INTERNATIONAL MARITIME ORGANIZATION

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SUB-COMMITTEE ON CARRIAGE OF CARGOES AND CONTAINERS
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Agenda item 11

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UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, AND ENVIRONMENT-RELATED CONVENTIONS

Comments on document CCC 7/11/1

Submitted by IACS

SUMMARY

Executive summary:	This document comments on the discussion and the draft unified interpretation of paragraph 9.2.2 of part A-1 of the IGF Code, in document CCC 7/11/1 by EUROMOT
Strategic direction, if applicable:	6
Output:	6.1
Action to be taken:	Paragraph 7
Related document:	CCC 7/11/1

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 7/11/1.

Discussion

2 IACS appreciates the work performed by EUROMOT. Having carefully reviewed the arguments and the proposal in document CCC 7/11/1, IACS offers the following comments.

3 IACS agrees to the proposal in paragraph 19 of document CCC 7/11/1 to discuss, on a technical basis, the emerging practice in connection with paragraph 7.3.6.3 of part A-1 of the International Code of Safety for Ships using Gases or other Low-flashpoint Fuels (IGF Code).

4 At the same time, IACS notes that document CCC 7/11/1 does not consider the failure of the flange connection itself; only failures of single components within the flange are

considered in the paper, resulting in the same designs which have been deemed not acceptable. The use of common flanges and rubber seals as primary and secondary barriers makes the safety of the installations heavily reliant on the active safeguards such as gas detectors. IACS considers that this arrangement is not equivalent to existing standards where the primary and secondary barriers are required to be completely separate.

5 In this respect, a typical case which has not been considered is loose bolts. The loosening of the bolts will result in the flange failure when the pipe length becomes exposed to sudden movements (e.g. hogging/sagging of the ship). Severe sudden flange failures cannot be omitted based on a risk assessment.

6 Therefore, although IACS agrees to EUROMOT's proposal in paragraph 19 of document CCC 7/11/1, IACS does not agree to the draft unified interpretation as proposed in paragraph 18 of the same paper.

Action requested of the Sub-Committee

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