INTERNATIONAL MARITIME ORGANIZATION

IMO

E

SUB-COMMITTEE ON SHIP DESIGN AND EQUIPMENT
53rd session
Agenda item 18

DE 53/18/8
31 December 2009
Original: ENGLISH

DEVELOPMENT OF A MANDATORY CODE FOR SHIPS OPERATING IN POLAR WATERS

Comments on the principles in developing the Polar Code

Submitted by Finland

SUMMARY	
Executive summary:	This document contains comments and observations to be taken into account when developing the Polar Code.
Strategic direction:	5.2
High level action:	5.2.1
Planned output:	5.2.1.2
Action to be taken:	Paragraph 11
Related documents:	DE 52/9/3; DE 53/18/1, DE 53/18/2 and MSC 86/26

Background and purpose of the document

1 Referring to the note 1.1.3. attached to the provisional agenda (DE 53/1) for the fifty-third session of the Sub-Committee on Ship Design and Equipment, and in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work of the MSC and its subsidiary bodies (MSC-MEPC.1/Circ.2), Finland submits the following comments and observations relating to the alternative principles of the proposed Polar Code.

2 Shipping is foreseen to increase in polar waters due to intensified exploration and exploitation of natural resources. Increase in shipping is also due to the climate change making ice conditions in polar areas less severe. Thus it is timely and very important to provide measures aiming at making polar shipping safe and environmentally sustainable. A well-balanced Polar Code prepared by the IMO would undoubtedly facilitate reaching this goal. At the same time, we should try to avoid a situation of several overlapping principles related to ice class requirements used in polar waters.

3 The Polar Code under preparation should favour ship structures and operational practices that lead to increased safety in and decreased impact of shipping on maritime environment. While the Code should take duly into account most recent practices and technical innovations, it needs to be built upon practices (ice rules, ship design, operational practices and crew training) that have proven to be sound. Finally, the Code should be unbiased and treat ships with different ice classes on an equal footing.

4 As polar areas are large and remote, the role of Administrations ought to be emphasized and clarified in the Code. Administrations have the best knowledge of different facets of polar traffic, including weather and ice conditions, traffic lanes, traffic control, traffic density and available infrastructure (fairways, icebreakers, search and rescue, etc.). Thus, for safe, environmentally sustainable and economic polar shipping, the role of Administrations should be outlined in the Code in general terms with a view to harmonizing the principles for evaluation of vessels' suitability for polar navigation.

5 The Polar Code should support safe, environmentally sustainable and also economic polar shipping. The suggested four divisions of the Code (construction provisions, equipment, operational and environmental protection) overlap in many respects, and leave open some issues, such as control of vessels' suitability for polar navigation. Division could be done on the following basis: Ship construction matters, Operational control, Operational practices and Crew competence and ship manning, as elaborated below.

Ship construction

6 The Code should stipulate the required safety level when navigating in ice. This could be done following the Goal-Based Standards (GBS) concept by stating the functional requirements of various aspects in ship constructions. A reference is needed to existing ship ice classes, especially the past experience from various ice classes should be taken into account. The broad spectrum of ice conditions that are encountered in polar waters and the spectrum of ice classes starting from open water ships should match. It needs to be kept in mind that many polar areas have only first-year ice, however, there also exists multi-year ice of different thicknesses. Winterization requirements developed by classification societies should be reflected in the Code with a view to harmonize winterization requirements. The ships' operational capability in ice is a matter of safety. Thus ship performance in ice ought to be included in the Code.

Control of vessels' suitability for polar navigation

7 While elaborating the existing principles, such as ice regime or traffic restrictions, the broad spectrum of existing ice classes (e.g., the IACS PC classes, Finnish-Swedish ice classes and Russian Maritime Register of Shipping classes) needs to be taken into account. It is clear that the principles for defining the suitability of vessels for polar navigation should be developed. In these principles the different ice conditions and winterization notations need to be taken into consideration following the GBS concept. The availability of icebreakers has an impact on the evaluation of vessel suitability for polar navigation. The principles of evaluation ought to be flexible enough in order to reflect changes in ice conditions.

Operational practices

8 It is important that ships are operated so that navigation is safe and emergency situations are handled efficiently, at the same time the shipping must be continuous and economic. The Polar Code should stipulate safe practices and mandatory operations onboard.

Crew competence and ship manning

9 When more ships operate in the ice covered polar waters, it is foreseen that crew may have little or no experience in navigating in ice. Experience is of utmost importance, in some cases additional support to the regular crew might be needed especially when handling emergency situations. Thus the requirements for crew competence needs to be included in the Code. The required additional support in heavy ice conditions needs to be in line with the principles of evaluation.

10 The elaboration of the Polar Code has revealed the necessity of a thorough revision of the existing Polar Guidelines. Furthermore, a situation in which several different principles for evaluation exist in the polar waters (the Canadian, the Russian Federation and the Antarctic), in addition to the Polar Code, should be avoided.

Action requested of the Sub-Committee

11 The Sub-Committee is invited to consider and further develop the principles set out above.