Council of the
European Union

Brussels, 5 March 2019
(OR. en)

6734/1/19
REV 1

LIMITE

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Delegations
Subject:	6th session of the IMO Sub-Committee on Ship Systems and Equipment (SSE 6) (London, 4 – 8 March 2019) - Non-paper from the Commission drafted to facilitate EU co-ordination

DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (17.04.2019)

Delegations will find attached a non-paper from the Commission drafted to facilitate co-ordination between the EU Member States and the Commission in respect of the subject mentioned above**, revised in the light of the discussions at the coordination meeting in London on 4 March 2019**.

ANNEX

NON PAPER

DRAFTED TO FACILITATE CO-ORDINATION BETWEEN THE EU MEMBER STATES AND THE COMMISSION[1] FOR THE 6TH SESSION OF THE IMO SUB-COMMITTEE ON SHIP SYSTEMS AND EQUIPMENT (SSE 6) (LONDON, 04 – 08 MARCH 2019)[2]

Non-restrictive list of items for which EU, common or coordinated positions could be agreed upon.

This document lists all received documents[3]. The Commission suggest focussing the discussion on the proposed positions and on the consideration of support for submissions by another EU or EEA State as fellow EU/EEA State. This does not exclude the discussion of any other item on the agenda, if explicitly requested an EU/EEA Member State or the Commission.

The comments by the Commission are printed in *italics*. The proposed line of conduct to be followed by the Member States and the Commission is printed in ***bold italics*.**

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1 For reasons of brevity, the word "Commission" used in this document means the responsible service of the Commission.

2 It is the intention of the Presidency to ensure the necessary co-ordination of the Member States' positions on the spot on the basis of the discussion of this paper.

3 Based on documents received up to 15 February 2019.

Agenda item 1 – Adoption of the agenda

Docs: SSE 6/1, SSE 6/1/1-2

SSE 6/1 (Secretariat): provides the provisional Agenda for SSE 6.

SSE 6/1/1 (Secretariat): provides information on actions the Sub-Committee will be invited to take on the agenda items at this session.

SSE 6/1/2 (Chair): informs of the proposed selection of working and drafting groups for this session of the Sub-Committee, decided by the Chair in consultation with the Secretariat, taking into account the volume of documentation submitted on the relevant subjects.

The proposed working groups for this session, in accordance with document SSE 6/1/2, are the following:

1. Working Group on Life-Saving Appliances (LSA) (agenda items 3, 4, 5, 12, 13, 14 and 17);
2. Working Group on Fire Protection (FP) (agenda items 6, 7, 12 and 17); and
3. Working Group on Onboard Lifting Appliances and Anchor Handling Winches (OLAW) (agenda item 9).

Drafting group(s) may also be established during the session, as necessary.

Agenda item 2 – Decisions of other IMO bodies

Docs: SSE 6/2, SSE 6/2/1

SSE 6/2 (Secretariat): reports on the decisions taken by MSC 99 relevant to the work of the Sub-Committee.

SSE 6/2/1 (Secretariat): references the decisions taken by III 5 and MSC 100 relevant to the work of the Sub-Committee

The issues raised relevant to the SSE Sub-Committee will be handled under the relevant agenda item at this session. Relevant to the EU are the following issues:

- MSC 99 - Revision of the Standardized Life-Saving Appliance Evaluation and Test Report Forms (MSC/Circ.980 and addenda) (Agenda item 14).

- MSC 100 – Development of new requirements for ventilation of survival craft (Agenda item 4).
- MSC 100 - Consequential work related to the new Code for ships operating in polar waters (Agenda item 5)
- Draft amendment to paragraph 6.1.1.3 of the LSA Code (Agenda item 17)
- Draft interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel (Agenda item 17)

Agenda item 3 – Safety objectives and functional requirements for the guidelines on alternative design and arrangements for SOLAS Chapters II-1 and III

Docs: SSE 6/3, SSE 6/3/1-2

SSE 6/3 (United States as coordinator of the Correspondence Group): provides the report of the part of the Correspondence Group on Life-Saving Appliances, which was re-established at SSE 5, with the terms of reference related to both "Safety objectives and functional requirements of the Guidelines on alternative design and arrangements for SOLAS chapters II-1 and III" and "Develop new requirements for ventilation of survival crafts".

SSE 6/3/1 (RINA): comments on document SSE 6/3 (United States) containing the report of the Correspondence Group on Life-Saving Appliances, and requests the Sub-Committee to consider whether enough progress has been made to commence the revision of SOLAS chapter III.

SSE 6/3/2 (IACS): provides comments on the report of the LSA Correspondence Group, as provided in document SSE 6/3 (United States).

EU relevance

This subject may in the future affect EU legislation on life saving appliances, in particular once the discussion starts on the revision of SOLAS Chapter III and the LSA Code.

Background

MSC 98, in considering the recommendations of SSE 4 regarding the draft functional requirements for SOLAS chapter III, instructed the SSE Sub-Committee to consider the following principles when describing the necessary function of the draft functional requirements (expected performance) in quantitative terms:

a. functional requirements ought to be formulated in a clear, unambiguous and objective manner;
b. the expected performance should be expressed as precisely as possible, preferably in quantitative terms; and
c. the approach proposed in document MSC 98/12/6 and the information contained in annex 4 to document SSE 4/3 should be used by the Sub-Committee to take the initial steps in attempting to describe functional requirements in quantitative terms.

In this context, the Committee invited Member States and international organizations to submit relevant information and data to SSE 5 for consideration and action, as appropriate.

Based on the documents submitted to SSE 5, the Sub-Committee considered whether the focus of the work should be SOLAS chapter III, as proposed in document SSE 5/3 (Germany), or the consistent application of SOLAS regulations III/4.3 and III/38 and the Guidelines on alternative design and arrangements for SOLAS chapters II-1 and III (MSC.1/Circ.1212) before the Organization undertakes a comprehensive revision of SOLAS chapter III or the LSA Code, as proposed in document SSE 5/3/1 (United States). After a long discussion, the Sub-Committee agreed that the primary focus of this output was in line with the proposal by the United States. It was agreed that the goals, functional requirements and expected performance criteria for SOLAS chapter III cannot be separated from those for life-saving appliances covered by the LSA Code.

A working group was established at SSE to develop goals, functional requirements and expected performance in line with the decision of the Sub-Committee. However, the working group identified differences in the presentation of functional requirements and expected performance provided in document SSE 5/INF.7 versus those presented in annex 1 of document SSE 4/WP.3, and that those differences would best be resolved by conducting a gap analysis between those two documents. The Sub-Committee established a correspondence group, under the coordination of the United States, to carry out this gap analysis and to work further on the establishment of the functional requirements.

Consideration at SSE 6

Document 6/3 provides the report of the Correspondence Group. It notes that the Correspondence group made substantial progress on advancing the development of functional requirements and expected performance criteria for SOLAS chapter III. However, further discussion is required since some text in the draft functional requirements and expected performance criteria for SOLAS chapter III remained in square brackets. However, it is expected that the remaining work could be completed within a working group at this session.

In document 6/3/1, RINA reminds the Sub-Committee that MSC 98 had determined that a new output on the revision of SOLAS chapter III and the LSA Code should only commence once the work on the functional requirements and expected performance standards for SOLAS chapter III had been completed. It expects that the latter work will be completed at this session. RINA therefore proposes that the Sub-Committee determines whether the work was completed and, if so, to make the necessary arrangements to start the revision of SOLAS chapter III and the LSA Code.

In document 6/3/2, IACS notes that the work produced by the Correspondence Group is not fully in line with the principles included in the Generic guidelines for developing goal-based standards (MSC.1/Circ.1394/Rev.1). IACS, therefore, proposes a number of amendments to improve the use of quantitative terminology of the draft expected performance. In addition, it proposes again the development of a HAZID for Chapter III and the LSA Code, which did not command a majority in the CG. **DELETED**

DELETED

Agenda item 4 – Develop new requirements for ventilation of survival crafts

Docs: SSE 6/4, SSE 6/4/1-2, SSE 6/INF.3-4

SSE 6/4 (China): proposes amendments to ventilation rate criteria in the LSA Code and resolution MSC.81(70), as amended, which is based on the verification of the ventilation rate criteria through comparison between lifeboat test and model calculation.

SSE 6/4/1 (Canada): proposes additional measures to supplement the draft amendments to the LSA Code on ventilation requirements of survival craft.

SSE 6/4/2 (CLIA): comments on document SSE 6/4/1 proposing to amend paragraph 4.4.8 of the LSA Code to include CO_2 monitors as part of the equipment for all types of lifeboats.

SSE 6/INF.3 (China): provides the results of a research on lifeboat ventilation systems conducted by China in order to support and serve as a supplement to the proposal contained in document SSE 6/4 (China).

SSE 6/INF.4 (Canada): provides information and a technical report on ventilation requirements for survival craft.

EU relevance

Lifeboats and survival craft standards as well as Resolution MSC.81(70) form part of the Annex to Commission Implementing Regulation (EU) 2018/773 of 15 May 2018 on design, construction and performance requirements and testing standards for marine equipment and repealing Implementing Regulation (EU) 2017/306 (Implementing Regulation (EU) 2018/773). This issue therefore falls in the scope of Directive 2014/90/EU of the European Parliament and of the Council of 23 July 2014 on marine equipment and repealing Council Directive 96/98/EC (Marine Equipment Directive 2014/90/EU).

In addition, Article 6(2)(a)(i) of Directive 2009/45/EC on safety rules and standards for passenger ships applies SOLAS, as amended, to Class A passenger ships. Moreover, Directive 2009/45/EC, Annex I, Chapter III Life Saving Appliances, lays down various and extensive requirements for Class B, C and D passenger ships when engaged in domestic voyages also concerning totally enclosed lifeboats.

The Commission therefore considers that this agenda item is one of EU competence.

Background

At MSC 97, Bahamas and Japan successfully requested a new output concerning requirements for the ventilation of totally enclosed lifeboats. At that time, an EU position was agreed "to support in principle the proposal contained in MSC 97/19/8 submitted by Bahamas and Japan with a view to establish the planned output at MSC 97 also by providing additional possible areas of intervention where applicable" (see Council WD 13864/2/16 of 21/11/16). In SSE 4/14, Bahamas and Japan outlined the specificities of ventilating this type of lifeboat and proposed draft amendments to both the LSC Code and the revised recommendation on testing of LSAs (Resolution MSC.81(70), as amended.

SSE 4, after considering the documents submitted at that session in a working group, noted that the Group had agreed that additional research and experience data related to microclimate inside totally enclosed lifeboats would be helpful to reach a conclusion with regard to the ventilation flow to be included in the draft amendments. For this purpose, SSE 4 re-established the Life Saving Appliance (LSA) Correspondence Group, under the coordination of the United States, to gather the required data, to identify the possible criteria on which the new ventilation requirements should be based, and to recommend the criteria to be used for the draft amendments to paragraph 4.6.6.1 of chapter IV of the LSA Code, and draft amendments to resolution MSC.81(70).

At SSE 5, after considering the report of the Correspondence Group (SSE 5/4), the Sub-Committee agreed that:

1. *for totally enclosed lifeboats, the ventilation/air exchange rate based on microclimate parameters should be the criterion set out in the draft amendments to the LSA Code without precluding either active or passive ventilation methods; and*
2. *a habitable environment should be maintained for a period of time of not less than 24 h for lifeboats, in general, while a longer period may be required for survival craft of ships operating in polar waters.*

Finally, SSE 5 agreed to the draft amendments to the LSA Code regarding ventilation on totally enclosed lifeboats, for eventual submission to the MSC for approval once the related amendments to the LSA Code regarding ventilation on survival craft other than totally enclosed lifeboats were finalized. The latter amendments were referred to a correspondence group for further consideration.

Consideration at SSE 6

The report of the correspondence group is contained in document SSE 6/3. This report notes in particular the divergent views on this subject. These differences in opinions could be seen from the different options presented and the text in square brackets. The Group was unable to propose complete draft amendments to the LSA Code, resolution MSC.81(70). Therefore it proposed that the matter be further discussed in a working group.

DELETED

China (SSE 6/4 and SSE 6/INF.3) and Canada (SSE 6/4/1 and SSE 6/INF.4) provide additional research results as well as proposing further amendments to the LSA Code and resolution MSC.81 (70). **DELETED**

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Agenda item 5 – Consequential work related to the new Code for ships operating in polar waters

Docs: SSE 6/5, SSE 6/INF.2

SSE 6/5 (Norway as coordinator of the Correspondence Group): provides the part of the report of the Correspondence Group on Life-Saving Appliances related to "Consequential work related to the new Code for ships operating in polar waters", which was re-established at SSE 5.

SSE 6/INF.2 (Norway): provides information on an exercise conducted in May 2018 in Fjortendejuli Bukta, north of Ny-Ålesund, i.e. the SARex 3, and provides a link to its report.

EU relevance

Life-saving appliances form part of Commission Implementing Regulation (EU) 2018/773 and consequently fall within the scope of the Marine Equipment Directive 2014/90/EU. In addition, Article 6(2)(a)(i) of Directive 2009/45/EC on passenger ships applies SOLAS to Class A passenger ships.

It is also relevant to note that in April 2016, in response to the changing environment in the Arctic and with a view to promote the sustainable development of the region, the EU adopted an integrated policy on the Arctic.

Background

MSC 97 instructed SSE to review the LSA Code and the relevant IMO resolutions to:

- *adapt current testing and performance standards to the Polar Code provisions; or*
- *develop additional requirements, if necessary.*

SSE 4 developed a work plan to address additional requirements related to life-saving appliances and arrangements on board ships operating in polar waters. It also established a Correspondence Group in order to progress the work. Following the consideration of the report of the Correspondence Group, the Sub-Committee established a working group to develop specific conditions and test and performance criteria for life-saving appliances and arrangements intended for use in polar waters and methods related to the regulatory framework to address conditions, test and performance criteria; it also considered that Interim guidelines on life-saving appliances and arrangements for ships operating in polar waters had to be developed due to the urgency of the matter.

The working group at SSE 5 made substantial progress on the development of the draft Interim guidelines on life-saving appliances and arrangements for ships operating in polar waters, particularly on the following assessment criteria:

- *maximum expected time of rescue;*
- *operation in low-air temperatures (ships with an assigned PST);*
- *operation in ice;*
- *icing of life-saving appliances and arrangements;*
- *the effect of operation in high latitudes;*
- *operation in extended periods of darkness; and*
- *abandonment onto ice or land.*

However, the working group was unable to finalize the draft Interim guidelines at SSE 5. Consequently, the Sub-Committee agreed to establish a correspondence group to progress the work on the draft interim guidelines with a view to finalise them at SSE 6. The correspondence group was also tasked to identify an appropriate regulatory option to address future new test and performance criteria, e.g. a new chapter of the LSA Code, amendments to MSC.81(70), amendments to the Polar Code, part I-B or a standalone resolution/circular.

Consideration at SSE 6

The report of the correspondence group is contained in document SSE 6/5. The report notes that the correspondence group made good progress on the finalization of the draft interim guidelines on life-saving appliances and arrangements for ships operating in polar waters, as contained in the annex. However, it was not able to finalize the document. Some open issues remained, including on survival craft capacity, on heat loss/body core temperature and on food rations. As regards to identifying suitable regulatory options to address future new test and performance criteria, it was recommended that there was a need to finalize the draft interim guidelines and to gain experience before a decision was made on this matter.

The Group was also of the opinion that it is necessary to further clarify the content of the polar survival guidance, to develop guidelines on how to determine the expected time of rescue and to develop guidelines for testing and evaluation. The Group recommends establishing an LSA Working Group with a specific ToR, namely to finalize the draft interim guidelines on life-saving appliances and arrangements for ships operating in Polar waters concentrating primarily on the remaining open topics. **DELETED**

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Agenda item 6 – Review SOLAS chapter II-2 and associated codes to minimize the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships

Docs: SSE 6/6, SSE 6/6/1-5

SSE 6/6 (Japan as coordinator of the Correspondence Group): provides the report of the Correspondence Group on Fire Protection related to reviewing of SOLAS chapter II-2 and associated codes to minimize the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships.

SSE 6/6/1 (EU): presents all relevant accident investigation reports and particularly any safety recommendations that could be useful to the work on this agenda item.

SSE 6/6/2 (EU): presents the main topics and the structure of the FIRESAFE II study and suggests a possible way forward.

SSE 6/6/3 (China): based on the lithium-ion battery fire tests conducted by China, provides comments on the draft interim guidelines for minimizing the incidence and consequences of fires in ro-ro spaces and special category spaces of new and existing ro-ro passenger ships, as contained in the report of the Correspondence Group on Fire Protection.

SSE 6/6/4 (China): proposes amendments to MSC.1/Circ.1432.

SSE 6/6/5 (IACS): provides comments on the report of the Correspondence Group on Fire Protection related to reviewing of SOLAS chapter II-2 and associated codes to minimize the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships.

EU relevance

Article 6(2)(a)(i) of Directive 2009/45/EC applies SOLAS, as amended, to Class A passenger ships. Moreover, Directive 2009/45/EC, Annex I, Chapter II-2 Fire Protection, Detection and Extinction lays down various and extensive requirements for Class B, C and D passenger ships when engaged in domestic voyages.

Background

MSC 97 agreed to the EU's proposed new output concerning fires on ro-ro decks of passenger ships based on the analysis of historical and recent accidents occurring on ro-ro passenger ships, identifying 14 areas of possible interventions for improvement and amendment of the instruments. SSE 4/INF.6 by the Commission set out the study to support this output. When approving this new output, MSC 97 instructed SSE 4 to consider the scope and the work plan, given the high number of areas to be considered and to advise MSC 98 accordingly.

SSE 4 invited member States and international organizations to submit proposals regarding the draft Interim Guidelines and draft amendments to SOLAS chapter II-2 and associated codes, for consideration at SSE 5. After considering the submitted documents, SSE 5 agreed that the draft interim guidelines should not be limited to the transport of electrically powered vehicles and reefer units and their connection to the ship's electrical supply. Following the presentation of the report of the Fire Protection working group, the Sub-Committee approved the provisional structure for the draft Interim guidelines. The Sub-Committee also noted that, due to time constraints, the working group was unable to commence identifying and amending fire safety provisions in SOLAS chapter II-2 and associated codes.

In view of the remaining work, SSE 5 re-established the Correspondence Group on Fire Protection (FP), under the coordination of Japan, and instructed it to develop draft interim guidelines for minimizing the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships, to develop draft amendments to the 1974 SOLAS Convention and associated codes, taking into account their application to existing ships, and to identify other related instruments which need to be consequentially amended.

Consideration at SSE 6

Document SSE 6/6 reports on the progress achieved by the Correspondence Group in the development of the draft interim guidelines, the draft amendments to the 1974 SOLAS Convention and associated codes, and the identification of other related instruments which need to be consequentially amended. It should be noted that consensus had not been reached on a number of issues and, therefore, text was kept in square brackets. In fact, on many aspects the Group agreed to wait for additional data or results of scientific studies like the FIRESAFE II project before finalising the text. Additionally, it should be highlighted that the Guidelines are still considered to be at an early stage, since definitions, introduction text, application etc. have not been discussed.

The FIRESAFE II study has now been concluded and its structure and main outcome is provided in document SSE 6/6/2 (EU), while the full report could be accessed at: http://www.emsa.europa.eu/firesafeii.html. A presentation of the results of the study will be delivered during lunch time on Tuesday, 5 March. The results of the study can now be considered for the further development of the interim Guidelines and draft amendments to legal instruments when the issue is considered in the working group on Fire Protection. In support of this work, the EU also submitted document SSE 6/6/1 providing extracts from the relevant accident investigation reports and safety recommendations.

Furthermore, both FIRESAFE studies have been drafted following the IMO's Formal Safety Assessment (FSA) Guidelines and as such they may be reviewed by the FSA Experts Group (FSA EG), unless the Committee decides that the subject is sufficiently clear, according to the FSA Guidelines (MSC-MEPC.2/Circ.12/Rev.2, Appendix 10, paragraph 26). Therefore, it seems probable that the Sub-Committee will ask the Committee for advice on whether the studies have been conducted according to the Guidelines. MSC 101 will then have to decide whether it will send the study to the FSA EG. In any case, SSE 6 might provide a recommendation to MSC 101 in relation to this issue, especially since its participants will have had a first look at the study. Regardless of the final result of the FSA review, which may effectively determine whether the proposed recommendations are cost effective or not (so whether or not to consider them for regulatory amendments to SOLAS even for existing ships), the technical elements of the study should be considered by the Fire Protection Working Group (FP WG), since the FSA EG will in any case not review the technical elements of the studies (i.e. the fire safety ones).

In document SSE 6/6/3, China provides the results of its lithium-ion battery (LIB) fire tests. From these tests China concluded that the overcharge of LIBs would lead to direct deflagration or fire. Therefore, China recommends measures to avoid such incidents: not to connect electric vehicles powered by LIBs to ship's sockets, crew to be equipped with portable thermographic cameras during patrols on ro-ro spaces, separate stowage of such vehicles and the use of water-based fire-extinguishing equipment. China also proposes draft amendments to the interim Guidelines.

China, in document SSE 6/6/4, also proposes to amend paragraph 7.5 of the annex to the Revised Guidelines for the maintenance and inspection of fire protection systems and appliances (MSC.1/Circ.1432) by replacing the requirement of annual air blowing and simulation tests on the fixed water-based fire-extinguishing systems with flowing water tests. It arrived at this recommendation following the results of inspections and tests on ro-ro passenger ships engaged on international and domestic voyages whereby it was found that nozzles of water-based fire-extinguishing systems were blocked by rust.

In document SSE 6/6/5, IACS comments on the work undertaken by the Correspondence Group and reproduces its comments on different sections of the interim Guidelines as was also done in the course of the Correspondence Group.

Finally, it should be mentioned that the target completion date for this agenda item was initially set at 2019. It is suggested to extend this deadline by at least two years, given various factors: (1) the one year delay because of the work that had to be done at SSE 4 on the scope and work plan, which had to be approved by MSC; and (2) the need to be able to properly consider the work carried out in different research projects, in particular the results of FIRESAFE II which was completed close to the end of 2018.

Technical considerations

As already mentioned, document SDC 6/6/1 includes a number of technical issues that are still open and are expected to be discussed during SSE 6. At the same time, both FIRESAFE studies provide significant technical input, some of which is also drafted in the form of text amendment proposals within their reports. **DELETED**

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Agenda item 7 – Amendments to MSC.1/Circ.1315

Docs: SSE 6/7, SSE 6/7/1-2

SSE 6/7 (Japan): provides the report of the Correspondence Group on Fire Protection (FP) related to draft amendments to the Guidelines for the approval of fixed dry chemical powder fire-extinguishing systems for the protection of ships carrying liquefied gases in bulk (MSC.1/Circ.1315).

SSE 6/7/1 (Japan): provides comments on document SSE 6/7 (Japan) containing the report of the Correspondence Group on Fire Protection.

SSE 6/7/2 (IACS): provides comments on the report of the Correspondence Group on Fire Protection.

EU relevance

Fixed fire-extinguishing systems are regulated by Implementing Regulation (EU) 2018/773 and consequently fall within the scope of the Marine Equipment Directive 2014/90/EU. More specifically, dry chemical powder fire-extinguishing systems are listed as item MED/3.62 in Implementing Regulation (EU) 2018/773.

Background

At SSE 4, the Republic of Korea (SSE 4/INF.5) suggested a review and preparation of a unified interpretation of the Guidelines for the approval of fixed dry chemical powder fire-extinguishing systems for the protection of ships carrying liquefied gases in bulk (MSC.1/Circ.1315). It pointed out that in this circular, while sodium bicarbonate is included in the list of dry powders, there is no guidance on the mixing rate of sodium- or potassium-bicarbonate. It sought an initial discussion before making a submission for a new output on the issue.

The Commission was aware that a Korean manufacturer had withdrawn his sodium bicarbonate fire extinguishing system from the market due to a non-conformity with MSC.1/Circ.1315. The Commission considered that the requirement in 3.4 IMO MSC.l/Circ 1315: "Only chemicals based on the salts of potassium should be used" is justifiable from a technical point of view as:

(1) the use of sodium based powder may lead to the clogging of pipelines in certain circumstances, which tends to be the most common reason for a malfunctioning of such firefighting systems.

(2) sodium based powder tends to decompose at temperatures above 50°C, which may lead to the effects described above, whereas potassium based powder will only decompose above 300°C.

(3) sodium bicarbonate powder consists of particles having irregular shapes, resulting in a poor flow of powder under discharge conditions.

At MSC 98, in MSC 98/20/8, the Republic of Korea proposed the inclusion of a new output in the biennial agenda of the Sub-Committee on Ship Systems and Equipment (SSE) in order to amend the Guidelines for the approval of fixed dry chemical powder fire-extinguishing systems for the protection of ships carrying liquefied gases in bulk (MSC.1/Circ.1315) to ensure the capabilities of fixed dry chemical powder fire-extinguishing systems. Despite the above mentioned concerns, voiced by some member States, MSC agreed to include a new output in the biennial agenda of the Committee and the provisional agenda for SSE 5.

At SSE 5, the EU submission SSE 5/9, highlighted that although sodium bicarbonate ($NaHCO_3$, baking soda) and potassium bicarbonate ($KHCO_3$) were very similar powders, it was well known that potassium bicarbonate dry chemicals were more effective than sodium bicarbonate-based dry chemical powder with particular regard to fires relevant to the protection of ships carrying liquefied gases in bulk. As evidence, it included references to scientific literature reporting on studies comparing the effectiveness of both compounds.

Japan (SSE 5/9/1) expressed similar views and, in fact, stated that it was not in favour of the proposal to allow sodium-based powders to be used in fire-fighting systems on board ships carrying liquefied gases, as this might reduce the safety level as a result of the fire-extinguishing performance due to clogging. The Republic of Korea (SSE 5/9/3) provided an updated proposal to MSC 98/20/8 but still attempted to allow sodium bicarbonate powder in extinguishing systems. It addressed the claims on clogging by stating that no incidents had been reported regarding clogging in sodium-based fixed dry chemical powder systems installed in existing ships. **DELETED**

The Republic of Korea proposed to remove the exclusion of sodium based powders and to follow the test methods outlined in standard ISO 7202 or an equivalent national standard acceptable to the Administration. However, ISO 7202 preamble itself provides for a warning about the use of sodium based (NaHCO3) compounds as a possible cause of caking and overpressure ruptures.

ISO 7202

"WARNING — The mixing of different types of powders (e.g. ABC and BC) consisting of certain compounds (e.g. $NH_4H_2PO_4$, $NaHCO_3$ or $CaCO_3$) and/or the mixing of these compounds as raw materials into one powder may result in caking, and the production of gas which will increase pressure in the container to an unsafe level. Such increases in pressure have been known to cause containers to rupture, and to cause bodily injury and damage."

It should also be noted that the test for resistance to caking and lumping foreseen in ISO 7202 refers to the conditioning in an oven controlled to (48 ± 3) °C, i.e. the temperature just high enough for sodium based powders to pass the test.

SSE 5, while noting the concerns raised in the use of sodium bicarbonate, agreed that this product should be excluded as an acceptable dry chemical powder on ships carrying liquefied gases in bulk; dry chemical powder other than sodium bicarbonate should be approved by the Administration in accordance with recognized international standards; and a specific fire-extinguishing capability test might be necessary within the Guidelines. The Sub-Committee also noted that the development of draft amendments to the Guidelines was premature due to the lack of expertise, in particular with respect to the testing procedure, and that further input was required from dry chemicals experts. Therefore, the Sub-Committee instructed the Fire Protection Correspondence Group to develop draft acceptance criteria for dry chemical powders in terms of fluidity, moisture behaviour and suitability for use on board ships carrying liquefied gases in bulk, and in terms of fire extinguishing capabilities, with a view to establishing performance and testing requirements, as well as to identify available standards and best practices relevant to the maritime sector, and possible gaps in the existing international regulations.

Consideration at SSE 6

SSE 6/7 provides the report of the Correspondence Group on Fire Protection (FP) related to draft amendments to MSC.1/Circ.1315. The report clearly shows that in view of the lack of consensus a number of open issues remain to be considered by SSE 6. In fact, Japan (SSE 7/6/1) and IACS (6/7/2) noted such disagreements in their submissions and gave their comments to the issues discussed in the Correspondence Group. **DELETED**

In SSE 6/7/2, IACS notes that it is necessary that the tests for dry chemical powder (DCP) should conform to a unified/common internationally agreed standard rather than national standards, which can be different and may result in a lack of consistency in their application. The undertaking of testing to national standards could be additional at the discretion of the relevant Administration, on a one-off or case-by-case basis, if the national standards are equivalent to or no less stringent than the provisions in MSC.1/Circ.1315. **DELETED**

DELETED

Agenda item 8 – Amendments to chapter 9 of the FSS Code for fault isolation requirements for cargo ships and passenger ship cabin balconies fitted with individually identifiable fire detector systems

No Docs.

Agenda item 9 – Requirements for onboard lifting appliances and anchor handling winches

Docs: SSE 6/9, SSE 6/9/1-5

SSE 6/9 (Japan as coordinator of the Correspondence Group): provides the report of the Correspondence Group on Onboard Lifting Appliances and Anchor Handling Winches.

SSE 6/9/1 (Japan and ICS): provides analysis and proposals relevant to the consideration of the placeholder for the draft new SOLAS regulations for onboard lifting appliances and anchor handling winches.

SSE 6/9/2 (Japan and ICS): provides text proposals for the draft new SOLAS regulations based on the analysis and proposals contained in document SSE 6/9/1 (Japan and ICS).

SSE 6/9/3 (Canada): provides comments on the report of the Correspondence Group on Onboard Lifting Appliances and Anchor Handling Winches.

SSE 6/9/4 (Germany): comments on document SSE 6/9 (Japan) containing the report of the Correspondence Group on Onboard Lifting Appliances and Anchor Handling Winches (OLAW) and provides a proposal for the application of certain regulations for lifting appliances.

SSE 6/9/5 (Germany): comments on document SSE 6/9 (Japan) containing the report of the Correspondence Group on Onboard Lifting Appliances and Anchor Handling Winches (OLAW) and provides a proposal for the use of key terms in the draft regulations and guidelines for lifting appliances.

Agenda item 10 – Revised SOLAS Regulation II-1/13 and II-1/13-1 and other related regulations for new ships

No Docs.

EU relevance

Article 6(2)(a)(i) of Directive 2009/45/EC on safety rules and standards for passenger ships establishes that new passenger ships of Class A shall comply entirely with the requirements of the 1974 SOLAS Convention, as amended. Furthermore, Directive 2009/45/EC contains operational rules for watertight doors for Class B, C and D ships which are identical to those found in SOLAS, as laid down in Annex I, Chapter II, Part B.

Background

At SDC 2, the EU Member States and the Commission put forward a submission on watertight doors anti-crushing mechanisms (SDC 2/3/7). Unfortunately, it was not actively supported by EU Member States, so it was forwarded to MSC 95 inviting the Committee to consider how to proceed in view of the divergent views on how to take it forward. MSC 95 agreed that this was an urgent matter, prepared a justification for a new unplanned output and agreed to include, in the 2016-2017 biennial agenda of the SSE Sub-Committee and provisional agenda for SSE 3, a new planned output on "Revision of SOLAS regulations II-1/13 and II-1/13-1 and other related regulations for new ships", with a target completion year of 2017.

SSE 3 considered that more information was needed before taking the issue forward and agreed to a Correspondence Group to (1) identify relevant industry standards for anti-crushing protection (ACP) that can be applied to water tight doors; (2) identify relevant existing applications, including to which standards such applications have been designed, taking into account paragraph 27 of annex 2 to document MSC 95/WP.12; and (3) consider which elements of those standards might be suitable. In the absence of an EU MS volunteering as a coordinator, the Commission stepped in offering one of its EMSA technical officers. During the course of the Correspondence Group, a number of relevant functional requirements were reviewed with significant progress in terms of the goals that should be included in relevant Guidelines for protecting personnel from crushing accidents. Among others, the outcome of the Correspondence Group noted that a majority supported a UK suggestion for a two-stage closure of WTDs. Japan et al. in SSE 4/11/1 pointed out the lack of evidence produced to show this is a significant problem and proposed to defer any further action pending receipt of such evidence.

In this respect, the Commission agreed that there is a need for further investigation of the issue, also by looking into the three parameters that the co-sponsors of SSE 4/11/1 had identified and in addition by looking into possible new designs that could satisfy some of the functional requirements that were discussed by the Correspondence Group. This could be performed by a simple risk assessment following the FSA methodology partially, but not requiring a full FSA as described in the Guidelines.

SSE 4 agreed that the consideration of this output should continue and invited interested delegations and international organizations to provide further information, results of risk assessments, if available, and possible safety solutions compatible with the functions of watertight doors for consideration at SSE 5. The only document submitted at SSE 5 was that by China (SSE 5/11) proposing the fixing of visible anti-crushing warning signs on both sides of the WTD to make persons aware of potential risks when passing through WTD. The Sub-Committee, including the EU, did not agree with this proposal.

Taking into account that no progress had been made since the inclusion of this output by MSC 95, the Sub-Committee invited Member States and international organizations to submit proposals to the next session, with the understanding that the work on this output would be considered as completed with no action taken if no substantive proposals were submitted to SSE 6.

Consideration at SSE 6

No documents were submitted under this agenda item and therefore the most likely outcome, based on the decision taken at SSE 5, is that this agenda item will be closed.

Agenda item 11 – Development of guidelines for cold ironing of ships and of amendments to SOLAS chapters II-1 and II-2, if necessary

Docs: SSE 6/11, SSE 6/11/1, SSE 6/INF.5

SSE 6/11 (China as coordinator of the Correspondence Group): provides the report of the Correspondence Group on Development of Guidelines on Safe Operation of On-shore Power Supply (OPS) Service in Port for Ships Engaged on International Voyages, including the outcome of the consideration of amendments to SOLAS Chapters II-1 and II-2.

SSE 6/11/1 (Japan): provides comments on document SSE 6/11 (China), i.e. the report of the Correspondence Group, regarding the general requirements in the draft guidelines in relation to the development of series of standards ISO/IEC/IEEE 80005.

SSE 6/INF.5 (IEC): informs on the development of IEC/IEEE 80005 series – Utility connections in port.

EU relevance

Directive 2014/94/EC on the deployment of alternative fuels infrastructure defines technical specifications for on-shore power supply and procedures to update them. The main objective is to ensure interoperability. In that context, the Commission has addressed a mandate (M/533) to the CEN/CENELEC to have interoperability standards, including for onshore plugs. During this year it expects to finalise standards in respect of electrical shore connection for inland navigation vessels.

In addition, in Article 8(3) of Directive (EU) 2016/802 relating to a reduction in the sulphur content of certain liquid fuels, Member States shall, as an alternative solution for reducing emissions, encourage the use of onshore power supply systems by vessels in their ports.

Background

MSC 98 concurred with the proposal by China (MSC 98/20/2) to include in the 2018-2019 biennial agenda of the SSE Sub-Committee and the provisional agenda for SSE 5, an output on "Development of guidelines for cold ironing of ships and of amendments to SOLAS chapters II-1 and II-2, if necessary", with a target completion date of 2020, in association with the SDC and III Sub-Committees, as and when requested by the SSE Sub-Committee.

DELETED

At SSE 5, China (SSE 5/13 and SSE 5/13/1) provided draft guidelines on safe operation of on-shore power supply (OPS) service in port for ships engaged on international voyages taking into consideration the relevant international standards: the International Electrotechnical Commission (IEC), the International Organization for Standardization (ISO) and Institute of Electrical and the Electronics Engineers Standards Association (IEEE). The United States (SSE 5/13/2), while agreeing with this approach, highlighted that duplication of text from international standards should be avoided. The US would prefer direct referencing to the applicable standards.

SSE 5 agreed that the Guidelines should be developed by focusing on the operational safety aspects at this stage, with the expectation of a further development to incorporate a uniform set of equipment standards by the target completion year. The Sub-Committee also agreed to the establishment of a Correspondence Group, under the coordination of China, on the development of guidelines on safe operation of OPS service in port for ships engaged on international voyages.

Consideration at SSE 6

In SSE 6/11, China as coordinator of the Correspondence Group provides the report of the Group. The progress achieved by the Group in the drafting of the guidelines is included in annex. However, it can be seen that details related to the framework of the guidelines as well as the technical requirements were not finalized and need to be further discussed at this session. The Group did not reach a consensus on the need for amendments to SOLAS, and therefore this issue would also need to be discussed further. Japan (SSE 6/11/1) provides comments on document SSE 6/11 (China), providing information on the development of international standards ISO/IEC/IEEE 80005 and insisting that the guidelines should include correct referencing to such international standards to avoid unnecessary confusion for the relevant industries. Japan further includes in SSE 6/11/1 two proposals for amendment/correction of the Annex in SSE 6/11:

- *In SSE 6/11/1, paragraphs 4 and 6, making reference to the current draft version of the Guidelines, Japan suggests to strike out the expressions "unless expressly provided otherwise" and "or other recognized standards" from the chapeau of paragraph 1.2.1:*

  "1.2.1 Technical requirements for the OPS system~~, unless expressly provided otherwise,~~ should be in compliance with following standards ~~or other recognized standards:~~"

  The Commission recognizes the merit and supports the Japanese proposal so as to clarify in the best way possible the exact standards for inter-connectivity and inter-operability that should referred to in the Guidelines.

- *In paragraph 7, a correction is suggested which appears to be well indicated and meritful from a technical perspective. Before disconnection of OPS, the load has to be increased for ship generators. The proposed amendment is supported.*

SSE 6/INF5 (IEC) provides important information that should be taken into account in the development of the IMO Guidelines for OPS. IEC reports that TC 18 had established Joint Working Group 28 (JWG 28) to develop and maintain standards for utility connections in ports. JWG 28 was set up in cooperation with the International Organization for Standardization (ISO) and the Institute of Electrical and Electronics Engineers (IEEE). Information on the following standards is of particular relevance, in the context of the work by JWG 28:

a) *IEC/ISO/IEEE 80005-1:2012 ED1 – Utility connections in port – Part 1: High Voltage Shore Connection (HVSC) Systems - General requirements: IEC informs that Work on edition 2 was completed in May 2018, estimated date of publishing within Q1 2019 and indicates no further work by the JWG 28 is foreseen on this edition in the near future. There is however a note made, for a more distant future, where some changes may be considered, including a proposal to move operational requirements to a separate, new standard.*
b) *IEC/IEEE 80005-2:2016 ED 2 – Utility connections in port – Part 2: High and Low voltage shore connection systems – Data communication for monitoring and control: No work performed since the current revision was issued in 2016 and currently, no plans to start revision work;*
c) *IEC/IEEE PAS 80005-3:2014 ED 1 – Utility connections in port – Part 3: Low Voltage Shore Connection (LVSC) Systems – General requirements: This publication is currently a pre-standard (PAS). Work on edition 1 of an international standard is ongoing. Further details to be developed by JWG28.*

DELETED

Agenda item 12 – Unified interpretation of provisions of IMO safety, security and environment-related conventions

Docs: SSE 6/12, SSE 6/12/1-14

SSE 6/12 (IACS): provides a new draft revision of the Unified Interpretation (UI) SC242; the annex to this document provides a copy of the revised version of UI SC242, which offers draft unified interpretations of the relevant elements of SOLAS regulations II-1/28, II-1/29 and II-1/30, on which IACS seeks the Sub-Committee's comments and views.

SSE 6/12/1 (IACS): proposes a draft unified interpretation of SOLAS regulation II-2/10.10.4 on the requirements for two-way portable radiotelephone apparatus for fire-fighter's communication, in particular, regarding the term "explosion-proof type or intrinsically safe".

SSE 6/12/2 (IACS): discusses the implementation of SOLAS regulation III/33.2 and paragraph 5.4 of part 2 of resolution MSC.81(70), as amended, and seeks clarification from the Sub-Committee on the matter of the application of the requirement to launch free-fall lifeboats with the ship making headway at speeds up to 5 knots in calm water.

SSE 6/12/3 (IACS): proposes a draft unified interpretation on "Lifebuoy arrangements for means of embarkation/disembarkation" (SOLAS regulation II-1/3-9.2 and MSC.1/Circ.1331; and SOLAS regulation III/7.1).

SSE 6/12/4 (IACS): provides a draft IACS unified interpretation (UI) on the application of the design temperature for piping, fittings and related components, as required by paragraph 11.3.6 of the IGC Code with a view to facilitating the global and consistent application of these mandatory provisions.

SSE 6/12/5 (IACS): provides a draft unified interpretation on fire detection and alarms for boilers in unattended machinery spaces, as required by SOLAS regulation II-1/47.1.

SSE 6/12/6 (IACS): provides a draft unified interpretation of SOLAS regulations II-2/3.30, II-2/9.2.2.3.2.2, II-2/9.2.2.4.2.2, II-2/9.2.3.3.2.2 and II-2/9.2.4.2.2.2 in order to clarify the required fire integrity of bulkheads between engine rooms and spaces, in which urea or sodium hydroxide solution tanks are installed.

SSE 6/12/7 (IACS and SIGTTO): provides a new draft unified interpretation (UI) regarding the onboard discharge test of a dry chemical powder fire-extinguishing system, as required by paragraph 11.4.8 of the IGC Code, with a view to facilitating the global and consistent implementation of these mandatory requirements.

SSE 6/12/8 (IACS): provides a copy of a draft unified interpretation (UI) of the footnote to SOLAS regulation II-2/9.7.5, as amended by MSC.365(93).

SSE 6/12/9 (IACS): responds to the outcome of SSE 4 relating to the means of escape from the steering gear space in cargo ships according to SOLAS regulation II-2/13.4.2 and presents in the annex to the document a draft version (Rev.2) of IACS UI SC269.

SSE 6/12/10 (IACS): provides a copy of IACS Unified Interpretation SC288 on "Carriage of dangerous goods – Required air changes", which has been developed to facilitate the global and consistent implementation of SOLAS regulations II-2/19.3.4.1 and II-2/19.3.5.4.

SSE 6/12/11 (IACS): identifies the need to clarify the provisions of paragraph 6.5.5 of the MODU Code related to equipment that is capable of operation after shutdown, as set out in paragraph 6.5.1 of the Code.

SSE 6/12/12 (IACS): identifies the need to clarify the requirements in the FSS Code related to inert gas systems on tankers and provides the rationale behind and the copies of the IACS Unified Interpretation (UI) of paragraph 15.2.2.3.2.3.3 and the draft IACS UI of paragraph 15.2.4.1.4 of the FSS Code, which have been developed to facilitate the global and consistent implementation of these requirements.

SSE 6/12/13 (IACS): identifies the need to provide clarification regarding the requirements of SOLAS regulation II-1/43.6, noting the requirements of paragraph 2.7.2.2 of the revised IGC Code, as amended by resolution MSC.370(93), with a view to facilitating the global and consistent implementation of these provisions.

SSE 6/12/14 (China): seeks clarification on the requirement of "direct access to the open deck" for the means of escape from the steering gear space containing emergency steering position in the SOLAS Convention to achieve a unified understanding among the shipping industry.

EU relevance

In general, Unified Interpretations (or amendments to these UI) are not proposing amendments to SOLAS but only propose interpretations by the IACS Member Societies of SOLAS provisions with the aim of achieving uniform application. As these interpretations concern SOLAS, in some cases they may concern passenger ships falling under the scope of Directive 2009/45/EC and therefore the consequences of such UIs should be assessed.

Consideration at SSE 6

a) Modern steering systems (UI SC242)

SSE 4 considered a proposal by IACS (SSE 4/12/10) to revise UI SC242 since feedback received from industry indicated that further clarification was needed, in particular with respect to the implementation of SOLAS regulations II-1/29.1 and II-1/29.6.1. The Sub-Committee, taking into consideration concerns raised by Norway (SDC 4/12/14), did not approve the draft revised UI. IACS was requested to note the comments made and consider whether to update the UI accordingly. IACS has now resubmitted a revised UI SC242 in document SSE 6/12. In addition, IACS is proposing to update MSC.1/Circ.1416 to reflect this draft revised version of tis UI.

The EU position at SSE was to "Support the revised UI SC242 on arrangements for steering capability and function on ships fitted with propulsion and steering systems other than traditional arrangements for a ship's directional control put forward by IACS in SSE 4/12/10, taking into account the observations made by Norway in SSE 4/12/14". **DELETED**

b) Two-way portable radiotelephone apparatus for fire-fighter's communication

IACS (SSE 6/12/1) considers that the requirement in SOLAS regulation II-2/10.10.4 on mitigating the explosion hazard is rather vague and open to interpretation, in particular without specifying the certified safe type and reference to IEC Standards 60079 and 60092-502. IACS also highlights that a similar lack of clarity regarding the requirements related to the two-way portable radiotelephone apparatus for fire patrols on passenger ships exists in relation to SOLAS regulation II-2/7.8.3 (two-way portable radiotelephone apparatus). IACS therefore proposes a draft IACS UI to be applied to ships contracted for construction on or after 1 January 2020.

c) Lifebuoy arrangements for means of embarkation/disembarkation

In SSE 6/12/3, IACS proposes a draft UI to clarify that a lifebuoy fitted with both a light and a lifeline as per MSC.1/Circular.1331 for compliance with SOLAS regulation II-1/3-9 (means of embarkation/disembarkation) should be arranged ad hoc and, therefore, should not be taken into account when considering the minimum number and distribution of lifebuoys, as required by SOLAS regulation III/22.1.1 (lifebuoys for passenger ships) or III/32.1.1 (lifebuoys for cargo ships), as applicable. **DELETED**

d) Fire integrity of the bulkheads between engine rooms and spaces, in which urea or sodium hydroxide solution tanks are installed

IACS (SSE 6/12/6) notes that in response to MARPOL requirement there is an increase in the number of ships installing selective catalytic reduction (SCR) systems, exhaust gas recirculation (EGR) systems or exhaust gas cleaning systems (EGCS). Urea or sodium hydroxide solutions which are used as reducing agents in SCR systems, EGR systems and EGCS, are often stored in storage tanks installed within the main engine room or in a space that is adjacent to the main engine room. IACS notes that in determining the fire integrity of divisions, SOLAS regulation II-2/9 does not identify a category for such a storage space. Therefore, there is a possibility that inconsistencies may arise due to different understandings/interpretations. Therefore IACS proposes a UI to clarify that in determining fire integrity of divisions, the solution tank space should be considered as "similar spaces" in the definition of "machinery spaces" and should be categorized as:

- *"Tanks, voids and auxiliary machinery spaces having little or no fire risk" for ships carrying more than 36 passengers; or*

- *"Other machinery spaces" for ships carrying not more than 36 passengers and cargo ships.*

DELETED

e) UI of footnote to SOLAS Regulation II-2/9.7.5

In SSE 6/12/8, IACS proposes a draft UI to clarify that the footnote to SOLAS regulation II-2/9.7.5, applicable also to passenger ships, does not prohibit the use of fixed CO_2 fire-extinguishing systems that have not been designed or tested to ISO 15371. It clarifies that the ISO standard is only given as an example of a suitable performance standard for pre-engineered galley duct fixed fire-extinguishing systems. **DELETED**

f) Inert gas systems on tankers

In SSE 6/12/12, IACS identifies the need to clarify the requirements in the FSS Code related to inert gas systems on tankers and provides the rationale behind and the copies of the IACS Unified Interpretation (UI) of paragraph 15.2.2.3.2.3.3 and the draft IACS UI of paragraph 15.2.4.1.4 of the FSS Code, which have been developed to facilitate the global and consistent implementation of these requirements. **DELETED**

DELETED

Agenda item 13 – Amendments to paragraph 4.4.7.6.17 of the LSA Code concerning single fall and hook systems with on-load release capability

Docs: SSE 6/13

SSE 6/13 (Marshall Islands, New Zealand, ICS, BIMCO, IFSMA, IMarEST, InterManager, IPTA, RINA, IBIA and ITF): proposes amendments to paragraph 4.4.7.6.17 of the LSA Code in order to ensure adequate safety standards for lifeboats and rescue boats fitted with single fall and hook systems with on-load release capability.

EU relevance

As indicated above, life-saving appliances form part of Commission Implementing Regulation (EU) 2018/773 (MED1.1 to MED1.63) and consequently fall within the scope of the Marine Equipment Directive 2014/90/EU. In addition, Article 6(2)(a)(i) of Directive 2009/45/EC on passenger ships operating domestically applies SOLAS to Class A passenger ships. Furthermore, Class B, C and D ships apply the LSA Code and SOLAS Chapter III in their main features.

Background

MSC 99 considered documents MSC 99/20/8 and MSC 99/20/8/Add.1 (Marshall Islands et al.) which proposed amending paragraph 4.4.7.6 of the LSA Code in order to ensure adequate safety standards for lifeboats and rescue boats with single fall and hook systems. The submission provided two different options to achieve this outcome. The majority of delegations supported option 2 that proposed the amendment of paragraph 4.4.7.6.17 to specify that exemptions to requirements in paragraph 4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15 of the LSA Code do not apply to single fall and hook systems with on-load release capability. Consequently MSC 98 agreed to include in the 2018-2019 biennial agenda of the SSE Sub-Committee an output on "Amendments to paragraph 4.4.7.6.17 of the LSA Code concerning single fall and hook systems with on-load release capability", with a target completion year of 2019.

DELETED

Consideration at SSE 6

SSE 6/13 (Marshall Islands et al) in comparing paragraphs 4.4.7.6.8 and 4.4.7.6.17 of the LSA Code highlights that 4.4.7.6.17 removes the requirement for single fall systems to have two release capabilities whilst not specifying which type (off-load or on-load) single release capability should be employed. Therefore, the co-sponsors propose to amend paragraph 4.4.7.6.17 by adding the sentence "These exemptions do not apply to single fall and hook systems with on-load release capability." **DELETED**

DELETED

Agenda item 14 – Revision of the Standardized Life-Saving Appliance Evaluation and Test Report Forms (MSC/Circ.980 and addenda)

Docs: SSE 6/14

SSE 6/14 (United States and ILAMA): proposes amendments to the Standardized life-saving appliance evaluation and test report forms (MSC/Circ.980) by incorporating the amendments to the International Life-Saving Appliance (LSA) Code and the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70)) since MSC/Circ.980 and its two addenda were approved in February 2001.

EU relevance

MSC/Circ. 980 and resolution MSC.81(70) are implemented in the EU through point 1 (Life Saving Appliances) of the Annex to Commission Implementing Regulation (EU) 2018/773 of 15 May 2018 on design, construction and performance requirements and testing standards for marine equipment and repealing Implementing Regulation (EU) 2017/306 . This issue therefore falls in the scope of Directive 2014/90/EU of the European Parliament and of the Council of 23 July 2014 on marine equipment and repealing Council Directive 96/98/EC. Therefore, the revision of these instruments falls under EU competence. **DELETED**

Background

MSC 99 considered document MSC 99/20/10 (United States and ILAMA), proposing to amend the Standardized life-saving appliance evaluation and test report forms (MSC/Circ.980 and addenda), to incorporate the amendments to the LSA Code and the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70)) adopted/approved since the forms were approved, together with documents MSC 99/20/11 (Dominica), supporting the proposal, and MSC 99/20/13 (ISO), proposing minor corrections to references to standards for material tests for inflatable liferafts and hydrostatic release unit membranes as a consequence of references to outdated/withdrawn standards. The Committee agreed to include in the 2018-2019 biennial agenda of the SSE Sub-Committee and the provisional agenda for SSE 6 an output on "Revision of the Standardized life-saving appliance evaluation and test report forms (MSC/Circ.980 and addenda)", with a target completion year of 2020.

DELETED

Developments at SSE 6

In SSE 6/14, the United States and ILAMA propose to revise the existing MSC/Circ.980 with a new format that presents the test forms in six annexes corresponding to the LSA Code chapters II to VII. The co-sponsors maintained that this proposed new format of the circular would be more easily updated, as needed, in keeping with the Guidance on drafting of amendments to the 1974 SOLAS Convention and related mandatory instruments (MSC.1/Circ.1500). **DELETED**

DELETED

Agenda item 17 – Any other business

Docs: SSE 6/17, SSE 6/17/1-8

SSE 6/17: *(not issued)*

SSE 6/17/1 (IACS): highlights an omission in the amendments to chapter VI of the LSA Code and the testing requirements in resolution MSC.81(70), as adopted at MSC 98.

SSE 6/17/2 (Secretariat): provides information on the draft amendments to SOLAS chapters III and IV related to the modernization of the Global Maritime Distress and Safety System (GMDSS).

SSE 6/17/3 (United States): proposes revisions to the Guidelines for developing operation and maintenance manuals for lifeboat systems (MSC.1/Circ.1205) and adding a note to SOLAS regulation III/9 in the IMO-Vega database in support of resolution A.1116(30).

SSE 6/17/4 (Japan): proposes to modify the draft amendment approved by MSC 100.

SSE 6/17/5 (China): proposes to develop a definition for gastightness in SOLAS regulation II-2/3 (Definitions) and related test since the lack of definition for gastightness in IMO instruments leads to different standards in the implementation of provisions concerning gastightness.

SSE 6/17/6 (China): provides analysis on handhold stanchion spacing of survival craft embarkation ladders from the perspective of quick and safe passing through the survival craft embarkation ladders in the event of a ship's distress and proposes to review the requirements in paragraph 6.1.6.1 of the LSA Code for handhold stanchion spacing standards.

SSE 6/17/7 (CESA): CESA has conducted an initial review of relevant SOLAS regulations regarding systems that are required to remain operational in different emergencies. A holistic assessment of provisions for emergency power source (SOLAS regulation II-1/42) and safe return to port (SOLAS regulations II-2/21 and 22) revealed shortcomings that could hamper the efficient implementation of decentralized energy systems. CESA therefore recommends a more detailed review under a new output that could lead to amendments to SOLAS or specific guidance facilitating alternative design.

SSE 6/17/8 (China): proposes to amend MSC.1/Circ.1331 to add specific provisions on the stop pins of the means of embarkation and disembarkation, in the aim of ensuring the reliability of their structure, fittings and attachments during usage.

EU relevance

Article 6(2)(a)(i) of Directive 2009/45/EC on safety rules and standards for passenger ships applies SOLAS, as amended, to Class A passenger ships. Moreover, Directive 2009/45/EC, Annex I, Chapter III Life Saving Appliances lays down various and extensive requirements for Class B, C and D passenger ships when engaged in domestic voyages.

Marine Equipment Directive 2014/90/EU, as well as Commission Implementing Regulation (EU) 2018/773, makes mandatory IMO instruments in relation to performance and testing standards of certain categories of marine equipment. An amendment to any of such instruments (in particular amendments to, carriage and performance requirements are directly applicable in the EU legislation) it is considered of EU competence. Under this agenda item the equipment which are directly related to this note are life-saving appliances.

Consideration at SSE 6

a) Amendments to chapter VI of the LSA Code and resolution MSC.81(70) (SSE 6/17/1 (IACS)).

In SSE 6/17/1, IACS is of the opinion that there was an error when MSC 98 adopted resolutions MSC.425(98) and MSC.427(98), amendments to the LSA Code and resolution MSC.81(70) on Revised recommendation on testing of life-saving appliances to correct the discrepancy regarding the testing of winches and winch brakes. IACS therefore proposes, to provide the necessary alignment of the provisions in the LSA Code and resolution MSC.81(70), as amended, that the correction of the text, as indicated in paragraph 6 of its document should be submitted to MSC 101 to be approved as a minor amendment. **DELETED**

b) Uniform implementation of paragraph 6.1.1.3 of the LSA Code (SSE 6/17/4 (Japan))

It is worth noticing that SSE 4 had agreed that these draft amendments should only apply to cargo ships taking into account the view expressed that the application of these amendments to passenger ships might be in conflict with SOLAS regulation III/23.2 (paragraph 5.7 of document SSE 4/19). However, at SSE 5, Japan submitted document SSE 5/5/1 proposing to apply the draft amendments also to passenger ships (bringing the issue under EU competence). The EU position was to oppose this proposal and consequently SSE 5 again agreed that the draft amendments should only be applicable to cargo ships. In SSE 6/17/4 Japan sets out several modifications to the amendment to the LSA Code approved at MSC 100 for adoption at MSC 101. **DELETED**

c) Handhold stanchion spacing of survival craft embarkation ladders

In SSE 6/17/6, China proposes to quantify the handhold stanchion spacing of survival craft embarkation ladders by referring to the requirements for pilot ladders, with a view to avoiding the negative effects caused by too wide or too narrow spacing and ensuring the safety of persons on board when escaping. **DELETED**

d) Review of systems that are required to remain operational in a casualty

MSC 99 when discussing the report of the SDC Sub-Committee, considered the outcome related to improving availability of passenger ships' electrical power supply in case of a side raking damage. MSC agreed that, in view of the lack of agreement on finding an appropriate solution, no further action was required, in particular in relation to damage stability requirements and flooding scenarios. Member States and international organizations were invited to review the systems that were required by SOLAS regulation II-1/42 to be supplied by the emergency source of power, and the methods of energy distribution for those systems, and consider whether there were any additional systems that might need to remain operational in a damage scenario. Similarly, as it had done at MSC 99 and SDC 6 (in an identical submission), CESA submitted to this session document SSE 6/17/7 recommending that Member States propose a new output to carry out a detailed review of SOLAS chapters II-1 and II-2, in particular the provisions and definitions related to main and emergency energy distribution systems, as well as SRtP, with a view to identifying ambiguities and limitations to improve ships' safety using new power supply concepts. **DELETED**

DELETED

e) Draft interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel

SSE 6/2/1 reports on the outcome of MSC 100 with respect to the consideration of the draft Interim Guidelines for the safety of ships using methyl/ethyl alcohol as fuel. MSC 100 agreed with the recommendation of CCC 5 to seek the comments from other Sub-Committees with respect to different aspects of the draft Interim Guidelines. SSE 6 is being asked to review the content of draft section 11 and draft section 15.8 respectively regarding fire safety and control and monitoring of fire detection systems in machinery spaces containing methyl/ethyl alcohol engine. **DELETED**

DELETED