

SUB-COMMITTEE ON SHIP DESIGN AND  
CONSTRUCTION  
1st session  
Agenda item 4

SDC 1/4/4  
29 November 2013  
Original: ENGLISH

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

**Comments on the report of the correspondence group**

**Submitted by the International Association of Classification Societies (IACS)**

**SUMMARY**

*Executive summary:* This document proposes to the Sub-Committee that an additional tolerance be agreed addressing an acceptable per cent difference when remeasurement takes place on a ship where there has not been an alteration or modification

*Strategic direction:* 2

*High-level action:* 2.0.1

*Planned output:* 2.0.1.5

*Action to be taken:* Paragraph 8

*Related documents:* SDC 1/4 and SDC 1/INF.4

**Introduction**

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 provides comments on document SDC 1/4.

2 IACS has participated in, and contributed to, the Correspondence Group on the Development of Provisions to Ensure the Integrity and Uniform Implementation of the 1969 TM Convention, which was established at SLF 54, and re-established at SLF 55, and is prepared to continue to support this important work.

3 During SLF 54, IACS made a general comment during the plenary discussion of this issue, in which it commented that it is important to clarify what per cent change in the gross tonnage triggers the reissuance of the ITC certificate.

4 IACS notes that the correspondence group has considered what extent of alterations or modifications is considered to affect the tonnage of existing ships and the need for relevant criteria to be developed (SDC 1/4, paragraph 6.2). IACS notes that this issue has generated a significant number of comments within the group and, indeed, at the fifty-fifth session of the SLF Sub-Committee.

### **Discussion**

5 IACS input to the correspondence group has supported a 1% change in the gross tonnage as a trigger for reissuance of the ITC certificate when alterations or modifications have occurred.

6 However, there did not appear to be an opportunity within the correspondence group to raise another factor, besides alterations or modifications, which would trigger reissuance of the ITC certificate. IACS considers that another factor that should be considered is what per cent difference is acceptable when remeasurement takes place (for instance by another approval entity) in instances when there has not been an alteration or modification to the ship.

### **Proposal**

7 IACS proposes that when remeasurement takes place where there has not been an alteration or modification to the ship, a difference of 2% be considered as an acceptable margin. This proposal takes into account that:

- .1 MSC.1/Circ.1229 considers that +/- 2% difference in displacement and +/-2% on compartment volume are acceptable margins in reviewing submitted stability calculations; and
- .2 IACS is aware that some Administrations apply a 5% tolerance when they undertake oversight reviews of tonnage calculation verifications by recognized organizations.

### **Action requested of the Sub-Committee**

8 The Sub-Committee is invited to consider the above comments and observations, the proposal in paragraph 7 above, and take action as appropriate.

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