

SUB-COMMITTEE ON SHIP DESIGN AND
CONSTRUCTION
10th session
Agenda item 3

SDC 10/3/2
1 December 2023
Original: ENGLISH
Pre-session public release:

DEVELOPMENT OF GUIDELINES FOR EMERGENCY TOWING ARRANGEMENTS FOR SHIPS OTHER THAN TANKERS

Comments on document SDC 10/3

Submitted by IACS

SUMMARY

Executive summary: This document presents the views of IACS on document SDC 10/3 and offers comments and proposals on the preliminary draft guidelines for emergency towing arrangements for ships other than tankers.

Strategic direction, if applicable: 2

Output: 2.20

Action to be taken: Paragraph 14

Related document: SDC 10/3

Introduction

1 The 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.5) and comments on document SDC 10/3 containing preliminary draft guidelines for emergency towing arrangements for ships other than tankers and proposing a way forward to develop the draft guidelines.

Background

2 MSC 107 approved draft amendments to SOLAS regulation II-1/3-4 relating to new requirements for all new ships other than tankers of not less than 20,000 GT to be fitted with emergency towing arrangements (ETA). In considering the request of SDC 9 to develop associated guidelines, following the finalization of the aforementioned draft amendments, the Committee agreed to an expansion of the output on "Development of amendments to SOLAS regulation II-1/3-4 to apply requirements for emergency towing equipment for tankers to other types of ship" to develop a complete new set of guidelines for the ETA on new ships other than tankers.

3 IACS appreciates the efforts of Japan to develop and present preliminary draft guidelines and the proposal on a way forward, as submitted in document SDC 10/3. This document offers comments on document SDC 10/3.

Discussion

Minimum strength of towing components

4 The proposal in paragraph 2.3.1 of annex 1 of document SDC 10/3 states:

"The minimum strength of towing components as specified in 2.2 should be 1.25 times of TOW required above."

5 IACS considers that emergency towing equipment is used when the towed ship cannot navigate on its own. Therefore, IACS believes that the proposed safety factor of 1.25 is inappropriate to apply in the same way as normal towing operations that require manoeuvring in protected waters. It seems more reasonable to apply the same strength margin as tankers whose working strength is defined as one half ultimate strength.

Safe towing load (TOW)

6 IACS opines that the technical justification for the proposed ETA capability of "at least 2,000 kN for ships other than tankers of [30,000] gross tonnage" (paragraph 2.3.1 of annex 1 to document SDC 10/3) is needed.

7 Because tankers are mostly of a uniform design (which implies that the emergency towing loads can be approximately categorized based on deadweight), the existing guidelines for the ETA on tankers (resolution MSC 35(63)) specify a well-defined working strength based on deadweight. However, in the case of ships other than tankers, the towing load in an emergency would depend on the ship's particulars, including the windage area of the ship. It is noted that the proposed minimum safe towing load (TOW) is 2,000 kN for ships other than tankers of 30,000 gross tonnage and above. This implies that a general cargo ship of nominal size and a large containership of 20,000 TEU would have the same ETA capability, which does not seem to be reasonable to IACS.

8 It is the opinion of IACS that towing forces required to arrest, turn and tow at slow speeds under defined bad weather conditions would dictate the required ETA capability. Hence, IACS would appreciate clarification from Japan whether these aspects have been considered when finalizing the ETA capability for ships other than tankers.

Rapid deployment

9 IACS considers that getting towing line on board large ships in bad weather represents the main challenge. Further, SOLAS regulation II-1/3-4.1.2.1 requires that "the arrangements shall, at all times, be capable of rapid deployment in the absence of main power on the ship to be towed and easy connection to the towing ship". IACS notes that without including the provisions applicable to the pick-up gear or the towing pennant, the guidelines will remain silent on provisions which would make it easier in the future to connect a towing line to a large ship without power.

Proposal

10 Regarding the minimum strength of towing components, IACS proposes to apply the same strength margin as for tankers whose working strength is defined as one half ultimate strength, rather than the safety factor of 1.25 for normal towing operations.

11 With respect to the safe towing load (TOW), IACS suggests the need of a further review of proposal of "2,000 kN for all ships with [30,000] gross tonnage and above".

12 In relation to the requirement of rapid deployment stated in SOLAS regulation II-1/3-4.1.2.1, IACS proposes to consider if rapid deployment could be appropriately carried out for large ships in bad weather without provisions applicable to the pick-up gear or the towing pennant.

13 Further, as there is a potential to confuse the wording "safe towing load (TOW)" (paragraph 2.3.1 of annex 1 to document SDC 10/3) with the load of normal towing operation as specified in paragraph 3.6 of MSC.1/Circ.1175/Rev.1, IACS suggests using a different term, e.g. emergency towing load (ETL).

Action requested of the Sub-Committee

14 The Sub-Committee is invited to consider the above, the proposals in paragraphs 10 to 13 and take action, as appropriate.
