



# Türk Loydu Summary Report – SDC 11

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TLR /SDC 11

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summary report

The 11<sup>th</sup> session of the IMO Sub-Committee on Ship Design and Construction (SDC) was held from 13 to 17 January 2025 in London. Decisions and discussions have been summarized hereunder.

## **AGENDA ITEM 3 DEVELOPEMENT OF GUIDELINES FOR EMERGENCY TOWING ARRANGEMENTS FOR SHIPS OTHER THAN TANKERS**

In accordance with amendments to SOLAS regulation II-1/3-4 by MSC.549(108), ships other than tankers of not less than 20,000 gross tonnage constructed on or after 1 January 2028, shall be fitted with an emergency towing arrangement (ETA).

In order to support the application of aforementioned amendments, SDC 10 has initiated the development of guidelines for the design and construction of emergency towing arrangements for ships other than tankers based on existing guidelines for tankers. In this session, the Sub-Committee finalized the Interim Guidelines for Emergency Towing Arrangements on Ships Other than Tankers for approval at MSC 110 (June 2025).

Main aspects of the developed guidelines can be listed as below:

- Towing components (only bollard/bitt mandatory) and working strength sufficient to withstand the required towing load specified in the following table:

Ship with Equipment Number (EN) (See note)	Required towing load (kN)
EN<3000	1000
3000<=EN<10000	2000
EN>=10000	EN*0.2 or greater as determined by the Administration

*Note: Equipment Number (EN) should be calculated taking into account [MSC.1/Circ.1175/Rev.2].*

- Designs of emergency towing arrangements in accordance with these Guidelines should be prototype tested to the satisfaction of the Administration.
- The ETA should be capable of being deployed in harbour conditions in not more than one hour.
- All emergency towing components should be inspected by ship personnel at regular intervals and maintained in good working order.

In addition, the draft amendments to MSC.1/Circ.1175/Rev.1, with a view to circulation as MSC.1/Circ.1175/Rev.2 (Revised guidance on shipboard towing and mooring equipment) in relation to the update of IACS Unified Requirement A2 and Recommendation No.10, aimed at updating the method for calculating the Equipment Number and the draft amendments to MSC.1/Circ.1255, with a view to circulation as MSC.1/Circ.1255/Rev.1 (Revised guidelines for

owners/operators on preparing emergency towing procedures) aimed at assisting owners/operators in preparing ship-specific emergency towing procedures for ships subject to SOLAS regulation II-1/3-4, as amended by resolution MSC.549(108) were prepared.

Revised circulars will be submitted to MSC 110 (June 2025) for approval.

#### **AGENDA ITEM 4 - FURTHER DEVELOPMENT OF THE IP CODE AND ASSOCIATED GUIDANCE**

A proposal for a change in the IP code to take the industrial personnel weight as 90 kg for stability calculations has been accepted and draft amendments to IP code, Part IV, regulation 2 will be submitted to MSC 110 for approval.

The subcommittee did not agree to proceed with the development of guidelines related to the IP Code at this stage, taking into account the relatively short period of time that the IP Code has been in force and the insufficient experience gained by the industry in its application.

#### **AGENDA ITEM 5 - REVISION OF THE INTERIM EXPLANATORY NOTES FOR THE ASSESSMENT OF PASSENGER SHIP SYSTEMS' CAPABILITIES AFTER A FIRE OR FLOODING CASUALTY (MSC.1/CIRC.1369) AND RELATED CIRCULARS**

Due to the experience gained in the use of safe return to port requirement, interpretation of the rules by flag states and classification societies and the latest technology developments in technology and design, the need to review the relevant circular has arisen. For this reason, IMO decided to proceed with the revision of the explanatory note and the related circular. On the basis of previous meetings, the finalization of the main part of the draft revised Explanatory Notes has been completed in principle at this session.

In relation to provisions on training, familiarization and drills, the Sub-Committee noted that the revision of the Interim Explanatory Notes should provide high-level guidance covering training and other operational matters. The finalized Explanatory Notes, and any other relevant information or standards, should be referred to the HTW Sub-Committee for consideration.

Due to time constraints, it was not possible to complete the revisions to MSC.1/Circ. 1369 at this session. Therefore, the Sub-Committee decided to continue its work by establishing a Correspondence Group on Revision of the Interim Explanatory Notes (MSC.1/Circ.1369) and to give further consideration to the revision of other relevant circulars.

With a view to finalizing the work on (MSC.1/Circ.1369) and related circulars, the Sub-Committee also invited MSC 110 to extend the target completion year to 2027.

#### **AGENDA ITEM 6 - AMENDMENTS TO THE 2011 ESP CODE**

With advances in technology, Remote Inspection Technology (RIT) (e.g., by drones, remotely operated vehicles and robotic arms) offers significant advantages to support surveyors in conducting on-site inspections. These new techniques offer greater efficiency, higher flexibility, and increased reliability in the day-to-day activities of survey and inspection without impairing the result of those surveys.

In order to allow the use of RIT for Close-up Surveys of existing ships, this session finalized draft amendments to the 2011 ESP Code and draft guidelines for the approval and certification of companies using RIT for hull structure surveys. The draft amendments will be submitted to MSC110 for approval and are expected to enter into force on January 1, 2028.

The amendments to the 2011 ESP Code contain the following main items:

- Definition of RIT
- Thickness measurements and close-up surveys
- Procedures for the use of RIT
- Renewal survey
- Preparations for survey
- Equipment for survey
- Approval and certification of a firm engaged in close-up survey of hull structures using a RIT

It was also agreed to establish a correspondence working group to continue the development of inspection guidelines for the use of the RIT, which will include a discussion on structural thickness measurements of ships.

**AGENDA ITEM 7- AMENDMENTS TO THE GUIDELINES FOR CONSTRUCTION, INSTALLATION, MAINTENANCE AND INSPECTION/SURVEY OF MEANS OF EMBARKATION AND DISEMBARKATION (MSC.1/CIRC.1331) CONCERNING THE RIGGING OF SAFETY NETTING ON ACCOMMODATION LADDERS AND GANGWAYS**

SDC 10 finalised technical amendments to the Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation (MSC.1/Circ.1331); however, some discussion had remained on the point of updating ISO standards and how this should be done to ensure that no new requirements are imposed on existing equipment.

SDC 11 completed the revision of MSC.1/Circ.1331 and MSC 110 is expected to approve the revised circular as MSC.1/Circ.1331/Rev.1. The revised circular contains the following main items:

1. Application and Definitions
2. Construction
3. Installation
4. Maintenance
5. Examination and operational tests during surveys required by Solas regulations I/7 and I/8

The applicable standards, depending on the ship's construction and installation dates, are listed in the table below.

Ship construction date	Accommodation ladders and gangways	
	Installed before 1 July 2026*	Installed on or after 1 July 2026*
on or after 1 January 2010	Applicable standards: • ISO 5488:1979 • ISO 7061:1993	Applicable standards: • ISO 5488:2015 • ISO 7061:2015 • ISO 7061:2024
before 1 January 2010		Applicable standards, as reasonable and as practicable: • ISO 5488:1979 • ISO 5488:2015 • ISO 7061:1993 • ISO 7061:2015 • ISO 7061:2024

Ship construction date	The construction and test of accommodation ladder winches	
	Installed before 1 July 2026*	Installed on or after 1 July 2026*
on or after 1 January 2010	Applicable standards: • ISO 7364:1983	Applicable standards: • ISO 7364:2016
before 1 January 2010		Applicable standards, as reasonable and as practicable: • ISO 7364:1983 • ISO 7364:2016

\*"installed on or after 1 July 2026" means:

(a) for ships for which the building contract is placed on or after 1 July 2026, or in the absence of the contract, the keels of which are laid or which are at a similar stage of construction on or after 1 July 2026, any installation date on the ship; or

(b) for ships other than those ships prescribed in (a) above, a contractual delivery date for the equipment or, in the absence of a contractual delivery date, the actual delivery date of the equipment to the ship on or after 1 July 2026.

#### **AGENDA ITEM 8 - REVISION OF SOLAS CHAPTERS II-1 (PART C) AND V, AND RELATED INSTRUMENTS REGARDING STEERING AND PROPULSION REQUIREMENTS, TO ADDRESS BOTH TRADITIONAL AND NON-TRADITIONAL PROPULSION AND STEERING SYSTEMS**

Since new types of propulsion and steering systems (such as azimuth thrusters, waterjets) do not fully comply with the current SOLAS Convention safety standards, the IMO has decided to revise SOLAS chapters II-1 (Part C) and V, along with related documents. This revision aims to accommodate both traditional and non-traditional propulsion and steering technologies.

During the session, the main topic of discussion was whether ship manoeuvrability standards should become mandatory. Opinions varied widely during plenary discussions. Ultimately, the Sub-Committee agreed to include mandatory manoeuvrability standards in the SOLAS Convention, while acknowledging that the proposed standards still require refinement to address implementation challenges.

The SDC Sub-committee decided to invite MSC 110 to extend the target completion year of the output to 2028, and a roadmap was developed to finalize these standards by SDC14 in 2028, aiming for them to enter into force in 2032 following approval by the MSC.

Given that relevant data and recommendations on mandatory manoeuvrability standards are still pending, the Sub-Committee decided not to re-establish the Correspondence group at this time. However, establishment of the Correspondence Group could become necessary following future sessions, notably for further consideration of trial data and information to be received for the development of manoeuvrability standards.

#### **AGENDA ITEM 9 - AMENDMENT TO REGULATION 25 OF THE 1988 LOAD LINE PROTOCOL REGARDING THE REQUIREMENT FOR SETTING OF GUARD RAILS ON THE DECK STRUCTURE**

The Sub-Committee agreed with the draft amendments to regulation 25 of the 1988 Load Line Protocol and the associated draft MSC resolution, for approval at MSC 110 and subsequent adoption at MSC 111, with the expected entry into force on 1 January 2028.

The following changes were accepted in the draft amendments:

- Guard rails or bulwarks shall be fitted not only around superstructures but also around all exposed decks and all exposed sea access holes (such as edges of moonpools) accessible to the crew during navigation.
- If the height of the bulwarks or guard rails (at least 1 m from the deck) interferes with the normal operation of the ship a lesser height may be approved, if the Administration is satisfied that adequate protection is provided.
- All the guardrails shall be at least three courses.
- If chains fitted between two fixed stanchions and/or bulwark, chains shall be tightened as much as reasonably practicable and shall be detachable.

## **AGENDA ITEM 10 - UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, ENVIRONMENT, FACILITATION, LIABILITY AND COMPENSATION-RELATED CONVENTIONS**

The subcommittee reviewed submitted documents under this agenda item and made the following decisions:

### Interpretations of SOLAS regulation II-1/25-1:

The proposed UI was not approved the UI as it is failed to satisfy the safeguards. the Sub-Committee interested delegations to submit a proposal for a new output to the MSC Committee, for a possible revision of SOLAS regulation II-1/25,

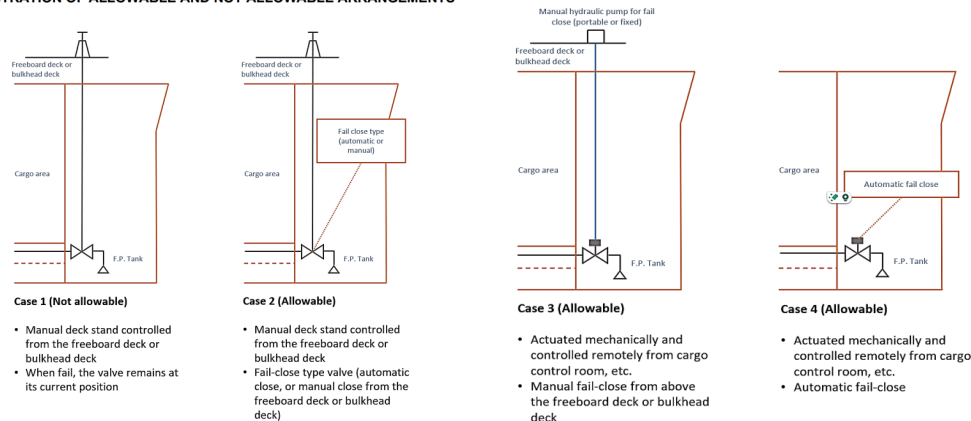
*Note : MSC 108 had agreed on following safeguards;*

- *UIs are not meant to amend mandatory requirements in Conventions and associated instruments;*
- *UIs should not go beyond the interpretation of requirements; and*
- *UIs should not contradict the text of requirements;*

### Interpretation of SOLAS regulation II-1/12.6.2:

The proposed interpretation provides clarification on the term "remotely operated valve", The Sub-Committee agreed to the draft MSC circular on UI of SOLAS regulation II-1/12.6.2 with a view to approval by MSC 110. See below:

#### **ILLUSTRATION OF ALLOWABLE AND NOT ALLOWABLE ARRANGEMENTS**



Draft revision of MSC.1/Circ.1511/Rev.1 on the Unified interpretations of SOLAS regulations II-2/9 and 13 in relation to regulations II-2/13.4.1 and 13.4.2:

The Sub-Committee considered revision in relation to regulations SOLAS II-2/13.4.1 and 13.4.2, to clarify the term "lower part" used in connection with the means of escape from spaces below the bulkhead deck.

The Sub-Committee did not agree with the proposed amendment to MSC.1/Circ.1511/Rev.1, considering that it did not meet the safeguards, notably for going beyond the interpretation of requirements and suggested interested delegations to re-submit a revised proposal, or a proposal for a new output with a view to addressing the regulation itself.

The Sub-Committee also invited III 11 to consider the outcome of the discussion, which raised the question of rightful flag States' interpretations of mandatory provisions being potentially challenged by PSCOs, as appropriate, regarding the need for potential guidance in the context of the harmonization of PSC activities.

Interpretation of the method for calculating the minimum quantity of oil fuel required for emergency generators

The Sub-Committee considered an UI for the method for calculating the minimum quantity of oil fuel required for emergency generators, to achieve common understanding by Administrations and ROs, and to ensure harmonized implementation. In this respect, the Sub-Committee considered, in particular, whether the safeguards were satisfied, and the technical content was agreeable. Subsequently, having concluded that the proposed UI failed to satisfy the safeguards, notably for going beyond the interpretation to the requirement, the Sub-Committee did not approved the proposal.

**AGENDA ITEM 11 - GUIDELINES FOR USE OF FIBRE-REINFORCED PLASTICS (FRP) WITHIN SHIP STRUCTURES**

The Sub-Committee recalled that MSC 107 had agreed to include the development of FRP guidelines in ship structures in the agenda of SDC 10, aiming for completion in 2025. The progress on revision of the FRP Interim Guidelines (MSC.1/Circ.1574) were discussed in the Sub-Committee and noted that:

- Concerns regarding FRP combustibility and environmental impact remain significant and should be prioritized.
- The FRP Guidelines serve as supplements to IMO circulars on alternatives (MSC.1/Circ.1455) and fire safety designs (MSC.1/Circ.1002 and MSC.1/Circ.1552), and should offer harmonized guidance to flag States and the industry.

In addition, detailed discussions were focused on whether load-bearing divisions and elements contributing to global strength should be included in the guidelines' scope. Subsequently, the Sub-Committee agreed to:

- re-establish the Correspondence Group (CG) on FRP to continue work until SDC 12.
- instruct the CG on FRP to address also load-bearing divisions and elements, in addition to other aspects, as part of its revision work, within the scope of SOLAS chapter II-2 from fire safety perspective; and.
- invite MSC 110 to confirm whether or not load-bearing divisions and elements contributing to global strength were considered as part of the scope of the existing output, i.e. clarification on whether the scope of the output was limited to SOLAS chapter II-2 only, or wider, with a view

to advising the Correspondence Group on FRP, and to instructing SDC 12 accordingly.

## **AGENDA ITEM 12 - REVIEW OF THE 2009 CODE ON ALERTS AND INDICATORS**

The Sub-Committee recalled that MSC 108 had agreed to prioritize reviewing the 2009 Code on Alerts and Indicators, with work based on the draft revision in document SSE 10/17, coordinated by SSE 10. At SDC 11, the Sub-Committee reviewed further amendments to the Code. Discussions highlighted the importance of aligning these amendments with current conventions and resolutions concerning visual and auditory alerts for onboard safety. The Sub-Committee approved revisions mainly on:

- Incorporating new instruments: References to the Exhaust Gas Cleaning Systems (EGCS) Guidelines, the ISPS Code and the Ballast Water Management Systems (BWMS) Code.
- Clarifications and edits: The Code's amendments were aligned with the most recent versions of the relevant instruments.
- Revisions to specific sections: The Group decided not to delete a critical section on the general emergency alarm, retaining it based on SOLAS requirements. It also corrected editorial errors and inconsistencies in tables, updated references, and moved certain references to more appropriate sections.

The Sub-Committee also agreed to the draft 2025 Code on Alerts and Indicators, and the associated draft Assembly resolution with a view to concurrent approval by MEPC 83 and MSC 110, and subsequent adoption by A 34.

## **AGENDA ITEM 15 - EXPERIENCE-BUILDING PHASE (EBP) FOR THE REDUCTION OF UNDERWATER RADIATED NOISE FROM SHIPPING**

The Sub-Committee recalled that MEPC 82 had agreed to continue the work on reducing underwater radiated noise (URN) from ships. In this context, MEPC 82 agreed to include an output for Member States, international organizations and the Secretariat to submit all technical documents concerning the EBP and other technical action items in the URN Action Plan to SDC 11 and SDC12.

The Sub-Committee considered this agenda item at length and consequently, established the Correspondence Group on Underwater Radiated Noise for further work mainly on URN Action Plan, application and uptake of the Revised URN Guidelines, select and evaluate studies on URN emissions from the maritime sector.

### **For further information:**

Mehmet Faruk ELBAN  
Principal Plan Approval Engineer  
Tel : +90-216-5813775  
Fax : +90-216-5813840  
E-mail: [felban@turkloydu.org](mailto:felban@turkloydu.org)  
Web: [www.turkloydu.org](http://www.turkloydu.org)

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