



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

MEMORANDUM

TO: Distribution

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

SUBJECT: Report on the 54th session of the IMO Sub-Committee on Ship Design and Equipment

DATE: 1 November 2010

The 54th session of the International Maritime Organization's Sub-Committee on Ship Design and Equipment (DE 54) was held from 25 to 29 October 2010, under the Chairmanship of Ms. Anneliese Jost (Germany). The session was attended by delegations from 62 Member nations, one Associate Members, two intergovernmental organizations, and 28 non-governmental organizations. IADC was represented at this meeting by John Pertgen, IADC Assistant Director, Offshore Technical and Regulatory Affairs, and Rod Allan (Transocean). An IADC drilling contractor member was also represented on the delegation of Vanuatu: Warren Weaver (Transocean).

The following is a summary of issues addressed by the Sub-Committee that may be of interest to those in the offshore oil and gas industries:

Stowage of marine evacuation systems

The Sub-Committee considered a proposal by the International Association of Classification Societies (IACS), providing the text of an IACS Unified Interpretation (UI SC 143) of SOLAS regulation III/15.1 concerning the stowage of marine evacuation systems, in particular with regard to the term "any openings". The Sub-Committee agreed to a draft MSC circular on Interpretation of SOLAS regulation III/15.1 for submission to the Maritime Safety Committee's 89th session (MSC 89, May 2011) for approval. The Sub-Committee clarified that it was not the intention to apply the interpretation retrospectively and therefore inserted a place holder for a date of application circular whereby the date of application should be the date of approval of the interpretation by the Committee.

Mechanical, hydraulic and electrical independency and failure detection and response of steering control systems

The Sub-Committee also considered an IACS proposal based on UI SC 94 on mechanical, hydraulic and electrical independency and failure detection and response of steering control systems as required by SOLAS regulation II-1/29. The Sub-Committee agreed to a draft MSC circular on Interpretation of SOLAS regulation II-1/29 for submission to MSC 89 for approval. The Sub-Committee clarified that it was not the intention to apply the interpretation retrospectively and therefore inserted a place holder for a date of application circular whereby the date of application should be the date of approval of the interpretation by the Committee.

Application of SOLAS, MARPOL and Load Line requirements to conversions of single-hull tankers to double-hull tankers or bulk carriers

The Sub-Committee agreed to a draft MSC-MEPC circular on Unified interpretations on the application of SOLAS, MARPOL and Load Line requirements to conversions of single-hull tankers to double-hull tankers or bulk carriers for submission to MSC 89 for approval, subject to the concurrent decision by MEPC 62 (July 2011). The interpretation is not intended to apply to already agreed conversions.

Application of amendments to SOLAS chapter III and supporting Codes and Recommendations

The Sub-Committee agreed that further clarifications of all the issues involved were needed, in particular concerning replacement/substitution of LSA; provisions of accessories for oversized lifejackets; application of amendments to the LSA Code to new and existing ships; alignment of amendments to the LSA Code with amendments to the Revised recommendation on testing of LSA; and practical problems with using the date of installation of LSA on board ships.

In view of the ongoing work of the Sub-Committee on Flag State Implementation (FSI) on the matter, the Sub-Committee agreed that the issue should be referred to FSI 19 (February 2011) for further consideration.

Performance standard for recovery systems for all types of ships

The Sub-Committee agreed that a performance standard with functional requirements should be prepared, as instructed by MSC, which would not require the carriage of dedicated recovery equipment, but would allow sufficient flexibility with regard to the actual equipment used for recovery operations, bearing in mind that the recovery system must be tested to demonstrate its effectiveness. In addition, the Sub-Committee agreed that draft SOLAS regulation III/17-1 would be maintained as drafted by MSC.

Member Governments and international organizations were invited to submit concrete proposals in line with the above decision to the next session so as to meet the Committee's 2012 deadline.

Draft framework of the requirements for life-saving appliances, including goals and functional requirements

The Sub-Committee considered proposals by Japan for goals and functional requirements for life-saving appliances, following the goal-based concept, and proposing an overall structure of the draft new framework of requirements for life-saving appliances. The Sub-Committee fully supported the proposals by Japan, but identified a number of issues which need further clarification – such as the place of the LSA Code and the Revised recommendation on testing of LSA in the new framework, the alignment of the (proposed) revised chapter III with the provisions of chapter II-2, and the type approval of LSA. It was agreed to establish a working group at the next session to further develop the draft framework.

Proposal for a new Assembly resolution superseding A.744(18)

The Sub-Committee agreed that, in view of the numerous and substantial amendments made to the Guidelines on the enhanced programme of inspections during surveys of bulk carriers and oil tankers (ESP Guidelines, resolution A.744(18)) since their adoption in 1993, which have changed their structure completely, a new Assembly resolution should be prepared to supersede resolution A.744(18). Concomitantly, SOLAS regulation XI-1/2 would need to be amended to refer to the new resolution. These will be prepared by the Secretariat for consideration at the next session.

Thermal performance of immersion suits

MSC's 84th session approved work on this matter based upon a proposal from Japan. A detailed proposal from Japan for providing a revised proposal for test specifications for thermal performance of immersion suits based on the reference test device (RTD) concept and proposing relevant draft amendments to the LSA Code and the Revised recommendation on testing of life-saving appliances was considered. A proposal for introduction of thermal manikin testing was also considered.

While concurring that the RTD concept could be useful in the evaluation of the thermal performance of immersion suits, the Committee was of the view that more data and analyses of the RTD devices and better defined thermal manikins were necessary in order to consider the proposed amendments to the LSA Code and the Revised recommendation on testing of life-saving appliances comprehensively. It was agreed that this matter would be further considered at the Sub-Committee's 56th session (DE 56).

Development of a mandatory Code for ships operating in Polar Waters

MSC's 86th session approved work on this matter based upon a proposal from Denmark, Norway and the United States. Both the MSC's 87th session and the 60th session of the Marine Environment Protection Committee (MEPC) referred additional concerns to the Sub-Committee for consideration.

A Working Group was established to further advance the effort. The Group did not reach agreement on the text for a draft Code, but did support the inclusion of an Ice Certificate in the Code. It also conducted a preliminary exchange of views on the inclusion of an environmental chapter in the Code.

The Sub-Committee invited MSC 89 to instruct the Sub-Committee on Sub-Committee on Standards of Training and Watchkeeping (STW) to develop requirements for navigation in polar waters in parallel to the development of the Polar Code and to consider developing a model course for navigation in polar waters as this would be beneficial.

It was agreed to re-establish a correspondence group, coordinated by Norway¹, 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 basic principles of the Code.

Protection against noise on board ships

DE 53, following an intensive debate on this item, agreed, as a first step, to revise the Code on Noise Levels on Board Ships (resolution A.468(XII)), bearing in mind that it should not be applied to existing ships and that differences in ship types and sizes should be taken into account, with a view to possibly making the provisions of the Code mandatory as a second step.

To progress the work on this output, the Sub-Committee established a Correspondence Group on Protection Against Noise on Board Ships, under the coordination of Denmark², and instructed it to finalize the draft amendments to the Code on Noise Levels on Board Ships and consider how the Code could be made mandatory – providing relevant suggestions to the Sub-Committee.

Due to the short period between the MEPC's request for the Sub-Committee to consider to the environmental issues associated with noise from commercial shipping and this session, it was agreed to defer consideration of this matter until the next session.

Amendments to the Revised recommendation on testing of life-saving appliances

The Sub-Committee agreed to amendments to the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70)), for submission to MSC 89 with a view to adoption.

Problems with the reference test device (RTD) for lifejackets (resolution MSC.200(80))

In consideration of the need for refinements to the test method, and to the construction and calibration instructions, to ensure that the RTD provides repeatable results as intended, the Sub-Committee agreed to invite the Committee to include an unplanned output on "Revision of testing requirements for lifejacket RTDs" in the biennial agenda and in the provisional agenda for DE 55, so that the matter could be given urgent attention.

Type approval standards for add-on pollution prevention equipment

The Sub-Committee agreed to the draft Guidelines and specifications for add-on equipment for upgrading MEPC.60(33)-compliant oil filtering equipment and an draft MEPC resolution, for submission to MEPC 62 for adoption. It also agreed to inform the MEPC that the Guidelines and specifications should not apply retroactively.

Oily waste pollution prevention plan

The Sub-Committee agreed to a draft MEPC circular on Guidelines for a ship board oily waste pollution prevention plan for submission to MEPC 62 for approval.

Manually operated alternatives in the event of pollution prevention equipment malfunctions

The Sub-Committee agreed to the draft MEPC resolution on Amendments to the Revised guidelines and specifications for oil discharge monitoring and control systems for oil tankers for submission to MEPC 62 for adoption.

Testing of free-fall lifeboats

The Sub-Committee considered a submission from IACS noting an inconsistency between SOLAS regulations III/19.3.3.4 and III/20.11.2 concerning the testing of free-fall lifeboat release systems and suggesting that a clarification of the matter is necessary. The Sub-Committee, acknowledged that recognized organizations needed clarity on how the relevant SOLAS regulations should be implemented, agreed with the view of the Chairman that this matter could only be resolved by means of SOLAS amendments.

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Arrangements for the next session

The 55th session has been scheduled to take place from 21 to 25 March 2010.

The agenda for DE 55 includes:

- Performance standards for recovery systems for all types of ships;
- Safety provisions applicable to tenders operating from passenger ships;
- Making the provisions of MSC.1/Circ.1206/Rev.1 mandatory;
- Guidelines for the standardization of lifeboat control arrangements;
- Development of a new framework of requirements for life-saving appliances;
- Amendments to resolution A.744(18);
- Supporting guidelines for cargo oil tank coating and corrosion protection;
- Thermal performance of immersion suits;
- Development of a mandatory Code of ships operating in polar waters;
- Revision of resolution A.760(18);
- Protection against noise on board ships (includes consideration of noise from commercial shipping and its adverse impact on marine life);
- Amendments to the Revised recommendation on testing of life-saving appliances;
- Classification of offshore industry vessels and consideration of the need for a Code for offshore construction support vessels;
- Test standards for type approval of add-on equipment;
- Measures to promote integrated bilge water treatment systems;
- Revision of resolution MEPC.159(55);
- Revision of testing requirements for lifejacket RTDs (subject to approval by MSC)
- Consideration of IACS unified interpretations.

Based on submissions received, consideration will be given to establishing the following working or drafting groups at DE 55:

- Development of a new framework of requirements for life-saving appliances;
- Development of a mandatory Code of ships operating in polar waters;
- Protection against noise on board ships;
- Performance standards for recovery systems of all types of ships;
- Supporting guidelines for cargo oil tank coating and corrosion protection; and
- Lifesaving appliances.

Sub-Committee work program

Areas of interest in the Sub-Committee's requested revised work program include:

Description	Number	Parent	Coordinating	Involved	Target
Mandatory instruments: performance standards for recovery systems for all types of ship	5.1.1.1	MSC	DE	STW	2011
Making the provisions of MSC.1/Circ.1206/Rev.1 mandatory	5.1.2.1	MSC	DE	FSI NAV STW	2011
Guidelines for standardization of lifeboat control arrangements	5.1.2.1	MSC	DE	FSI NAV STW	2011
A new framework of requirements for life-saving appliances	5.1.2.4	MSC	DE		2012
Mandatory instruments: amendments to resolution A.744(18)	5.2.1.1	MSC	DE		2011

Description	Number	Parent	Coordinating	Involved	Target
Non-mandatory instruments: supporting guidelines for cargo oil tank coating and corrosion protection	5.2.1.8	MSC	DE		2011
Mandatory instruments: development of safety objectives and functional requirements of the Guidelines on alternative design and arrangements for SOLAS chapters II-1 and III	5.2.1.13	MSC	DE		2011
Mandatory instruments: amendments to the LSA Code for thermal performance of immersion suits	5.2.1.14	MSC	DE		2012
Mandatory instruments: amendments to the LSA Code for free-fall lifeboats with float-free capabilities	5.2.1.15	MSC	DE		1 session
Mandatory instruments: development of a mandatory Code for ships operating in polar waters	5.2.1.19	MSC	DE		2012
Non-mandatory instruments: revision of resolution A.760(18)	5.2.1.24	MSC	DE		2010
Non-mandatory instruments: protection against noise on board ships	5.2.1.26	MSC	DE		2011
Non-mandatory instruments: amendments to the Revised recommendation on testing of life-saving appliances	5.2.1.27	MSC	DE		2011
Non-mandatory instruments: classification of offshore industry vessels and consideration of the need for a code for offshore construction support vessels	5.2.1.28	MSC	DE		2011
Non-mandatory instrument: Development of guidelines for use of Fibre Reinforced Plastic (FRP) within ship structures	5.2.1.32	MSC	DE		2013
Amendments to the Guidelines on the enhanced programme of inspections during surveys of bulk carriers and oil tankers (resolution A.744(18))	5.3.1.1	MSC	DE		2011
Test standards for type approval of add-on equipment	7.1.2.27	MEPC	DE		2011
Measures to promote integrated bilge water treatment systems	7.1.2.28	MEPC	DE		2011
Revision of resolution MEPC.159(55)	TBD	MEPC	DE		2012
Revision of testing requirements for lifejackets	TBD	MSC	DE		2012

Elections

The Sub-Committee unanimously re-elected Mrs. Anneliese Jost (Germany) as Chairman and Dr. Susumu Ota (Japan) as Vice-Chairman, both for 2011.

The IMO report of this session is will be made available on the IADC website at:
<http://iadc.org/committees/offshore/IMO.html>.

Please feel free to contact me by phone (+1 / 713 292 1964) or e-mail (alan.spackman@iadc.org) with any questions you may have regarding this summary report.