ANY OTHER BUSINESS

Safety of Double-Hull Tankers – Coating of cargo oil tanks

Submitted by Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Poland, Portugal, Slovakia, Slovenia, Spain, United Kingdom, the European Commission, BIMCO, IACS, ICS, INTERTANKO and OCIMF

SUMMARY

Executive summary: This document contains a proposal for a new SOLAS regulation II-1/3-9 introducing mandatory coating of cargo oil tanks of new oil tankers.

Action to be taken: Paragraph 17

Related document: A 24/INF.5

1 This document is submitted in accordance with the provisions of the Guidelines on the organization and method of work (MSC/Circ.1099) and is proposing a new SOLAS regulation II-1/3-9 on coating of cargo oil tanks of new oil tankers.

Background

2 In the aftermath of the Prestige tanker accident concerns were expressed both at IMO and European Union levels about the safety and adequacy of rules which govern the safety of double-hull tankers. The introduction of double hull tankers would not be the panacea for avoiding accidents and preventing future pollution from tankers at sea.

3 In this respect the European Commission took initiatives at EU level to examine pro-active measures for improving the safety of double-hull tankers and informed IMO at the twenty-fourth session of the Assembly accordingly.

4 An international seminar was hosted in November 2003 by the European Commission and a High-Level Panel of Experts on Double-Hull Tankers was established by the European Maritime Safety Agency (EMSA). This Panel concluded its work in March 2005. A benchmark meeting was organized in February 2006. The following maritime industry organizations participated in the work of the Panel:
• Baltic and International Maritime Council (BIMCO);
• The Community of European Shipyards Associations (CESA);
• International Association of Classification Societies (IACS);
• International Chamber of Shipping (ICS);
• International Association of Independent Tanker Owners (INTERTANKO); and
• Oil Companies International Marine Forum (OCIMF).

Moreover, the IMO Secretariat and the Tanker Structure Cooperative Forum attended the meetings of the Panel.

5 One copy of the final report of the Panel was made available to each delegation at the twenty-fourth session of the Assembly and one more will be made available to each delegation attending the eighty-second session of the Maritime Safety Committee. Moreover, the report can be retrieved from the following web address:

http://www.emsa.europa.eu/Docs/workshops/dh%20tanker%20panel%20final%20report%20complete%203.6.05.pdf

6 This submission is responding to the invitation of the twenty-fourth session of the Assembly (MSC 81/2/4, paragraph 23) for appropriate submissions in accordance with the Committee’s Guidelines on the organization and method of work.

Need for adoption of this proposal

7 One of the problem areas identified by the Panel was the lack of mandatory provisions relating to coating of cargo oil tanks. Currently there are no statutory requirements for the cargo oil tanks to be provided with corrosion prevention systems. However, accelerated corrosion has been found to be present within the cargo tanks of a number of oil tankers, particularly those carrying crude oil or residual fuels.

Pitting corrosion to the inner bottom plating within cargo tanks can lead to cargo leakage into the double bottom spaces giving increased risk of explosion and pollution during ballasting operations. Corrosion of the under deck structure within the cargo tank area can lead to a reduction in longitudinal strength which gives rise to a possibility of a more serious structural failure occurring.

8 The same problem has not been identified in chemical tankers. Moreover, in combination carriers the coating of the inner bottom can be easily damaged by cargo. Therefore the Panel consider this requirement not applicable for combination carriers and chemical tankers.

9 Moreover, the Panel agreed that the risk of corrosion is not evident for some benign cargoes if carried solely throughout the service life of the oil tanker. In such cases an exemption from the proposed mandatory requirements might be considered by the Administration. In that respect guidelines need to be developed by the Organization containing criteria for determining cargoes not causing corrosion and the steps to be followed to ensure that cargoes carried meet these criteria. Any exemption and conditions for which the exemption is granted shall be recorded on an Exemption Certificate. The Panel noted that inert gas is quite corrosive and thus the atmosphere in the ullage space of a loaded tank is corrosive irrespective of the nature of the cargo. This fact should be taken into account when developing the Guidelines and granting any exemptions.
Costs to the maritime industry

10 Coating of tanks is not something new to shipbuilding industry. Many of the new tankers, specially the product carriers, are coated during construction. The cost of applying this requirement may vary depending on the ship’s size, cargo tank layout, the details of the performance standard itself which is currently under development, etc. In all cases this cost would represent a minor increase in the new building price, if agreed at the time the contract is signed. The long-term benefit in the safety of the ship and the lower cost of the maintenance throughout the service life of the tanker are unquestionable and overbalance the initial cost.

11 The Panel considered the application of this requirement to existing tankers but came to the conclusion that application of this requirement is not cost effective for existing oil tankers.

Benefits which would accrue from the proposal

12 This proposal is within the scope of SOLAS objectives. It is aimed at improving the safety of new double-hull tankers and at building more robust ships. The benefits justify the proposed action.

Legislative and administrative burden

13 This proposal is referring to a detailed performance standard. An IACS/Industry working group has been established following recommendation No.3 of the Panel and is currently developing the performance standard for the cargo oil tank coating. Apart from that, no other legal or administrative burden is anticipated.

Indication of required action

14 Following recommendation No.2 of the Panel, to establish mandatory provisions for coating of the internal structure of cargo oil tanks of new oil tankers, a proposal for a new SOLAS regulation II-1/3-9 is set out in the annex.

15 This proposal affects the design and construction of new oil tankers. It has therefore been drafted following the decision of the Committee at its seventy-fourth session (MSC 74/24, paragraph 12.23) to use the MARPOL regulation I/1(6) principle instead of the SOLAS “ships constructed” expression.

16 Although shipbuilding industry is familiar with coating of tanks, it is understood that some time is needed for the tanker shipbuilding industry to prepare for the mandatory implementation of the cargo oil tank coating. When deciding the date for mandatory implementation of the proposed requirement this fact has to be taken into account.

Action requested of the Committee

17 The Committee is invited to consider the proposal in paragraph 14 and approve the new SOLAS regulation II-1/3-9 given in the annex to this document with a view to adoption at MSC 83 or take any other actions as appropriate.
ANNEX

PROPOSAL FOR A NEW SOLAS REGULATION

CHAPTER II-1

CONSTRUCTION- STRUCTURE, SUBDIVISION AND STABILITY, MACHINERY AND ELECTRICAL INSTALLATIONS

PART A-1 STRUCTURE OF SHIPS

Regulation 3-9
Coating of cargo oil tanks of oil tankers

1 This regulation shall apply to oil tankers of 5,000 dwt and above:
   .1 for which the building contract is placed on or after [    ]; or
   .2 in the absence of a building contract, the keels of which are laid or which are at a similar stage of construction on or after [    ]; or
   .3 the delivery of which is on or after [    ].

2 This regulation shall not apply to combination carriers and chemical tankers as defined in regulation 1 of Annexes I and II of the protocol of 1978 relating to the International Convention for the Prevention of Pollution from Ships, 1973.

3 The internal structure of cargo oil tanks of oil tankers shall be coated during the construction of the ship in accordance with the Cargo Oil Tank Coating Performance Standard, adopted by the Maritime Safety Committee by resolution MSC.[...], as may be amended by the Organization, provided that such amendments are adopted, brought into force and take effect in accordance with the provisions of article VIII of the present Convention concerning the amendment procedures applicable to the Annex other than chapter I.

4 The Administration may exempt an oil tanker from the requirements of paragraph 3 of this regulation if the ship is to be engaged throughout its service life solely in the carriage of cargoes not causing corrosion\(^1\). Such exemption and conditions for which it is granted shall be recorded on an Exemption Certificate.

\(^1\) Guidelines to be developed by the Organization containing criteria for determining cargoes not causing corrosion and the steps to be followed to ensure that cargoes carried meet these criteria.