INTERNATIONAL MARITIME ORGANIZATION

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# AMENDMENTS TO THE IGF CODE AND DEVELOPMENT OF GUIDELINES FOR LOW-FLASHPOINT FUELS

## Comments on document CCC 7/3/1

## Submitted by IACS

**SUMMARY**

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|---|---|
| *Executive summary:* | This document comments on the amendments to the IGF Code proposed in document CCC 7/3/1 submitted by China, the United Kingdom, the United States, ISO and SGMF |
| *Strategic direction, if applicable:* | 2 |
| *Output:* | 2.3 |
| *Action to be taken:* | Paragraph 8 |
| *Related document:* | CCC 7/3/1 |


## 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 CCC 7/3/1.

## Discussion

2 IACS appreciates the work performed by the co-sponsors to develop the draft amendments to paragraph 4.2.2 of part A and regulations in section 8.4 of part A-1 of the IGF Code.

3 Having carefully reviewed the proposals, IACS supports the proposals in general, subject to the following comments and modifications.

4 If a Dry-Disconnect/Connect Coupling were designed not according to the publication ISO 21593:2019 or an "equivalent" standard, as specified in the proposed paragraph 8.4.1.1, a consideration of dynamic loads at the Dry-Disconnect/Connect Coupling connection would

be required, in accordance with the proposed paragraph 8.4.2. However, regarding the compliance with the proposed paragraph 8.4.2, IACS is concerned that the term "dynamic loads" would not be clearly specified in the publication ISO 21593:2019, and, therefore, the development of evaluation methods for the dynamic loads would be required at IMO. As far as IACS is aware, there is no concrete mathematical description for the wall thickness of the couplings in the publication ISO 21593:2019; it merely stipulates a requirement in its section 4.2.5 as follows:

> *"*the wall thickness of the coupling shall take into account, as a minimum but not limited to, the internal pressure, the external loads and the moments*".*

5 In addition, with regard to the proposed paragraph 8.4.3, based on the understanding that ERC/ERS is not necessarily installed on the ship side even when the bunkering lines are provided (either ship side or shore side), the said paragraph needs modification to reflect the above-mentioned fact.

6 With regard to the bolted flange to flange assembly in the proposed paragraph 8.4.1.3, IACS considers that this paragraph should also refer to superscript "2"; the superscript "2" is referencing publication ISO 20519:2017, which, for this arrangement, reads:

> *"*flange bolting assembly (on provider side only), unless an assessment of operating procedures concludes that dry-disconnection can be achieved by procedural means*".*

**Proposal**

7 To address the above comments, IACS offers modifications to the proposed paragraphs 8.4.1 to 8.4.3 as follows:*

> "**8.4 Regulations for manifold**
>
> 8.4.1 (…)
>
> .3 a bolted flange to flange assembly[2].
>
> 8.4.2 When intended to use either of the alternative connections specified in paragraphs 8.4.1.2 and 8.4.1.3, these shall be combined with operating procedures to ensure disconnection can be achieved without any release of gas fuel. The arrangement shall be subject to special consideration, within the risk assessment, ~~taking into account~~ based on the Guidelines developed by the Organization on the dynamic loads at the bunkering manifold connection, in addition to the safe operation of the ship and other hazards that may be relevant to the ship during bunkering operation.
>
> 8.4.3 An Emergency Release Coupler (ERC)/Emergency Release System (ERS) or equivalent means shall be provided, unless installed on the shore side of the bunkering line, and said means shall be in accordance with a standard equivalent to those acceptable to the Organization[2], it shall enable a quick physical disconnection 'dry break-away' of the bunker system in an emergency event."

**Action requested of the Sub-Committee**

8 The Sub-Committee is invited to consider the foregoing and take action as appropriate.

* Tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight new insertions.