

SUB-COMMITTEE ON SHIP DESIGN AND  
CONSTRUCTION  
1st session  
Agenda item 4

SDC 1/4/2  
15 November 2013  
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**DEVELOPMENT OF PROVISIONS TO ENSURE THE INTEGRITY AND UNIFORM  
IMPLEMENTATION OF THE 1969 TM CONVENTION**

**Remarks on the development of provisions to ensure the integrity and uniform  
implementation of the 1969 TM convention**

**Submitted by Germany**

**SUMMARY**

*Executive summary:* This document comments on the report of the correspondence group regarding good living conditions aboard ships by means of a reduced GT parameter for assessing fees

*Strategic direction:* 2

*High-level action:* 2.0.1

*Planned output:* 2.0.1.5

*Action to be taken:* Paragraph 10

*Related documents:* SDC 1/4, SDC 1/INF.4; SLF 53/3; SLF 54/9, SLF 54/9/2; SLF 55/9/3, SLF 55/17; MSC 92/26; resolutions A.758(18), A.791(19) and MSC.234(82)

**Introduction**

1 The Sub-Committee on Stability and Load Lines and on Fishing Vessels Safety (SLF), at its fifty-fifth session, agreed to re-establish the correspondence group that was primary established at SLF 54, under the coordination of Japan and the United States and with terms of reference as described in paragraph 9.16 of document SLF 55/17.

2 The group's work was conducted under the planned output requested by SLF 53 and approved by MSC 89 with a target completion year of 2014. The work commenced at SLF 54, and was carried forward by a correspondence group, that drew on earlier work to examine and evaluate 59 specific issues, which were then considered at SLF 55.

**Discussion regarding accommodation spaces**

3 Regarding the discussion on a reduced gross tonnage (GTr) parameter for accommodation spaces, the group developed approaches and alternatives to implementing a GTr parameter for accommodation spaces, but could not reach an agreement. Annex 3 of the report of the correspondence group summarizes the principal outcomes of this work, which identifies eight different options developed by the group and evaluated in Round 3, listing benefits and disadvantages.

4 Option 7 was supported by a majority recommending the use of net tonnage (NT) when assessing fees, similar to an approach evaluated under an earlier SLF planned output (SLF 53/3, option B).

5 The delegation of Germany understands that the group discussed in depth the merits and the disadvantages of all possible options. Germany remains in favour of having in place a method as simple as possible but it must clearly indicate the objective to support good living conditions.

**Proposal**

6 In this regard, the proposal to change from gross tonnage (GT) to net tonnage (NT), when assessing fees, seems not feasible. Traditionally GT formed the basis for calculations; conventions like MARPOL, SOLAS, etc., use GT for their regulations. Port dues are set by local authorities, which cannot be forced by international recommendations to be based on NT.

7 Germany would like to draw the attention of the distinguished delegates to the annex of document SLF 55/9/3 which was discussed under option 1 within the correspondence group.

8 The benefits and disadvantages have been outlined in the report of the correspondence group. However, the proposed formula ( $GT' = K1 \times (V - V_{crew})$ ) extends the current formulation by a reduction factor and clarified the objective of good living conditions aboard ships in a simple manner.

9 The formula above is as simple as possible and thereby provide for incentives for making use of it.

**Action requested of the Sub-Committee**

10 The Sub-Committee is invited to consider the information presented in this document and to take actions as appropriate.