



SUB-COMMITTEE ON SHIP DESIGN AND
EQUIPMENT
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INTERPRETATION ON APPLICATION OF SOLAS, MARPOL AND LOAD LINE REQUIREMENTS FOR MAJOR CONVERSIONS OF OIL TANKERS

The application of ICLL regulations to conversions of single-hull tanker to double-hull tanker or bulk carrier/ore carrier

Submitted by the International Association of Classification Societies (IACS)

SUMMARY

Executive summary:	This document advises the Sub-Committee about the IACS draft UI for the application of ICLL regulations to conversions of single-hull tanker to double-hull tanker or bulk carrier/ore carrier and looks for clarification on this matter from the Sub-Committee
Strategic direction:	2
High-level action:	2.0.1
Planned output:	2.0.1.29
Action to be taken:	Paragraph 8
Related documents:	DE 51/28 (paragraph 20.7); MSC 85/23/7, MSC 85/26 (paragraph 23.28); DE 52/17/1 and DE 52/21 (paragraph 17.6)

Introduction

1 In paragraph 20.7 of document DE 51/28, it is stated that the Sub-Committee supported the IACS proposal that the extent of the application of SOLAS, MARPOL and ICLL requirements to conversions should be discussed in a holistic manner. Also, in paragraph 23.28 of document MSC 85/26, the Committee endorsed the proposal of the Republic of Korea and IACS (MSC 85/23/7) to include in the DE Sub-Committee's agenda a new work program item on Application of SOLAS, MARPOL and Load Line requirements to major conversions of oil tankers.

2 Subsequently, IACS submitted document DE 52/17/1 on the application of SOLAS regulations to conversions of Single Hull Tankers (SHT) to Double Hull Tanker (DHT) or Bulk Carrier/Ore Carrier (BC/OC), which addressed the application of SOLAS regulation only, and left that of ICLL regulations untouched due to lack of clear definition of the term "major conversion" in ICLL.

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3 Following the decision of DE 52, as reported in paragraph 17.6 of document DE 52/21, to defer further consideration of document DE 52/17/1 to a time when the item had been included in the provisional agenda of the Sub-Committee; and with the view of developing Unified Interpretations to provide a uniform package for major conversions of SHT to DHT or BC/OC, IACS submits at annex 1 to this document a draft IACS Unified Interpretation on Load Line (“draft LL UI”) as a separate document to address the application of ICLL to the major conversion of SHT to DHT or BC/OC.

Discussion

4 In the recent decade, much effort has been made to update the ICLL with a view to continuously improving the standards of bulk carriers and mitigating the risks of bulk carriers that were identified during IMO’s FSA Study on Bulk Carrier Safety.

5 From the technical point of view, to maintain these IMO standards for bulk carriers, it would seem reasonable that the regulations in effect at the “date of conversion” should be complied with for conversion from oil tankers to bulk carriers even if the freeboard remains the same after conversion.

6 IACS requests the Sub-Committee to note that the draft LL UI at the annex to this document is incomplete for the time being due to a lack of the definition of “major conversion” in the ICLL. Consequently, and in order to finalize this UI, IACS would like to seek clarification from the Sub-Committee on:

- .1 whether or not a BC/OC which is converted from a SHT should be regarded as a major conversion when there is no magnitude change of freeboard after conversion;
- .2 whether or not ICLL regulations in effect at the “date of conversion” shall be applied to a SHT converted to a BC/OC if the freeboard remains unchanged after conversion; and
- .3 if the answer to paragraph 6.2 above is “Yes”, whether or not the requirements for bow height in regulation 39(1) and for reserve buoyancy in regulation 39(5) of the amended 1988 Protocol to the ICLL should only be applied for a newly installed forecastle. In determining such a clarification, the Sub-Committee is invited to note that the experience of IACS Members in applying regulation 39(5) has shown that it can lead to an increase in the minimum bow height requirement by up to 2 metres, leading to a reduction in permissible freeboard and consequent loss of deadweight.

7 The Sub-Committee is invited to consider the foregoing discussion and provide clarification on the issue identified in paragraph 6 above to assist IACS in finalization of the draft LL UI on application of ICLL regulations to conversions from SHT to DHT or BC/OC, which will be submitted to a subsequent session for consideration.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the above discussion, in particular paragraph 7, and the IACS draft LL UI and Technical background for IACS UI LL thereto attached at annexes 1 and 2, and decide as appropriate.

ANNEX 1

DRAFT

**IACS UI ON APPLICATION OF ICLL REQUIREMENTS FOR CONVERSIONS
OF SINGLE-HULL OIL TANKERS TO DOUBLE-HULL OIL TANKERS
OR BULK CARRIERS/ORE CARRIERS**

This unified interpretation only applies to conversion of single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers and gives the principles of application of ICLL requirements for such conversion in following Table.

Nature of Conversion	Freeboard Assignment (chapter III)	Conditions of Assignment (chapter II)
1) Ship's Length and/or Depth are increased	Assigned freeboard is to be calculated in accordance with the regulations in effect at the "date of conversion"* ¹	The ship may continue to comply with regulations in effect prior to the "date of conversion" except that newly installed or modified structures and/or equipment such as doors, cargo hatches, small hatches, air pipes, guard rails are to comply with regulations in effect at the "date of conversion"
2) Cases other than that stated in 1) above	a) The type of the assigned post-conversion freeboard is the same as, and the value is not less than, the pre-conversion assigned freeboard, the post-conversion freeboard is to be calculated in accordance with the regulations in effect prior to the "date of conversion"* ²	
	b) The type of assigned post-conversion freeboard is different from, or the value is less than, the pre-conversion assigned freeboard, the post-conversion freeboard is to be calculated in accordance with the regulations in effect at the "date of conversion"	

*¹ – "date of conversion" is the date on which a contract is placed for the conversion; or, in the absence of a contract, the date on which the work identifiable with the specific conversion begins.

*² – Where an oil tanker with an assigned freeboard not less than the geometric freeboard for a Type "B" ship, regardless whether it is certificated as Type "A" or Type "B" ship, is converted to a bulk/ore carrier, the regulations in effect at the "date of conversion" are to be applied.

ANNEX 2**TECHNICAL BACKGROUND FOR IACS UI LL**

1 It is a common concern among shipowners, shipyards and classification societies how to apply ICLL to double-hull tankers (DHT) or bulk/ore carriers (BC/OC) when converted from single-hull tankers (SHT) due to no clear definition of major conversion in ICLL. This UI is developed to address the regulations of ICLL in effect prior to or at “the date of conversion” that shall apply to these conversions.

2 In order to avoid a difficult job for defining the threshold of “major conversion”, it is agreed to limit the application in item 1) of the first column in the Table of the draft UI and to keep the parameters as ship length/depth and increase thereof alone, which would definitely lead to a significant increase of the minimum freeboard required.

3 Other subordinate parameters, which do not certainly and significantly increase the minimum freeboard required, are poured to item 2) of the 1st column in the Table of the draft UI, so as to directly access the effects on the assigned freeboards by changes to such parameters. It would explicitly be understood that this approach, by no means, is with the intention to ignore or miss such parameters’ influence on freeboard.

4 In respect to Freeboard Assignment it is recognized that Article 4(4) in ICLL is applicable to existing ships (i.e. those to which the 1930s ICLL applies under 1966 ICLL, or to which 1966s ICLL applies under 1966 ICLL amended by 1988 Protocol). However, nowhere else in the ICLL is any reference made to the application of new requirements to existing ships. Care needs to be taken with use of Article 4(4) to conversions as it states that “in no case shall such ships be required to increase their freeboards” where “such ships” are existing ships to which the new requirements are to be applied. Notwithstanding, Article 4(4) does require existing ships, which wish to take advantage of any possible reduction in freeboards achievable under the new requirements, to meet the new requirements in full.

5 For Condition of Assignment, based on the Article 10(2) in ICLL, the idea of substantial change of structure and/or equipment could be followed, which is subject to that one advocated by EU and IMO DE 51 and DE 52 as well.

6 Footnote for the explanation to “date of conversion” was deemed necessary to add to the draft UI.

7 In the recent decade, much effort has been made to amend ICLL in IMO with a view to continuously improving the standards of bulk carriers and mitigating the risks of bulk carriers which were identified during IMO’s FSA Study on Bulk Carrier Safety.

8 It should also be noted that some Administrations accept the case where an oil tanker with an assigned freeboard, which reaches or exceeds the geometric freeboard for a Type B ship, can be certificated as either a Type A ship or a Type B ship.

9 For the purpose of eliminating the possible ambiguity it is suggested to make a specification “Where an oil tanker with an assigned freeboard not less the geometric freeboard for a Type B ship, regardless of its certificated Type A or Type B ship, is converted to a bulk/ore carrier, the regulations in effect at the “date of conversion” are to be applied, even if the freeboard is unchanged after conversion.” added to the Draft UI.

10 It was also asserted that a change in ship type from A to B (or B – reduced) is not considered to be a major change under Article 10 of ICLL which 8 flag administrations have accepted. It is therefore suggested that the judgement conditions referred to “type of freeboard” be removed from the Table of the Draft UI.

11 Furthermore agreement could not be reached on whether or not the conversion from SHT to BC/OC should be regarded as a major conversion. It was agreed that this would be referred back to IMO for clarification as an agreement within IACS is not going to be reached on this matter.
