



IMCO

INTERNATIONAL CONFERENCE ON TONNAGE MEASUREMENT, 1969

GENERAL OBSERVATIONS SUBMITTED BY GOVERNMENTS ON A UNIVERSAL SYSTEM OF TONNAGE MEASUREMENT

Further observations on a universal system of tonnage measurement have been submitted by the Governments of India, Italy, Kuwait and Senegal and these are reproduced in the attachment.

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INDIA

1. General Observations: The proposals have been studied with the following basic points in view:

- (i) A simplified system of Tonnage Measurement should be evolved which is internationally acceptable.
- (ii) The safety of the vessel should always be considered of paramount importance.
- (iii) The new method of Tonnage Measurement should not allow different interpretations leading to manipulation of tonnage.
- (iv) The tonnage evolved by the new method should be as close as is reasonably possible to the existing tonnage figures so that existing ships do not have to pay additional port and harbour dues.

2. The Government of India would give its full support to any simplified system of Tonnage Measurement which relates the tonnage to the earning capacity of the vessel, and at the same time does not give any scope for ambiguity in the computation of tonnage. The Government of India also recommends that all countries which are signatories to the proposed Convention should advise their port and harbour authorities to levy dues on the basis of the tonnage evolved by the new method.

3. The Government of India give below their comments on proposals A, B, C and the Danish Amendment:

- (i) Proposal A This proposal is similar to the existing method of tonnage measurement commonly followed and retains the various ambiguities which have been the bane of the existing systems. This proposal is not conducive to good design and safety of the vessel. It is not possible to ascertain the tonnages at an early stage of the design

due to various indefinable characteristics contained in the proposal. Though the proposed method is to a certain extent simpler than the existing practice, it leaves much to be desired towards evolving a formula for easy calculation of tonnages at the initial design stage of the vessel. It also allows unlimited reduction for water ballast spaces creating anomalies in different types of vessels and in some cases resulting in absurd net tonnage.

- (ii) Proposal B. This proposal has the advantage of direct measurement of cargo and passenger spaces for arriving at the net tonnage. These spaces represent the earning capacity of the ship. The gross and net tonnages arrived at by this method would be as close as is reasonably possible to the tonnages of the existing vessels.
- (iii) Proposal C This proposal has the merit of simplicity. However, the gross tonnages of existing ships derived on the basis of this proposal show wide variations and are generally higher than those computed by the existing method. It would therefore impose undue penalty on the shipowners unless the present rates for port and harbour dues are suitably amended. In this proposal there is no provision for assignment of net registered tonnage but the displacement at the summer loadline in salt water is defined as the second parameter. There is vagueness in the treatment of closed-in spaces leading to varied interpretations. It does not allow dual tonnages to be assigned.
- (iv) Danish Amendment: This proposal is a modification of proposal C and it envisages assignment of only one tonnage based directly on the function of displacement.

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Though the method proposed is very simple in evaluating the tonnage of the vessel, the tonnage so evolved does not represent the true earning capacity of the vessel. It does not evolve net registered tonnages close to those of existing ships.

4. The Government of India favour proposal B and proposal C as amended by Denmark for the following reasons:

- (a) Proposal B Gross and Net registered tonnages derived from this proposal would be close to the existing tonnages.
- (b) Proposal C with the Danish Amendment: This proposal has simplicity.

5. The amendments proposed by India to proposals B and C as amended by Denmark are shown in documents TM/CONF/5/Add.2 and TM/CONF/7/Add.2, respectively.

ITALY

At the forthcoming meeting of the International Conference on Tonnage Measurement 1969, Italy thinks it would be advisable, in order to avoid unnecessary misunderstanding relating to the consequences of a new tonnage system on the application of the 1960 Safety Convention and of the 1966 Load Line Convention, to point out the following:

During the 1960 Safety Conference, Italy proposed not to make reference to the tonnage bearing in mind that:

- tonnage rules were different in various countries;
- in the future tonnage rules were expected to be radically modified;
- tonnage was a parameter which could be obtained only after completion of ship construction while the safety rules need to be known at the design stage.

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On that occasion, therefore, Italy proposed to substitute tonnage by the ship's length or some other equivalent parameter and a table of correlation between these two factors was prepared.

This Italian proposal resulted in Recommendation 3 of the 1960 Safety Conference and was accepted as a basis for the 1966 Load Line Convention.

In view of the fact that among the various proposals put to the 1969 Tonnage Measurement Conference there is one which assumes the displacement as tonnage parameter (proposal which Italy supports) the Italian delegation submits the attached table for the attention of the members of the 1969 Conference. The attached table shows how the 1960 Safety Convention might be modified in order to replace the tonnage factor with the displacement.

Gross Tonnage	Displacement	
	Tankers and Cargo Ships	Passenger Ships
150	330	220
300	650	
500	1100	
1000	2200	1200
1600	3500	1800
2000	4500	
3000	6000	
3500	7800	
4000	9000	4500
5000	11000	5500
10000		11000
20000		18000

KUWAIT

After having studied the documents emanating from other countries the Government of Kuwait is of the opinion that Proposal C, as amended by both Denmark and Sweden, merits its support.

The comment made by the Government of New Zealand, in document TM/CONF/3, is also worthy of consideration. The Government of Kuwait subscribes to the attitude taken, that any system which perpetuates the anomalies at present in existence is to be discouraged. An entirely new concept in regard to tonnage measurement is required, such as a simplified system, whereby the true size of the vessel and its earning capacity can be more readily appreciated.

Kuwait has not been a supporter of the "Recommendations on the treatment of shelter-deck and other 'open' spaces" (Resolution A.48(III)) as it has found by experience that these Recommendations have, in some instances, been misinterpreted. Kuwait would therefore support a system of tonnage measurement which does not embody this attitude toward the treatment of shelter-decks and other open spaces.

When the various opinions of governments concerning the proposed universal system of tonnage measurement has been collated, the advantages and disadvantages of the proposals can be more easily digested. The Government of Kuwait reserves its final opinion until it is in possession of such collated information and is also able to discuss the matter at the Conference.

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SENEGAL

The Government of Senegal, having studied the three proposals, states its preference for basic Proposal C which seems to be the simplest, most equitable and most realistic, in particular because it brings in the concept of displacement. This latter gives a fairly accurate picture of the ship's size.

This proposal also has the advantage of permitting only a single tonnage, and thus eliminates the present complications of multiple tonnages calculated in a more or less arbitrary fashion; they are the cause for numerous controversies in regard to port and pilotage dues.
