

Sulphur Cap Chaos ?

On 1st January 2020 the worlds ships will need to use fuel that contains no more than 0.5% sulphur or be fitted with exhaust scrubbers to remove the pollutant. Equipment manufactures advise that of the 40,000 ships without scrubbers only a small fraction could be fitted in time. ICS are forecasting wide spread disruption as there is insufficient global standard to ensure fuels are compatible and safe on-board. The fuel market consultants have stated that the increased demand for clean fuel will trigger a major price rise in all fuels. They have also warned that that they don't believe the refining industry can produce all the fuels that would be needed for 100% compliance and is potentially rather chaotic and stressed. *Is there sufficient investment into the 2020 deadline?*

Maritime Safety Committee, MSC 99.

[Regulatory scoping exercise for the use of Maritime Autonomous Surface Ships \(MASS\)](#)

The most important agenda item at MSC 99 for the future of the shipping industry was the new work item '***A regulatory scoping exercise to determine what revisions are required to international regulations to allow unmanned ships to operate in international trades***'. It is notable that the unmanned ship was first on the agenda of the 8th Maritime Safety Committee in 1964 using a similar definition.

There were 20 papers submitted to MSC 99 regarding Maritime Autonomous Surface Ships (MASS) and numerous interventions and views at plenary over a five hour debate, but basically the flags fell in two camps. Supported by the manufacturers there were those that wanted urgency, scoping to be completed by 2020 and opposed parallel guidelines or a MSC circular restricting, at this time, any unmanned vessels in international waters. The other camp spoke of a realistic evolution of maritime automation, to be 'user' driven and with safety, security and the environment the priority, considering a realistic time frame for scoping would be completion by 2023.

There was agreement that the other IMO committees would work in conjunction with the MSC and other relevant international bodies e.g. ILO, UNCLOS etc are to be kept advised of progress. The sub committees however would not be involved which will possibly mean new operational, training and technical standards will not be progressed until the regulation scoping has been completed. This in itself a massive undertaking and the bulk of the work will not be covered by the IMO secretariat.

A working group was set up and this agreed the Aims, Objectives, Methodology, Plan of work and Framework. To facilitate this process they agreed four preliminary definitions;

1. ***Ship with automated process and decision support.***
2. ***Remotely controlled ship with seafarers on board.***
3. ***Remotely controlled ship without seafarers on board.***
4. ***Fully autonomous ship.***

The methodology is in two steps identifying first the instruments that apply, or not, to MASS and those that will or will not preclude a MASS operation. In the second step an analysis is conducted taking into account the human element, technology and operational factors. This will determine if any change is required, that will require using an equivalence or new interpretation, or amendment, or new instrument.

The working group recognised the magnitude of this undertaking for all the IMO legislation, instruments and relevant Codes to be reviewed so a small selection of instruments were chosen for a trial of the process in a correspondence group, before MSC 100, in December this year. The MSC committee have agreed to the time table but we still think that it is unlikely to have made the progress envisaged by MSC 103 in 2020. We will be involved in all working groups and correspondence groups including any intersessional groups if they are introduced, but we hope to have a better understanding of where it is going by MSC 100.

[Safety measures for non-SOLAS ships operating in polar waters.](#)

Whilst there is a general recommendation that there is a need for safety measures for non SOLAS vessels operating in polar water there is strong feelings that the IMO should not be considering mandatory measures. It was eventually agreed that at this time they should concentrate on recommendatory measures for fishing vessels over 24meters in length and pleasure yachts above 300gt, but not confined to international voyages. The discussion on mandatory provision will probably be vigorously debated again at MSC 100.

[Carriage of Industrial Personnel](#)

The considerations regarding MASS again highlights the need to tie down the definition of industrial personnel. Again in the debate at MSC 99 the matter of Industrial Personnel working onboard was raised but made no progress The carriage of over 12 Industrial Personnel in the offshore energy sector transported or accommodated on ships on international voyages continues to make slow progress towards a new chapter in SOLAS and an Industrial Personnel Code. The problem at this session were confined to concerns regarding the application of a mandatory code in a consistent way. This relies on the understanding of the term 'industrial personnel' and the nature of the voyage and what is understood by the term international voyage. The committee did not have a solution to the inconsistencies although they accepted they exist. The second clarification was the interaction of the new SOLAS provision, IP Code and other instruments. It was recognised that the carriage of Special Personnel under a non-mandatory provision at the same time as IP crew under a mandatory provision, both on off shore activities, will need to be addressed by the SDC subcommittee. It was however agreed that a mixture of persons, IP, SP and passengers could be carried at one time up to a maximum of 12.

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[Lifeboats](#)

The Industry Lifeboat Group (ILG) has identified a number of problems regarding lifeboat capacity, design and ventilation of lifeboats and wire failures that need urgent attention. At MSC 99 there were four papers submitted under new work items and other business concerning lifesaving appliances. Two of these were put off as the review of the LSA is already on the SSE subcommittee agenda but as yet there has been insufficient time to progress it.

The papers submitted were

- Amendment to the life raft requirement in SOLAS to ensure they are self righting. (Place on biennial agenda).
- Amend LSA code to ensure safety standards for boats with single fall and on load release hook systems. (Place on current agenda)
- Requirements for practical seating arrangements and capacity of survival craft. (More detail and further submissions required).
- Revision of the lowering speed of survival and rescue boats. (place on biennial agenda).

[Availability of passenger ships' electrical power supply in cases of flooding from side raking damage.](#)

Following the Costa Concordia disaster, the SDC Sub-committee consider the availability of passenger ship electrical power supply in cases of flooding from side raking damage and in particular whether this matter should be solved by applying electrical engineering solutions, rather than naval architectural solutions i.e. double hulls. The naval architectural solution were complicated and it was decided to settle for the electrical engineering functional approach. This will mean there will be no further action on this output but member states should propose a new output probably to the SSE sub-committee.

[Sub Committee workload](#)

Due to an excessive workload the NCSR sub-committee (navigation, search and rescue and communication), will be for two sessions, extended to eight days. However, this is not the only sub-committee overloaded and we have been unable to have new work program items on lifeboat safety apparatus LSA progressed despite the SOLAS Chapter III and the LSA being on the agenda for complete review for a few years without any progress. The autonomous ship debate is eventually expected to introduce far more work to committees and sub-committees and the IMO will need to find a way of responding.

John Bainbridge