



# INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

## MEMORANDUM

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FROM: Alan Spackman, Vice President, Offshore Technical and Regulatory Affairs

SUBJECT: Report on the 55<sup>th</sup> session of the IMO Sub-Committee on Ship Design and Equipment

DATE: 4 April 2011

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The 55<sup>th</sup> session of IMO's Sub-Committee on Ship Design and Equipment (DE 55) was held from 21 to 25 March 2011 under the chairmanship of Mrs. Anneliese Jost (Germany). The session was attended by representatives of 74 member countries, one associate member, three inter-governmental organizations and 21 non-governmental organizations. IADC was represented at this session by Alan Spackman (IADC) and Roderick Allan (Transocean). Tom Horan (Pride) also attended as an advisor to the Marshall Islands.

The following is a summary of issues addressed by the Sub-Committee that may interest of companies with offshore oil and gas operations:

### ***Steering capability and function on ships (SOLAS regulation II-1/29.1)***

Based on IACS Unified Interpretation SC 242) agreed to a draft MSC circular on Unified interpretation of SOLAS regulations II-1/28 and II-1/29 for submission to the 90<sup>th</sup> session of the Maritime Safety Committee (MSC 90) for approval.

### ***Performance standards for recovery equipment***

The sub-committee noted concerns voiced regarding the draft proposed standards with respect to: (1) requiring rescue in a horizontal or near-horizontal ("deck chair") position, was difficult for certain ships and that this provision duplicated advice already contained in the Guide to recovery techniques (MSC.1/Circ.1182); and (2) requiring a capability of recovering at least 10 persons per hour, was too prescriptive.

The Sub-Committee decided to further consider the draft Performance standards and the associated draft new SOLAS regulation III/17-1 at DE 56. It further agreed that the matter should be concluded at DE 56 for referral to MSC 90, so that the Committee's target year of 2012 for completion could be met.

### ***Visible element for the general emergency alarm on passenger ships***

The Sub-Committee agreed to a draft MSC circular on Guidelines for the design and installation of a visible element to the general emergency alarm on passenger ships for submission to MSC 90 for approval, and requested the Sub-Committee on Fire Protection (FP) to consider those parts under its purview.

### ***Testing of free-fall lifeboat release systems***

MSC instructed the Sub-Committee to consider an inconsistency between SOLAS regulations III/19.3.3.4 and III/20.11.2 concerning the testing of free-fall lifeboat release systems raised by IACS. To resolve this matter, the Sub-Committee agreed to draft amendments to SOLAS regulation III/20.11.2, for submission to MSC 90 for approval, with a view to subsequent adoption.

### ***Evaluation and replacement of lifeboat release and retrieval systems***

The Sub-Committee agreed to the procedure for reporting the results of each type of existing lifeboat release and retrieval system evaluation, for incorporation in the draft Guidelines as a new appendix 3, and agreed to a draft MSC circular on Guidelines for evaluation and replacement of lifeboat release and retrieval systems for submission to MSC 89 for approval.

### ***Making the Measures to prevent accident with lifeboats (MSC.1/Circ.1206/Rev.1) mandatory***

The International Lifesaving Appliances Manufacturers' Association (ILAMA) expressed the view that MSC.1/Circ.1206/Rev.1 and the supporting guidelines contained in MSC.1/Circ.1277 could now be made

mandatory since their website lists all known manufacturers of life-saving appliances and fulfills the mandate for the provision of a global network by the service providers.

Following a lengthy discussion, the Sub-Committee, while principally supporting to make the provisions of MSC.1/Circ.1206/Rev.1 and MSC.1/Circ.1277 mandatory, recognized the need for more information on the global coverage by independent service providers, criteria for such providers, and for clarifications regarding vague expressions, such as "adequate coverage" and "inadequate maintenance", and agreed to further consider the issue at DE 56, in particular how to make the provisions mandatory and whether the two above circulars should be merged into one instrument.

#### ***Lifeboat "Manufacturer" inspection of steering and propulsion systems of lifeboats***

ILAMA suggested that the engine, steering and propulsion systems of lifeboats should be subjected to thorough inspection required by the Guidelines, taking into account that a faulty lifeboat engine or propulsion system may place the crew in extreme danger following the launch of the lifeboat. This was not supported by the Sub-Committee, since such servicing was normally carried out by the ship's crew and no problems had been encountered in this regard.

#### ***Draft amendments to SOLAS regulation III/1***

Having considered the need for a time limit for the replacement of lifeboat on-load release mechanisms not complying with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code, the Sub-Committee agreed to a date of 1 July 2019, based on a five-year inspection period after 1 July 2014.

The Sub-Committee agreed to the draft amendments to SOLAS regulation III/1, for submission to MSC 89 for adoption.

Considering the urgency of evaluating lifeboat release and retrieval systems and their replacements, and in order to encourage the early implementation of the new SOLAS regulation III/1.5, pending its entry into force, the Sub-Committee agreed to the draft MSC circular on Early application of new SOLAS regulation III/1.5, for submission to MSC 89 for approval in conjunction with the adoption of the draft amendments to SOLAS regulation III/1.

#### ***Draft amendments to chapter IV of the LSA Code on release gear acceptance***

The Sub-Committee agreed to the draft amendments to chapter IV of the LSA Code to establish clearer terms for acceptance of release mechanisms for submission to MSC 89 for adoption.

#### ***Guidelines for the standardization of lifeboat control arrangements***

The Sub-Committee agreed to a draft MSC circular on Guidelines for the standardization of lifeboat control arrangements for approval by MSC 90.

#### ***Development of the draft Polar Code***

The Sub-Committee agreed, in principle, that:

- A two-step approach should be taken, i.e. the Code should initially apply to SOLAS passenger and cargo ships, taking into account the urgent need for relevant mandatory requirements, and later requirements for non-SOLAS ships, such as fishing vessels, may be developed, after consideration by the Organization;
- A combination of goal-based (GBS) orientated and prescriptive requirements should be pursued at this stage; and
- The Code should not conflict with Antarctic Treaty and UNCLOS provisions.

The Sub-Committee reiterated that an environmental protection chapter would be included in the draft Polar Code, and decided:

- Not to further consider the geographical boundaries of Arctic and Antarctic waters that would conflict with the provisions in other IMO instruments;
- To further consider polar vessel traffic monitoring and information systems from the safety perspective only, pending further input from the Sub-Committee on Safety of Navigation (NAV);
- Not to further consider the loss of harmful substances in packaged form and containers, bearing in mind that a relevant proposal for a new output for the DSC Sub-Committee regarding measures to prevent the loss of containers would be considered at MSC 89;

- Not to further consider black carbon (particulate matter) emissions from ships and standards for discharges of sewage, grey water and sewage sludge, noting that these matters were under discussion in the Marine Environment Protection Committee (MEPC); and
- Not to further consider vessel voyage planning and operations, since it should first be considered by the NAV.

The Sub-Committee further decided:

- To include in the Code an ice certificate concept in the form of a "[Polar/Ice] operational manual", the Sub-Committee noting that further deliberations are needed in order to agree on the content of such a manual;
- To establish three categories of ships as follows:

Category		Definition	Comment
A	Polar ice covered	Ships that may operate in ice-covered waters with 10% or more ice	Polar class or equivalent
B	Polar open water	Ships that may operate in ice-covered waters with less than 10% ice, where it may pose a structural risk	Assessment/ice-strengthening or other mitigating measures (such as damage stability)
C	Polar open water including ice-free water	Ships that may operate in waters with zero to 10% ice cover where it does not pose a structural risk	No ice-strengthening

It was agreed to re-establish a correspondence group, coordinated by Norway<sup>1</sup>, to further develop the draft International Code of safety for ships operating in polar waters (Polar Code) on the basis of the decisions made at the session regarding the Code and the decisions of other Sub-Committees.

#### ***Draft amendments to the Code on Noise Levels on Board Ships***

The Sub-Committee agreed, in principle, to:

- Maintain the basic structure and the current scope of application of the Code (i.e. ships of 1,600 gross tonnage and above);
- Regarding noise level limits, not to differentiate the limits based on ship sizes;
- Not to include provisions on extra-aural noise impact; and
- Further considering the special requirements for dynamically positioned (DP) vessels.

The Sub-Committee agreed that that it was premature to propose specific text to make the Code mandatory under the SOLAS Convention at this stage.

To progress the work, the Sub-Committee re-established a Correspondence Group on Protection against Noise on Board Ships, under the coordination of Denmark<sup>2</sup>, and instructed it to:

- Identify the requirements to be included in the mandatory and recommendatory parts of the Code and revise the draft Code accordingly; and
- Finalize the revision of the Code, taking into account the division in mandatory and recommendatory part and the deliberations at this session.

#### ***Noise from commercial shipping and its adverse impacts on marine life***

The Sub-Committee noted that the majority of the delegations supported the development of separate technical guidelines to reduce noise from ships and agreed to invite MEPC 62 to provide guidance on how to proceed with the matter and to establish a relevant new output on the Sub-Committee's biennial agenda.

ISO reported that ISO/TC8/SC2 was currently developing ISO 16554 "Measurement and reporting of underwater sound radiated from merchant ships." The standard is currently at the Committee Draft stage.

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### ***Unified interpretations of the 2008 SPS Code***

The Sub-Committee considered a submission by the International Association of Classification Societies (IACS) proposing draft unified interpretations of the 2008 SPS Code to facilitate the global and consistent implementation of the provisions on chapters 1, 2, 6, 7 and 10 of the Code. On this basis of this submission, the Sub-Committee agreed to the draft MSC circular on Unified interpretations of the 2008 SPS Code for submission to MSC 90 for approval.

### ***Amendments to the 2008 SPS Code***

IACS also proposed amendments to chapters 1 and 8 of the 2008 SPS Code related to the definition of "persons" and the application of paragraph 8.4 of the Code. While the Sub-Committee generally supported the proposed draft amendments it was of the opinion that further instruction from the MSC was needed. It invited MSC 89, as an urgent matter, to authorize it to proceed with the development of amendments to the 2008 SPS Code with a target completion year of 2013.

### ***Integrated bilge water treatment systems (IBTS)***

To facilitate installation and use of integrated bilge water treatment systems (IBTS), and reduce potential difficulties associated with Port State Control through the adoption of a standard format of statement of fact on installation of an IBTS, the Sub-Committee agreed to a draft MEPC circular on Amendments to the 2008 Revised Guidelines for systems for handling oily wastes in machinery spaces of ships incorporating guidance notes for IBTS (MEPC.1/Circ.642, as amended by MEPC.1/Circ.676) for submission to MEPC 62 for approval.

### ***Effluent standards and performance tests for sewage treatment plants***

MEPC approved draft amendments to MARPOL Annex IV, designating the Baltic Sea as a Special Area and prohibiting the discharge of sewage effluent from passenger ships in Special Areas, unless there is a sewage treatment plant in operation that is type approved by the Administration in accordance with standards and test methods to be developed by the Organization, implementing additional effluent standards to those applicable to other ships. MEPC recognized that the Revised Guidelines on implementation of effluent standards and performance tests for sewage treatment plants (resolution MEPC.159(55)) would need updating in view of the new MARPOL Annex IV requirements and included a new output in the Sub-Committee's agenda on "Revision of resolution MEPC.159(55)", with a target completion year of 2012.

To progress this effort, the Sub-Committee established a Correspondence Group on Revision of resolution MEPC.159(55), under the coordination of Germany<sup>3</sup> and instructed it to finalize amendments to the Revised guidelines on implementation of effluent standards and performance tests for sewage treatment plants (resolution MEPC.159(55)) for this purpose.

### ***Clarification of SOLAS application regarding requirements for steering gears trials***

The Sub-Committee considered a document submitted by Germany raising a practical difficulty in the implementation of SOLAS regulations II-1/29.3.2 and 29.4.2, concerning main and auxiliary steering gear in sea trials, for certain ship types. Following discussion, the Sub-Committee agreed that a clarification of the issue was needed and invited Member Governments and international organizations to submit proposals for a relevant new output to the Committee

### ***Corrigendum to the Code on Alerts and Indicators, 2009***

Germany proposed a corrigendum to paragraph 8.4.1 of the Code on Alerts and Indicators, 2009 (resolution A.1021(26)), concerning the operation of the general emergency alarm systems.

Noting that a proposal has been submitted to MSC 89 for inclusion of a new planned output on "Amendments to the Code on Alerts and Indicators, 2009," the Sub-Committee agreed that the proposed corrigendum may be considered under the new output, if approved by MSC 89, bearing in mind that relevant definitions in the Code on Alerts and Indicators and the LSA Code should be harmonized.

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3 Mr. Holger Steinbock (holger.steinbock@bg-verkehr.de)

### **Arrangements for the next session**

DE 56 is tentatively scheduled to be held from 13 to 17 February 2012.

It was agreed that working groups would be established for:

- Development of a new framework of requirements for life-saving appliances; and Development of safety objectives and functional requirements of the Guidelines on alternative design and arrangements for SOLAS chapter III;
- Development of a mandatory Polar Code for ships operating in polar waters;
- Amendments to SOLAS regulation II-1/40.2 concerning general requirements on electrical installation; and Development of safety objectives and functional requirements of the Guidelines on alternative design and arrangements for SOLAS chapter II-1;
- Protection against noise on board ships;
- Revision of the Revised guidelines on implementation of effluent standards and performance tests for sewage treatment plants (resolution MEPC.159(55)); and
- Making the provisions of MSC.1/Circ.1206/Rev.1 mandatory.

### **Elections**

The Sub-Committee unanimously re-elected Mrs. Anneliese Jost (Germany) as Chairman and Dr. Susumu Ota (Japan) as Vice-Chairman for 2012.

The IMO report of this session is will be made available on the IADC website at:

<http://www.iadc.org/committees/offshore/Programme%20of%20Meetings.html>

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