PASSENGER SHIP SAFETY
Revision of SOLAS Chapter II-1 – Subdivision and Damage Stability
Regulations on passenger ship survivability after damage
Submitted by the Community of European Shipyards’ Associations (CESA) and INTERFERRY

SUMMARY

Executive summary: With this document the industry provides recommendations for improving the survivability of passenger ships after damage. The need to increase the required index \( R \) should be answered by a holistic approach addressing both safety and economic aspects of the significantly different ship types and sizes. Interim steps based on a "one-measure-fits-all" approach will create uncertainty as the new standards will only be applied to the few ships built in this time period.

Strategic direction: 5.1

High-level action: 5.1.1

Planned output: 5.1.1.2

Action to be taken: Paragraph 10

Related documents: MSC 93/6/2, MSC 93/6/3, MSC 93/6/6; SDC 1/26 and SDC 1/INF.7

Introduction and Background

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the Guidelines on 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.4/Rev.2) and provides comments on document SDC 1/26 and MSC 93/6/2.

2 Documents MSC 93/6/2 and MSC 93/6/3 provide FSA related considerations addressing the need to raise the required subdivision index \( R \). In SDC 1/7/2 submitted by the United States a proposal is presented for a moderate phase 1 \( R \) increase in regulation II-1/6 to be included in the revision of SOLAS chapter II-1 subdivision and damage stability provisions.
Assessment

3 The industry welcomes measures for increasing the safety of passenger ships and reconfirms that an increase of the required index $R$ is a necessary and technically feasible safety measure. On this basis, the industry is willing to contribute to the SDC development of appropriate new $R$ requirements, which form one important element of a holistic safety package.

4 With regard to paragraph 10 of MSC 93/6/2 the industry would like to state that conducting cost-benefit analysis generally in line with the FSA Guidelines does not ensure that proposed requirements will not induce a significant loss of competitiveness of newly built vessels in relation to existing ships.

5 Regarding the discrepancies in the Potential Loss of Life (PLL) considerations in Japanese and European studies highlighted in documents MSC 93/6/3, SDC 1/26 and SDC 1/INF.7 the industry recommends clarifying this matter in order to facilitate the use of FSA in the future rule development process. This clarification is in particular necessary because the assumed PLL is a decisive input parameter finally governing whether a risk control option is considered to be cost-effective or not.

6 In this context the submitters would like to bring to the attention of the Committee that the use of an identical NetCAF (Net Cost of Averting a Fatality) threshold value of $7.45$ million for RoRo passenger and cruise ships in conjunction with the different risk models would lead to significantly different required absolute overall investments. This discrepancy becomes even more pronounced if the relative investments are considered (= percentage of the ship's price), which are induced by the $R$ increase.

7 Previous studies proposed new requirements for a large size range (13 to 10,000 passengers) and for two significantly different main ship types such as RoRo passenger and cruise ships at the same time. It became, however, apparent that further efforts are needed to enlarge the database of sample vessels to sufficiently cover such a wide and diverse range of ship types and sizes.

8 The industry therefore welcomes any further coordinated efforts aiming at adding more and state-of-the-art sample ships to support this work item. The Committee may recall work done in previous European funded studies (generally known as GOALDS, EMSA1 and EMSA2), now continued in the ongoing so-called EMSA3 study, in which all stakeholders will further investigate the survivability of passenger ships, complementing previous studies and findings. This process should put more emphasis on exploring options to implement appropriate and cost-effective safety standards utilizing also retrofitting and/or operational measures.

Proposal

9 Owing to the complex nature of the issue, the industry would recommend to take into account additional findings from the above mentioned study when making the final decision. Interim provisions will create significant uncertainty as the new requirements will only be applied to the very few passenger ships built in this time period.

Action requested of the Committee

10 The Committee is invited to consider the information provided and take action as appropriate.