

MARITIME SAFETY COMMITTEE  
102nd session  
Agenda item 21

MSC 102/21/21  
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## WORK PROGRAMME

### Comments on document MSC 102/21/9

#### Submitted by IACS

#### SUMMARY

*Executive summary:* This document provides comments on document MSC 102/21/9 proposing a new output to amendment SOLAS chapter XII and MSC/Circ.1178

*Strategic direction,  
if applicable:* 5

*Output:* Not applicable

*Action to be taken:* Paragraph 12

*Related documents:* MSC 102/21/9 and III 6/4/3

#### 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 102/21/9 (Brazil, Marshall Islands and INTERCARGO).

#### 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 102/21/9 proposes amendments to SOLAS regulations XII/4, XII/5 and XII/12 and to MSC/Circ.1178.

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

## Discussion

### *General view and concerns*

4 Immediately following the accident, IACS members carried out studies to reassure structural integrity and fitness for purpose of similar converted VLOCs classed by the individual class society. Detailed reports provided by those IACS member class societies show that no safety-related critical structural damages were identified.

5 IACS highly honours and appreciates the effort of the Marshall Islands in carrying out this very comprehensive investigation, particularly considering the complex, serious and tragic nature of the incident. It is understood that the Republic of Korea is also progressing its investigation of the incident. As such, IACS is of the view that a comprehensive review of the proposals made in document MSC 102/21/9 should be carried out taking into account the results of the investigation by the Republic of Korea and those issues summarized in this document.

6 IACS notes that the scope of amendments proposed in document MSC 102/21/9 includes not only VLOCs converted from VLCCs, but also all new bulk carriers\* covered by SOLAS regulations XII/4 and XII/5. Applying these amendments to all new bulk carriers may require further justification based on the service experience of existing bulk carriers other than those converted from VLCC.

7 Regarding the suggestion in paragraph 19 of document MSC 102/21/9 that IACS would need to revise its Common Structural Rules (CSR) for bulk carriers and pertinent Unified Requirements (URs), IACS is of the view that this should be considered after results of a further study are available.

8 Nonetheless, IACS' initial assessment of the consequences of proposed amendments does not indicate that CSR require any consequential amendments from the perspective of stability and strength, as the proposed amendments to SOLAS regulations XII/4 and XII/5 are targeting typical ore carriers with longitudinal bulkhead located B/5 or 11.5 m from the side shell and will not have an impact on hull configurations covered by CSR and pertinent URs.

### *Proposed amendments to SOLAS regulation XII/12*

9 As proposed in paragraph 6 above, the degree of the impact, or the justification of the requirements, should be thoroughly investigated in advance of developing a requirement regarding water level detectors in addition to the existing SOLAS regulation XII/12 in any ballast tank and dry and void space within the cargo length.

### *Proposed amendments to SOLAS regulations XII/4 and XII/5 and to MSC/Circ.1178*

10 IACS fully supports the principle that ore carriers should have necessary strength and stability to withstand possible flooding of susceptible spaces. At the same time, since the double bottom on ore carriers does not extend to the ship's side, it is observed that the maximum size of wing tanks on ore carriers has been reduced as a consequence of complying with SOLAS regulation II-1/9. As far as IACS understands, the arrangement of the very large wing tanks as was found on **Stellar Daisy**, while considered acceptable at the time of conversion, is no longer permitted. Therefore, it is questionable if an explicit check of the strength and stability of the ship with individual spaces flooded is needed for new ore carriers.

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\* Reference to "bulk carriers" should be taken as bulk carriers covered by SOLAS regulations XII/4, XII/5 and XII/12.

11 IACS understands that the proposed new SOLAS regulation XII/4.8 extends the damage stability requirements for reduced type B freeboards under regulation 27(12) of the 1966 LL Convention, as modified by the revised 1988 Protocol, to bulk carriers regardless of the assigned freeboard. If this understanding is correct and the amendments are adopted as proposed, then IACS is of the opinion that SOLAS regulation XII/4.8 should also reflect the provisions in regulation 27(12)(c) of the 1966 LL Convention, concerning the need to consider damage of a lesser extent when such lesser extents of damage result in a more severe condition. In addition, this amendment will imply, or require, bulk carriers of type B freeboard to meet both damage stability requirements of regulation 27(12) of the 1966 LL Convention and part B-1 of SOLAS chapter II-1. This is not necessary as ordinary bulk carriers defined in SOLAS chapter XII, which are assigned with ordinary type B freeboard, have been well addressed regarding damage stability by part B-1 of SOLAS chapter II-1.

**Action requested of the Committee**

12 The Committee is invited to note the above and to take action, as appropriate.

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