



SUB-COMMITTEE ON SHIP DESIGN AND
EQUIPMENT
54th session
Agenda item 5

DE 54/5/2
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**INTERPRETATION ON APPLICATION OF SOLAS, MARPOL AND LOAD LINE
REQUIREMENTS FOR MAJOR CONVERSIONS OF OIL TANKERS**

**Unified Interpretations on the application of Load Line requirements for conversions
from single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers**

Submitted by the International Association of Classification Societies (IACS)

SUMMARY

Executive summary: This document submits for the Sub-Committee's consideration proposals for improving the draft MSC-MEPC circular attached at annex 3 of the annex to document DE 54/5 on the Unified Interpretation on the application of ICLL requirements for conversions from single-hull tankers to double-hull tankers or bulk carriers/ore carriers

Strategic direction: 2

High-level action: 2.0.1

Planned output: 2.0.1.29

Action to be taken: Paragraph 8

Related documents: DE 53/16/1, DE 53/26 (paragraphs 16.8.3, 16.9, 16.16 and 16.18, respectively) and DE 54/5

Introduction

1 In paragraphs 16.16 and 16.18 of document DE 53/26, the Sub-Committee agreed that further work is necessary with regard to Unified Interpretations on application of the Load Line Convention ("the Convention") for conversions from single-hull oil tankers to double-hull oil tankers, and invited comments and proposals to be submitted to DE 54.

2 It is noted that the Secretariat has prepared a consolidated and editorially improved draft MSC-MEPC circular on Unified Interpretations on application of SOLAS, MARPOL and ICLL requirements for conversions from single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers, at the annex to document DE 54/5; for further discussion at DE 54.

3 IACS submits, at annex to this document, proposals for amending annex 3 (Unified Interpretations on application of ICLL requirements for conversions from single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers) of the draft MSC-MEPC circular attached at annex to document DE 54/5.

Discussion

4 Because there is no available definition on what constitutes a major conversion in the Convention, IACS developed a principle to facilitate the uniform application of the provisions of the Convention to major conversions of single-hull tankers to double-hull tankers in annex 1 to document DE 53/16/1. This principle is based on IACS's understanding that a dimensional increase, or any decrease of assigned freeboard, is considered as a key factor in determining whether the requirements in effect at the date of conversion should be applied to conversions from single-hull oil tankers to double-hull oil tankers. It is recommended that this principle be introduced into the Unified Interpretations on the application of the Convention for conversions provided in annex 3 to the draft MSC-MEPC circular attached at annex to document DE 54/5.

5 IACS has a long-established practice of applying the principle of only requiring newly added or installed or substantially modified structure/equipment to comply with the requirements in effect at the date of conversion, so as to avoid retrospective application of new requirements to existing unmodified structure/equipment. This has been clearly stated in the Unified Interpretations on the application of SOLAS provisions related to such conversions (annex 1 to the draft MSC-MEPC circular attached at annex to document DE 54/5). IACS believes that the same principle should also be reflected in the Unified Interpretations on the application of the provisions of the ICLL in such instances.

6 While it has been clarified in the Unified Interpretations on application of the Convention for conversions, that a conversion from single-hull oil tankers to bulk carriers/ore carriers should be regarded as a modification of major character and the ship should meet the requirements of the regulations in effect at the date of conversion, the agreement reached by the Sub-Committee as documented in paragraph 16.8.3 of document DE 53/26 on questions relating to bow height and reserve buoyancy, should still be explicitly addressed to avoid possible misunderstanding in implementation of the Unified Interpretations.

7 In light of the decision made by the Sub-Committee as documented in paragraph 16.9 of document DE 53/26 on utilizing the "three-date" system for the application of the Convention to major conversions, IACS considers that the related wording should be kept in line with those for application of SOLAS to major conversions. However:

- .1 it is noted that the proposed [six months'] duration between the date on which the contract is placed for the conversion and the completion date of the conversion seems not to be in line with the practice in MARPOL. It is therefore recommended to define the completion date of conversion as a date that occurs more than [3 years] after the date on which the contract is placed, or [30 months] after the date on which the conversion work begins, in absence of a contract; and
- .2 IACS believes it would be better to set the "three-date" system as a general principle for the application of SOLAS, MARPOL and ICLL to major conversions in the introductory text of the draft MSC-MEPC circular (unless expressed otherwise) in annexes 1, 2 and 3, rather than reiterate the system in annexes 1 and 3 respectively.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the comments and proposals made above and the alternative text for annex 3 to document DE 54/5, provided at the annex to this document, and take action as appropriate.

ANNEX

UNIFIED INTERPRETATIONS ON THE APPLICATION OF LOAD LINE REQUIREMENTS TO CONVERSIONS OF SINGLE-HULL OIL TANKERS TO DOUBLE-HULL OIL TANKERS OR BULK CARRIERS/ORE CARRIERS

Alternative text for annex 3 to document DE 54/5

Article 10 – Repairs, alterations and modifications

- 1 For single-hull oil tankers converted to double-hull oil tankers:
 - .1 the ship should meet the requirements of the regulations contained in chapter III (Freeboards) of the Convention in effect at the date of conversion where there is a change in the parameters which results in changing of the minimum freeboard or any decrease of magnitude of freeboard assigned after conversion; and
 - .2 only structure and/or equipment such as doors, hatches, and cable lockers, etc., which is newly added, replaced, or modified, is to comply with the requirements of the regulations contained in chapter II (Conditions of assignment of freeboard) of the Convention in effect at the date of conversion.
- 2 For single-hull oil tankers converted to bulk carriers/ore carriers:
 - .1 any such conversion should be regarded as a modification of a major character and the ship should meet the requirements of the regulations attached to the Convention in effect at the date of conversion;
 - .2 only structure and/or equipment such as doors, hatches, and cable lockers, etc., which is newly added, replaced, or modified, is to comply with the requirements of the regulations contained in chapter II (Conditions of assignment of freeboard) of the Convention in effect at the date of conversion; and
 - .3 provided that the magnitude of freeboard assigned after the conversion is not reduced, the requirements in regulation 39 of the Convention in effect at the date of conversion should only be applied for a newly installed forecastle.
- 3 The date on which such a conversion occurs for the purposes of determining the applicability of requirements for ships constructed on or after the date on which any relevant amendments enters into force should be:
 - .1 the date on which the contract is placed for the conversion; or
 - .2 in the absence of a contract, the date on which the work identifiable with the specific conversion deigns begins; or
 - .3 the completion date of the conversion, if that occurs more than [3 years] after the date specified in paragraph 3.1 above or [30] months after the date specified in paragraph 3.2 above, either as applicable.