



SUB-COMMITTEE ON STABILITY AND  
LOAD LINES AND ON FISHING  
VESSELS SAFETY - 30th session  
Agenda item 10

IMO

CLARIFICATION OF SPECIFIC REGULATIONS OF THE  
1969 TONNAGE CONVENTION

Comments to paper submitted by the Federal Republic of Germany  
and the Netherlands (SLF 30/10)

Submitted by Norway

Reference is made to paragraph 10.4 of the report of the Sub-Committee at its twenty-ninth session (SLF 29/15), where Members were invited to submit comments to paper SLF 30/10 presented by the Federal Republic of Germany and the Netherlands. Reference is also made to paragraph 10.2 of SLF 29/15.

With this paper the Norwegian delegation submits its comments in the same sequence as in SLF 30/10.

1 Regulation 6(2) - Volume of appendages

To define any kind of appendages on board of ships by names and by their use, and thereafter agree to exclude or to include the volume of such appendages is not recommended for the following reasons:

- The list would eventually be extensive
- It would have to be under frequent reconsideration
- It would be the first step to undermine the 1969 Tonnage Regulations and probably lead to the same kind of exemptions as the exemptions of the old Tonnage Regulations that are now outdated.
- For large ships those items listed have a rather small influence on the gross tonnage.

To support more detailed regulations on appendages than what is given regarding small items in TM.5/Circ.1 is not appropriate.

2 Regulation 6(3) - Volumes of spaces open to the sea

Due to the important safety aspects of those matters, the Norwegian delegation is of the opinion that those matters should be discussed in plenary as a principal question rather than in a working group of tonnage specialists.

From a safety point of view, areas (volumes) within side erections as demonstrated by figures 10, 11 and 12 should be included in "V" and "Vc" to promote:

- The removal of the side erections, or
- Closing the volume by weathertight means of closure

If deciding upon the cases described in paragraphs 2.1.3.1 to 2.1.3.3, careful consideration has to be given not to introduce a new type of "open" shelterdecker (figure 10). If that should be the outcome, the tonnage according to the 1969 Tonnage Convention might be relied upon in the future as an expression of the physical size of a ship.

4 Regulation 2(5)(e) - Recesses

A recess is defined rather clearly by regulation 2(5)(e) itself. Accordingly the whole volume in figure 14 should be included in the enclosed volume. No interpretation is necessary.

5 Regulation 2(1) - Upper deck  
Regulation 2(2) - Moulded depth

5.1 The interpretation of the regulations of the 1969 Tonnage Convention should in principle, when possible, go along with the load line interpretations. As to figures 15 and 16 it is not problematic to go along with the cases illustrated there. Accordingly the space ABCD in figure 16 is to be included in the underdeck enclosed volume as indicated.

5.3 If interpretations are agreed upon within IMO, then it is rather important to know whether all Contracting Governments apply them. There is no need to continue the wording up of interpretations that are not used.

7 Article 3(2)(b) - "Alterations or modifications"

As to figure 19, alterations or modifications demonstrated by A, B and C are regarded to have the effect that the 1969 Tonnage Convention being applied in Norway. As to sketch D the Norwegian delegation thinks such a modification is only theoretical and can see no reason for building in such a well. Theoretical cases and cases that do not occur in practice are not necessary to consider. Each case is, however, to be treated on its merits.

8 International Tonnage Certificate (1969)

This is a rather unimportant point. In tonnage certificates issued by the Norwegian Administration the details are given, even by volumes, of items regarding the specified deckhouses etc., and are therefore easy to check if found necessary.

9 Sub-Committee's report (SLF 29/15)

It is up to the Sub-Committee itself to decide what is to be reported to the MSC. The MSC should decide what should be distributed to the Governments.

If nothing is reported by the Sub-Committee, the Norwegian delegation can hardly see the need to discuss interpretations in the Sub-Committee or in a working group regarding the 1969 Tonnage Convention.

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