



SUB-COMMITTEE ON FIRE PROTECTION
54th session
Agenda item 6

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MEASURES TO PREVENT EXPLOSIONS ON OIL AND CHEMICAL TANKERS TRANSPORTING LOW-FLASH POINT CARGOES

Clarification of the term “the property-based approach”

Submitted by the International Parcel Tankers Association (IPTA)

SUMMARY

<i>Executive summary:</i>	IPTA asks for clarification of the term “the property-based approach”.
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.3
<i>Planned output:</i>	5.2.3.4
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	FP 53/23; FP 52/20/2; MSC 83/28 and MSC 82/21/15

Background

1 In document MSC 82/21/15, Norway set out its proposal for “a user-friendly regulatory regime applicable to all tankers regardless of their size and age” in relation to the application of inert gas. Norway also explained that under such a system tankers not fitted with an inert gas system would have the following choices:

- .1 fit an inert gas system; or
- .2 rely on delivery of inert gas from shore, whenever transporting chemicals or petroleum products requiring inerting; or
- .3 only transport chemicals or products not requiring inerting.

2 In document FP 52/20/2, Norway made reference to a “property-based approach” to the application of inert gas, which was defined as “requiring inerting of the cargo tanks when the ship is carrying cargo with a flash point not exceeding 60°C regardless of ship size, age, tank size, capacity of nozzles of washing machines and the washing machine’s total throughput”.

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Discussion

3 The above definition of the property-based approach clearly implies application to existing ships, which in turn implies a requirement for retrofit of existing vessels that trade in low-flash products, since for most operators it would not be possible to change their entire trading pattern to stop transporting low-flash products, and in most cases it is simply not practical to rely solely on shore supply of inert gas.

4 It also clearly implies that there should be no lower tonnage size limit for the application of inert gas.

5 The instructions given to the FP Sub-Committee by MSC 83 were to consider firstly measures for new ships, and, depending on the outcome of these discussions, the item might be extended to existing vessels. There has, as yet, been no agreement reached on any lower tonnage size limit.

6 In the course of the discussions in relation to new ships, however, we continue to hear references to “the property-based approach”, and the report of FP 53 makes reference (FP 53/23, paragraph 5.7.11) to a number of delegations supporting the “property-based approach”.

7 IPTA would suggest that if the phrase is to continue to be used, in order to avoid any misunderstandings, clarification should be given on the precise meaning of “the property-based approach” in the context of the current discussions.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the above and take action as appropriate.
