

SUB-COMMITTEE ON BULK LIQUIDS AND
GASES
16th session
Agenda item 6

BLG 16/6/8
9 December 2011
Original: ENGLISH

**DEVELOPMENT OF INTERNATIONAL CODE OF SAFETY FOR SHIPS USING
GASES OR OTHER LOW FLASHPOINT FUELS**

Comments on the draft IGF Code

Submitted by the IMarEST

SUMMARY

Executive summary: This document comments on the Report of the Correspondence Group on the Development of the IGF Code and the Revised IGC Codes (BLG 16/6/1), for matters related to the development of the IGF Code

Strategic direction: 5.2

High-level action: 5.2.1

Planned output: 5.2.1.3

Action to be taken: Paragraph 9

Related documents: BLG 15/WP.5, BLG 15/19; BLG 16/6, BLG 16/6/1 and BLG 16/INF.2

BACKGROUND

1 This document is submitted in accordance with paragraph 6.12.5 of Guidelines on the organization and method of work (MSC-MEPC.1/Circ.4) and offers comments on the report of the correspondence group (BLG 16/6/1).

2 The environmental benefits of the use of liquefied natural gas (LNG) as a fuel for ships are well known and recognized by LNG ship and terminal operators.

3 The LNG shipping industry has an exemplary safety record; this has been achieved and maintained by high standards of training and operational procedures and tried and tested designs. This safety record has led some to think that these products are intrinsically safe and can be handled without problem. When attending meetings and conferences pertaining to the use of LNG as ship's fuel, we are concerned at the lack of knowledge on the hazards and properties of LNG, particularly those posed by its very low temperature and flashpoint and the fact that, when compared with conventional marine fuels, LNG requires only a fraction of the energy to ignite it when it is within the flammable range. Therefore, it is essential that potential designers, owners and operators of LNG-fuelled ships are educated to this effect and supported by a robust regulatory framework, which will require a degree of

formal direction until a greater depth of experience is achieved in the design and operation of these vessels.

DISCUSSION

Training requirements

4 The IGC Code was developed by IMO to regulate the construction and equipment of ships carrying liquefied gases in bulk as cargo, including regulation of various aspects of using LNG cargo as fuel; it is recognized that the IGF Code is intended to fulfil a similar function regarding the use of gas fuels in ships other than those carrying liquefied gases as cargo.

5 It is also recognized that the requirements for training of those seafarers with responsibility for the safety of vessels carrying liquefied gases as cargo are regulated through STCW Convention and that these provisions will not apply to vessels where the gas is fuel rather than cargo. Furthermore, the present requirements in the STCW Convention would not be relevant to ships where the gas is fuel, as they refer to all the cargoes covered by the IGC Code, of which there are more than thirty, many unsuitable as a fuel.

6 The current draft of the IGF Code proposes that training requirements should be controlled by the Company and Master; this would inevitably lead to varying levels of understanding and competence without the addition of safeguards similar to those currently present through the implementation of the STCW Convention for gas as cargo.

7 The use of the STCW Convention as a vehicle for prescribing training requirements has already been proposed by some members of the correspondence group, but this process would lead to unacceptable and potentially hazardous further delay in delineating requirements.

8 To avoid delay in the implementation of appropriate training requirements for those handling liquefied gases as fuel, it is proposed that the current STCW Convention requirements for training of those involved with the carriage of liquefied gases as cargo be incorporated into the IGF Code, amended to cover only those gases approved for use as fuel. This will underpin the safe operation of ships using gas as fuel in the same way as the current STCW Convention requirements do for vessels carrying liquefied gases as cargo until a suitable amendment to STCW Convention can be formulated and adopted.

ACTION REQUESTED OF THE SUB-COMMITTEE

9 The Sub-Committee is invited to consider the above comments and take action as appropriate.
