

ANY OTHER BUSINESS

Comments on MSC 97/21/3

Submitted by the International Chamber of Shipping (ICS) and Cruise Lines
International Association (CLIA)

SUMMARY

<i>Executive summary:</i>	This document provides comments on MSC 97/21/3 by Argentina <i>et al</i> regarding additional performance and/or test standards in support of the implementation of the Polar Code.
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.1
<i>Planned output:</i>	5.2.1.15
<i>Action to be taken:</i>	Paragraph 10
<i>Related documents:</i>	None

Introduction

1. This document provides comments on MSC 97/21/3 by Argentina *et al* and is submitted in accordance with the provisions of paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Committees and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.4).

2. The Committee has been invited to endorse a decision of the SSE sub-committee that additional performance and test standards for the equipment and systems on board ships operating in polar waters should be developed, and to take action as appropriate (SSE 3/16, paragraph 15.16).

Scope of work

3. In considering the proposed scope of work, the co-sponsors recall that not all ships to which the Polar Code is applicable are intended to operate in the environmental conditions (e.g., low air temperature) currently under consideration in document MSC 97/21/3.

4. For example, the Polar Ship Certificate may indicate that a ship is not intended to operate in low air temperature and therefore Polar Service Temperature (PST) would be not applicable. Additionally, a ship may be restricted to operate in ice free waters, open water, or other ice conditions.

5. To avoid any potential confusion, the Committee may wish to clarify the scope of this work. For example, for each additional performance/test standard to be developed, SSE

should undertake to clearly and consistently identify the relevant provision of the Polar Code, including one or more of the relevant conditional clauses as applicable:

- .1 For ships intended to operate in low air temperature having a PST of °C (e.g., -25 °C, -35 °C, etc.);
- .2 For ships intended to operate during extended periods of darkness; and
- .3 For ships having maximum expected time of rescue of days (e.g., 5 days).

6. With respect to paragraph 11 of document MSC 97/21/3, the Committee may wish to consider that the Polar Code (8.2.3.3) has a functional requirement for resources to support survival following abandoning ship, whether to the water, to ice or to land, for the maximum expected time of rescue that includes *inter alia* a habitable environment taking into account the presence of any hazards as identified in the assessment in chapter 1 of the Code (1.5). In this context, this proposal to develop “additional requirements for survival craft” could be beyond the scope of the current effort to consider the need for additional performance/test standards in relation the Polar Code.

7. Additionally, the Polar Code provides for procedures to be developed and implemented in relation to operation of certain equipment such as communications equipment in survival craft. In such cases, it should be recognized during development of any related additional performance/test standards that such procedures are to be developed and implemented on board ship and should not, therefore, be part of any performance/test standards that may be developed.

Type of equipment

8. In considering the types of equipment, the Committee may also wish to consider if SSE should be instructed to consider, for ships intended to operate in low air temperature, whether there is a need for new or revised performance/test standards to maintain capability for distress alerting, locating and on-scene communications on board released survival craft either at the relevant ship-specific PST or perhaps a range of relevant low air temperatures below -20 °C. In this context, it is important to keep in mind that the Polar Code (10.3.2.3) provides for procedures to be developed and implemented on board ship to ensure such mandatory communications equipment is available for operation (e.g., battery life) during the maximum expected time of rescue.

Conclusion

9. The Committee may wish to clarify the scope of work and type of equipment in development of additional performance/test standards, including the need to acknowledge when the Polar Code provides for procedural solutions to be developed and implemented on board ships. In conclusion, the co-sponsors consider that careful consideration of the application of any new standards will be necessary to ensure that appropriate provision is made for ships operating outside the envelope of current SOLAS provisions whilst avoiding any unintended consequences for ships operating within their existing design capabilities as recognised within the relevant provisions of the Polar Code.

Action requested of the Committee

10. The Committee is invited to consider the comment provided in this document and take action as appropriate.

