INTERNATIONAL MARITIME ORGANIZATION

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SUB-COMMITTEE ON STABILITY AND LOAD LINES AND ON FISHING VESSELS SAFETY
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Agenda item 9

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GUIDELINES FOR VERIFICATION OF DAMAGE STABILITY REQUIREMENTS FOR TANKERS AND BULK CARRIERS

Development of guidelines for the verification of damage stability on oil, chemical and gas tankers

Submitted by International Parcel Tankers Association (IPTA)

SUMMARY

Executive summary:	This document provides comments on document SLF 52/9/1
Strategic direction:	2
High-level action:	2.1.1
Planned output:	2.1.1.2
Action to be taken:	Paragraph 13
Related documents:	SLF 52/9/1; SLF 51/13/1; MSC 83/25/14, MSC 83/22/2, MSC 82/18/3, MSC 82/18/4, MSC 82/18/5 and MSC 81/20/3

Introduction

1 This document is submitted in accordance with paragraph 4.10.5 of the Guidelines on the organization and method of work of the MSC and the MEPC (MSC−MEPC.1/Circ.2) and comments on document SLF 52/9/1 submitted by the United Kingdom *et al*.

2 IPTA notes the submission made by the United Kingdom *et al.* in response to the request from SLF 51 for more data on the alleged non-compliance of tankers with damage stability requirements and thanks the United Kingdom for the work carried out. We would offer the following comments.

3 We note that, in paragraph 7, the United Kingdom and its co-sponsors state that they have applied a standard of 2% variation by weight in any cargo or ballast tank to judge whether a vessel is loaded in accordance with its approved conditions, however, note 4 of the instructions to surveyors carrying out the survey states that the filling of each cargo or ballast tank should lie within 1% of the weight in the approved condition to be considered approved. We would appreciate clarification on this point.

4 We further note that this latest survey has covered 73 vessels, which, together with the previous survey carried out by the United Kingdom, means that 144 vessels have been examined altogether. According to EQUASIS statistics, the combined fleet of oil, chemical and gas tankers amounted in 2007 to approximately 12,800 vessels, meaning that the combined surveys have covered a little over 1% of the total fleet. We would suggest that this is an extremely small percentage from which to extrapolate that one third of the tanker fleet currently poses an unacceptable risk to life at sea and to the environment.

Discussion

5 Notwithstanding the above, we would offer the following observations. According to the latest survey by the United Kingdom, only 13 vessels both arrived and departed closely loaded to a condition in the approved Stability Information Booklet, while 49 either arrived or departed in a loaded condition that did not meet the United Kingdom's criteria for being an approved condition. According to the criteria applied by the United Kingdom, therefore, if we are to take this survey as representative of the entire fleet, more than 80% of tankers are sailing part or all of the time in a condition that deviates significantly from the Stability Information Booklet.

6 The United Kingdom argues that, where such vessels are not in a position to verify compliance with damage stability requirements prior to sailing, they are non-compliant, justifying enforcement measures under SOLAS regulation I/19. The United Kingdom has previously asserted (document MSC 83/25/14) that the only practical method of verifying compliance is by use of an onboard damage stability program and, indeed, vessels using alternative methods have not been deemed satisfactory under their survey criteria.

7 It should, however, be borne in mind that there is currently no mandatory requirement for onboard damage stability programs, and many tankers do not have them. The figures quoted by the United Kingdom would indicate that at least 36% and possibly up to 45% of the fleet, or between 4,600 and 5,800 vessels, are not fitted with damage stability programs. To encourage Port State Control to start an enforcement programme based on the United Kingdom's criteria at present could lead to large numbers of vessels being detained until such time as their loading condition could be approved by their Administrations. Given the lack of evidence of problems caused by this alleged non-compliance and indeed the United Kingdom's previous comment that "the risk of a vessel in an unverified loading condition being lost following an incident is considered to be relatively low" (document MSC 81/18/3), we would suggest that the potential for disruption to the normal operation of a great many tankers would be disproportionate to the risk posed.

Proposed course of action

8 IPTA would therefore propose a phased approach on this issue. In our view the Sub-Committee should first decide whether it agrees with the United Kingdom and its co-sponsors' definition of what constitutes a significant deviation from an approved condition, and if not, what that definition should be.

9 The Sub-Committee should then decide whether it accepts that verification of a non-approved condition is possible by means other than the use of damage stability programs, such as KG curves or shore-based instruments, and if so, in what circumstances.

10 As we have previously noted, there has long been an understanding within the chemical tanker industry that damage stability issues are dealt with at design stage, with onboard verification being confined to intact stability. We would therefore suggest that before any Port State Control campaign is embarked upon, Administrations should be given the opportunity to verify that vessels flying their flag are aware of what is required of them in respect of onboard verification of damage stability requirements and have some means of checking compliance with damage stability requirements if they load outside of the agreed tolerance.

11 If, after due consideration, the Sub-Committee is of the opinion that the only way of ensuring compliance with damage stability criteria is for some or all tankers to be fitted with damage stability programs, then amendments should be made to the appropriate instruments to set out the conditions under which such equipment may be required, with an adequate lead-in time to allow the many tankers that do not currently have the equipment to get it fitted.

12 In IPTA's view, the approach outlined in paragraphs 8 to 11 presents a reasonable and practical way of ensuring that tankers are properly loaded to within the approved intact and damage stability limits and both industry and Port State Control understand what is required of them.

Action requested of the Sub-Committee

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