

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
5th session
Agenda item 3

CCC 5/3/5
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**AMENDMENTS TO THE IGF CODE AND DEVELOPMENT OF GUIDELINES FOR
LOW-FLASHPOINT FUELS**

Comments on document MSC 99/8/1

Submitted by IACS

SUMMARY

Executive summary: In light of the discussion at MSC 99 regarding document MSC 99/8/1 (Denmark), this document provides comments supporting draft amendments to the IGF Code, as agreed at CCC 4

Strategic direction, if applicable: 2

Output: 2.3

Action to be taken: Paragraph 13

Related documents: CCC 4/3/1, CCC 4/12; MSC 99/8/1, MSC 99/22 and CCC 5/2

Introduction

1 This document is submitted in accordance with the provisions 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, paragraph 6.12.5) and provides comments on document MSC 99/8/1 (Denmark) and paragraph 2.2 of document CCC 5/2 (Secretariat), which explains that the Sub-Committee has been tasked with reconsidering the draft amendments to regulation 9.5.6 of the International Code of Safety for Ships Using Gases or other Low-flashpoint Fuels (IGF Code), as agreed at CCC 4.

Background

2 The Sub-Committee, at its fourth session, having considered document CCC 4/3/1 (IACS), instructed the Working Group on Amendments to the IGF Code and Development of Guidelines for Low-flashpoint Fuels to consider the draft amendments to section 9.5 of the IGF Code, as discussed in paragraphs 4 to 10 of document CCC 4/3/1.

3 The Sub-Committee endorsed the draft amendments prepared by the Working Group, as set out in annex 1 to document CCC 4/12; and invited the Committee to approve them with a view to adoption at MSC 100 (CCC 4/12, paragraph 3.44).

4 The Maritime Safety Committee, at its ninety-ninth session, in considering the action requested of it as discussed in paragraph 2 above, discussed document MSC 99/8/1. Subsequently, the Committee agreed to hold the approval of the draft amendments to parts A and A-1 of the IGF Code in abeyance and instructed CCC 5, taking into account the above views and document MSC 99/8/1, to reconsider the draft amendments to regulation 9.5.6 of the IGF Code and report the outcome to MSC 100 as an urgent matter (MSC 99/22, paragraph 8.5).

Discussion

5 It is noted that paragraph 2.3 of the IGF Code allows appliances and arrangements to deviate from the requirements of the Code, provided that these meet the intent of the relevant "goal" and "functional requirements" and provide an equivalent level of safety according to the relevant chapters. The equivalence of the alternative design is to be demonstrated as specified in SOLAS regulation II-1/55 and is to be approved by the Administration. However, in the context of the proposed amendments to section 9.5 of the IGF Code, IACS would offer the following advice for the Sub-Committee's consideration in relation to the comments and proposals in document MSC 99/8/1.

6 IACS considers that liquefied fuel pipes need to be protected by a secondary enclosure able to contain leakages.

7 A drip tray is not an equivalent solution because it will not contain spray from a leaking pressurised liquefied fuel pipe and it will not be gastight.

8 Experience has shown the need to give particular attention to hazardous areas on gas fuelled ships, where the control of ignition sources is very limited compared to a gas tanker. Consequently, the gas tightness of the secondary enclosure, not only in enclosed spaces but also on open decks, is very important.

9 Regarding paragraph 6 of document MSC 99/8/1, it is agreed that if a ventilated secondary enclosure was provided for liquefied fuel piping, there would be problems with icing. This is the reason for considering that a ventilated secondary enclosure is not suitable for liquefied fuel pipes. The draft amendments agreed at CCC 4 do not require the fitting of ventilated secondary enclosures on liquefied fuel piping.

10 Exposure to the elements, such as sea spray, rain and icing, is another reason that justifies the requirement for the liquefied gas pipe to be properly protected against the elements by a secondary enclosure. This may also reduce the probability of pipe corrosion and increase the efficiency of the insulation.

11 As discussed in paragraph 8 of document MSC 99/8/1, the reference to "alternative solutions" in the current paragraph 9.5.1, and in the proposed new paragraph 9.5.4, for gaseous fuel pipes is understood as relating to alternative solutions with respect to the requirement for ventilation and gas detection in the secondary enclosure, such as inerting and pressure monitoring. This provision is not intended to facilitate alternative solutions to the provision of the secondary enclosure itself.

Recommendation

12 In light of the comments in paragraphs 5 to 11 above, IACS recommends that the Sub-Committee confirm the draft amendments to section 9.5 of the IGF Code, as provided in annex 1 to document CCC 4/12.

Action requested of the Sub-Committee

13 The Sub-Committee is invited to consider the above discussion, in particular the recommendation in paragraph 12 above and take action, as appropriate.
