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Agenda item 3

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CONSIDERATION AND ADOPTION OF AMENDMENTS TO MANDATORY INSTRUMENTS

Comments on the draft new SOLAS regulation II-1/25-1

Submitted by Belgium, United States and IACS

SUMMARY

<i>Executive summary:</i>	This document proposes refinement of the text of draft new SOLAS regulation II-1/25-1 to address the differences between bilge water detection system and water level alarms
<i>Strategic direction, if applicable:</i>	Other work
<i>Output:</i>	OW 30
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	MSC 100/20; SDC 7/7, SDC 7/16; MSC 102/17/1 and MSC 102/24 (paragraph 17.22)

Background

1 MSC 100 had agreed to include a new output on the post-biennial agenda on "Development of amendments to SOLAS chapter II-1 to include requirements for water level detectors on non-bulk carrier cargo ships with multiple cargo holds", with two sessions needed to complete the item. The aim was to expand the applicability of requirements of SOLAS regulation II-1/25 for cargo hold water level detectors by developing a new SOLAS regulation applying to cargo ships with multiple cargo holds (MSC 100/20, paragraphs 17.2 to 17.4).

2 Based on document SDC 7/7 (United States), SDC 7 finalized the draft new SOLAS regulation II-1/25-1 with a view to its approval by MSC 102 (SDC 7/16, annex 6).

3 Having considered the outcome of SDC 7 and modifications proposed in document MSC 102/17/1 (Belgium and United States) adding a new sub-paragraph 2.3, MSC 102 approved the draft new SOLAS regulation II-1/25-1 for adoption at MSC 103. The proposal in document MSC 102/17/1 argued for the use of bilge alarms as an acceptable alternative to water level detectors.

4 At the time, IACS conveyed its concerns, which were reflected in paragraph 17.22 of document MSC 102/24 (report of MSC 102).

Discussion

5 During the Committee's consideration of document MSC 102/17/1, being appreciative of the proposal to make the technical installation simpler, IACS opined that the purpose of the water level detector and a bilge level alarm sensor was different. Similarly, the typical installation height of the two sensors is different. This led to the concern that the alternative in document MSC 102/17/1 would make the lower level height of 0.3 m for water detection irrelevant, because level detectors may be fitted at any level lower than 0.3 m and be termed as a bilge level alarm sensor.

6 In addition, IACS considered that if the equivalency of effectiveness of the two systems to respond to the risks is to be recognized by the new SOLAS regulation II-1/25-1, then the performance standards of the bilge alarm detection system shall not be inferior to the performance standards for water level detectors required for the cargo holds. The co-sponsors consider that it is possible to address this recognition by making reference to the same resolution MSC.188(79) on the *Performance standards for water level detectors on bulk carriers and single hold cargo ships other than bulk carriers*, as presented in paragraph 1 of the draft new SOLAS regulation II-1/25-1.

Proposal

7 To address the abovementioned concerns, the co-sponsors propose to replace paragraph 3 of the approved draft SOLAS regulation II-1/25-1 by the following new version of paragraph 3:

- "3 As an alternative to the water level detector at a height of not less than 0.3 m as per sub-paragraph 2.1, a bilge level sensor* serving the bilge pumping arrangements required by regulation 35-1 and installed in the cargo hold bilge wells or other suitable location, is considered acceptable, subject to:
- .1 the fitting of the bilge level sensor at a height of not less than 0.3 m in the aft end of the cargo hold; and
 - .2 the bilge level sensor giving audible and visual alarm at the navigation bridge which is clearly distinctive from the alarm given by the other water level detector fitted in the cargo hold."

* Refer to the *Performance standards for water level detectors on bulk carriers and single hold cargo ships other than bulk carriers* (resolution MSC.188(79)).

Action requested of the Committee

8 The Committee is invited to note the information and consider, in particular, the proposal in paragraph 7 and take action, as appropriate.
