INTERNATIONAL MARITIME ORGANIZATION

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

Draft amendment to the unified interpretations of SOLAS regulation II-1/3-6.3.2 (MSC.1/Circ.1572/Rev.1)

Submitted by IACS and INTERTANKO

SUMMARY

Executive summary:	This document proposes draft amendment to the unified interpretations of SOLAS regulation II-1/3-6.3.2 contained in circular MSC.1/Circ.1572/Rev.1
Strategic direction, if applicable:	6
Output:	6.1
Action to be taken:	Paragraph 6
Related documents:	None

Introduction

1 SOLAS regulation II-1/3-6.3.2 states:

> "Tanks, and subdivisions of tanks, having a length of 35 m or more shall be fitted with at least two access hatchways and ladders, as far apart as practicable. Tanks less than 35 m in length shall be served by at least one access hatchway and ladder. When a tank is subdivided by one or more swash bulkheads or similar obstructions which do not allow ready means of access to the other parts of the tank, at least two hatchways and ladders shall be fitted."

Background

2 The Maritime Safety Committee (MSC), at its 102nd session, approved circular MSC.1/Circ.1572/Rev.1. The circular contains, inter alia, unified interpretations of the provisions of SOLAS regulation II-1/3-6 and the *Technical provisions for means of access for inspections* (resolution MSC.158(78)). Paragraph 1.6.1 of the annex to circular MSC/Circ.1572/Rev.1 states:

> "1 A cargo oil tank of less than 35 m length without a swash bulkhead requires only one access hatch".

Discussion

3 IACS has received information on a new trend for the oil tanker designs which reduce access to only one entry in cases where the length of ballast tanks is less than 35 m, together with concerns regarding safety problems it may cause.

4 Although SOLAS allows one entry into the tank in certain conditions, IACS considers that water ballast tanks which are even less than 35 m in length should have two access hatchways and ladders. Such consideration is based not only on reasons of convenience of survey and maintenance, but also on safety grounds when the internal structure prevents direct view of the only escape ladder and/or when it becomes an obstruction in case of a rapid escape or may cause pockets with dangerous atmosphere inside parts of tanks.

Proposal

5 The concern regarding a new trend for oil tanker designs which reduce access to one entry in cases where the length of the ballast tanks is lesser than 35 m may be caused by ambiguous expression "similar obstructions" in SOLAS regulation II-1/3-6.3.2. To address the concern and its cause, IACS proposes the unified interpretations to elaborate that "similar obstructions" mean internal structures which do not allow ready means of access to the other parts of the tank, such as double side web frames and double bottom floors.

Action requested of the Sub- Committee

6 The Sub-Committee is invited to consider the information and the draft amendment set out in the annex, and take action as appropriate.

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ANNEX

**DRAFT MODIFICATION TO PARAGRAPH 1.6.1
OF THE ANNEX TO MSC/CIRC.1572/REV.1**

The following modification is proposed*:

"1.6 SOLAS REGULATION II-1/3-6, PARAGRAPH 3.2

Interpretation

1 "Similar obstruction" includes double side web frames and double bottom floors which do not allow ready means of access to the other parts of the tanks.

~~1~~2 A cargo oil tank of less than 35 m length without a swash bulkhead requires only one access hatch.

~~2~~3 Where rafting is indicated in the ship structures access manual as the means to gain ready access to the under-deck structure, the term "similar obstructions" referred to in the regulation includes internal structures (e.g. webs >1.5 m deep) which restrict the ability to raft (at the maximum water level needed for rafting of under-deck structure) directly to the nearest access ladder and hatchway to deck. When rafts or boats alone, as an alternative means of access, are allowed under the conditions specified in the ESP Code (resolution A.1049(27)), permanent means of access are to be provided to allow safe entry and exit. This means:

.1 access direct from the deck via a vertical ladder and small platform fitted approximately 2 m below the deck in each bay; or

.2 access to the deck from a longitudinal permanent platform having ladders to the deck in each end of the tank. The platform should, for the full length of the tank, be arranged in level with, or above, the maximum water level needed for rafting of the under-deck structure. For this purpose, the ullage corresponding to the maximum water level is to be assumed not more than 3 m from the deck plate measured at the midspan of deck transverses and in the middle length of the tank (see figure below). A permanent means of access from the longitudinal permanent platform to the water level indicated above should be fitted in each bay (e.g. permanent rungs on one of the deck webs inboard of the longitudinal permanent platform)."

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