

SUB-COMMITTEE ON POLLUTION
PREVENTION AND RESPONSE
1st session
Agenda item 3

PPR 1/3/11
13 December 2013
Original: ENGLISH

**EVALUATION OF SAFETY AND POLLUTION HAZARDS OF LIQUID CHEMICALS AND
PREPARATION OF CONSEQUENTIAL AMENDMENTS**

**Review of products requiring oxygen-dependent inhibitors and proposals to amend
MSC/Circ.879-MEPC/Circ.348**

**Submitted by the International Association of Independent Tanker Owners
(INTERTANKO)**

SUMMARY

Executive summary: Taking into account the work being done on the review of the IBC Code and the carriage requirements for cargoes requiring protection by oxygen-dependent inhibitors, this document comments on the outcome of the ESPH 19 Working Group (PPR 1/3, paragraph 6.5) and makes recommendations for an alternate, simpler proposal, instead of a review of MSC/Circ.879-MEPC/Circ.348

Strategic direction: 5.2

High-level action: 5.2.3

Planned output: 5.2.3.7

Action to be taken: Paragraph 10

Related documents: MSC/Circ.879, MSC/Circ.879/Corr.1; PPR1/3; BLG 16/16 and BLG 16/INF.8

General

1 This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.2) and comments on the outcome of the ESPH 19 Working Group contained in document PPR 1/3, paragraph 6.5.

2 The ESPH Working Group, at its nineteenth meeting, recalled that BLG 16 had discussed the topic of cargoes requiring oxygen-dependent inhibitors in relation to inert gas controls. In particular, the Group had discussed a proposal that the MSC/MEPC circular covering equivalency arrangements for the carriage of styrene should be expanded to provide guidance when carrying other cargoes with similar requirements.

3 The ESPH Working Group further recalled that, although it had encouraged the submission of additional information regarding oxygen cut-off limits for the products identified in document BLG.16/INF.8, in order to develop a new MSC-MEPC circular, it had also noted that no additional information had yet been submitted. In view of this, it was agreed that it would be impossible to consider any expansion of the circular for styrene for the time being.

4 The ESPH Working Group, had noted, however, that no documents had been submitted under this agenda item to ESPH 19. Recognizing that nothing had been forthcoming on this topic, the Working Group had agreed that, as a consequence, unless submissions are made to PPR 1, then the original circular MSC/Circ.879-MEPC/Circ.348 should be reinstated, with a footnote added to paragraph 15.13.5.2 of the recent IBC Code amendments, as approved by MEPC 65 and MSC 92.

Proposal

5 In light of the discussions and background outlined above, INTERTANKO believes that there is no need to amend MSC/Circ.879-MEPC/Circ.348 for the following reasons:

- .1 the circular is directed towards a specific product (styrene monomer) to allow carriage for a specific purpose (in cargo tanks 3000 m³ or higher), where the SOLAS inerting requirements would apply. This is not being sought for other products having oxygen-dependent additives, as referenced by the IBC Code, paragraph 15.13; and
- .2 it is estimated that there are approximately a further 10 products involved, with each having the possibility of several different types of inhibitors being used. Such details would perhaps make any circular unduly complicated.

6 As an alternate and simpler approach, INTERTANKO proposes that an amendment to the IBC Code should be considered at the next opportunity.

7 While, procedurally, it may be quicker and easier to amend a circular, the robustness and clarity that an amendment makes would, in the long run, avoid confusion and be much more beneficial for industry.

8 The proposal would be to address this need for information on the oxygen cut-off limits for oxygen-dependent inhibitors by amending the IBC Code, paragraph 15.13.3.2, which addresses the requirements for the format of the *certificate of protection*, to be supplied by the manufacturer to each ship when such cargoes are transported. The draft text of the proposed amendment is set out in annex 1 to this document.

9 If agreed and adopted, INTERTANKO notes that the earliest these proposed amendments to the IBC Code could come into effect would be at the end of 2016 and, therefore, as an interim measure, proposes issuing an MSC-MEPC circular promulgating these changes. A proposed draft circular is included in annex 2.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the proposal put forward in this document and take action as appropriate.

ANNEX 1

PROPOSED AMENDMENTS TO THE INTERNATIONAL CODE FOR THE CONSTRUCTION AND EQUIPMENT OF SHIPS CARRYING DANGEROUS CHEMICALS IN BULK (IBC CODE)

Chapter 15 – Special requirements

Paragraph 15.13.3.2 is replaced with the following:

"whether the additive is oxygen-dependent and if so, then the range of oxygen required in the vapour space of the tank, for the inhibitor to be effective, must be specified;"

ANNEX 2

DRAFT CIRCULAR

Products requiring oxygen-dependent inhibitors

1 The Maritime Safety Committee, at its XX session (2014) and the Marine Environment Protection Committee, at its XX session (2014), noted that as a result of the revised inert gas regulations for new ships, low-flashpoint cargoes that require oxygen-dependent inhibitors would need to be carried under inert conditions, thereby depriving the inhibitor of the required level of oxygen to keep it effective.

2 Such cargoes would therefore need to include relevant safety information in the *certificate of protection*, as required under the IBC Code paragraph 15.13, as a lack of information regarding the safe levels of oxygen presents clear hazards for the safety of the ship and protection of the marine environment.

3 Having considered the proposal by the Sub-Committee on Pollution Prevention and Response (PPR) at its first session, the Committees agreed that the existing IBC Code paragraph 15.13.3.2, which requires the *certificate of protection* to state "whether the additive is oxygen-dependent" should be replaced by the requirement that states "whether the additive is oxygen-dependent and if so, then the range of oxygen required in the vapour space of the tank for the inhibitor to be effective, must be specified".

4 As an interim measure, pending the adoption of the proposed changes to the IBC Code, the Committees have agreed to issue this circular with the aim of bringing the attention of all stakeholders to the above referred decision.

5 Member Governments are invited to bring the content of the circular to the attention of all interested parties.
