

MARINE ENVIRONMENT PROTECTION
COMMITTEE
73rd session
Agenda item 11

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POLLUTION PREVENTION AND RESPONSE

Comments on the draft 2018 Guidelines for the application of MARPOL Annex I requirements to floating production, storage and offloading facilities (FPSOs) and floating storage units (FSUs)

Submitted by India, Marshall Islands, United States and IACS

SUMMARY

Executive summary: This document provides comments on the draft 2018 Guidelines for the application of MARPOL Annex I requirements to floating production, storage and offloading facilities (FPSOs) and floating storage units (FSUs), as agreed at PPR 5

Strategic direction, if applicable: 1

Output: 1.11

Action to be taken: Paragraph 9

Related documents: MEPC 69/14/2, MEPC 69/21; MEPC 70/15/1, MEPC 70/18; PPR 5/14, PPR 5/24 and MEPC 73/11

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 provides comments on paragraph 3.15 of document MEPC 73/11 (Secretariat), which invites the Committee to consider the draft MEPC resolution on the *2018 Guidelines for the application of MARPOL Annex I requirements to floating production, storage and offloading facilities (FPSOs) and floating storage units (FSUs)*, as agreed at PPR 5, with a view to adoption.

Background

2 At its sixty-ninth session, the Committee considered document MEPC 69/14/2 (IACS), seeking clarification on the scope of the application of the stability instrument requirements in regulation 28.6 of MARPOL Annex I to FPSOs, FSUs and unmanned ships not propelled by mechanical means. Having agreed that the issue should be further clarified, including the

voluntary nature of the proposed format, as well as its application to other types of ships, the Committee invited interested Member Governments and international organizations to submit a relevant proposal for a new output to a future session (MEPC 69/21, paragraphs 14.7 to 14.9).

3 Subsequently, at its seventieth session, the Committee considered document MEPC 70/15/1 (United States), and agreed to a new output on "Revised Guidelines for the application of the revised MARPOL Annex I requirements to floating production, storage and offloading facilities (FPSOs) and floating storage units (FSUs)", and assigned it to the PPR Sub-Committee (MEPC 70/18, paragraphs 15.4 and 15.5).

4 At its fifth session, the PPR Sub-Committee, having considered document PPR 5/14 (United States) that provided the text of the draft revised Guidelines; agreed to the draft MEPC resolution on the *2018 Guidelines for the application of MARPOL Annex I requirements to floating production, storage and offloading facilities (FPSOs) and floating storage units (FSUs)* (draft 2018 Guidelines), as set out in annex 11 to document PPR 5/24, which has been submitted to the Committee at this session with a view to adoption.

Discussion

5 The co-sponsors welcome the diligent and important technical work that has been undertaken by the PPR Sub-Committee in developing the draft 2018 Guidelines. It is firmly the view of the co-sponsors that the draft 2018 Guidelines should be finalized at this session. There is no doubt that the 2018 Guidelines are needed by industry to provide considered advice from the Organization on the application of MARPOL Annex I to FPSOs and FSUs.

6 Notwithstanding the comments in paragraph 5 above, before finalizing the draft 2018 Guidelines, the co-sponsors are of the view that the following issue of a policy nature should be considered by the Committee. To be clear, the co-sponsors would urge the Committee to decide on the rather straightforward proposal made in this document, without referring the matter to the technical experts in the PPR Sub-Committee.

Proposal

7 With a view to facilitating the global and consistent understanding of the draft 2018 Guidelines, the co-sponsors offer the comments and proposal set out in paragraph 8 below.

8 The complement on FPSOs and FSUs is different from conventional ships and is generally governed by local coastal laws. FPSOs and FSUs under the purview of these Guidelines may not necessarily have a Master onboard, as is the case on conventional ships. The co-sponsors are aware that many disconnectable FPSOs/FSUs have a master, whereas non-disconnectable FPSOs/FSUs have a person-in-charge. Therefore, in the Record of Construction and Equipment for FPSUs and FSUs in annex 2 to the draft 2018 Guidelines, it is proposed to replace "master" with "master or person-in-charge" in sections 5.6.5.1, 5.6.5.3 and 5.6.5.4. This would take into account the wording of regulation 28.5 of MARPOL Annex I, which states:

".... the person in charge of a new non-self-propelled oil tanker ... shall be supplied in an approved form with: ..."

Action requested of the Committee

9 The Committee is invited to consider the foregoing comments and proposal and take action as appropriate.