

SUB-COMMITTEE ON SHIP DESIGN
AND CONSTRUCTION
8th session
Agenda item 10

SDC 8/10/2
15 September 2021
Original: ENGLISH
Pre-session public release:

**UNIFIED INTERPRETATION TO PROVISIONS OF IMO SAFETY, SECURITY,
AND ENVIRONMENT-RELATED CONVENTIONS**

**Proposed unified interpretation of regulation 37(3) of the Protocol of 1988
relating to the International Convention on Load Lines, 1966**

Submitted by IACS

SUMMARY

Executive summary: This document proposes a draft unified interpretation of regulation 37(3) of the Protocol of 1988 relating to the International Convention on Load Lines, 1966 (hereinafter referred to as the 1988 Load Lines Protocol), as amended, with a view to its global and consistent implementation

*Strategic direction,
if applicable:* 6

Output: 6.1

Action to be taken: Paragraph 6

Related documents: None

Background

1 Regulation 37(3) of annex B to the 1988 Load Lines Protocol, as amended, currently reads as follows:

"For ships of type 'B' where the effective length of a forecastle is less than 0.07L no deduction is allowed."

2 Prior to the 2003 amendments to the 1988 Load Lines Protocol (resolution MSC.143(77)), the text of regulation 37(3) of annex B to the 1988 Load Lines Protocol reads as follows:

"(3) For ships of Type 'B':

...

(c) Where the effective length of a forecastle is less than 0.07L, the above percentages shall be reduced by:

$5 \times (0.07L - f)/0.07L$

where f is the effective length of the forecastle."

Discussion

3 IACS notes the possibility of the following two different interpretations of the current text of regulation 37(3) of annex B to the 1988 Load Lines Protocol:

.1 Interpretation 1:

For ships assigned type B, or reduced type-B freeboards, if the effective length of a forecastle is less than 0.07L, a superstructure correction cannot be applied to the ship.

For example, if the ship has no forecastle, or the effective length of the forecastle is less than 0.07L, and has other superstructure, no superstructure correction is to be applied.

In case the ship has a full superstructure (one that extends from AP to FP, per regulation 3(10)(h) of annex B to the 1988 Load Lines Protocol), the deduction for a superstructure may be applied in accordance with regulation 37(1) of annex B to the 1988 Load Lines Protocol; and

.2 Interpretation 2:

For ships assigned type B, or reduced type-B freeboards, if the effective length of a forecastle is less than 0.07L, a superstructure correction cannot be applied for a forecastle but can be applied to other superstructure.

For example, if the ship has no forecastle or effective length of a forecastle is less than 0.07L and has other superstructure, credit should be given to other superstructure only, and no credit should be given to a forecastle.

4 IACS is of the view that interpretation 1 is correct and believes that a unified interpretation drafted along the lines of interpretation 1 is necessary to ensure the global and consistent implementation of regulation 37(3) of annex B to the 1988 Load Lines Protocol.

Proposal

5 Based on the above view, IACS has developed a draft unified interpretation, as set out in the annex, for the Sub-Committee's consideration.

Action requested of the Sub-Committee

6 The Sub-Committee is invited to consider the information provided, in particular the proposal in paragraph 5 and the draft unified interpretation set out in the annex, and take action as appropriate.

ANNEX

DRAFT UNIFIED INTERPRETATION ON THE DEDUCTION FOR A SUPERSTRUCTURE AND TRUNKS

Regulation 37(3) of annex B to the 1988 Load Lines Protocol, as amended, reads as follows:

"For ships of type 'B' where the effective length of a forecastle is less than 0.07L no deduction is allowed."

Interpretation

For ships assigned type B, or reduced type-B freeboard, if the effective length of a forecastle is less than 0.07L, a superstructure correction cannot be applied to the ship.

For example, if the ship has no forecastle, or the effective length of the forecastle is less than 0.07L, and has other superstructure, no superstructure correction is to be applied.

In case the ship has a full superstructure (one that extends from AP to FP, per regulation 3(10)(h) of annex B to the 1988 Load Lines Protocol), the deduction for a superstructure may be applied in accordance with regulation 37(1) of annex B to the 1988 Load Lines Protocol.
