

MARITIME SAFETY COMMITTEE
89th session
Agenda item 11

MSC 89/11/3
24 March 2011
Original: ENGLISH

BULK LIQUIDS AND GASES

Comments on the outcome of BLG 15

Submitted by Norway, INTERTANKO, OCIMF, IFSMA, ITF, NI, BIMCO

SUMMARY

| | |
|-----------------------------|---|
| <i>Executive summary:</i> | This document comments on the draft report of BLG 15, agenda item 4 |
| <i>Strategic direction:</i> | 5.2 |
| <i>High-level action:</i> | 5.2.3 |
| <i>Planned output:</i> | 5.2.3.4 |
| <i>Action to be taken:</i> | Paragraph 15 |
| <i>Related documents:</i> | MSC 82/21/15; FP 54/17/1; BLG 15/WP.1 and MSC 88/26/12 |

Background

1 This document comments on document MSC 89/11, reporting on the outcome of BLG 15, and is submitted in accordance with paragraph 4.10.5 the Guidelines on the organization and method of work of the Committees (MSC-MEPC.1/Circ.2).

2 Noting the Organization's aim to reduce complexity and following the justification prepared by DSC 13 to review and revise the specific provisions of the Recommendations for entering enclosed spaces aboard ships (resolution A.864(20)), the Maritime Safety Committee (MSC 85) agreed to include a new output in the work programmes of the BLG, DSC, FP and STW Sub-Committees, assigning the DSC Sub-Committee as the coordinator.

3 FP 54, having had an extensive discussion on the documents submitted to the session, noted the areas of general agreement; in particular, that the vast majority of those who spoke on the issue agreed that **only one set of general recommendations should be developed** by IMO to provide guidance to the industry on the risks associated with entering enclosed spaces aboard ships (BLG 15/WP.1, paragraph 14.3.1); and, that some proposals contained in document FP 54/17/1 (IPTA), proposing the development of guidelines for tank entry on chemical tankers, should be considered in the context of revision of the Recommendations (BLG 15/WP.1, paragraph 14.3.3).

4 FP 54 had expressed, to BLG 15, its view that the draft Guidelines annexed to document FP 54/17/1 should be considered by the DSC Sub-Committee in light of the work

on the revision of resolution A.864(20), **taking into account its applicability to all tankers**. In particular, FP 54 agreed that section 2 (Use of nitrogen) of the aforementioned proposed guidance should be specifically considered by DSC 15, **with a view to including relevant provisions in the revised Recommendations**, and encouraged Member Governments and international organizations to take part in the DSC Correspondence Group established on the matter (BLG 15/WP.1, paragraph 14.4).

5 MSC 87 instructed DSC 15 to forward its outcome to STW 42, BLG 15 and FP 55 so that their expert views can be considered at MSC 89 and A 27, as appropriate, so that the work on the revision of the Recommendations could be completed at MSC 89, for subsequent adoption by the next Assembly.

6 BLG 15, considered the views of DSC 15 that two sets of guidelines should be prepared (BLG 15/WP.1, paragraph 14.7) and the proposed new section 10.4 in the draft revised Recommendations is set out in annex 6 to document DSC 15/18.

7 In considering the above, BLG 15 agreed to prepare draft Guidelines on tank entry for tankers using nitrogen as an inerting medium, based on document FP 54/17/1, as modified by document BLG 15/14/1 (Bahamas and the Cook Islands), with a view to dissemination via an MSC circular.

Discussion

8 Although the BLG Sub-Committee has agreed to two sets of draft guidelines: (1) a revision of the recommendations to tank entry; and (2) Guidelines on tank entry for tankers using nitrogen as an inerting medium, MSC 88, considering the outcome of the debate on the matter of guidelines for tank entries, stated in document MSC 88/26/12:

"12.12 The Committee noted that the Sub-Committee had completed its work on the draft Revised Recommendations for entering enclosed spaces aboard ships, for approval by MSC 89, and had forwarded the draft revised recommendations to STW 42, BLG 15 and FP 55 for comment, as instructed by MSC 87. In this context, the Committee also noted the Sub-Committee's view that matters related to the entry into cargo tanks on tankers using nitrogen gas as the inerting medium should be contained in separate guidance and, taking into account that such guidance falls under the purview of the BLG Sub-Committee, BLG 15 had been invited, using document FP 54/17/1 as the base document, to consider the above view and advise MSC 89 accordingly (DSC 15/18, paragraphs 10.7 and 10.8)."

9 The co-sponsors appreciate the work done by the different sub-committees and the various working and drafting groups in revising the Recommendations and in highlighting the dangers of nitrogen used as an inerting medium on tankers.

10 However, in light of the above statement by MSC 88 (paragraph 8 above), the co-sponsors are of the opinion that the issue of whether or not separate guidelines as have been developed are required and necessary has not been fully considered.

11 The co-sponsors are further of the opinion that **there are no benefits of having separate guidelines** as have been developed and proposed for consideration to MSC 89. In fact, it is the opinion of the co-sponsors that it is detrimental having two sets of guidelines for what is essentially a single issue in separate documents. It will be detrimental to the seafarer for whom these guidelines are envisaged as instruments for the enhancement of safety on board **all** ships, and not specifically tankers using nitrogen as an inerting medium, and contrary to the stated goal of the Organization to reduce complexity.

Proposal

12 The co-sponsors strongly propose that the draft Guidelines on tank entry for tankers using nitrogen as an inerting medium, as set out in annex 10 to document BLG 15/19, should be either:

- .1 incorporated into the Revised Recommendations for entering enclosed spaces aboard ships (resolution A.864(20)) as an appendix; or
- .2 be linked together by an explicit reference made in the proposed new section 10.4 of the draft Revised Recommendations for entering enclosed spaces aboard ships that uses nitrogen as an inerting medium. The co-sponsors, therefore, propose the following modifications to paragraphs 10.2 and 10.4 of the draft Revised Recommendations:

"10.2 Bulk liquid

The tanker industry has produced extensive advice to operators and crews of ships using inert gases as an inerting medium engaged in the bulk carriage of oil, chemicals and liquefied gases, in the form of specialist international safety guides and best management practices such as ISGOTT (International Safety Guide for Oil Tankers and Terminals). Information in the guides on enclosed space entry amplifies these recommendations and should be used as the basis for preparing entry plans."

"10.4 Use of nitrogen as an inert gas

Nitrogen is a colourless and odourless gas that when used as an inert gas causes oxygen deficiency in enclosed spaces, and at exhaust openings on deck, during purging of tanks and void spaces and use in cargo holds. ~~It should be noted that one deep breath of 100% nitrogen gas will be fatal.~~ Additional guidance for use on any vessel when entering enclosed spaces that have previously been inerted with nitrogen are contained in MSC.1/Circ.[...]."

13 The co-sponsors believe that including the proposed MSC circular on dangers of nitrogen within the revised Recommendations for entering enclosed spaces aboard ships will consolidate and strengthen the Recommendations and ensure that it will serve its purpose as an instrument for the enhancement of safety of seafarers.

14 The co-sponsors are further of the opinion that not incorporating the proposed MSC circular on dangers of nitrogen within the revised Recommendations for entering enclosed spaces aboard ships will only increase the fragmentation of the guidance to seafarers and make it difficult for the seafarer to follow the guidance and advice provided therein.

Action requested of the Committee

15 The co-sponsors implore the Committee to note the above comments and, giving consideration to the fact the co-sponsors also include representatives of a the majority of seafarers and industry, incorporate the proposed MSC circular on the Dangers of nitrogen within the revised Recommendations for entering enclosed spaces aboard ships, thereby consolidating and strengthening the Recommendations and ensuring that it will serve its purpose as an instrument for the enhancement of safety of seafarers.