Eareckson, Peter

From: Eareckson, Peter
Sent: Friday, March 12, 2010 21:39
To:

Subject: Commencement of Round 1 Work: SLF Tonnage CG

Good day to you all:

First, I would like to extend my thanks for your participation in the planning phase of this correspondence group. I am confident that the planning work will pay dividends in the long run, and was both necessary and well worth the time invested.

Second, please be advised that the finalized Action Plan has been issued: http://www.uscg.mil/imo/slf/docs/tonnage/Action_Plan_Rev_0.pdf. Based on participant feedback on the revised draft circulated last week, paragraph 6 was changed slightly to reflect that summaries of comments posted on the website will be without specific attribution. This change should help ensure that comments are not taken out of context, and facilitate more open discussion within the group, while maintaining an appropriate level of transparency. Except for several other changes of an administrative/editorial nature (including clarification of Round 1 deadlines in the Annex), the document is unchanged from the revised draft version.

Third, with the issuance of the Action Plan, the Round 1 work has "officially" begun. The Round 1 work items, along with associated deadlines when input is due, are summarized below:

1. Development of Option A Questionnaires (Deadline Friday 2 April 2010) Questionnaires under this option are intended to gather additional supporting information for Option A. A draft questionnaire is offered for the group's consideration at: http://www.uscg.mil/imo/slf/docs/tonnage/Option_A_Questionnaire_Draft.pdf, along with a completed sample at: http://www.uscg.mil/imo/slf/docs/tonnage/Option_A_Questionnaire_Sample_Draft.pdf. A series of these questionnaires is envisioned, with a single questionnaire dedicated to each individual issue of interpretation. Please provide your input on the questionnaire design by the April 2nd deadline, along with input on any issues that you feel should be addressed by these or other questionnaires (e.g., specific text within the TM Convention or TM.5/Circ.5 that requires interpretation). The questionnaires will be finalized and distributed for completion by Tonnage CG participants on April 16th.

2. Development of Option B Questionnaires (Deadline Friday 2 April 2010) Questionnaires under this option are intended to gather additional supporting information for Option B. A draft questionnaire is offered for the group's consideration at http://www.uscg.mil/imo/slf/docs/tonnage/Option_B_Questionnaire_Draft.pdf. A single questionnaire along these lines may suffice. As with the Option A questionnaires, please

provide your input by April 2nd. The questionnaire(s) will be finalized and distributed for completion by Tonnage CG participants on April 16th.

3. Input on variants of Options A,B,C and D (Deadline Friday 14 May 2010) If you have thoughts on variants of the four options that would address the deck cargo and/or crew accommodation concerns in the direction given by SLF 52, please share them with the group and provide a finalized proposal by the May 14th deadline. Refer to Annex 1 and Annex 2 of SLF 52/5/2 for examples of what such a proposal could look like: http://www.uscg.mil/imo/slf/docs/tonnage/SLF_52-5-2_Tonnage_CG_Report.pdf. Evaluation of any variants under this item will take place in Round 2.

4. Copies of Tonnage Rules and Interpretation (Deadline Friday 2 April 2010) This item is directed primarily to tonnage specialists, and/or representatives of governments that have developed/published their own rules and/or interpretations of the TM Convention. Please submit any such documents in Adobe Portable Document Format (.pdf) if available, or alternatively provide a web link to the document(s). For examples of such documents that have already been posted, please refer to the rules and interpretations page of the website at http://www.uscg.mil/imo/slf/rules.asp.

There is a lot of information covered above, and I apologize for the length of this email. I believe that once we are through this early stage, the work will become more focused, and not so overwhelming. Your continued patience and support is, therefore, most appreciated.

With my warmest regards to you all, and again my thanks for the input and the help you have provided to date.

Sincerely,

Peter Eareckson
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Questionnaire #1 Option A (Integrity/Uniform Implementation) **Draft 3/12/2010**

1. **Subject:**

2. **Text from TM Convention or TM.5/Circ.5:**

3. **Brief Description of Issue:**

4. **Estimate of number of vessels potentially affected in world fleet.**

Small____	Moderate____	Large____	No Opinion / ____
(<10%)	(10% - 30%)	(>30%)	Don't Know

5. **Estimate of potential impact on gross/net tonnage assignments of affected vessels.**

Low____	Moderate____	High____	No Opinion / ____
(<10% GT/NT)	(10%-30% GT/NT)	(>30% GT/NT)	Don't Know

6. **Opinion on need to amend TM Convention to address.**

Not Needed____	Possibly Needed____	Needed____	No Opinion / ____
			Don't Know

7. **Opinion on effect on ship design / safety / crew accommodation if unresolved.**

Little Effect____	Moderate Effect____	Large Effect____	No Opinion / ____
			Don't Know

8. **Opinion on overall importance of resolving issue to ensure uniform application/integrity.**

Low ____	Moderate ____	High____	No Opinion / ____
			Don't Know

Tonnage CG Participant Name:_____ Date:_____

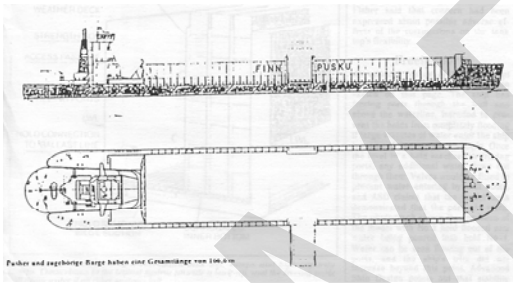
1. **Subject:** Requirement for a Deck Above to Bound Enclosed Space

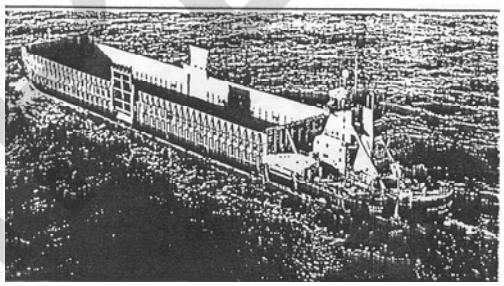
2. **Text from TM Convention or TM.5/Circ.5**

   TM Convention Reg 4: "Enclosed spaces are all those spaces which are bounded by the ship's hull, by fixed or portable partitions or bulkheads, by decks or coverings other than permanent or movable awnings. No break in a deck, nor any opening in the ship's hull, in a deck or in a covering of a space, or in the partitions or bulkheads of a space, nor the absence of a partition or bulkhead, shall preclude a space from being included in the enclosed space."

3. **Brief Description of Issue**

   Reg 4 is unclear as to whether – in order for a space to be considered enclosed and therefore included in V – a space not within the vessel's hull must be bounded by a deck above. The issue was discussed at SLF 30 (SLF 30 / WP 4), and a decision made that, in effect, a deck above was required to bound an enclosed space, although there was not universal agreement on this interpretation. In theory, under this interpretation, the space bounded by the high coamings is not enclosed. Subsequently, IMO has taken different approaches, with volumes inside coamings of open-top containerships included in V, while volumes inside of coaming of dockships have been omitted.





4. **Estimate of number of vessels potentially affected in world fleet.**

   Small _X_ (<30%) Moderate ____ (30% - 70%) Large____ (>70%) No Opinion / ____ Don't Know

5. **Estimate of potential impact on gross/net tonnage assignments of affected vessels.**

   Low ____ (<10% GT/NT) Moderate ____ (10%-30% GT/NT) High_X_ (>30% GT/NT) No Opinion / ____ Don't Know

6. **Opinion on need to amend TM Convention to address.**

   Not Needed ____ Possibly Needed_X_ Needed ____ No Opinion / ____ Don't Know

7. **Opinion on effect on ship design / safety / crew accommodation if unresolved.**

   Little Effect____ Moderate Effect____ Large Effect_X_ No Opinion / ____ Don't Know

8. **Opinion on overall importance of resolving issue to ensure uniform application/integrity.**

   Low ____ Moderate ____ High_X_ No Opinion / ____ Don't Know

Tonnage CG Participant Name: ___John Doe_____ **Date:**__12 Mar 2010___

SAMPLE

1. To what extent do you estimate that net tonnage (NT) is being used (as opposed to gross tonnage, deadweight tonnage, or other vessel parameters) in your country and/or the geographic region(s) under your purview, for each of the purposes listed below:

	Small	Medium	Large	No Opinion / Don't Know
Tonnage duties and other Customs fees	____	____	____	____
Port/harbor fees, light dues etc.	____	____	____	____
Corporate income taxes	____	____	____	____
Vessel registration size limits	____	____	____	____
Other _____	____	____	____	____

2. Assuming an IMO Circular or Resolution is developed to promote the net tonnage parameter, provide your opinion as to the importance of addressing the following aspects of the net tonnage parameter in the Circular or Resolution:

	Don't Address	Possibly Address	Definitely Address	No Opinion / Don't Know
Reflects cargo spaces / # passengers	____	____	____	____
Encourages higher freeboards	____	____	____	____
Little/no penalty crew spaces	____	____	____	____
Little/no penalty segregated ballast spaces	____	____	____	____
Little/no penalty environmental protection spaces	____	____	____	____
Used for corporate income taxes	____	____	____	____
Used for tonnage duties / fees	____	____	____	____
In no case is NT < 0.3 GT	____	____	____	____
Other _____	____	____	____	____

3. Were an IMO Circular or Resolution to be developed, in your opinion at what level should it be issued?

SLF____ MSC____ Assembly____ No Opinion / ____ Don't Know

4. Please list any studies, articles, documents etc., that you are aware of that describe how net tonnage is currently being used, either domestically or internationally.

5. Please provide any suggestions on ways to promote use of the net tonnage parameter other then via an IMO Circular / Resolution.

Tonnage CG Participant Name: _____ **Date:**_____