The 54th session of IMO DE Sub-Committee will be held on 25 – 29 October 2010

23rd September 2010

Headline items;
1) Progress on Mandatory Polar Code
2) Guidelines relating to permits to leave watertight doors open on passenger ships to be finalised
3) Application of SOLAS, MARPOL and Load line to conversions to be further discussed

This publication, produced by Lloyd’s Register, provides an overview of the agenda for DE 54, and summarises all the documents submitted for discussion at this meeting.

It contains details of all papers submitted up to 23rd September, 2010.

Synopses have only been included for each agenda item.

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Opening of the session

1. Adoption of the agenda
2. Decisions of other IMO bodies
3. Consideration of IACS unified interpretations
4. Guidance to ensure a consistent policy for watertight doors to remain open during navigation
5. Interpretation on application of SOLAS, MARPOL and Load Line requirements for major conversions of oil tankers
6. Application of amendments to SOLAS chapter III and the LSA Code
7. Performance standards for recovery systems for all types of ships
8. Safety provisions applicable to tenders operating from passenger ships
9. Guidelines for a visible element to general alarm systems on passenger ships
10. Development of a new framework of requirements for life-saving appliances
11. Amendments to resolution A.744(18)
12. Thermal performance of immersion suits
14. Protection against noise on board ships
15. Amendments to the Revised recommendation on testing of life-saving appliances
16. Test standards for type approval of add-on equipment
17. Measures to promote integrated bilge water treatment systems
18. Guidelines for a shipboard oil waste pollution prevention plan
19. Manually operated alternatives in the event of pollution prevention equipment malfunctions
20. Work programme and provisional agenda for DE 55
21. Election of Chairman and Vice-Chairman for 2011
22. Any other business
23. Report to the Maritime Safety Committee
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Agenda item 2 - Decisions of other IMO bodies (Target completion date – Continuous)

Background:
The Sub-Committee will be informed of relevant decisions made and action taken by MSC 87 (DE 54/2) and COMSAR 14, MEPC 60, FP 54, FSI 18 and NAV 56 (DE 54/2/1) and will take action, as appropriate, under the relevant agenda items.

LR position: To monitor discussion.

Implications: No substantial discussion will take place under this agenda item. Matters of importance will be discussed under the appropriate agenda item.

Application: Not applicable.

(Document submitted)

DE 54/2 (Secretariat) - Outcome of MSC 87
This document contains references to decisions taken by MSC 87 relevant to the work of the Sub-Committee.

DE 54/2/1 (Secretariat) - Outcome of COMSAR 14, MEPC 60, FP 54, FSI 18 and NAV 56
This document contains references to decisions taken by COMSAR 14, MEPC 60, FP 54, FSI 18 and NAV 56 relevant to the work of the Sub-Committee.

Agenda Item 3 - Consideration of IACS unified interpretations (Target completion date – Ongoing)

Background:
The Sub-Committee will consider IACS unified interpretations as submitted to the session with a view to developing relevant IMO interpretations, as appropriate.

LR position: LR implements IACS unified interpretations unless instructed otherwise by Flag Administrations.

Stowage of marine evacuation systems
Implications: Openings, including opening side scuttles and windows are not permitted between the embarkation station and the lightest waterline.
Builders / designers will have to ensure that openings are not in line with marine evacuation systems.
Flag administrations / Recognized Organizations will need to be aware of the application to cargo ships as well as passenger ships.

Application: To passenger ships carrying more than 12 passengers. To all cargo ships. To be applied to ships contracted for construction on or after 1 July 2010.

Mechanical, hydraulic and electrical independency and failure detection and response of steering control systems
Implications: Builders / designers will have to ensure that if there is a system failure then an audible and visual warning is given so that appropriate action can be taken.
Flag Administrations / Recognized Organizations will need to ensure systems meet the requirements and amend survey procedures to ensure the requirements are met.

**Application:** To all passenger ships and cargo ships over 500 GT which are contracted for construction on or after 1 July 2011.

(Documents submitted)

**DE 54/3 (IACS) - Stowage of marine evacuation systems**
This document provides a copy of the latest version of IACS Unified Interpretation UI SC 143 on the stowage of marine evacuation systems as prescribed by SOLAS regulation III/15.1. Reference has been made to cargo ships as well as to passenger ships and the reference has been updated.

**DE 54/3/1 (IACS) - Mechanical, hydraulic and electrical independency and failure detection and response of steering control systems**
This document provides a copy of the latest version of IACS Unified Interpretation UI SC 94 on mechanical, hydraulic and electrical independency and failure detection and response of steering control systems as required by SOLAS regulation II-1/29. The UI has been updated to cover hydraulic control components and failure detection and response.

Agenda Item 4 - Guidance to ensure a consistent policy for watertight doors to remain open during navigation (Target completion date – 2010)

**Background:**
The Sub-Committee will consider the Guidance to ensure consistent policy for determining the need for watertight doors to remain open during navigation, discussed at DE 53 (DE 53/9 and Corr.1), together with the Guidance for the determination by Administrations of the impact of open watertight doors on ship survivability under SOLAS regulation II-1/22.4 and previous SOLAS regulation II-1/15.9.3, prepared by the SDS Working Group at SLF 52 (SLF 52/WP.3), with a view to finalization (DE 54/4/Rev.1). A working group will be established to discuss the matter in depth.

**LR position:** To closely monitor developments this could have significant impact on ships. The lack of clarity over the application (to new requests or to all existing requests) is a cause for concern.

**Implications:** Builders / designers may have to carry out further stability assessment if the proposals are agreed as presented in DE 54/4/Rev.1. Owners will need to ensure that operational procedures are written which make it clear which watertight doors are permitted to be opened for what time and the control of opening them.

**Application:** It is not clear if the agreed requirements will be retrospectively applied or will only be applied when a new request is received to have a watertight door left open. The guidelines only apply to Passenger ships which require having watertight doors left open.
(Document submitted)

DE 54/4 (Secretariat) - Draft MSC circular on Guidance on open watertight doors on passenger ships
This document provides the consolidated text of the draft MSC circular on Guidance on open watertight doors on passenger ships, including the Guidance prepared by SLF 52, for further consideration by the Sub-Committee.

DE 54/4/Rev.1 (Secretariat) - Draft MSC circular on Guidance on open watertight doors on passenger ships
This document provides the consolidated text of the draft MSC circular on Guidance on open watertight doors on passenger ships, including the Guidance prepared by SLF 52, for further consideration by the Sub-Committee.

DE 54/4/1 (CLIA) - Comments on document DE 54/4/Rev.1
CLIA notes that IMO is more and more relying on risk assessment for the development of regulations and guidance in the safe design and operation of vessels. CLIA suggests that the floatability assessment requirements contained in the draft guidelines be implemented on a situation-by-situation basis as a result of the risk assessment, rather than requiring this comprehensive assessment regardless of the condition in which the ship is sailing and subject to little or no risk of collision or grounding.

DE 54/4/2 (United States) - Comments on document DE 54/4/Rev.1
This document comments on document DE 54/4/Rev.1 and recommends modified text for section 2.2 of annex 2 of the draft MSC circular regarding Guidance for the determination by Administrations of the impact of open watertight doors on passenger ship survivability under SOLAS regulation II-1/22.4 and previous SOLAS regulation II-1/15.9.3.

Agenda Item 5 - Interpretation on application of SOLAS, MARPOL and Load Line requirements for major conversions of oil tankers (Target completion date – 2010)

Background:
The Sub-Committee will further consider the draft MSC-MEPC circular on Unified Interpretations on the application of SOLAS, MARPOL and Load Line requirements to conversions of single-hull tankers to double-hull tankers or bulk carriers/ore carriers, prepared at DE 53 (DE 54/5, annex), together with any comments received (DE 54/5/1 & DE 54/5/2), with a view to finalization. A drafting group will be established to draft relevant text after discussion in plenary.

LR position:  To closely monitor developments.

Implications: Builders undertaking conversions will have a clear statement of which parts of SOLAS, MARPOL and Load Line will need to be complied with.

Application:  Single hull tanker conversions to either double hull tanker or bulk carrier.
(Document submitted)

DE 54/5 (Secretariat) - Draft MSC-MEPC circular on Unified Interpretations on the application of SOLAS, MARPOL and Load Line requirements to conversions to single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers
This document provides the text of the draft MSC-MEPC circular on Unified Interpretations on the application of SOLAS, MARPOL and Load Line requirements on conversions of single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers, as prepared at DE 53, for further consideration by the Sub-Committee.

DE 54/5/1 (Austria, Belgium, Bulgaria, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the United Kingdom and the European Commission) - Comments on document DE 54/5
This document provides comments on document DE 54/5 and proposes clarifications and amendments to the unified interpretations on the application of SOLAS, MARPOL and Load Line requirements to major conversions of oil tankers.

DE 54/5/2 (IACS) - Unified Interpretations on the application of Load Line requirements for conversions from single-hull oil tankers to double-hull oil tankers or bulk carriers/ore carriers
This document submits for the Sub-Committee's consideration proposals for improving the draft MSC-MEPC circular attached at annex 3 of the annex to document DE 54/5 on the Unified Interpretation on the application of ICLL requirements for conversions from single-hull tankers to double-hull tankers or bulk carriers/ore carriers.

DE 54/5/3 (IACS) - Comments on draft MSC-MEPC circular attached to document DE 54/5
This document proposes amendments, and justifications thereto, to the unified interpretations proposed in the annex to document DE 54/5.

Agenda Item 6 - Application of amendments to SOLAS chapter III and the LSA Code (Target completion date – 2010)

Background:
There has been some confusion over the application of amendments to SOLAS chapter III and the LSA Code which was originally raised at the DE sub-committee in 2009 (DE 52). The matter was extensively discussed but no agreement was reached. MSC 86 (May to June 2009) further considered the matter in general terms and decided that the DE sub-committee should investigate further during its work. DE 53 (February 2010) agreed that entry into force for SOLAS should be based on the date of construction, while the LSA Code entry into force should be based on the date of installation of the equipment.
The Sub-Committee will further consider the application of amendments to SOLAS chapter III and the LSA Code to new and existing ships, based on the proposals in document DE 54/6.
It will also consider the extent of application of the requirements for infant and oversize lifejackets.

LR position: To closely monitor developments and ensure that the relevant regulations are applied as agreed.
**Implications:** Once the application of amendments to SOLAS chapter III and the LSA Code has been agreed it will be clear when equipment will need to be modified or updated.

**Application:** All passenger ships carrying more than 12 people, all cargo ships.

(Document submitted)

DE 54/6 (Secretariat) - Scope of application of amendments to SOLAS chapter III and the LSA Code
The document presents proposals for clarification of the scope of application of amendments to SOLAS chapter III and the LSA Code adopted at MSC 81, MSC 82, MSC 85 and MSC 87, and for a relevant draft amendment to the LSA Code.

DE 54/6/1 (United Kingdom) - Regulation III/7.2 – provision of infant and oversize lifejackets
This document comments on document DE 54/6 with respect to the scope of application of SOLAS regulation III/7.2 and proposes an amendment to SOLAS to provide clarification of the carriage requirements for infant and oversized lifejackets.

**Agenda Item 7 - Performance standards for recovery systems for all types of ships (Target completion date – 2010)**

**Background:**
MSC 81 (May 2006) agreed amendments to SOLAS to ensure that all ships had onboard a means to easily recover persons from the sea even if they were unconscious and unable to help. It also decided that performance standards for these “recovery systems” would have to be developed before the amendment could come into force. Discussions in the past have been concerned with whether dedicated systems or functional requirements which could use existing onboard equipment should be developed, and whether certain ship types with high freeboard (e.g. car carriers, ro-ro cargo ships) could practically use a system which is designed to be used from an open deck. The Sub-Committee will further consider the performance standards for recovery systems, based on the report of the LSA Correspondence Group submitted to DE 53 (DE 53/6).

**LR position:** To monitor discussions.

**Implications:** All ships will be required to carry means to rescue people from the sea by an amendment to SOLAS which is to be agreed once these performance standards are agreed.

**Application:** All ships, new and existing, from a date yet to be agreed.

(Document submitted)

DE 54/7 (Bahamas, Liberia, the Marshall Islands, Panama, BIMCO, CLIA, ICS, IFSMA, IMCA, INTERCARGO, IPTA, ISF, NI, OCIMF and SIGTTO) - Regulation III/7.2 – Comments on the report of DE 53
The co-sponsors consider that setting "ship specific" performance standards for recovery systems is within the scope of measures to be addressed when complying with the
requirements of the ISM Code. Ships should have audited plans and procedures to address recovery of casualties and consideration of a performance standard for this function should remain a matter for individual ships. Text for a draft MSC circular is included for consideration by the Sub-Committee.

DE 54/7/1 (Australia and Germany) - Draft performance standard for recovery systems
The co-sponsors reaffirm support for completion of this item in accordance with the Committee's instructions. A revised text for a draft performance standard for recovery systems is provided.

DE 54/7/2 (Iceland) - Comments on document DE 54/7/1
This document provides comments and remarks on the annex to document DE 54/7/1, relating to draft performance standard for recovery systems.

Agenda Item 8 - Safety provisions applicable to tenders operating from passenger ships (Target completion date – 2011)

Background:
For a number of years it has become common practice for passenger ships to use their tenders/lifeboats to transfer passengers and crew from the ship to shore where there are no berthing facilities for the ship; however there are no internationally agreed and available standards that address operational procedures, performance standards, safety provisions and manning requirements (including training) for those boats when used as tenders. It is recognised that the majority of cruise ship tenders are also approved as SOLAS lifeboats and this is a satisfactory standard for tenders even if all the lifeboat requirements are not needed. There has been discussion in the past over whether these boats when used for short coastal voyages should be considered to be tenders or not.

The Sub-Committee will continue its work on the development of safety provisions applicable to tenders operating from passenger ships, based on the draft guidelines for passenger ship tenders prepared at DE 53 (DE 53/WP.3) and taking into account the outcome of COMSAR 14, FP 54 and NAV 56 on the matter (DE 54/8).

Matters which the working group raised at DE 53 which are still to be resolved are:
- Whether a reference to the LSA Code chapter IV was useful or not,
- Whether two lifebuoys (one with line for day time and one with a light for night time) were necessary or if one could be replace by the other, and
- Access arrangements for persons with reduced mobility.

LR position: To monitor the discussion.

Implications: Manufacturers - Tender manufacturers will need to ensure compliance with the agreed standard, bearing in mind that local requirements may be more stringent.
Owners - Training of crew to meet the required standards will need to be arranged and maintained, particularly when crew transfer from one ship to another.

Application: To tenders carried on board passenger ships.
DE 54/8 (Secretariat) - Outcome of COMSAR 14, FP 54 and NAV 56
This document reports on the outcome of COMSAR 14, FP 54 and NAV 56 with regard to the agenda item.

**Agenda Item 9 - Guidelines for a visible element to general alarm systems on passenger ships (Target completion date – 2012)**

**Background:**
The Sub-Committee will continue its work on the development of draft Guidelines for a visible element to general alarm systems on passenger ships, based on the draft Guidelines submitted by the United States (DE 54/9). The current proposals are for guidelines only (i.e. non-mandatory) at this stage, although it should be noted that these requirements are mandatory for cruise ships which trade in the US.

**LR position:** To closely monitor discussions and developments.

**Implications:** Passenger ships will be encouraged to fit a visual alarm which should operate when the general alarm does. Flag administrations and Recognized Organizations will have a standard against which they can assess these systems.

**Application:** To all passenger ships.

DE 54/9 (the United States) - Proposed draft Guidelines
This document provides proposed draft Guidelines for the design and installation of a visible element to the general emergency alarm on passenger ships to accommodate passengers who are deaf or hard of hearing. The proposals include design guidance (performance based and prescriptive) and testing requirements (at installation and at regular intervals).

**Agenda Item 10 - Development of new framework of requirements for life-saving appliances (Target completion date – 2012)**

**Background:**
The Sub-Committee will be invited to continue its work on the development of a new framework of requirements for life-saving appliances. Proposals for the goals and functional requirements and a draft outline framework have been prepared for the consideration of the Sub-Committee.

The issue of whether there should be a limit to how many liferafts can be launched from a single davit/crane is raised.

**LR position:** To closely monitor developments. This is the first attempt at changing prescriptive rules into more goal based rules.
Implications: This is a fundamentally different approach to the way regulations have been written in the past. It should permit greater ease in demonstrating equivalency.

Application: To all LSA covered by SOLAS chapter III and the LSA Code.

(Document submitted)

DE 54/10 (Japan) - Proposal for goals and functional requirements for life-saving appliances based on goal-based standards
This document contains proposals for goals and functional requirements for life-saving appliances based on a goal-based standard.

DE 54/10/1 (Japan) - Draft framework of requirements for life-saving appliances
This document provides the draft new framework of requirements for life-saving appliances, based on draft goals and functional requirements proposed in document DE 54/10.

DE 54/10/2 (IACS) - Launching devices serving a multiple number of liferafts on board passenger ships and starting point for the 10 minutes abandonment of cargo ships
IACS requests the Sub-Committee, in its further consideration of this agenda item, to clarify the existing provisions relating to one launching appliance serving multiple liferafts carried on passenger ships and the starting time for the 10 minutes abandonment time with respect to cargo ships.

Agenda Item 11 - Amendments to resolution A.744(18) (Target completion date – 2010)

Background:
The Sub-Committee will consider amendments to the ESP Guidelines (resolution A.744(18) “Guidelines on the enhanced programme of inspections during surveys for bulk carriers and oil tankers”), based on the work carried out by the Correspondence Group established at DE 52 (DE 54/11) and taking into account any comments submitted (DE 54/11/1), with a view to finalization. Some of the work is to ensure that the IACS UR Z10 series and the IMO document are consistent; other parts are to ensure consistency between the single skin and double skin requirements. Other minor amendments have been proposed. The amendments affect both Annex A (Bulk Carriers) and Annex B (Oil tankers) of the ESP Guidelines. A drafting group will be established to deal with the matter.

LR position: To closely monitor the developments to ensure that impractical requirements are avoided.

Implications: Survey requirements should be consistent for all bulk carriers. Owners will need to ensure that their survey preparation meets the requirements before the survey is started and that all required surveys will be possible.

Application: To bulk carriers and oil tankers of 500 GT and more.
**DE 54/11 (Germany) - Report of the Correspondence Group**
This document reports the outcome of the Correspondence Group on the amendments to resolution A.744(18). Proposed amendments to A.744(18) are given in the Annex to the paper.

**DE 54/11/1 (Germany) - Proposal for further harmonization of resolution A.744(18) with the IACS UR Z10 series**
This document provides a proposal for a harmonization of resolution A.744(18), Annex A, Part A, on single-side skin bulk carriers, with IACS UR Z10.2 (Rev. 27 2009). The new text proposed in the Annex uses that given in paper 54/11 as a base text.

**DE 54/11/2 (Germany) - Proposal for further harmonization of resolution A.744(18) with the IACS UR Z10 series**
This document provides a proposal for a harmonization of resolution A.744(18), Annex A, Part B on double-side skin bulk carriers with IACS UR Z10.5 (Rev. 9 2009).

**Agenda Item 12 - Thermal performance of immersion suits (Target completion date – 2010)**

**Background:**
Following the introduction at the IMO of the reference test device concept for lifejackets (see also agenda item 15 papers DE 54/15/1, DE 54/15/2 and DE 54/15/3), a proposal was made to introduce the same idea for the testing of immersion suits in order to ensure consistent results in testing, particularly as individual resistance to cold makes testing immersion suits consistently very difficult. Initial proposals were made at the last session of DE (February 2010), where concerns were raised on the advisability of immersing people in cold water for extended periods as suggested. Alternative processes are now being proposed. The Sub-Committee will continue its consideration of the introduction of the reference test device concept for the evaluation of the thermal performance of immersion suits, including relevant amendments to the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70)) and the LSA Code, based on the proposals made by Japan (DE 54/12).

**LR position:** To monitor developments.

**Implications:** The use of a reference test device and possibly thermal manikins should make testing of immersion suits safer with consistent results.

**Application:** To type approval of immersion suits.

**Document submitted**

**DE 54/12 (Japan) - Introduction of "Reference test device (RTD) concept" for thermal performance requirements**
This document contains a proposal for test specifications for thermal performance of immersion suits based on the "Reference Test Device (RTD)" concept and provides draft amendments to the LSA Code and the Recommendation on testing of life-saving appliances.
DE 54/12/1 (Dominica) - Use of thermal manikins to improve measurement accuracy and to encourage innovation in immersion suits
Dominica is of the opinion that, in addition to the use of an RTD to improve thermal performance of immersion suits as proposed by Japan in document DE 54/12, the use of thermal manikins will significantly improve measurement repeatability and further innovation in immersion suit performance. Text is proposed to include a provision to allow for use of a thermal manikin in testing.

DE 54/12/2 (Canada) - Comments on submissions by Japan – Introduction of "Reference test device (RTD) concept" for thermal performance requirements; and Dominica – Use of thermal manikins to improve measurement accuracy and to encourage innovation in immersion suits
Canada has several comments on the submissions by Japan (DE 54/12) and by Dominica (DE 54/12/1). Formation of a correspondence group is suggested as the way forward in finalizing this agenda item.

Agenda Item 13- Development of a mandatory Code for ships operating in Polar waters (Target completion date – 2012)

Background:
The IMO adopted the “Guidelines for ships operating in Arctic ice-covered waters” (MSC/Circ.1056 MEPC/Circ.399) in 2002 in recognition of the fact that this area required provisions in addition to those contained in existing IMO instrument. MSC 79 (December 2004) was asked by the Antarctic Treaty Nations to extend these to cover the Antarctic area and the non-mandatory “Guidelines for ships operating in Polar waters” (Res. A.1024(26)) were developed and come into effect for ships constructed on or after 1 January 2011.

This preliminary work is now being developed into an all encompassing mandatory document, which will potentially cover structural, fire, safety and stability aspects.

At DE 53 it was agreed that a two part code with mandatory requirements in one part and recommendatory requirements in the other should be developed, the format of the ISPS Code was suggested as being a good format. It was further agreed that the code should contain risk based functional requirements supported by prescriptive solutions where applicable and the code should have text which was relevant to both Polar areas with specific area requirements as considered necessary.

The sensitivity of Polar Regions to environmental damage was noted and relevant documents from DE 53 were submitted to MEPC 60 (MEPC 60/21/1). Further environmental issues are now raised, in particular the issue of grey water discharges and the impact they can have on the environment are brought to the Sub-Committee's attention.

The Sub-Committee will continue its work on the development of a mandatory Code for ships operating in Polar waters based on the report of the Correspondence Group (DE 54/13/3), together with any other related submissions, and also taking into account documents MEPC 60/21/1 and MSC 87/INF.15, as instructed by MEPC 60 and MSC 87,

LR position: Lloyd’s Register will be closely involved in the development of this new mandatory code.
Implications:
Although the current voluntary code (MSC/Circ.1056-MEPC/Circ.399. further updated by A.1025 (26)) has been widely implemented, this new mandatory Code will have further implications to concerned parties.

Owners and builders will need to meet the new mandatory requirements, the degree of which is yet to be determined. They are expected to be stricter than existing requirements on construction and anti-pollution measures. Training requirements for crew are likely to require experience in ice conditions. The availability of SAR in the Polar Regions will need to be considered by owners with ships operating in these areas.

Flag Administrations will need to consider new approval, survey and certification scheme requirements.

Application: To be decided in the course of the discussions (could include vessels normally not covered by SOLAS, MARPOL, and Load Line etc.). Ships which do not operate in Polar waters will not need to comply with the Code.

(Document submitted)

DE 54/13 (Secretariat) - Outcome of the 2010 Manila Conference
This document reports on the outcome of the 2010 Manila Conference with regard to the agenda item.

DE 54/13/1 (Germany) - Risk-based concept
This document provides a framework for the Polar Code using a goal based structure with functional requirements. It also introduces paper DE 54/INF.3.

DE 54/13/2 (New Zealand) - Information on shipping and conditions in the Antarctic area
This document contains information regarding shipping patterns and environmental conditions in the Antarctic area relevant to the development of the proposed mandatory Polar Code. It states the extent of environmental disaster that would follow an oil spill in Antarctica.

DE 54/13/3 (Norway) - Report of the correspondence group
This document contains the report of the correspondence group on development of a mandatory Code for ships operating in Polar waters. In particular the group discussed a proposal to establish operational limitations based on geographical boundaries. The draft contents of the Code were developed which lists various proposals for additional hazards to be considered.

DE 54/13/4 (Vanuatu) - Alternate framework for development of the mandatory Code
This document gives consideration to an alternate framework for development of the mandatory code using amendments to SOLAS and ISM as appropriate.

DE 54/13/5 (New Zealand) - Fishing vessels operating in Polar waters
This document contains information regarding fishing vessel operations in Antarctic waters relevant to the development of the proposed mandatory Polar Code.

DE 54/13/6 (Finland) - Comments on the report of the Correspondence Group
Finland proposes that a reference to the Finnish-Swedish Ice Class Rules should be included in the Polar Code. Furthermore, we find that the operational limitations
related to structural requirements for ships in the Arctic area should be based on meteorological and ice conditions.

**DE 54/13/7 (Norway) - Environmental aspects of the Code**
This document proposes a way forward on how to address the environmental aspects in the development of the Polar Code, within the foreseen time schedule.

**DE 54/13/8 (FOEI, IFAW, WWF, Pacific Environment and CSC) - Additional MARPOL provisions for the Polar Code**
This document proposes a way forward on how to address the environmental aspects in the development of the Polar Code, within the foreseen time schedule.

**DE 54/13/9 (FOEI, IFAW, WWF, Pacific Environment and CSC) - Wider environmental provisions for the Polar Code**
In this document FOEI, IFAW, WWF, Pacific Environment and CSC elaborate proposals for environmental provisions for application in Polar Regions which should be included in a mandatory Polar Code.

**DE 54/13/10 (Russian Federation) - Comments on document DE 54/13/4**
This document contains proposals on the basic IMO requirements for ships operating in ice-covered Polar waters to be included in Part A: Mandatory requirements and in Part B: Recommendations of the draft Polar Code.

**DE 54/13/11 (New Zealand) - Comment on the tiered risk assessment study submitted by CLIA**
This document comments on the Antarctic Tiered Risk Assessment commissioned by IAATO and submitted to DE 54 by CLIA.

**DE 54/INF.2 (CLIA) - A tiered risk assessment approach to Polar operations safety and the mandatory Polar Code**
This document provides the report of a preliminary study aimed at supporting passenger ship operators in the development of a Tiered Risk Assessment approach that can be used in the development and application of a mandatory Polar Code and/or as a framework for voyage planning and risk assessment.

**DE 54/INF.3 (Germany) - Code for Safety for ships operating in Polar waters**
This document contains a proposal for a goal based approach for the Code of safety for ships operating in Polar waters as discussed in the margins of DE 53.

**DE 54/INF.5 (Norway) - Environmental aspects of emissions and discharges from shipping during regular operation in Polar areas**
This document contains the report of an analysis performed on regular operational emissions and discharges from shipping in Polar areas – in particular the environmental aspects.

**Agenda Item 14 - Protection against noise on board ships (Target completion date – 2010)**

**Background:**
Excessive noise has long been recognised as being harmful. Reliable means to predict noise levels are now available and many flag states have national mandatory limits on
noise. High levels of background noise are known to contribute to crew fatigue. The IMO agreed to review the existing resolution (A.468(XII) “Code on noise levels on board ships”) to encompass developments in noise prediction and reduction since it was first written.

The Sub-Committee will continue its consideration of the issue of protection against noise on board ships, based on the agreement at DE 53 to revise the Code on Noise Levels on Board Ships as a first step, with a view to possibly making the provisions of the Code mandatory as a second step.

**LR position:** To closely monitor developments and contribute to developments where possible.

**Implications:** The proposals significantly reduce the existing permitted levels. Designers of ships will need to give more consideration to ways of reducing noise particularly in accommodation areas.

**Application:** All ship types 1600 GT or over.

(Document submitted)

**DE 54/14 (Marshall Islands, Liberia and Vanuatu) – Practical matters to be considered prior to development of mandatory noise limits and related proposals for the revision of the code on noise levels on board ships**

This document raises practical concerns that need to be addressed prior to the development of mandatory noise standards, offers comments on the DE 53/10 and offers proposals for the revision of the Code on noise levels on board ships.

**DE 54/14/1 (Japan) – Proposals for a revision of the Code on noise levels on board ships**

This document provides the proposals for a revision of the Code on noise levels on board ships (resolution A.468(XII)). It presents the results of some test measurements made on existing ships.

**DE 54/14/1/Corr.1 (Japan) – Proposals for a revision of the Code on noise levels on board ships**

This document provides the corrigendum to the annex of document DE 54/14/1, for Figures 1 and 2.

**DE 54/14/2 (China) – Suggestions on revision of the Code on Noise Levels on Board Ships (resolution A.468(XII))**

This document is to provide China’s suggestions on revision of the Code on Noise Levels on Board Ships (resolution A.468(XII)). The proposal is to leave the levels as they currently are and ensure that adequate ear protection is provided in noisy areas.

**DE 54/14/3 (CESA) – Proposal for mandatory, technical feasible noise protection on board ships**

This document supports the initiative to review resolution A.468(XII) and to make appropriate noise protection measures mandatory. It describes technical concerns related to the proposed area definition, related maximum noise levels and airborne sound insulation contained in the annex to document DE 53/10.
DE 54/INF.4 (European Commission) - A brief summary of relevant bibliography to support the proposal in document DE 53/10 to develop amendments to SOLAS regulation II-1/36 and a revision of the Code on maximum noise exposure limits on board ships.

This document sets out a brief bibliography of scientific research documents to support the proposal to revise the current SOLAS provisions on noise protection and to review the limits of the 1981 Code on noise exposure levels on board ships.

DE 54/INF.6 (Denmark) - Information on noise requirements on board Danish ships

This document provides information on Danish requirements on noise on board ships, which reflect those contained in the proposals given in DE 54/10.

DE 54/INF.7 (China) - Method of cabin noise prediction

This document provides a method of cabin noise prediction based on statistical energy analysis (SEA) developed by China. The accuracy of the method has been proved acceptable for the shipbuilding industry by full scale application.

**Agenda Item 15 - Amendments to the Revised recommendation on testing of life-saving appliances (Target completion date – 2010)**

**Background:**

The Sub-Committee will continue its work on draft amendments to the Revised recommendation on testing of life-saving appliances (DE 54/15), with a view to finalization. Concerns have been raised about the reference test device for lifejackets which have been found while tests have been conducted. These will be considered by the Sub-Committee.

**LR position:** LR has concerns about the proposed change to liferaft tests which may result in liferafts collapsing in use as this aspect would no longer be tested.

**Implications:** The amendments proposed in DE 54/15 will update the references to other standards and should make the document easier to use. With respect to lifejackets the concerns raised may lead to a revision of MSC 81(70) chapter 2, as amended, i.e. the test using RTDs may be changed due to inconsistencies in the test results.

**Application:** To life-saving appliances and arrangements as required by SOLAS Chapter III. Such equipment will be required to meet the revised testing requirements when the amendments enter into force.

*(Document submitted)*

DE 54/15 (Secretariat) - Draft amendments to the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70))

This document contains a list of draft amendments to the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70), as amended), prepared by the Secretariat as requested by DE 53, taking into account relevant proposals by Japan (DE 53/13) and decisions of DE 53 (DE 53/26, paragraph 13.3).
DE 54/15/1 (United Kingdom) - Lifejacket reference device test
This document brings to the attention of the Sub-Committee a number of issues that have been brought to the attention of the United Kingdom when using the lifejacket reference device to evaluate in-water performance of lifejackets.

DE 54/15/2 (China) - Proposed amendments to the Revised Recommendation on Testing of Life-saving Appliances (resolution MSC.81(70), as amended)
This document proposes amendments to the Revised Recommendation on Testing of Life-saving Appliances (resolution MSC.81(70), as amended) about the making of RTD and about an omission on mass of an average person.

DE 54/15/3 (ILAMA) - Reference test device for lifejackets
This document provides information on problems encountered with the new test requirements implemented by resolution MSC.200(80).

**Agenda Item 16 - Test standards for type approval of add-on equipment (Target completion date – 2011)**

**Background:**
The Sub-Committee will consider draft type approval standards for add-on pollution prevention equipment, as developed by a Correspondence Group (DE 54/16). A working group will be established to deal with the matter in conjunction with related agenda items 17, 18 and 19.

**LR position:** To monitor developments. When standards are agreed LR will, where authorised, issue type approval certificates on behalf of Administrations.

**Implications:** Add-on equipment designed to ensure that effluent from older oily water separators meets the 15 ppm limit, will need to be tested and certified in accordance with this standard. Equipment which has not been tested and certified to the standard will need to be.
Forms A and B will need to be modified to incorporate this standard and equipment.

**Application:** To equipment which is designed to be used in conjunction with existing oily water separators, either a specific piece of equipment or to any (non-specific) equipment.

(Document submitted)

DE 54/16 (the United States) - Report of the correspondence group
This document provides a draft set of test standards for type approval of add-on equipment capable of breaking up emulsions that could supplement existing resolution MEPC.60(33)–compliant equipment, for finalization at DE 54.
Agenda Item 17 - Measures to promote integrated bilge water treatment systems (Target completion date – 2011)

**Background:**
The Sub-Committee will consider the inclusion of Integrated Bilge Water Treatment Systems (IBTS) (MEPC.1/Circ.642) as a key element in the draft guidelines to assist ship owners and operators to prepare ship-specific oily waste management plans, as developed by a Correspondence Group (DE 54/18) (see agenda item 18). A proposal has been submitted to develop a document of compliance for integrated bilge water treatment systems (IBTS) in order to promote its use & to provide information to port state control officers has been put forward. A working group will be established to deal with the matter in conjunction with related items 16, 18 and 19.

**LR position:** Lloyd’s Register supports the proposal which should help reduce the current confusion in PSC. It is suggested that the document of compliance be linked to the IOPP certificate to further improve it.

**Implications:** If agreed builders and owners will be able to demonstrate compliance with IBTS. IBTS may lead to more complex engine room design. Owners which pay the extra initial costs to achieve compliance with MEPC.1/Circ.642 should see reduced running costs in the long term. Oily waste prevention plans will be required to be written and approved. If IBTS is implemented there should be a reduced chance of an oil pollution incident. Flag / Recognized Organizations will have a format for the certificate and a checklist for compliance. There may be extra work required for the approval and survey of IBTS.

**Application:** All ships.

(Document submitted)

DE 54/17 (Japan) - Proposal for promotion of integrated bilge water treatment systems (IBTS)
This document provides a proposal for promotion of integrated bilge water treatment systems (IBTS). It also contains study results on bilge water generated on board ships equipped with IBTS, which obviously demonstrates the effectiveness of IBTS.

Agenda Item 18 - Guidelines for a shipboard oil waste pollution prevention plan (Target completion date – 2011)

**Background:**
The Sub-Committee will consider the draft Guidelines to assist ship owners and operators to prepare ship-specific oily waste management plans, as developed by a Correspondence Group (DE 54/18). A working group will be established to deal with the matter in conjunction with related items 16, 17, and 19.

**LR position:** To monitor developments, in particular to see if clarification can be provided on the following areas:
The area of application (whole vessel (ER and Cargo) or to just the engine room)
Whether these will be recommendatory or mandatory requirements.
Cross references to MARPOL Annexes I and II and to SOPEP / SMPEP are needed, as are references to emergency procedures as required by OPRC-HNS and IMDG / MARPOL Annex III.

**Implications:** Owners Oily waste pollution prevention plans will be required to be written and approved. These should include integrated bilge water systems. There will be additional costs associated with this. They will require to be updated as necessary as part of ISM requirements. Flag administrations / Recognized Organizations will need to ensure that sufficient trained staff is available to approve the oily waste pollution prevention plans when they are written.

**Application:** Oil tankers of 150 GT and over.

(Document submitted)

**DE 54/18 (the United States) - Report of the correspondence group**
This document provides a draft set of guidelines for a shipboard oil waste pollution prevention plan for finalization at DE 54.

**Agenda Item 19 - Manually operated alternatives in the event of pollution prevention equipment malfunctions (Target completion date – 2011)**

**Background:**
The Sub-Committee will consider relevant draft amendments to the “Revised guidelines and specifications for oil discharge monitoring and control systems for oil tankers” (resolution MEPC.108(49)), as developed by a Correspondence Group (DE 54/19). A proposal to require 2 PPM monitors is also included. A working group will be established to deal with the matter in conjunction with related items 16, 17 and 18.

**LR position:** To monitor developments. There is potential for increased confusion among crews if two different models of ODM are fitted on the same vessel. It is noted that it is only intended to amend MEPC.108(49) which means that older equipment (pre 2005) will not be affected.

**Implications:** The proposed amendments to resolution MEPC.108(49) cover operational matters and record keeping. Owners will have to ensure that crew are aware of their obligations and the need to record actions. If extra equipment is needed to be fitted there will be cost and space issues and work will have to be carried out during dry-docking. There should be adequate space on board existing ships for spares to be carried.
The proposal to require 2 PPM meters will have cost and space implications for designers.
If extra equipment is fitted then the Form B will need to be reissued to include the additional information.

**Application:** Oil tankers of 150 GT and over.
DE 54/19 (the United States) - Report of the correspondence group
This document provides draft amendments to resolution MEPC.108(49) to amend existing provisions for manually operated alternatives in the event of pollution prevention equipment malfunctions for finalization at DE 54.

Agenda items 20 and 21

Agenda items 20 and 21 are not covered in this agenda preview document.

Agenda Item 22 – Any other business

Background:
The Sub-Committee will consider the problem of counterfeit LSA products (DE 54/22 & DE 54/22/Rev.1), the testing of free-fall lifeboats (DE 54/22/1), the application of SOLAS regulation II-1/3-2 to ore carriers and combination carriers (DE 54/22/2) and any other matters submitted by Member Governments or international organizations or referred to it by the committees or other sub-committees.

Counterfeit LSA products

LR position: To monitor any developments. Where LR is advised of known counterfeit products, we will advise our surveyors to be aware of them.

Implications: Owners should be aware that products may be copied and may not be to the same standard as the original.

Application: All ships.

Testing of free-fall lifeboats and application of SOLAS regulation II-1/3-2 to ore carriers and combination carriers

LR position: LR supports the IACS submissions and will take any actions necessary once the sub-committee has decided.

(Document submitted)

DE 53/22 (ILAMA) - Counterfeit LSA products - a growing problem and a threat to the safety of lives at sea
This document provides information on the necessity for IMO to raise awareness on the growing problem of counterfeit LSA products.

DE 53/22/Rev.1 (ILAMA) - Counterfeit LSA products - a growing problem and a threat to the safety of lives at sea
This document provides information on the necessity for IMO to raise awareness on the growing problem of counterfeit LSA products.
DE 54/22/1 (IACS) - Testing of free-fall lifeboats
This document brings to the attention of the Sub-Committee what appears to be an inconsistency in the applicable SOLAS regulations regarding the testing of free-fall lifeboats release systems.

DE 54/22/2 (IACS) - Application of SOLAS regulation II-1/3-2 to ore carriers and combination carriers
This document seeks clarification on a possible unintended application of SOLAS regulation II-1/3-2, as amended by resolution MSC.216(82), to void wing spaces found on ore carriers or combination carriers.

Agenda Item 23 - Report to the Maritime Safety Committee

Agenda item 23 is not covered in this agenda preview document.