

SUB-COMMITTEE ON SHIP DESIGN AND CONSTRUCTION 11th session Agenda item 10

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UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, ENVIRONMENT, FACILITATION, LIABILITY AND COMPENSATION-RELATED CONVENTIONS

Information on the deletion of IACS unified interpretations UI SC 4 and UI SC 5

Submitted by IACS

SUMMARY

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Executive summary: This document presents information on the deletion of IACS unified

interpretations (UIs) SC 4 and SC 5 pursuant to consideration of the

discussion on document SDC 10/10.

Strategic direction,

if applicable:

Output: 7.1

Action to be taken: Paragraph 9

Related documents: SDC 10/10 and SDC 10/17 (paragraph 10.5)

Background

- 1 IACS identified the need to update IACS UI SC 5 during maintenance of old IACS resolutions. UI SC 5 provides the interpretation on SOLAS regulation II-1/42.2.3.1 regarding the internal communication equipment required in an emergency, in addition to those listed in IACS UI SC 4, which are common for both cargo and passenger ships. As there were no records on whether UI SC 5 had been submitted to IMO, IACS found it prudent to submit the revised UI SC 5 as a new proposed interpretation in document SDC 10/10.
- 2 SDC 10 considered document SDC 10/10 proposing an interpretation on the means of internal communication equipment in an emergency on passenger ships (SOLAS regulation II-1/42.2.3.1). The proposal was not agreed by the Sub-Committee.
- 3 IACS advised that it will review the comments made at SDC 10, consider revising the proposed draft interpretation, so as to address the issues raised, and present it to a future session of the Sub-Committee.



Information

- The existing IACS UI SC 4 and UI SC 5 are valid from 1985 and provide interpretations of SOLAS regulations II-1/42.2.3.1 and 43.2.4.1. Those SOLAS regulations provide requirements for the capacity of the emergency generator to be sufficient to supply all emergency consumers essential for safety in an emergency. IACS is of the understanding that those requirements address the emergency generator and its capacity and do not intend to specify power supply requirements to individual consumers.
- The power consumption of internal communication equipment is marginal compared to the total power consumption of all the emergency consumers. IACS cannot recall discussions on the load balance for emergency conditions relating to the inclusion of various internal communication equipment. Industry practice is, in general, to supply all internal communication equipment required by the regulations from the emergency switchboard, possibly with an additional supply from the main switchboard, under the understanding that all internal communication equipment required by the regulations may be required in an emergency. Therefore, and having had the benefit of feedback from SDC 10, IACS questioned the need for interpretations of SC 4 and SC 5, in view of the actual requirements in SOLAS regulations II-1/42.2.3.1 and 43.2.4.1.
- Since the adoption of IACS UI SC 4 and UI SC 5 in 1985, SOLAS chapter II-2 has been amended to introduce new regulations relating to different emergency conditions for passenger ships. Those changes have improved the understanding of an emergency condition.
- 7 Ensuring power supply to consumers in various emergency conditions may be achieved without recourse to the emergency source of power. Further, interpretations may become outdated if, and when, a SOLAS regulation relating to internal communication equipment is introduced or amended. If there should be a need to clarify whether individual internal communication equipment is required to be supplied from the emergency source of power, this should rather be dealt with in the regulation for that internal communication equipment. IACS no longer considers it prudent to maintain a form of summary in interpretations of SOLAS regulations II-1/42.2.3.1 and 43.2.4.1.
- As a result, IACS concluded to delete its UI SC 4 and UI SC 5. IACS is considering converting the text of the interpretations into an IACS recommendation, recognizing that its provisions may be in use as guidance for various purposes by industry actors.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to note the above and take action, as appropriate.