

MARITIME SAFETY COMMITTEE
88th session
Agenda item 9

MSC 88/9/3
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FIRE PROTECTION

Comment on the draft MSC circular on Unified Interpretation of chapter 12 of the International Code for Fire Safety Systems

Submitted by Japan

SUMMARY

<i>Executive summary:</i>	This document invites the Committee to consider an effective date of the draft circular on Unified Interpretation of chapter 12 of the International Code for Fire Safety Systems, emanating from FP 54
<i>Strategic direction:</i>	1.1
<i>High-level action:</i>	1.1.2
<i>Planned output:</i>	1.1.2.2
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	MSC 88/9 and FP 54/25, annex 11

Background

1 This document is submitted in accordance with the provisions in paragraph 4.10.5 of the revised Guidelines on the organization and method of work of the MSC and the MEPC and their subsidiary bodies (MSC-MEPC.1/Circ.2).

2 This document is submitted to invite the Committee to consider an application date of the draft MSC circular on Unified Interpretation of chapter 12 of the FSS Code (FP 54/25, annex 11).

3 Paragraph 2 of the preamble of the draft MSC circular reads:

"Member Governments are invited to use the annexed unified interpretation as guidance when applying relevant provisions of chapter 12 of the FSS Code for ships constructed on or after [date of approval of the circular] and to bring the unified interpretation to the attention of all parties concerned."

Possible impact on ship design

4 In case where the Unified Interpretation is used for ships constructed on or after date of approval of circular, i.e. November this year, it will have serious influence on shipbuilding processes and contracts in view of the following:

- .1 in most ships, an emergency fire pump is installed in an aft compartment behind its engine-room, and a centrifugal type pump is used as an emergency fire pump;
- .2 in order that an emergency fire pump meets the requirements specified in the Unified Interpretation, it will be necessary to re-arrange the compartment installed with the emergency fire pump to a lower level, because the practical suction lift of the centrifugal pump is approximately 7m in maximum. In that case, it will be necessary to change a stern construction from the current design;
- .3 a stern construction is an important parameter to specify the ship performance such as speed control as well as fuel consumption, and the change of the stern construction affects on the shipbuilding contracts; and
- .4 the shipbuilding contract process including design modification or development of new hull design requires a certain period.

5 Such modification/development of design of ships' stern in order to comply with the Unified Interpretation will result in an impact on the ships that have already been contracted before the effective date but will be constructed after that date.

Proposal

6 Japan considers that it is necessary to give a certain period of time, after the approval of the circular, for re-design and contract to shipping and shipbuilding industries in order to minimize the impact on shipbuilding processes and contracts.

7 Therefore, Japan proposes to give a period of grace of 12 months to the industries. So, paragraph 2 of annex 11 to document FP 54/25 should be:

"Member Governments are invited to use the annexed Unified Interpretation as guidance when applying relevant provisions of chapter 12 of the FSS Code for ships constructed on or after 1 January 2012 and to bring the Unified Interpretation to the attention of all parties concerned."

Action requested of the Committee

8 The Committee is invited to consider the effective application date of draft MSC circular on Unified Interpretation of chapter 12 of the FSS Code as proposed in paragraph 7, and to take action as appropriate.
