SUMMARY

Executive summary: This document provides comments on the draft guidelines on operational information for masters in case of flooding for passenger ships constructed before 1 January 2014 developed by SDC 5.

Strategic direction, if applicable: Other work.

Output: OW 46.

Action to be taken: Paragraph 7.


Introduction

1. This document is submitted in accordance with the provisions of paragraph 6.12.5 of the Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.5) and provides comments on the draft guidelines on operational information for masters in case of flooding for passenger ships constructed before 1 January 2014 (hereinafter referred to as "the draft Guidelines") (SDC 5/15, annex 1; and MSC 99/10, paragraph 2.3).

Discussion

2. Having reviewed the provisions of the aforementioned draft Guidelines (SDC 5/15, annex 1), IACS would offer the comments and proposals, as outlined in paragraphs 3 to 6 below, with a view to facilitating the global and consistent implementation of these provisions, and, consequently, SOLAS regulation II-1/8-1.3 for passenger ships constructed before 1 January 2014.
Paragraph 11.1 of the draft Guidelines states:

"11 The system should:

1. utilize software capable of analysing the damage stability following any real flooding casualty including multi-compartment, non-linked breaches (see also paragraph 3)."

IACS notes the above text includes the term "non-linked breaches". Aside from the Revised Guidelines on operational information for masters of passenger ships for safe return to port (MSC.1/Circ.1532) (see paragraph 6 below), IACS is not aware that this term has previously been used in any IMO instruments. The Committee is therefore invited to confirm if it means the same as "discontinuous hull breaches" (i.e. breaches to non-adjacent spaces) or if it refers to flooding that occurs not because of a breach of the hull.

Paragraph 18 of the draft Guidelines states:

"18 When shore-based support is provided in accordance with SOLAS regulation II-1/8-1.3.1.2, the shore-based support should be manned by adequately qualified persons with regard to stability, i.e. no less than two qualified persons should be available to be on call at all times."

IACS notes that "parallel" provisions applicable to an onboard system are explained in paragraph 16 of the draft Guidelines:

"16 At least two crew members should be competent in the operation of the system including the communication links to the shore-based support, when provided. They should be capable of interpreting the output of the system in order to provide the required operational information to the master."

To avoid any inconsistency or misunderstanding in what qualifications the shore-based support personnel should have, IACS proposes that paragraph 18 of the draft Guidelines is aligned with paragraph 16 as follows (additions/deletions):

"18 When shore-based support is provided in accordance with SOLAS regulation II-1/8-1.3.1.2, the shore-based support should be manned by adequately qualified persons with regard to stability that are competent in the operation of the system and capable of interpreting the output of the system in order to provide the required operational information to the master, i.e. no less than two qualified competent persons should be available to be on call at all times."

Paragraph 25 of the draft Guidelines states:

"25 The Administration should be advised of any ships fitted with systems before they are required by SOLAS regulation II-1/8-1.3, which may not fully comply with these Guidelines, to allow for a decision to be made on what further action, if any, is necessary. As a minimum, the system should have the functionality described under "Calculation methods" (see paragraph 11), "Output" (see paragraphs 12 to 14) and, if applicable, for ro-ro passenger ships (see paragraph 20)."
IACS proposes that to facilitate clarity, the entity responsible for advising the Administration should be identified. IACS therefore proposes the text should be modified as follows (additions/deletions):

"The Administration should be advised by the company, as defined in SOLAS regulation IX/1.2, of any ships fitted with systems before they are required by SOLAS regulation II-1/8-1.3, which may not fully comply with these Guidelines, ...".

6 IACS notes that some of the comments and proposals provided above are also applicable, mutatis mutandis, in the context of the provisions of the following instruments that have already been approved by the Committee:

.1 Revised Guidelines on operational information for masters of passenger ships for safe return to port (MSC.1/Circ.1532) – see paragraphs 3 and 4 above; and

.2 Guidelines on operational information for masters of passenger ships for safe return to port by own power or under tow (MSC.1/Circ.1400) – see paragraph 4 above.

In this regard, the Committee is invited to consider if the understanding and proposals should also apply to the aforementioned existing MSC circulars and, if so, whether they should be revised accordingly.

**Action requested of the Committee**

7 The Committee is invited to consider the comments and proposals in paragraphs 3 to 6 above, and take action as appropriate.