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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 the International Association of Classification Societies (IACS)

SUMMARY

Executive summary:	This document provides some suggested solutions to the issues previously identified as requiring further investigation 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 and MSC 89/25 (paragraph 22.34)

1 The Sub-Committee, at its fifty-third session, noted that the tonnage correspondence group had identified a number of issues requiring clarification, as detailed in annex 4 of document SLF 53/5.

2 Following the agreement of MSC 89 to progress with this work (MSC 89/25, paragraph 22.34), IACS has reviewed the issues identified and proposes some solutions, which are provided in the annex.

Action requested of the Sub-Committee

3 The Sub-Committee is invited to consider the proposals attached in the annex and take action as appropriate.

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ANNEX

REVIEW OF THE ISSUES IDENTIFIED AND PROPOSALS FOR SOLUTIONS

Note: References are to annex 4 of document SLF 53/5 entitled "Issues identified for option A – Ensure integrity and uniform implementation of existing gross tonnage (GT) and net tonnage (NT) parameters".

Issue 1 – Length definition

There are several areas where neither the TM Convention nor TM.5/Circ.5 provides sufficient information to permit assignment in a consistent manner of the length dimension, which is a determining factor for applicability of the TM Convention, and is widely used for applying design standards and, in some cases, fees. For example, the term "least moulded depth", which is the basis for the length assignment, is undefined, and various interpretations of the term can lead to length dimensions varying on the order of 5% or more. Further, with the increasing use of trainable water-jet propulsion units and similar combination steering/propelling devices, many ships are no longer fitted with rudder stocks, which is a key input in the length determination. Also, length can vary depending on treatment of bulbous bows, raked bows, raked transoms, sloping transoms, etc.

Suggested solution

Define least moulded depth as "The least moulded depth is the smallest depth along the length of the vessel from the top of the keel to the upper deck as defined in regulation 2 of the Convention and corresponds to the length in the Load Line Convention". Accompanying sketches and figures will be required.

Where a vessel does not have a rudder stock the length should be determined as follows: Taken as 0.96 of the L.O.A. at 0.85D.

Issue 2 – Novel craft provisions

Regulation 1(3) has been construed as allowing a flag State to calculate gross tonnage based on economic and safety considerations, "exempting" fully enclosed spaces which would otherwise have been included in tonnage. The result is the assignment of gross tonnage not reflective of a ship's "overall size" as defined in article 2(4). One Contracting Government reported via TM Circular that it was using this approach in the measurement of four ships under its flag. Applying novel craft provisions in this manner can result in assignment of gross/net tonnages that have no relationship to a ship's overall size/useful capacity.

Suggested solution

Define "novel craft" as "For the purposes of regulation 1(3) a novel craft is one which is novel in its design. It does not include general cargo ships, oil tankers, chemical carriers, container ships, passenger ships, offshore supply ships, yachts, tugs, barges or other craft of usual shape. Where ships include new types of structures fitted on board (for example loaders) that may impact on the tonnage measurements, these can also be considered novel craft".

Issue 3 – Tonnage grandfathering

Articles 3(2)(b) and (d) grant grandfathering privileges to certain older ships that have not undergone alterations "deemed by the Administration" to be a "substantial variation in their existing gross tonnage". This provision allows a qualifying ship's owner to use the pre-existing national tonnage (GRT) to apply older breakpoints in international conventions, including SOLAS and MARPOL. As described in document SLF 38/10/1 dated 16 December 1993, there appeared to be broad agreement that "substantial variation" meant a gross tonnage change on the order of 10%, and that a 1% change was effectively within the limit of calculation accuracy. Nonetheless, TM.5/Circ.5 established a 1% change as the breakpoint for loss of grandfathering privileges, creating confusion among ship owners, presenting difficulties in ensuring compliance, and raising the possibility of legal challenge.

Suggested solution

Define a "substantial change" as "For the purposes of articles 3(2)(b) and (d) a "substantial change" is one where the gross tonnage is changed by more than 1% of the original gross tonnage. Where the gross tonnage changes by more than this value then the new gross tonnage should be used for all purposes."

Issue 4 – Listing of spaces on the International Tonnage Certificate (ITC)

The reverse side of the ITC form provides for the listing of information on included spaces (both cargo and non-cargo spaces) and excluded spaces. Presumably, this was to permit ready verification that a ship has not undergone changes since the ITC was issued, and that spaces used for carrying cargo and stores had been properly accounted for in tonnage. However, with advances in ship designs and resulting complex hull and superstructure geometries, the practice of listing enclosed spaces by "tiers" is becoming increasingly difficult to maintain and consistently apply. Also, it is unclear whether smaller individual spaces (e.g. masts, deck lockers, settees) should be listed separately on the ITC. Additional guidance on this subject would help ensure consistency among flag States.

Suggested solution

A separate section providing guidance on the completion of the relevant sections of the ITC should be developed for inclusion in the modified TM.5/Circ.5 with completed sample certificates.

Issue 5 – Specifying lengths of spaces on ITC

The reverse side of the ITC form provides for specifying the length of all listed spaces, presumably to assist in verification that a ship has not undergone changes since the tonnages were certified. However, in many cases it is difficult to establish the length of a deckhouse or other above-deck space, as the ends of deck structures are frequently stepped, fitted with deck overhangs, have lockers or seating that is built into or otherwise attached to the structure, etc. This has led to inconsistent application, both within and between flag States.

Suggested solution

The length should include the overall length of the measured space. Typical diagrams would clarify the requirements. A separate section providing guidance on the completion of the relevant sections of the ITC should be developed for inclusion in the modified TM.5/Circ.5.

Issue 6 – Listing excluded spaces on the ITC

The reverse side of the ITC form provides a space for listing excluded spaces, but lacks sufficient room for specifying all excluded spaces on larger ships of complex design (e.g. cruise ships). Nor is it clear that the mere listing of an excluded space provides sufficient information to permit meaningful verification without access to associated tonnage calculations. Finally, space limitations on the form, and confusion regarding the need to even list excluded spaces, has resulted in different approaches among flag States, ranging from the attachment of addenda to the ITC, to omitting reference to the spaces altogether. Consideration should be given to either expanding this information (perhaps through use of a "standardized" addendum), or deleting the requirement altogether.

Suggested solution

The requirement to list excluded spaces should be removed.

Issue 7 – Remeasurement following alterations

There are no universally accepted criteria for remeasuring a ship following alterations/modifications. Different administrations apply different criteria: tonnage changes of unity, 1%, 2%, 5% and 10% have all been quoted, which can be problematic when a ship changes flag. Even small changes in assigned gross tonnage can cause ships to exceed critical regulatory breakpoints, affecting the design and operating standards that apply to the ship (e.g. SOLAS, MARPOL and STCW tonnage-based requirements). Further, it is unclear why a decrease in gross or net tonnage does not necessitate the remeasurement of a ship, if these parameters are to remain reflective of the ship's overall size and useful capacity, respectively.

The following alternative solutions may be proposed by IACS:

Option 1

Set the criteria for requiring remeasurement at [1]% for ships of 500 GT and over and [2]% for ships less than 500 GT to cover both increases and decreases. Changes which result in a difference of less than the agreed limit should be recorded on the ITC in the "Remarks" area on page 2 or in a designated box on the addendum to the ITC to ensure that cumulative minor changes are recorded traced. If the addendum is utilized for recording changes then a reference to this should be included in the appropriate box on the ITC.

Option 2

Require any changes to the parameters used to calculate tonnage to require the reissue of the ITC such that the ITC always reflects the actual arrangements on board the ship. In the case of a tonnage decrease, it should be the owner's decision whether the tonnage certificate is reissued.

Option 3

Require the remeasurement after increase/decrease of 1% for all ships.

Issue 8 – Acceptance of interpretations of TM.5/Circ.5

Article 13 precludes the claiming of the privileges of the TM Convention unless the ship holds a "valid" certificate under the Convention; however, the term "valid" is not defined in this context. The circumstances under which a port State could consider an ITC invalid, and therefore detain a ship, are unclear. TM.5/Circ.5 provides related interpretative language referring to article 10(2), which appears to make the interpretations of TM.5/Circ.5 binding if a ship is undergoing a flag change. Consideration should be given to expanding this provision of TM.5/Circ.5 to include all ships, provided the interpretations are not applied retroactively.

Suggested solution

Draft a circular which makes interpretations given in TM.5/Circ.5 (as amended) mandatory for all new ships, and ships which undergo major modification. IACS notes that the ideal solution would be to amend the ITC, however in view of the time that would be necessary to get changes to the ITC agreed, it is suggested that a circular be used as a preliminary measure.

Issue 9 – Requirement for a deck above to bounded enclosed space

Regulation 2(4) is unclear as to whether a space not within the ship's hull must be bounded by a deck above, in order for that space to be considered enclosed and therefore included in the total volume of all enclosed spaces (V). The issue was discussed at SLF 30 (SLF 30/WP.4), and a decision made that, in effect, a deck above was required to bound an enclosed space, although there was not universal agreement on this interpretation. In theory, under this interpretation, the space bounded by the high coamings is not enclosed. Subsequently, IMO has issued interpretations that call for inclusion in V of the volumes inside coamings of open-top containerships. IMO has also issued interpretations that address volumes associated with dock wells on dockship, that are subject to interpretation with respect to those spaces bounded by coamings.

Suggested solution

If a space is bounded on at least three sides and is not utilized for the storage of cargo and/or stores, etc., then it should be regarded as an excluded space. If it is utilized for the carriage of cargo and stores, etc., then it should be included in the calculation of V and Vc where applicable.

Issue 10 – Treatment of temporary deck equipment

Increasingly, ships in certain services are being fitted with temporary/semi-permanent tanks or modular installations such as portable quarters, seismic trailers, and processing facilities, which are sometimes referred to as "temporary deck equipment". Per regulation 2(4), spaces bounded by portable partitions are included in volume measurement for tonnage calculation, yet TM.5/Circ.5 implies that a tank on the upper deck that is connected to ship systems must be "permanent" in order for it to be included in tonnage. While at least one flag State treats temporary deck equipment in the same manner as any other enclosed structure, it is not clear how other flag States are treating such spaces, nor is it clear how such spaces are to be identified on ITC.

Suggested solution

Temporary/semi-permanent spaces should be excluded in the calculation of V and recorded as a temporary space when listed on the ITC. A clear definition of permanent and temporary equipment is required. The securing arrangement for theses spaces may be influential and this will require clarity also.

Issue 11 – Treatment of deck cargo bounded by enclosing structure

Neither the TM Convention nor TM.5/Circ.5 specifically addresses treatment of deck cargo. The space associated with deck cargo that is containerized or otherwise bounded by enclosing structure (e.g. portable liquid cargo tanks) appears to meet the definition of "enclosed space" in the sense that the space is bounded by "portable partitions or bulkheads". Therefore, it is unclear under what authority such enclosed deck cargo space may be ignored when calculating tonnage, as is typically the case, or why such spaces are treated differently from portable quarters and other temporary deck equipment spaces.

Suggested solution

Spaces which are bounded on at least three sides by wall sided ship's permanent structure and which are used to house cargo and/or stores, etc., should be included when calculating the gross and net tonnages.

Issue 12 – Treatment of spaces underneath overhangs

Under the enclosed space definition of regulation 2(4), space bounded by a deck above is considered enclosed space, and can be excluded only if it meets the excluded space requirements of regulation 2(5). It appears that bridge wings and other overhangs do, in fact, bound enclosed space under this definition, even though as a matter of practice, such spaces are generally ignored. Consideration should be given to developing generalized criteria (possibly under novel craft provisions) that could allow spaces with large height to breadth/depth aspect ratios, such as those bounded from above by bridge wings, to be considered as "unenclosed" and ignored from volume calculations.

Suggested solution

Open spaces below a bridge wing structure should not be considered as enclosed for the purposes of the tonnage calculation. This does not warrant any further consideration, or the development of any criteria.

Issue 13 – Definition of awning

The TM Convention treats spaces bounded by awnings differently than other spaces, but neither the TM Convention nor TM.5/Circ.5 defines what an awning is. For example, is an awning only cloth (e.g. canvas, tarpaulin), or does the term include other flexible solids such as plastic sheeting, or even materials such as Kevlar that have strength properties comparable to steel? Alternatively, should the term "awning" be defined on a functional basis (e.g. as a permanent or movable structure to protect the deck from the sun only)? There have also been differences in interpretations as to whether, by extension, fabric covers and partitions are considered to bound space that would otherwise be enclosed. Depending on how this is interpreted, designers can obtain substantial reductions in tonnage through substitution of materials.

Suggested solution

Definitions for "awning" should be developed and agreed. As an initial suggestion IACS suggests "An awning is a completely flexible material such as canvas or tarpaulin or plastic sheeting, designed to reduce the impact of wind or water although not necessarily wind or water proof". A list of accepted awning materials should be developed and included in TM.5/Circ.5. However, IACS has the following concern over the maintenance of this list: How would it be ensured that all materials currently accepted as awnings are on it, and how would it be updated?

Issue 14 – Treatment of space bounded by awnings

While regulation 2(4) indicates that a "permanent or movable awning" is not considered to bound an enclosed space, TM.5/Circ.5 treats space within the bounds of such awnings as enclosed space, which is excluded from volume calculations only if it meets certain conditions. It is possible that paragraph 4.2 was referring to spaces bounded on the sides by fabric-like material. Either way, it appears that TM.5/Circ.5 requires clarification.

Suggested solution

A space bounded by an awning as defined in Issue 13 should under no circumstances be considered as an enclosed space.

Issue 15 – Shelves or other means for securing cargo or stores in excluded spaces

Under regulation 2(5), certain qualifying spaces may be excluded from tonnage calculations provided they are not "fitted with shelves or other means for securing cargo or stores", regardless of whether or not the spaces are appropriated for the carriage of cargo or stores. Consistent application of this provision has proven problematic, as designers have devised ways to effectively secure cargo without the need for the space to be "fitted" with any means of securing it. In addition, there has been disagreement on what constitutes "stores", as under the equally authentic French version of the TM Convention, the term "provisions" is used. "Provisions" includes food and possibly other items of necessity, but not items such as ropes and lifejackets.

Suggested solution

Provide clarification that if a space is utilized in any way, regardless of whether or not shelves or other means for securing are provided, then it should be included in the tonnage calculations. Cargoes could be secured in place with air bags which can be inflated to keep the cargo in place during the voyage and deflated on arrival so that the cargo can be removed.

Issue 16 – Impact of end opening obstructions on excluded spaces

While regulation 2(5)(a) addresses obstructions to end openings within a deck structure, neither this regulation nor TM.5/Circ.5 addresses the situation where there is an obstruction external to the opening. For example, gantry structures on fishing trawlers, large cable reels on certain towing and industrial vessels, and excessively high bulwarks extending on either side of the openings may serve to "protect" the openings, and are taken into consideration by some flag States. Guidance on how to address such situations would be helpful to ensure consistent treatment, and prevent exclusion of spaces that are effectively protected from the sea and weather.

Suggested solution

For obstructions external to the opening, it is suggested that these are ignored when the separation is at least half the breadth (B/2) of the deckhouse/deck structure. The breadth should be taken at deck level. If the obstruction is closer than this, but has a height or breadth of less than a metre, then it should be ignored. Obstructions with a height or breadth of at least 1 m which are located closer than B/2 will disallow the space for consideration as an end opening. It is recommended that B/2 be applied within the regulations to maintain consistency throughout. Supporting diagrams are required.

Issue 17 – Excluding space opposite an end opening as a recess

If an opening in the end of a structure is treated as a "recess" under regulation 2(5)(e) instead of a "space opposite an end opening" under regulation 2(5)(a), up to twice the amount of space may be excluded. Various approaches have been used to address this issue, including the establishment of definitions for the term "boundary bulkhead" that would preclude treatment of a "typical" end opening as a recess. Clarification would be helpful to ensure consistency and avoid misuse.

Suggested solution

Clarify the definition of "recess" to cover only spaces bounded by three bulkheads which themselves form a boundary to an enclosed space. To qualify as an excluded space there must be a deck over as a space without a deck over would not be included anyway. The distinction between a recess and an end opening needs to be clarified.

Issue 18 – Characteristics of end and side openings for excluded spaces

Under regulation 2(5), the criteria for excluding space opposite end and side openings are largely prescriptive in nature, and can result in substantively different tonnage assignment on ships for which the physical arrangement varies only on the order of centimetres. Examples include: 1) criteria based on deck beam size under regulation 2(5)(a); 2) requirements for a structure to be "side-to-side" under regulation 2(5)(c); 3) impact of fitting of rails (allowed under regulation 2(5)(b) but not under regulation 2(5)(c)); and 4) prohibition against fitting of fashion plating to stanchions under regulation 2(5)(b). Consideration should be given to development of functional requirements (possible under novel craft provisions). This would provide a more accurate indication of spaces that are sufficiently open to qualify for exclusion from tonnage where prescriptive requirements are inadequate and could adversely affect ship design.

Suggested solution

The current requirement should be more clearly defined and supported by a comprehensive set of diagrams to clarify the overall position

Issue 19 – Deck structure height requirements for excluded space side openings

Increasingly, ships of certain types (e.g. cruise ships, car carriers) have spaces opposite large side openings that may not qualify for exclusion as recesses under regulation 2(5)(e), but could possibly be considered for exclusion under regulation 2(5)(c). However, regulation 2(5)(c) requires side openings to be at least "one third of the height" of the associated deck structure (erection) in order to allow a qualifying space to be excluded from volume calculations. It is unclear whether this height is taken to the top of the entire structure (the most "conservative" approach), or to an internal deck within the structure

(an approach which could lead to fitting of "false" decks within the ship to allow smaller openings).

Suggested solution

A clear definition of what constitutes a deck as opposed to an intermediate platform is required. Diagrams are also required.

Issue 20 – Restrictions on excluding space below uncovered openings

The text of regulation 2(5)(d) and the accompanying figure leave it unclear as to the extent to which a space "immediately below" a deck opening may be excluded. A question along these lines was raised by a flag State in document SLF 29/10, but was not resolved. Clarification would be helpful to ensure consistency and avoid misuse.

Suggested solution

Define "immediately below" as extending from the deck in which the opening occurs to the next complete structural deck below. For definition of structural deck see issue 19. A supporting diagram should be included.

Issue 21 – Remeasurement following net tonnage change

It is unclear how the regulation 5 language relates to the language in article 10 of the Convention, which also addresses remeasurement. For example, if a change in the characteristics cited in regulation 5 causes net tonnage to change by an amount of unity (one unit of net tonnage), does the regulation 5 language require both gross and net tonnage to be recalculated and recertified, even if the gross tonnage change is not of sufficient magnitude to cause remeasurement?

Suggested solution

Any changes to the net tonnage should result in the reissue of a new ITC. If the principal dimensions or passenger numbers change, then regardless of the magnitude of the change in the tonnage, the tonnage certificate should be re-issued immediately. This should be implemented even when there is no change to the gross or net tonnage. In the case of a tonnage decrease, it should be the owner's decision whether the tonnage certificate is reissued.

Issue 22 – Treatment of topside spaces of complex shape

Accounting for the volume measurement of miscellaneous topside spaces having complex shape can be problematic in terms of evaluating whether the space may be ignored under TM.5/Circ.5 guidance as "not exceeding 1 m^3", and/or in the excessive amount of time involved in calculating the "enclosed volume". Examples include shore gangway storage, double skin bulwarks, outside moulded seating (which may or may not be part of a bulwark), jacuzzis and sun lounges, recessed swimming pools and spaces bounded from above by complex roof designs. These features are typically seen on yachts of modern construction, but may also be encountered in other ship types, including passenger ships.

Suggested solution

All spaces with a horizontal or vertical cross sectional area of 1m² or greater and a combined volume of 1 m³ or greater should be included in V. Accessibility to these spaces should be considered when determining if they should be included or excluded from the gross tonnage. There needs to be a consistent approach for all items (e.g. masts, king posts, vents, bulwarks, etc.).

Issue 23 – Treatment of hull spaces of complex shape

Column-stabilized units, such as semi-submersible drilling units, and ships of similar design are often fitted with cross-bracing, for which volumes can be extremely difficult to calculate. Consideration should be given to developing guidance on how to treat such volumes in an efficient and consistent manner.

Suggested solution

Develop clear definitions as to what should and should not be included into the measurement. The method for determining volumes should be left to the Naval Architect's discretion.

Issue 24 – Evaluating accessibility of mast, kingposts and support structures

TM.5/Circ.5 allows masts, kingposts, cranes, crane and container support structures that are greater than 1 m^3 in volume to be ignored when calculating volume, if they are "completely inaccessible". In practice, however, the majority of such spaces are accessible in some fashion for survey and maintenance, which brings the "accessibility" constraint into question. This matter should be reviewed in the interest of ensuring consistent measurement treatment of such spaces.

Suggested solution

Define "completely inaccessible" as "Not readily accessible while the ship is undertaking its usual duties either at sea or in port". A space with an access panel held in position with a number of bolts would allow the space to qualify as not readily accessible, whereas, a space with quick release clips would be counted as accessible. IACS further suggests that 4.6 of TM.5/Circ.5 is amended "Masts, king posts, cranes, crane, container support structures and structures of those similar shape (e.g. dodger pillar) which are completely inaccessible …"

Issue 25 – Treatment of spaces inside the hull as open to the sea

Regulation 6(3) allows volumes of spaces open to the sea to be excluded from tonnage. The degree to which a normally flooded or free-flooding space inside the hull is considered "open" has required interpretation, in view of the criteria of regulation 2(5) that requires spaces above the upper deck to be reasonably "open" before they may be excluded. Further, designers have sought to reduce tonnage or principal dimensions through contrivances to treat otherwise enclosed spaces as spaces that are "open spaces to the sea". Examples include: 1) standpipes in underdeck voids and ballast spaces; 2) holes in bows and sterns of ships of all types; and 3) holes in cross-deck structures on multi-hull ships. Consideration should be given to developing guidance on how to treat such volumes in a consistent manner.

Suggested solution

For a space inside the hull to be considered as open to the sea, it has to be in free communication with the sea and the clear opening (i.e. not including any grating) must be more than [75]% of the bounded space to which it provides access. A hole, holes or pipe openings are not sufficient to consider a space for exclusion.

Issue 26 – Treatment of spaces outside the hull as open to the sea

Regulation 6(3) allows volumes of spaces open to the sea to be excluded from tonnage. The degree to which a space outside the hull is considered open to the sea has required interpretation in cases where free communication between the space and the sea is in some way restricted. Examples include: 1) "wells" or "pockets" for retractable keels and stabilizers with fairing plates; 2) semi-weatherproof storage spaces in the stern step areas of yachts that are protected from the sea by non-watertight closures; 3) bow thrusters tunnels fitted with doors to reduce underwater resistance; and 4) sea valve recesses ("sea chests") fitted with fine mesh strainers.

Suggested solution

If a space has the capability of being closed by a closing device which can be either watertight or non-watertight then it should be included in the calculation for gross and net tonnage where applicable.

Issue 27 – Treatment of moon pools

Moon pools and similar large "through-hull" openings that are sometimes fitted with covers or are otherwise covered from above by enclosing structure within the ship's hull or above the upper deck. In addition, some moon pool wells are fitted with retractable doors at their lower extremities, or at some distance from the keel, which in some cases serve as non-watertight fairings and in other cases as watertight closures. It is unclear as to whether spaces fitted with such covers or doors may be excluded as open to the sea under regulation 6(3), and if so, to the extent the space above the doors may be treated as excluded.

Suggested solution

Where moon pools are fitted with closing devices which can be watertight or non-watertight only that portion below the closing device should be excluded. Supporting diagrams should be included.

Issue 28 – TM.5/Circ.5 format and content

The consolidated interpretations of the annex to TM.5/Circ.5, which is 11 pages long, have grown considerably since such interpretations were initially issued in 1979 as a three-page document. Further, interpretations established over the years were often developed to address specific situations, rather than providing broader guidance applicable to more general situations. In addition, updating of the Interpretations is necessary to reflect the action of the Recommendations concerning tonnage measurement of open-top containerships (resolution MSC.234(82)). Consideration should be given to comprehensive review of the TM Circular, with the view toward replacing it with an updated version that is easier to use. This updated version could consolidate interpretations where appropriate, and express them in a more general way.

Suggested solution

As part of the review of the issues raised, a correspondence group or working group should review the existing format. IACS suggests that the advice of the secretariat be sought on the formats used in similar documents. IACS proposes that the revised TM.5/Circ.5 should address each of the Convention articles and regulations in turn and consolidate existing and new interpretations under them. The inclusion of relevant diagrams and figures would help with clarity.

Issue 29 – Single voyage for vessel delivery

Under articles 2(3), 3(1), 7(1) and 12(1)(a), a ship flying the flag of a country that is party to the TM Convention is subject to the Convention and must have an ITC on board the ship when engaged on an international voyage. Consideration should be given to exempting ships from these requirements when engaged on a single international voyage between the originating country and the ship's flag State for purposes of ship delivery (e.g. after the ship is initially constructed or otherwise obtained).

Suggested solution

Develop a standard exemption certificate for use in these circumstances with tonnages calculated to simplified formula (e.g. LxBxD) where a full ITC is not to be issued due to operating parameters.