



CARRIAGE OF CARGOES AND CONTAINERS

Report of the eleventh session of the Sub-Committee

Comments on paragraph 2.4 of document MSC 111/14

Submitted by IACS

SUMMARY

Executive summary: This document comments on the draft interim guidelines for the use of ammonia cargo as fuel, developed by CCC 11 and reported in document MSC 111/14. IACS identifies potential ambiguity arising from the repeated use of the term "ammonia cargo as fuel", particularly for gas carriers intended to carry ammonia exclusively for use as fuel and not as cargo.

Strategic direction, if applicable: 1

Output: 1.17

Action to be taken: Paragraph 8

Related documents: MSC 111/14 and CCC 11/16 (annex 2)

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.6). It provides comments on paragraph 2.4 of document MSC 111/14 inviting the Committee to approve the draft MSC circular on interim guidelines for the use of ammonia cargo as fuel, as set out in annex 2 of document CCC 11/16.

Discussion

2 IACS notes that the title for the draft interim guidelines, as well as several references in the text, use the expression "ammonia cargo as fuel".

3 IACS is concerned that this wording may lead to ambiguity in a case where a gas carrier intends to carry ammonia exclusively as fuel, and not as cargo. The expression "ammonia cargo as fuel" could be interpreted differently, potentially creating uncertainty regarding the applicability of the interim guidelines to such gas carriers.

4 IACS considers that the terminology does not fully capture all foreseeable design and operational concepts for gas carriers using ammonia as a fuel. In particular, gas carriers may be designed to carry ammonia exclusively for use as fuel with no intention of transporting ammonia as cargo. In such cases, the use of the wording "ammonia cargo as fuel" may create uncertainty as to whether the interim guidelines are applicable.

5 IACS is concerned that differing interpretations of the scope of application could arise, leading to inconsistent application of the interim guidelines by Administrations and recognized organizations. Such uncertainty could hinder the safe and timely implementation of ammonia as a marine fuel, which the interim guidelines are intended to support.

6 IACS understands that for gas carriers carrying ammonia exclusively for use as fuel, the intention is to apply the interim guidelines in full. Therefore, IACS seeks from the Committee the confirmation of this understanding.

Proposal

7 Subject to the confirmation of the understanding set out in paragraph 6, and in order to avoid divergent interpretations regarding the applicability of the interim guidelines to gas carriers carrying ammonia exclusively as fuel and not as cargo, IACS proposes the following amendment to paragraph 2.1.1 of the draft interim guidelines:

"2.1.1 These interim guidelines, referenced in 16.9 of the IGC Code, apply to gas carriers complying with the requirements of the IGC Code using ammonia as fuel. They are applicable outside the cargo area in accordance with 16.4.1.1 of the IGC Code, except where required as a result of a risk assessment or where specifically required. These interim guidelines apply also to gas carriers carrying ammonia solely for use as fuel."

Action requested of the Committee

8 The Committee is invited to:

- .1 consider the discussion set out in paragraphs 2 to 5;
- .2 consider the request for confirmation set out in paragraph 6;
- .3 if confirmed, consider the amendment proposed in paragraph 7; and
- .4 take action, as appropriate.

* Tracked changes are indicated using "grey shading" to highlight all modifications.