

SUB-COMMITTEE ON CARRIAGE OF
CARGOES AND CONTAINERS
10th session
Agenda item 15

CCC 10/15/2
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ANY OTHER BUSINESS

Comments on document CCC 10/2

Submitted by Liberia, WSC, BIMCO, ICS, ITF and P & I Clubs

SUMMARY

Executive summary: This document reiterates the importance of considering risk-prevention-related areas, including those that have been forwarded by SSE 10 to CCC 10. This document recommends tasking a working group to consider these issues, while at the same time recognizing the potential necessity to continue work intersessionally.

*Strategic direction, 7
if applicable:*

Output: 7.15

Action to be taken: Paragraph 8

Related documents: CCC 10/2 and MSC 103/21

Background

1 This document comments on document CCC 10/2 (paragraph 2.10) and is submitted in accordance with the provisions of paragraph 6.12.5 of MSC-MEPC.1/Circ.5/Rev.5.

Introduction

2 The co-sponsors highlight the importance of considering risk-prevention-related areas, including the non-exhaustive list that has been brought to the attention of CCC 10 by SSE 10 in the above-mentioned document.

3 The co-sponsors consider that the work currently undertaken by the SSE Sub-Committee should be part of the wider scope of solving the multi-faceted problem of containership fires. Currently, the safety of crew and personnel involved in containerized shipping, the environment, cargoes and ships are severely impacted by the increasing frequency and magnitude of container fires. The risk of these fires is increased by safety gaps that exceed the technical scope of the SSE Sub-Committee's work.

4 MSC 103 established the output on "Development of amendments to SOLAS chapter II-2 and the FSS Code concerning detection and control of fires in cargo holds and on the cargo deck of containerships" and assigned the SSE Sub-Committee as the coordinating body. However, MSC 103, having noted, in particular, the need for a holistic risk-based approach and prioritization of risk prevention and mitigation enhancement when developing amendments under the output, also assigned the CCC Sub-Committee as an associated body (see relevant discussions in document MSC 103/21, paragraphs 18.6 to 18.8).

5 Considering the above, the co-sponsors strongly support the necessity for the CCC Sub-Committee to consider measures that can effectively reduce the aforementioned safety gaps in order to ensure the successful implementation of the SSE Sub-Committee's future work outcomes.

Recommendation

6 To facilitate the commencement of a considered discussion, the co-sponsors recommend that a working group during CCC 10 be tasked to:

- .1 consider the list of risk-prevention-related areas as referenced in paragraph 2.10 of document CCC 10/2, along with relevant proposals and comments made at CCC 10; and
- .2 recommend a way forward, for consideration by CCC 10.

7 Recognizing the potential time constraints for a full discussion at CCC 10, the co-sponsors also note that this issue may necessitate further work by interested Member States and international organizations intersessionally, beyond CCC 10.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the recommendations in paragraphs 6 to 7 and take action, as appropriate.
