SUB-COMMITTEE ON STABILITY AND
LOAD LINES AND ON FISHING VESSELS
SAFETY
54th session
Agenda item 9

SLF 54/9/2
9 November 2011
Original: ENGLISH

DEVELOPMENT OF PROVISIONS TO ENSURE THE INTEGRITY AND UNIFORM IMPLEMENTATION OF THE 1969 TM CONVENTION

Proposals for solutions to the issues previously identified with the 1969 TM Convention

Submitted by Italy

SUMMARY	
Executive summary:	This document provides comments to document SLF 54/9 as well as suggested solutions to ensure the integrity and uniform implementation of the 1969 TM Convention
Strategic direction:	2
High-level action:	2.1
Planned output:	2.1.8
Action to be taken:	Paragraph 3
Related documents:	SLF 53/5; MSC 89/25 (paragraph 22.34) and SLF 54/9

Discussion

1   Italy appreciates the work carried out by IACS towards the identification of solutions to the issues previously identified as requiring further investigation to ensure the integrity and uniform implementation of the 1969 TM Convention, as presented in document SLF 54/9 and, in general, may agree with the proposals given in the annex of the document.

2   However, Italy wishes to comment on some of those solutions as indicated at annex, where the same numbering as per the document referred to is used.

Action requested of the Sub-Committee

3   The Sub-Committee is invited to consider the content of the annex to this document and decide as appropriate.

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ANNEX

COMMENTS ON THE PROPOSALS CONTAINED IN ANNEX TO DOCUMENT SLF 54/9

Issue 1 – Length definition
IACS' suggested solution is agreed. For the sake of clarity, the adoption of figures 1 and 2, set out below, should be considered.

Issue 7 – Remeasurement following alterations
Option 2 is supported. However, we would prefer that the last is deleted as we deem that any change to the TM needs to be recorded.

Issue 9 – Requirement for a deck above to bound enclosed space
Taking for granted that the "space bounded on at least three sides" mentioned here has no deck above, we agree with the proposal.

Issue 16 – Impact of end opening obstructions on excluded spaces
In order to render the entire paragraph clearer, it would be more appropriate to substitute it by a simple sentence such as "If the obstruction is closer than half the breadth, it is ignored if the obstruction itself is not included in gross tonnage. ". We agree that the preparation of supporting diagrams would be helpful.

Issue 17 – Excluding space opposite an end opening as a recess
IACS suggested solution is agreed but we believe that there is a need for specifying that the bounded bulkheads can also be fitted with access doors. It would also be necessary to clarify that recesses located at the side of the erection can be excluded from GT even though the recess extends for more than one tier. Figure 3 and 4, set out below, may be referred to in this context.

Issue 21 – Remeasurement following net tonnage change
IACS suggested solution is supported. However, we would prefer the last sentence to be deleted as we deem that any change to the net tonnage needs to be recorded.

Issue 22 – Treatment of topside spaces of complex shape
It is deemed that volumes of shore gangway storage, double skin bulwarks, outside moulded seating, jacuzzis and sun lounges, recessed swimming pools, spaces bounded from above by complex roof designs, extended superstructures decks, and similar, could be excluded under certain conditions, such as:

-   their internal volume is inaccessible and not used for any other purpose, e.g. for accommodating pipes or electrical cables; and
-   they are separated on all their sides from other enclosed spaces, apart from the surface of contact on the deck.

We agree that there is a need for a consistent approach for all the items listed in the above.

Issue 25 – Treatment of spaces inside the hull as open to the sea
IACS suggested solution is supported but we think that the sole presence of a grate should not preclude a space to be considered as open to the sea.

Issue 26 – Treatment of spaces outside the hull as open to the sea
IACS' suggested solution is supported with the objection of the Issue 25.
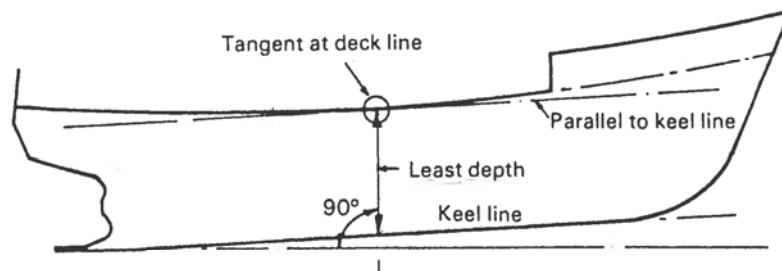
FIG. 1

LEAST DEPTH

Tangent at deck line

Parallel to keel line

Least depth

90°   Keel line

FIG. 2

LENGTH (L)

1. L = 0·96 OF THE TOTAL LENGTH ON A WATERLINE AT 85 PER CENT OF LEAST DEPTH

L (1)

L WATERLINE

90°   0·85 x least depth

L (2)

Axis of the
Rudder Stock

FIG. 3

B

W

W > 2 B
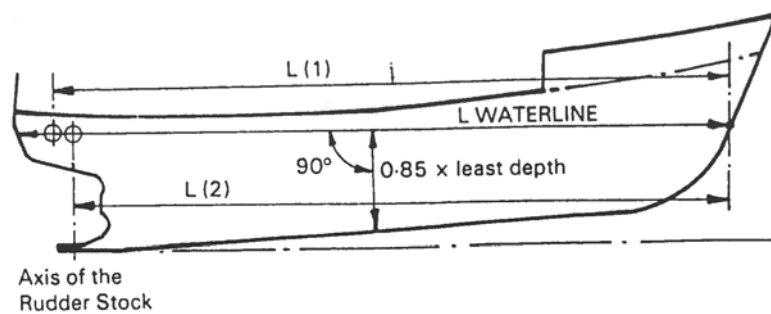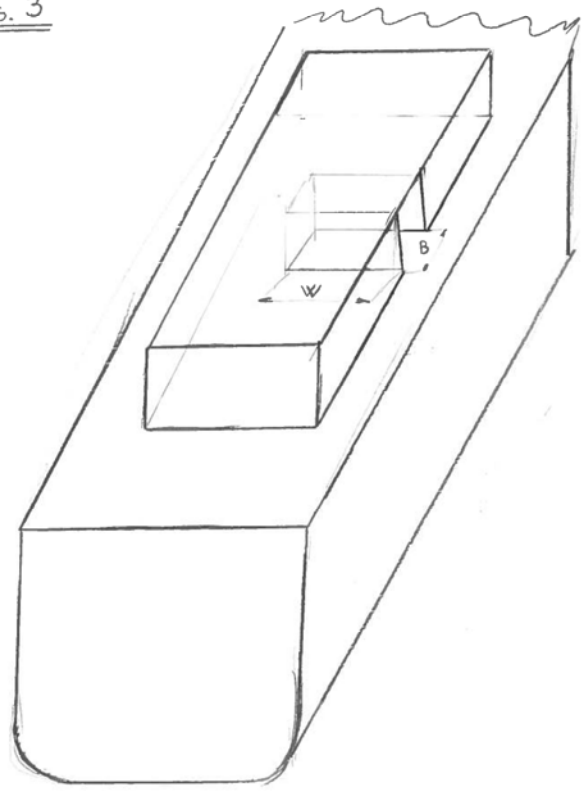
RECESS IS EXCLUDED
BECAUSE OPEN AT SIDE

FIG. 4

SUPERSTRUCTURE
DECK

2nd TIER

SUPERSTRUCTURE
DECK

1ST TIER

W

B

W < 2 B
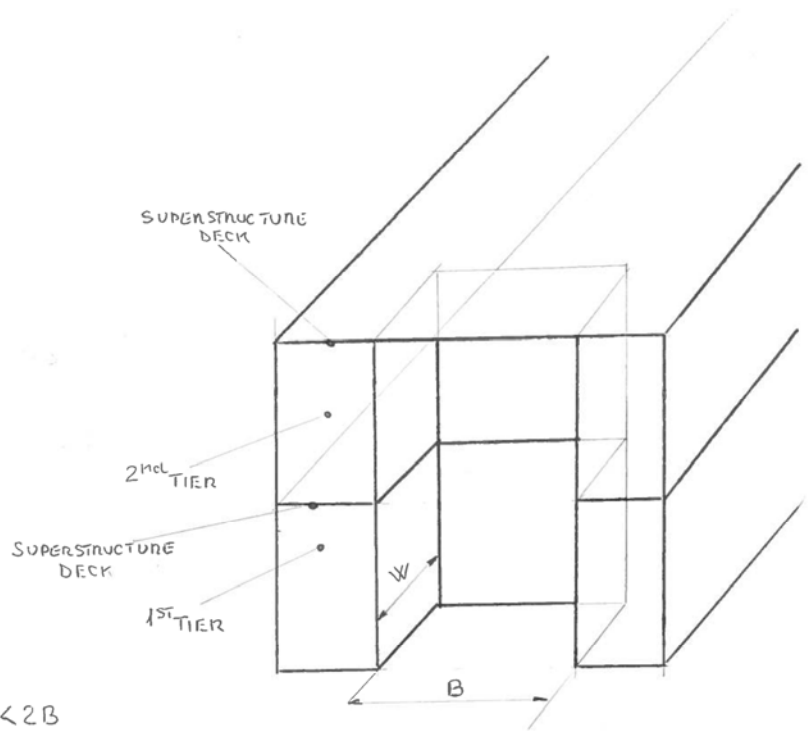
RECESS IS EXCLUDED
ALSO IF EXTENDED FROM MORE
THAN TWO DECKS