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WORK PROGRAMME

Comments on document MSC 102/21/10

Submitted by IACS

SUMMARY

Executive summary:	This document comments on document MSC 102/21/10 proposing a new output to amend the 2011 ESP Code
Strategic direction, if applicable:	5
Output:	OW 2
Action to be taken:	Paragraph 12
Related documents:	III 6/4/3 and MSC 102/21/10

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 MSC 102/21/10.

Background

2 In document III 6/4/3 (Marshall Islands), the Marshall Islands stated that the report of the marine safety investigation into the loss of **MV Stellar Daisy** had been submitted to the Marine Casualties and Incidents (MCI) module of the Global Integrated Shipping Information System (GISIS) under reference number C0010620. The consideration of this document was reported in paragraphs 4.4, 4.26 and 4.27 and annex 16 of document III 6/15 (report of III 6). Document MSC 102/21/10 (Marshall Islands) proposes amendments to the 2011 ESP Code, based on safety issues identified in that investigation.

3 **MV Stellar Daisy** was a very large ore carrier (VLOC) which had been converted from a very large crude carrier (VLCC). Only a limited number of this type of ship exists.

Discussion

4 IACS members that classed converted VLOCs have conducted additional surveys of other such ships. In addition, IACS reviewed survey requirements contained in the 2011 ESP Code. Having reviewed the report of the investigation into the loss of **MV Stellar Daisy,** together with document MSC 102/21/10 regarding the survey requirements of water ballast tanks and void spaces, IACS has the following comments on the proposed amendments, as set out in the ensuing paragraphs.

Strengthening the requirements for ballast tanks on bulk carriers (MSC 102/21/10, paragraphs 7 and 8)

5 As stated in document MSC 102/21/10, ballast tanks on bulk carriers are required to be inspected at annual intervals when the coating is found in poor condition. In contrast, ballast tanks on tankers are required to be examined at annual intervals when the coating is found in less than good condition.

6 IACS considers that a more stringent requirement for ballast tanks on tankers, in comparison to the requirement for ballast tanks on bulk carriers, is justified by the accelerated breakdown of coating and subsequent corrosion in ballast tanks as a result of the heating of the cargo tanks. Therefore, IACS does not see the necessity to strengthen the requirements for bulk carriers to the same level as tankers.

Proposal for more frequent inspection of void spaces (MSC 102/21/10, paragraphs 9 and 10)

7 As explained in document MSC 102/21/10, paragraph 2.1.4 of Part A and paragraph 2.1.4 of Part B of annex A to the 2011 ESP Code require that void spaces bounding cargo holds be inspected at each renewal survey. Neither sections 3 and 4 of Part A nor sections 3 and 4 of Part B require that void spaces bounding cargo holds be inspected during annual surveys.

8 However, it does not mean that void spaces are inspected only once in every 5 years. From the third intermediate survey onwards, the scope of intermediate survey is to be to the same extent as the previous renewal survey, which means that void spaces on bulk carriers older than 10 years are to be inspected twice in every 5 years.

9 Void spaces in ships to which SOLAS regulation II-1/3-2 does not apply are not required to be coated; therefore, the proposed amendments to the 2011 ESP Code may result in all void spaces bounding cargo holds on those bulk carriers having to be examined at annual intervals. This is particularly onerous and difficult to technically justify in the absence of analysis of existing ships designed and built as bulk carriers or ore carriers.

General concerns and comments

10 The scope of proposed amendments includes not only VLOCs converted from a VLCCs but addresses all bulk carriers. While there may be potential for corrosion and structural failure, the risk to existing ships which are designed and built as a bulk carrier (which includes ore carriers) needs to be quantified. IACS suggests that an investigation into the corrosion rates, structural deterioration and defect/failure rates experienced in water ballast tanks and void spaces on all types of bulk carriers should be considered to aid in deliberations of the proposed amendments to the 2011 ESP Code.

11 In conclusion, at present time, based on the provided information and the experience of surveys of bulk carriers (including VLOCs), IACS does not see the necessity to increase survey requirements of water ballast tank and void spaces for all bulk carriers.

Action requested of the Committee

12 The Committee is invited to consider the information provided and take action, as appropriate.

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