

MARITIME SAFETY COMMITTEE  
103rd session  
Agenda item 3

MSC 103/3/5\*  
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**CONSIDERATION AND ADOPTION OF AMENDMENTS  
TO MANDATORY INSTRUMENTS**

**Comments on documents MSC 103/3 and MSC 103/3/2**

**Submitted by Australia, Bahamas, Islamic Republic of Iran,  
New Zealand, United Arab Emirates and IACS**

**SUMMARY**

*Executive summary:* This document comments on the need for a minor additional amendment to the draft amendments to the Load Line Convention and the IGC Code regarding watertight doors for cargo ships, as developed by SDC 7 and approved by MSC 102

*Strategic direction,  
if applicable:* 1

*Output:* 1.13

*Action to be taken:* Paragraph 13

*Related documents:* MSC 101/21/16, MSC 101/24; SDC 7/12, SDC 7/12/1, SDC 7/16, paragraphs 12.8 to 12.12; MSC 102/17, MSC 102/24, paragraph 17.27; MSC 103/3, annex 3 and MSC 103/3/2

**Introduction**

1 This document is submitted in accordance with paragraph 6.12.5 of *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 provides comments on the draft amendments to the IGC Code and the Load Line Convention regarding watertight doors for cargo ships, approved by MSC 102, as set out in documents MSC 103/3 (Secretariat) and MSC 103/3/2 (Secretariat).

**Background**

2 The 101st session of Maritime Safety Committee agreed to include an output on the "Review of mandatory requirements in the SOLAS, MARPOL and Load Line Conventions and the IBC and IGC Codes regarding watertight doors on cargo ships", with a target completion year of 2021, following discussion of document MSC 101/21/16 on inconsistent requirements for doors on watertight bulkheads.

\* Re-issued due to correction made to the draft amendments in the annex.

3 SDC 7 reviewed all relevant requirements and finalized the draft amendments to MARPOL, the Load Line Convention and the IBC and IGC Codes for submission to MSC 102 and MEPC 76, for approval with a view to subsequent adoption and entry into force on 1 January 2024 for new ships only. MSC 102, held remotely from 4 to 11 November 2020, approved the amendments as provided in annexes 8, 9, 10 and 11 of document SDC 7/16, for adoption at MSC 103. Documents MSC 103/3 and MSC 103/3/2 contain the draft amendments to the IGC Code and the Load Line Convention, respectively, for adoption at MSC 103.

### **Discussion**

4 SOLAS regulation II-1/13-1 provides requirements for openings in watertight bulkheads and internal decks in cargo ships. The regulation states that any door in watertight bulkheads must ensure watertight integrity under all conceivable circumstances.

5 While SOLAS chapter II-1, regulations 13-1.3 and 13-1.4 do not exclude the potential use of hinged access doors, these regulations should be read in conjunction with regulations 13-1.1, 13-1.2 and 13-1.5 to require that access doors and access hatch covers kept "normally closed at sea" or "permanently closed at sea" ensure 100% watertightness.

6 Hinged watertight doors are designed to achieve watertight integrity by the operation of multiple dogs or clips evenly spaced around the door applying an even pressure to a compressive sealing material, all of which must be correctly secured to achieve the desired integrity. Where individual dogs or clips are incorrectly secured or left 'open' due to human error or lack of maintenance of the operating linkage and dog/wedge mechanisms, watertight integrity may be compromised. For example, only one secured or partially secured dog or clip may cause the limit switch operated indicators to register the door as 'closed' when in fact it is not properly secured and therefore not watertight. This will leave a hinged watertight door in a condition compromising the watertight integrity of the bulkhead with the potential for grave consequences in case of flooding to adjacent compartments.

7 All doors not closed properly or not adequately maintained, irrespective of whether they are kept "normally closed at sea" or "permanently closed at sea", may create a potentially dangerous safety risk, as described in paragraph 5.

8 Therefore, it is imperative that the requirement for quick acting or single-action type arrangements is extended to hinged watertight doors that will be kept "permanently closed" at sea.

9 Australia expressed these concerns during SDC 7 and at MSC 102 and indicated that it would submit relevant comments for further consideration to MSC 103 (MSC 102/24, paragraph 17.27).

10 The co-sponsors note that these amendments will apply to new ships (MSC 101/24, paragraph 21.26) and will have no impact on existing ships (MSC 102/24, paragraph 17.30)

### **Proposal**

11 To ensure 100% watertightness of all access doors in watertight bulkheads under all conceivable circumstances and for the purpose of uniform and consistent implementation of the requirements, the co-sponsors propose minor edits to the text approved by MSC 102, as provided in the annex.

12 The co-sponsors also propose that the changes to the draft amendments provided in the annex be sent to MEPC 76 for further consideration of the relevant amendments to MARPOL and the IBC Code.

**Action requested of the Committee**

13 The Committee is invited to consider the discussion in paragraphs 4 to 10, together with the proposals in paragraphs 11 and 12 and the annex, and take action as appropriate.

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## ANNEX

### PROPOSED MODIFICATIONS TO THE DRAFT AMENDMENTS TO MARPOL, THE LOAD LINE COVENTIONS AND THE IGC AND IBC CODES, APPROVED BY MSC 102

The following edits, stricken through for deletion and grey highlighted for addition, are proposed to be applied to the relevant texts approved by MSC 102 for:

1. Paragraph 3.1 of regulation 28 of MARPOL Annex I
2. Regulation 27(13)(a) of the 1988 LL Protocol
3. Paragraph 2.9.2 of the IBC Code
4. Paragraph 2.7.1 of the IGC Code

".....remotely operated sliding watertight doors, hinged watertight access doors with open/closed indication locally and at the navigation bridge, of the quick-acting or single-action type that are normally closed at sea, ~~hinged watertight doors that are~~ or permanently closed at sea, and sidescuttles of the non-opening type."