.6~~ the internal and external condition of the tanks and associated structure are found satisfactory by the surveyor at the time of the overall and close-up survey."

Examination of ballast tanks at annual surveys

Annex 7 to part A and B of annex A:

"...

Part 8 – Memoranda: -Acceptable defects
 -Any points of attention for future surveys, e.g. for suspect areas
 -Examination of ballast tanks at annual surveys
 ~~Extended annual/intermediate survey~~ due to coating breakdown

...

For ballast tanks, if coating condition POOR is given, ~~extended annual surveys~~ tanks shall be ~~introduced~~ examined at annual surveys. This shall be noted in part 8 of the Contents of condition evaluation report (executive hull summary report)."

Annex 10 to part A and annex 9 to part B of annex B:

"...

Part 9 – Memoranda: -Acceptable defects
 -Any points of attention for future surveys,
 e.g. for suspect areas
 -Examination of ballast tanks at annual surveys
 ~~Extended annual/intermediate survey~~ due to coating
 breakdown

...

For ballast tanks, if coating condition less than GOOD is given, ~~extended annual surveys~~ tanks shall be ~~introduced~~ examined at annual surveys. This shall be noted in part 9 of the Contents of condition evaluation report (executive hull summary report)."

Updates of references

Reference 3 of annex 9 to part A of annex A:

"3 IACS Recommendation 76, ~~Bulk Carriers~~: '*Guidelines for Surveys, Assessment and Repair of Hull Structures, 2007*'".

References of annex 9 to part B of annex A:

"1 ~~IACS, Unified Requirement Z10.5, Hull Surveys of Double Skin Bulk Carriers~~

2 IACS Recommendation 76, ~~Bulk Carriers~~: "*Guidelines for Surveys, Assessment and Repair of Hull Structures, 2007*"

32 TSCF, Guidelines for the Inspection and Maintenance of Double Hull Tanker Structures, 1995

43 TSCF, Guidelines Manual for Tanker Structures, 1997".

Reference 1 of annex 12 to part A of annex B:

"1 IACS Recommendation 96 "*Double Hull Oil Tankers – Guidelines for Surveys, Assessment and Repair of Hull Structures, 2019*"

42 TSCF, Guidelines for the Inspection and Maintenance of Double Hull Tanker Structures, 1995

23 TSCF, Guidelines Manual for Tanker Structures, 1997".