INTERNATIONAL MARITIME ORGANIZATION

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MARITIME SAFETY COMMITTEE
81st session
Agenda item 7

MSC 81/7/14
21 March 2006
Original: ENGLISH

SHIP DESIGN AND EQUIPMENT

Comments on urgent matters emanating from the forty-ninth session of the Sub-Committee with regard to the draft Performance Standards for Protective Coatings

Submitted by the International Association of Classification Societies (IACS)

SUMMARY	
Executive summary:	This document contains a proposal for the text of SOLAS regulation II-1/3-2 and requests a clarification on the application of the draft Performance Standards for Protective Coatings
Action to be taken:	Paragraph 12
Related documents:	Resolution MSC.170(79), MSC 81/7/1 and DE 49/20

1 This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work (MSC/Circ.1099) and is commenting on document DE 49/20, section 6 and annex 15 (Performance Standard for Protective Coatings).

Background

2 The Committee, at its seventy-ninth session, adopted resolution MSC.170(79) "Adoption of amendments to the International Convention for the Safety of Life at Sea, 1974, as amended" containing the text of the revised SOLAS chapter XII.

3 Regulation 6.3 of the revised SOLAS chapter XII reads:

> "3 Double-side skin spaces and dedicated seawater ballast tanks arranged in bulk carriers of 150m in length and upwards constructed on or after 1 July 2006 shall be coated in accordance with the requirements of regulation II-1/3-2 and also based on the Performance standards for coatings* to be adopted by the Organization."

It is noted that this regulation requires these spaces and tanks to be coated with hard protective coatings, or equivalent, as per SOLAS regulation II-1/3-2.

* Refer to the standards acceptable to the Administration until such time that Performance standards for coating, to be adopted by the Organization, will be made mandatory by suitably modifying the above requirements.

3 SOLAS regulation II-1/3-2 (Corrosion prevention of seawater ballast tanks) reads:

> "1 This regulation applies to oil tankers and bulk carriers constructed on or after 1 July 1998.
>
> 2 All dedicated seawater ballast tanks shall have an efficient corrosion prevention system, such as hard protective coatings or equivalent. The coatings should preferably be of a light colour. The scheme for the selection, application and maintenance of the system shall be approved by the Administration, based on the guidelines adopted by the Organization*. Where appropriate, sacrificial anodes shall also be used."

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* Refer to the Guidelines for the selection, application and maintenance of corrosion prevention systems of dedicated seawater ballast tanks adopted by the Organization by resolution A.798(19).

It is noted that this regulation requires these tanks to be provided with a corrosion prevention system which may - but is not necessarily required to - be a hard protective coating or equivalent.

Outcome of DE 49

5 The Sub-Committee on Ship Design and Equipment, at its forty-ninth session, agreed, in general, to DE 49/WP.3 which contains the Report of the Working Group for Performance Standards for Protective Coatings. This report also contains, at annex 2, a proposal for revising SOLAS regulation II-1/3-2 (with several sets of square brackets) and a proposal to delete SOLAS regulation XII/6.3.

6 Depending on the text in square brackets that is agreed by the Committee, the outcome is considered to be either:

.1 the regulation will require the specified spaces and tanks to be coated in accordance with the Performance standard for protective coatings for dedicated seawater ballast tanks and double-side skin spaces of bulk carriers; or

.2 the regulation will require the specified spaces and tanks to be provided with a corrosion prevention system. Only when the corrosion prevention system is a hard protective coating would compliance with the "Performance standard for protective coatings for dedicated seawater ballast tanks and double-side skin spaces of bulk carriers" become mandatory.

IACS view point

7 IACS considers that the intent of this effort is, in line with item 6.1 above, to require that all dedicated seawater ballast tanks arranged in all new ships of 500 GT and above, and in double-side skin spaces arranged in all new bulk carriers of 150m in length and upwards are coated in accordance with the Performance standard for protective coatings.

8 IACS does not consider that the fitting of protective coatings should be an option as noted in item 6.2 above, and therefore recommends that the text of SOLAS regulation II-1/3-2-1 as contained in annex 2 of DE 49/WP.3 should read as follows:

> "1. Except as provided for in paragraph 2, all dedicated seawater ballast tanks arranged in ships [of not less than [xxx] gross tonnage] constructed on or after [date to be determined by the MSC], and ~~[dedicated seawater ballast tanks and]~~ double-side skin

spaces arranged in bulk carriers of 150 m in length and upwards constructed on or after [the date to be determined by the MSC] shall ~~[have an efficient corrosion prevention system, such as hard protective coatings or equivalent. The protective coatings shall comply with] [~~be coated in accordance with~~]~~ the ~~[~~Performance standard for protective coatings for dedicated seawater ballast tanks and double-side skin spaces of bulk carriers~~]~~, 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."

Clarification needed

9 IACS also seeks clarification from the Committee concerning the application of the Performance standard for protective coatings to the permanent means of access that are fitted in the specified tanks and spaces in accordance with SOLAS regulation II-1/3-6.

10 IACS notes that the interpretation to Technical Provision 3.3, contained in MSC/Circ.1176, requires an initial corrosion protection to elevated passageways and the associated guard rails and that corrosion protection of these fittings is usually achieved by:

.1 galvanizing;

.2 use of GRP; or

.3 coatings specifications for these PMAs are usually different from those of hull structure.

11 The Committee is kindly requested to reflect its decision clearly in both SOLAS regulations II-1/3-2-1 and II-1/3-6.

Action requested of the Committee

12 The Committee is invited to consider the proposed text of SOLAS regulation II-1/3-2-1 in paragraph 8 and 11, above; provide clarification to the question raised in paragraph 9, above; and take action as appropriate.