

MARITIME SAFETY COMMITTEE  
109th session  
Agenda item 3

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## AMENDMENTS TO MANDATORY INSTRUMENTS

### Comments on document MSC 109/3 relating to the draft amendments to paragraphs 11.3.2 and 11.3.2.2 of the IGF Code

Submitted by Liberia and IACS

#### SUMMARY

*Executive summary:* This document comments on document MSC 109/3 which contains draft amendments to paragraphs 11.3.2 and 11.3.2.2 of the IGF Code and proposes modifications to improve the clarity and achieve uniform implementation.

*Strategic direction, if applicable:* 2

*Output:* 2.3

*Action to be taken:* Paragraph 12

*Related documents:* CCC 8/3/3 and MSC 109/3

#### 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.5) and provides comments on document MSC 109/3 which contains draft amendments to paragraphs 11.3.2 and 11.3.2.2 of the IGF Code.

#### Discussion

2 Paragraph 11.3.2 of the IGF Code states as follows:

"11.3.2 Any boundary of accommodation spaces, service spaces, control stations, escape routes and machinery spaces, facing fuel tanks on open deck, shall be shielded by A-60 class divisions. The A-60 class divisions shall extend up to the underside of the deck of the navigation bridge. In addition, fuel tanks shall be segregated from cargo in accordance with the requirements of the International Maritime Dangerous Goods (IMDG) Code where the fuel tanks are regarded as bulk packaging. For the purposes of the stowage and segregation requirements of the IMDG Code, a fuel tank on the open deck shall be considered a class 2.1 package."

3 It is noted that paragraph 11.3.2 of the IGF Code consists of two components, namely:

- .1 A-60 class protections for boundaries of spaces, other than cargoes, facing fuel tanks on open deck; and
- .2 segregation of fuel tanks from cargoes in accordance with the IMDG Code.

4 In this regard, MSC 108 approved draft amendments to the IGF Code for subsequent adoption at MSC 109, including paragraph 11.3.2 and new sub-paragraph 11.3.2.2.

5 If adopted, the following new text will be added after the last sentence of existing paragraph 11.3.2 of the IGF Code, as an equivalent protection to A-60 class divisions:

"For ships constructed on or after 1 January 2028, any boundary facing the fuel tank on the open deck which is separated by a minimum distance, as determined to the satisfaction of the Administration through a heat analysis to provide protection equivalent to an A-60 class division, shall be considered acceptable. Intermediate structures providing heat protection to the above spaces may also be considered acceptable."

6 In addition, under paragraph 11.3.2 of the IGF Code, sub-paragraphs will be newly established, including sub-paragraph 11.3.2.2 which reads as follows:

- ".2 Fuel tanks shall be segregated from cargo in accordance with the requirements of the International Maritime Dangerous Goods (IMDG) Code where fuel tanks are regarded as bulk packaging. For the purposes of stowage and segregation requirements of the IMDG Code, a fuel tank on the open deck shall be considered as a class 2.1 package."

However, the proposed sub-paragraph is the duplication of the second component of existing paragraph 11.3.2, as quoted in paragraphs 2 and 3 above. The second component of existing paragraph 11.3.2 of the IGF Code is not proposed for deletion at this time.

7 It is recalled that paragraph 13 of document CCC 8/3/3 (IACS), which originally proposed related amendments as reproduced below, did not intend such duplication:

"11.3.2 Any boundary of accommodation spaces, service spaces, control stations, escape routes and machinery spaces, facing fuel tanks on open deck, shall be shielded by A-60 class divisions. The A-60 class divisions shall extend up to the underside of the deck of the navigation bridge.

11.3.2.1 On oil tankers and chemical tankers, A-60 insulation, required by SOLAS regulation II-2/9.2.4.2.5, shall be considered to meet the requirement for A-60 insulation provided that the fuel tank is located forward of the accommodation block in the cargo area.

11.3.2.2 Boundaries facing the fuel tank on the open deck shall be boundaries that fall within the projected area of the fuel tank onto the surface of that boundary, measured at any angle, except where a structure exists within that projection such that in the event of a leaked fuel tank gas-jet fire, heat does not radiate upon the boundary. Where no source of gas release from the fuel containment system is considered possible, e.g. type C tank for which tank connections are in an enclosed tank containment structure, requirements in 11.3.2 need not apply.

11.3.3 In addition, fuel tanks shall be segregated from cargo in accordance with the requirements of the International Maritime Dangerous Goods (IMDG) Code where the fuel tanks are regarded as bulk packaging. For the purposes of the stowage and segregation requirements of the IMDG Code, a fuel tank on the open deck shall be considered a class 2.1 package."

8 As such, the co-sponsors are of the view that the duplication between existing paragraph 11.3.2 and new draft sub-paragraph 11.3.2.2, as identified in paragraphs 2, 3 and 6 above, may be an oversight and that existing paragraph 11.3.2 should be corrected to remove the duplication before the final adoption at MSC 109.

9 Otherwise, the new addition to the end of existing paragraph 11.3.2 of the IGF Code, as shown in paragraph 5 above, could be misunderstood as offering an alternative solution also for the second component of existing paragraph 11.3.2, i.e. segregation of fuel tanks from cargoes in accordance with the IMDG Code. This is because the new addition was unintentionally written to apply to any boundary facing the fuel tank on the open deck, and not limited to the boundaries of accommodation spaces, service spaces, control stations, escape routes and machinery spaces.

10 The new addition to existing paragraph 11.3.2 of the IGF Code clearly states that the separation by a minimum distance determined through a heat analysis may be an equivalent solution to an A-60 class division. In this regard, the A-60 class division is not related to the stowage and segregation requirements of the IMDG Code. Therefore, the co-sponsors believe that the new addition was intended as an alternative solution as of 1 January 2028 only to the first component of existing paragraph 11.3.2, i.e. A-60 protections for boundaries of spaces, other than cargoes, facing fuel tanks on open deck.

## Proposal

11 In light of the discussion in paragraphs 2 to 10 above and with the understanding that new sub-paragraph 11.3.2.2 is maintained, the co-sponsors propose that the amendments to paragraph 11.3.2 of the IGF Code, as a whole, should read, as follows:

"11.3.2 Any boundary of accommodation spaces, service spaces, control stations, escape routes and machinery spaces, facing fuel tanks on open deck, shall be shielded by A-60 class divisions. The A-60 class divisions shall extend up to the underside of the deck of the navigation bridge. ~~In addition, fuel tanks shall be segregated from cargo in accordance with the requirements of the International Maritime Dangerous Goods (IMDG) Code where the fuel tanks are regarded as bulk packaging. For the purposes of the stowage and segregation requirements of the IMDG Code, a fuel tank on the open deck shall be considered a class 2.1 package.~~ For ships constructed on or after 1 January 2028, any such boundary facing the fuel tank on the open deck which is separated by a minimum distance, as determined to the satisfaction of the Administration through a heat analysis to provide protection equivalent to an A-60 class division, shall be considered acceptable. Intermediate structures providing heat protection to the above spaces may also be considered acceptable."\*

## Action requested of the Committee

12 The Committee is invited to consider the proposal in paragraph 11 and take action, as appropriate.

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\* Tracked changes are indicated using grey shaded text to highlight new insertions and strikethrough and grey shaded text to highlight deletions.