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CONSIDERATION AND ADOPTION OF AMENDMENTS TO MANDATORY INSTRUMENTS

Consequential amendments to resolution MSC.188(79) arising from the adoption of new SOLAS regulation II-1/25-1

Submitted by Belgium, United States and IACS

SUMMARY

Executive summary: This document proposes to initiate a revision of 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 a consequence of the adoption of new SOLAS regulation II-1/25-1

*Strategic direction,
if applicable:* Other work

Output: OW 30

Action to be taken: Paragraph 14

Related documents: SDC 7/7; MSC 102/17/1, MSC 102/24 (paragraph 17.22) and MSC 103/3/3

Background

1 MSC 100 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 MSC 102, having considered the outcome of SDC 7 and modifications proposed in document MSC 102/17/1 (Belgium and United States), approved the draft new SOLAS regulation II-1/25-1 for adoption at MSC 103.

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

Discussion

5 During the Committee's consideration of the draft new SOLAS regulation II-1/25-1, IACS noted that the footnote to the draft new SOLAS regulation II-1/25-1 refers to resolution MSC.188(79) on the *Performance standards for water level detectors on bulk carriers and single hold cargo ships other than bulk carriers*, with the indication being that the water level detectors on multiple hold cargo ships (other than bulk carriers and tankers) should conform to the performance standards contained in that resolution.

6 IACS understands that resolution MSC.188(79) explicitly mentions that the standards pertain to technical functional provisions for water level detection and alarm arrangements installed in bulk carriers for compliance with SOLAS regulation XII/12 or in single hold cargo ships other than bulk carriers for compliance with SOLAS regulation II-1/23-3 (now SOLAS regulation II-1/25). Furthermore, some provisions in the standards are specifically mentioned as applicable to those two categories and cannot clearly be construed to be applicable to detectors for multiple hold cargo ships.

7 In addition, IACS considers that the recognition of equivalency of effectiveness of the two systems to respond to the risks, as offered by the approved draft new SOLAS regulation II-1/25-1, needs to be assured through consideration of the performance standards for bilge alarm detection system as being not inferior to the performance standards for water level detectors required for the cargo holds. The proposal of the co-sponsors to address this recognition appears in document MSC 103/3/3 (Belgium et al.) by making reference (*) to the same resolution MSC.188(79), as presented in paragraph 1 of the draft new SOLAS regulation II-1/25-1.

8 Accordingly, the co-sponsors are of the opinion that resolution MSC.188(79) will require revision to explicitly include detectors for multiple hold cargo ships and address the equivalency in standards applicable to bilge alarms and water level detectors.

9 To assist the Committee in its consideration, the following provisions in resolution MSC.188(79) were identified as requiring amendment, as a minimum:

- .1 paragraph 1 (purpose);
- .2 paragraph 2.1 (definition of a water level detector);
- .3 paragraph 3.1.2 (position of sensors);
- .4 paragraph 3.3.5 (capability of overriding); and
- .5 paragraph 1 of appendix (purpose).

10 Further, the co-sponsors believe that clarification will be needed regarding the installation of the water detection system being intrinsically safe with appropriate group rating and temperature class and the protection of the detection system from mechanical damage. Those clarifications would also apply to related SOLAS regulations II-1/25, II-1/25-1 and XII/12.

11 All above issues could be addressed in the consequential amendments to resolution MSC.188(79).

Proposal

12 Considering the above-mentioned misalignment of provisions which are applicable to the systems operating in different ship arrangements, the co-sponsors are of the opinion that resolution MSC.188(79) will require amendments to explicitly include detectors for multiple hold cargo ships, consider equivalency between the two systems and to address the above-mentioned additional technical aspects.

13 In order to progress this work, it is proposed that the existing output is extended and renamed accordingly and the SDC Sub-Committee is instructed to perform the review of resolution MSC.188(79) for application in time to allow manufacturers to approve their systems against new standards to be ready for installation on ships at the time of application of the regulation in question.

Action requested of the Committee

14 The Committee is invited to note the information and to consider, in particular, the proposal in paragraph 13 and take action, as appropriate.
