INTERNATIONAL MARITIME ORGANIZATION

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SUB-COMMITTEE ON SHIP DESIGN AND EQUIPMENT
54th session
Agenda item 13

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DEVELOPMENT OF A MANDATORY CODE FOR SHIPS OPERATING IN POLAR WATERS

Comments on the report of the Correspondence Group

Submitted by Finland

SUMMARY

Executive summary:	Finland proposes that a reference to the Finnish-Swedish Ice Class Rules should be included in the Polar Code. Furthermore, we find that the operational limitations related to structural requirements for ships in the Arctic area should be based on meteorological and ice conditions.
Strategic direction:	5.2
High-level action:	5.2.1
Planned output:	5.2.1.19
Action to be taken:	Paragraph 10
Related documents:	Resolution A.1024(26); DE 53/18/8 and DE 54/13/3

1 The purpose of the document is to provide comments on document DE 54/13/3, report of the Correspondence Group on development of a mandatory code for ships operating in polar waters.

2 In resolution A.1024(26) on Guidelines for ships operating in polar waters, chapter 1, section 1.1.4, it is stated that "all Polar Class ships and the equipment to be carried in accordance with the Guidelines should be designed, constructed and maintained in compliance with applicable national standards of the Administration or the appropriate requirements of a recognized organization which provide an equivalent level of safety for its intended service".

3 In our view, all relevant regulations concerning navigation in ice conditions, e.g., the Finnish-Swedish Ice Class Rules, and experience of navigation in ice conditions in other sea areas should be taken into account when developing the Polar Code further in the Sub-Committee.

4 Ships strengthened in accordance with the Finnish-Swedish Ice Class Rules (FSICR) and the equivalent ice class rules of classification societies have successfully sailed in Arctic and Antarctic regions for decades, see figure 1.

Figure 1. Voyages of the Finnish merchant ships in the Arctic region illustrated with black solid line. Shipping in/through the North East and North West Passages has been conducted either during the open water period, with icebreaker assistance or under ice conditions that are appropriate for the FSICR.

5 For example "Purha" class oil tankers (Finnish-Swedish ice class IA) have sailed year-round to the west coast of Greenland, see table 1.

Table 1. Voyages of the "Purha" class tankers to the west coast of Greenland

Year and month(s)	Name of the "Purha" class ship
2008, September, October and November	"Futura"
2008, April, May, June and July	"Neste"
2008, February and August	"Purha"
2009, February, April and November	"Futura"
2009, January	"Jurmo"
2009, June, July, August and September	"Purha"

6 The Correspondence Group has discussed a proposal to establish operational limitations based on geographical boundaries (see section 6 of the report of the Correspondence Group). Based on our experience we think that operational limitations related to structural requirements for ships in the Arctic area should not be based on geographical boundaries but rather on meteorological and ice conditions.

7 Therefore, we find that as far as the structural design of ships sailing in polar regions is concerned, ships strengthened in accordance with the FSICR and equivalent ice class rules of classification societies can be allowed to be used in first-year ice conditions also in the future. In the FSICR the ice conditions for which the rules have been designed are very well defined: the maximum first-year level ice thickness is 0.8 m for ice class IA and 1.0 m for ice class IA Super.

Proposal

8 Due to our long practical experience of sailing in polar regions we think that a reference to the FSICR should be included in the Polar Code. Pending on ice conditions, the ice strengthening of ships required for navigation in ice in the Baltic Sea region should be an acceptable level of ice strengthening for operation in polar regions as well.

9 In our view the operational limitations related to structural requirements for ships in the Arctic area should be based on meteorological and ice conditions.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the proposal and decide as appropriate.