



SUB-COMMITTEE ON STABILITY AND
LOAD LINES AND ON FISHING VESSELS
SAFETY
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Agenda item 12

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TONNAGE MEASUREMENT OF OPEN-TOP CONTAINERSHIPS

Tonnage measurement of open-top containerships

Submitted by Iran (Islamic Republic of)

SUMMARY

Executive summary: This document comments on the proposal of document SLF 48/12/1 and SLF 48/12/2 to change the calculation instrument of the ITC 69 for open-top containerships

Action to be taken: Paragraph 10

Related documents: ITC 69, TM.5/Circ.4, TM.5/Circ.5, SLF 46/15/1 and SLF 46/15/2

Background

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 of the MSC and MEPC and their subsidiary bodies (MSC/Circ.1099 - MEPC/Circ.405) and comments on documents SLF 48/12/1 and SLF 48/12/2.

2 In 1993, the Maritime Safety Committee approved TM.5/Circ.4, which provided for calculating a "reduced gross tonnage" parameter for open-top containerships, to be used for the sole purpose of applying tonnage-based fees. The preliminary IMO formula can be used for open-top containerships up to max GT 30,000.

3 The figures calculated by the new formula and that of IMO formula 1993 show a considerable difference in ships with lower GT. Therefore, Iran (Islamic Republic of) believes that the reduced gross tonnage formula in TM.5/Circ.4 should be revised to cover a wider GT range.

Iran's comments

4 Iran (Islamic Republic of) believes that the existing method of calculation GT given in the International Convention on Tonnage Measurement of Ships, 1969 (ITC 69), has some disadvantages for all types of open-top vessels such as container vessels and ro-ro ships. Although these ships are safer and have a modern design, they should bear more costs in relation to GT.

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5 It is necessary to improve the means to admeasure open-top containerships Gross Tonnage. Observations have shown that these types of ships have at least 10% more GT comparing with the closed-top container vessels, therefore; the related costs would raise accordingly.

6 Iran believes that TM.5/Circ.4 and TM.5/Circ.5 have some limitations for calculation of ships tonnage with very low GT and GT's more than 30,000.

6.1 Iran, also believes that the new methods proposed by Germany and Australia have some restrictions and being as such, we propose that this matter should be carefully taken into consideration.

6.2 With regard to the difference of gross tonnage of open-top and closed-top vessels, it is obvious that a new factor for tonnage based fees should be used for open-top vessels to reduce the related costs.

7 It seems that the 1969 TM Convention works well for some types of vessels, but for many other types of ships should be revised.

8 Iran is of the opinion that an alternative method for measuring tonnage based fees of container vessels should be derived, *e.g.*: number of Nominal TEUs that a vessel can carry.

8.1 Introduction of such measure would remove all the extra costs for these types of vessels while improving the safety of such vessels due to increased freeboard.

8.2 In our view, the methods proposed by the United States and Australia would be an additional item being measured nowadays such as Gross Tonnage and Net Tonnage. With this method all the ships with similar capacity of container will pay the same fee in the ports.

9 Taking into account the proposals made by the United States, Germany, Australia and the example proposed by Iran (Islamic Republic of) (paragraph 8 above) and wishing to access to more appropriate means, Iran (Islamic Republic of) wishes to propose that additional time to be allocated for detailed consideration of this issue.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the above comments and take action as appropriate.