



MARITIME SAFETY COMMITTEE  
83rd session  
Agenda item 9

MSC 83/9/2  
31 July 2007  
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## SHIP DESIGN AND EQUIPMENT

### Comments on the report of the fiftieth session of the Sub-Committee

#### Submitted by the United Kingdom

#### SUMMARY

<b><i>Executive summary:</i></b>	This document provides comments on the draft MSC resolution on Performance standard for protective coatings for void spaces on bulk carriers and oil tankers (DE 50/27, annex 3) and suggests minor amendments.
<b><i>Action to be taken:</i></b>	Paragraph 7
<b><i>Related documents:</i></b>	DE 50/27 and MSC 83/9

1 The Committee will be invited to adopt an MSC resolution on a Performance standard for protective coatings for void spaces on bulk carriers and oil tankers (paragraph 2.4 of document MSC 83/9 refers).

2 The United Kingdom recalls that during the course of DE 50 a number of delegates expressed concern that, within the draft Performance standard for protective coatings for void spaces', a new type of space, a "totally enclosed space", was being defined and that this could have possible implications for the way in which future bulk carriers and oil tankers would be designed and built (paragraph 4.12 of the report of DE 50, to which document DE 50/27 refers).

3 The principal concern was that spaces currently designed and constructed as "open" void spaces on these vessels could, on new vessels, be designed to be "totally enclosed spaces"<sup>1</sup> as this then would obviate the need for a coating system to be provided. However, an undesirable consequence of this would be that access for inspection and maintenance would be excluded.

4 The United Kingdom understands that provisions contained within other mandatory instruments would normally preclude the construction of "totally enclosed spaces" but would suggest that a footnote, inserted within this resolution, and which clarifies this issue may be helpful and appropriate.

<sup>1</sup> Refer to document DE 50/27, annex 3, paragraph 2.13: "***Totally enclosed space*** is a space which has no means of access and no ventilation".

5 The footnote proposed would be referenced from the ends of paragraphs 4.2.1.1.4 and 4.2.1.1.5 of document DE 50/27, annex 3, and would state that:

“Noting, *inter alia*, the mandatory provisions of resolution A.744(18), as amended, regarding the requirement to undertake close-up surveys of the internal structure of upper and lower stools, where fitted.”

6 On a related issue, the Committee’s attention is drawn to the text contained within paragraph 4.2.1.1.3 and it is suggested that the words “*other small void spaces in cargo tanks*” should be amended to read “... *in cargo holds*” or “... *in cargo spaces*”.

#### **Action requested of the Committee**

7 The Committee is invited to agree to the proposals contained in paragraphs 5 and 6 above when considering the text of the draft resolution for adoption.

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