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MSC-MEPC.2/Circ.10
1 December 2011

**UNIFIED INTERPRETATIONS ON THE APPLICATION OF SOLAS, MARPOL AND
LOAD LINES REQUIREMENTS TO CONVERSIONS OF SINGLE-HULL OIL TANKERS
TO DOUBLE-HULL OIL TANKERS OR BULK CARRIERS**

1 The Maritime Safety Committee, at its eighty-ninth session (11 to 20 May 2011), and the Marine Environment Protection Committee, at its sixty-second session (11 to 15 July 2011), approved the Unified interpretations on the application of SOLAS, MARPOL and Load Lines requirements to conversions of single-hull oil tankers to double-hull oil tankers or bulk carriers, as set out in the annex to this circular. For interpretations on requirements not specified in unified interpretations approved by the Organization, the Administration concerned should be consulted.

2 Member Governments are invited to apply the annexed Unified interpretations, in accordance with paragraph 2 (Application) of the annex, in relation to conversions occurring on or after 1 December 2011, and bring them to the attention of all parties concerned.

ANNEX

UNIFIED INTERPRETATIONS ON THE APPLICATION OF SOLAS, MARPOL AND LOAD LINES REQUIREMENTS TO CONVERSIONS OF SINGLE-HULL OIL TANKERS TO DOUBLE-HULL OIL TANKERS OR BULK CARRIERS

1 General

The Unified interpretations on the application of SOLAS, MARPOL and Load Lines requirements to conversions of single-hull oil tankers to double-hull oil tankers or bulk carriers were developed from a holistic point of view, in order to assist Member Governments and all parties concerned when applying the relevant regulations to major conversions. The unified interpretations of SOLAS, MARPOL and Load Lines requirements are contained in appendices 1 to 3, respectively.

2 Application^{*}

2.1 The date on which a conversion occurs for the purposes of determining the applicability of requirements for ships constructed on or after the date on which any relevant amendments enters into force should be:

- .1 the date on which the contract is placed for the conversion; or
- .2 in the absence of a contract, the date on which the work identifiable with the specific conversion begins; or
- .3 the completion date of the conversion, if that occurs more than three years after the date specified in subparagraph .1 above or 30 months after the date specified in subparagraph .2 above, either as applicable.

2.2 As for paragraph 2.1 above, the following applies:

- .1 Where the completion date of the conversion has been subject to delay beyond the period referred to in paragraph 2.1.3 above due to unforeseen circumstances beyond the control of the builder and the owner, the date on which contract is placed for the conversion or, if applicable, the date on which the work identifiable with the specific conversion begins may be accepted by the Administration in lieu of the completion date of the conversion. The treatment of such ships should be considered by the Administration on a case-by-case basis, bearing in mind the particular circumstances.
- .2 It is important that ships accepted by the Administration under the provisions of subparagraph .1 above should also be accepted as such by port States. In order to ensure this, the following practice is recommended to Administrations when considering an application for such a ship:

^{*} Refer to the Unified interpretation of the application of regulations governed by the building contract date, the keel laying date and the delivery date for the requirements of the SOLAS and MARPOL Conventions (MSC-MEPC.5/Circ.4).

- .1 the Administration should thoroughly consider applications on a case-by-case basis, bearing in mind the particular circumstances. In doing so in the case of a ship converted in a foreign country, the Administration may require a formal report from the authorities of the country in which the ship was converted, stating that the delay was due to unforeseen circumstances beyond the control of the builder and the owner;
- .2 when a ship is accepted by the Administration under the provisions of subparagraph .1 above, information on the conversion date annotated on the relevant certificates should be footnoted to indicate that the ship is accepted by the Administration under the unforeseen delay in completion of the conversion provisions of this interpretation; and
- .3 the Administration should report to the Organization on the identity of the ship and the grounds on which the ship has been accepted under the unforeseen delay in the completion of the conversion provisions of this interpretation.

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APPENDIX 1

**UNIFIED INTERPRETATIONS ON THE APPLICATION OF SOLAS REQUIREMENTS
TO CONVERSIONS OF SINGLE-HULL OIL TANKERS TO DOUBLE-HULL
OIL TANKERS OR BULK CARRIERS**

**SOLAS CHAPTER II-1
CONSTRUCTION – STRUCTURE, SUBDIVISION AND STABILITY,
MACHINERY AND ELECTRICAL INSTALLATIONS**

1 Regulation 1.3 – Application

For conversions of single-hull oil tankers to double-hull oil tankers or bulk carriers, the following should apply:

- .1 Conversions of single-hull oil tankers to double-hull oil tankers or bulk carriers should be regarded as modifications of a major character for the purposes of SOLAS chapter II-1.
- .2 Repairs, alterations and modifications of a major character include:
 - .1 Substantial alteration of the dimensions of a ship, for example lengthening of a ship by adding a new midbody. The new midbody should comply with SOLAS chapter II-1.
 - .2 A change of ship type, for example an oil tanker converted to a bulk carrier. Any structure, machinery and systems that are added or modified should comply with SOLAS chapter II-1, taking into account the interpretation of SOLAS chapter II-1 regulations as contained herein.

2 Regulations 3-2.2 and 3-2.4 – Protective coatings of dedicated seawater ballast tanks in all types of ships and double-side skin spaces of bulk carriers

2.1 For single-hull oil tanker conversion into double-hull oil tanker, SOLAS regulation II-1/3-2 as adopted by resolution MSC.216(82) should apply to dedicated water ballast tanks if constructed with all structural members being entirely new. If converting existing spaces into water ballast tanks with part of the existing structural members remaining in place, revised SOLAS regulation II-1/3-2 (MSC.216(82)) need not be applied. However, dedicated seawater ballast tanks should have an efficient corrosion prevention system such as hard protective coatings or equivalent and be of light colour.

2.2 For single-hull oil tanker conversion into bulk carrier, SOLAS regulation II-1/3-2 as adopted by resolution MSC.216(82) should apply to dedicated water ballast tanks and double-side skin spaces of bulk carriers if constructed with all structural members being entirely new. If converting existing spaces into dedicated water ballast tanks or double-side skin space of bulk carriers with part of the existing structural members remaining in place, revised SOLAS regulation II-1/3-2 (MSC.216(82)) need not be applied. However, dedicated seawater ballast tanks should have an efficient corrosion prevention system such as hard protective coatings or equivalent and be of light colour.

3 Regulation 3-6 – Access to and within spaces in, and, forward of, the cargo area of oil tankers and bulk carriers

3.1 For single-hull oil tanker conversion into double-hull oil tanker

3.1.1 Permanent means of access contained in table 1 of the Technical provisions for means of access for inspections (resolution MSC.158(78)) need not apply. However, if, in the course of conversion, substantial new structures are added, these new structures should comply with the regulation.

3.1.2 The term "substantial new structures" means hull structures that are entirely renewed or augmented by new double bottom and/or double-side construction (e.g. replacing the entire structure within cargo area or adding a new double bottom and/or double-side section to the existing cargo area).

3.1.3 Additionally, an approved Ship Structure Access Manual should be provided.

3.2 For single-hull oil tanker conversion into bulk carrier

3.2.1 Permanent means of access contained in table 2 of the Technical provisions for means of access for inspections (resolution MSC.158(78)) need not apply. However, if, in the course of conversion, substantial new structures are added, these new structures should comply with the regulation.

3.2.2 The term "substantial new structures" means hull structures that are entirely renewed or augmented by new double bottom and/or double-side skin construction (e.g. replacing the entire structure within cargo area or adding a new double bottom and/or double-side section to the existing cargo area).

3.2.3 Additionally, an approved Ship Structure Access Manual should be provided.

4 Regulation 3-8 – Towing and mooring equipment

For single-hull oil tanker conversion into double-hull oil tanker or bulk carrier

This regulation should be applied when equipment and fittings for mooring/towing are replaced, modified or the safe working load of the existing equipment and fittings is known. Where the latter cannot be ascertained, alternative compliance with SOLAS regulation II-1/3-8 should be sought (e.g. the equipment should be replaced, tested or modified).

5 Part B – Subdivision and stability

5.1 For single-hull oil tanker conversion into double-hull oil tanker

Oil tankers complying with damage stability requirements contained in Annex I to MARPOL 73/78 (except for combination carriers with type B freeboards) may be excluded from the damage stability requirements contained in SOLAS chapter II-1, part B-1.

5.2 For single-hull oil tanker conversion into bulk carrier

5.2.1 A bulk carrier which is assigned a B reduced freeboard complying with damage stability requirements contained in regulation 27 of the 1966 Load Line Convention, and resolutions A.320(IX) and A.514(13); or regulation 27 of the 1988 Load Line Protocol, may be excluded from the damage stability requirements contained in SOLAS chapter II-1, part B-1.

5.2.2 For a bulk carrier which is assigned a B freeboard, SOLAS chapter II-1, parts B and B-1 should be applied.

SOLAS CHAPTER II-2 CONSTRUCTION – FIRE PROTECTION, FIRE DETECTION AND FIRE EXTINCTION

6 Regulation 1.3 – Repairs, alterations, modifications and outfitting

For single-hull oil tanker conversion into double-hull oil tanker or bulk carrier, new and converted parts should comply with the latest applicable requirements.

SOLAS CHAPTER III LIFE-SAVING APPLIANCES AND ARRANGEMENTS

7 Regulation 1.4.2 – Application

For single-hull oil tanker conversion into double-hull oil tanker or bulk carrier, this should be considered as an alteration or modification of a major character.

8 Regulation 31.1.8 – Survival craft and rescue boats

8.1 For single-hull oil tanker conversion into double-hull oil tanker, this regulation is not relevant.

8.2 For single-hull oil tanker conversion into bulk carrier, it is recommended that SOLAS regulation III/31.1.8 should be met as for new ships, except where the space available for fitting and/or launching a free-fall lifeboat in accordance with regulation III/31.1.2.1 is not adequate, in which case the existing arrangements for lifeboats are acceptable subject to compliance with SOLAS regulation III/1.4.2.

SOLAS CHAPTER V SAFETY OF NAVIGATION

9 Regulation 22 – Navigation bridge visibility

For single-hull oil tanker conversion into double-hull oil tanker or bulk carrier, the level of visibility possessed by the ship prior to the conversion at the ballast loading condition should be maintained after the conversion. Where a conversion involves the modification of structural arrangements used to establish minimum bridge visibility, the provisions of SOLAS regulation V/22 should apply.

SOLAS CHAPTER XII ADDITIONAL SAFETY MEASURES FOR BULK CARRIERS

For single-hull oil tanker conversion into double-hull oil tanker, these regulations are not relevant.

For single-hull oil tanker conversion into bulk carrier, the provisions of chapter XII applicable for ships constructed on or after the date on which conversion occurs should be applied as for a new ship to the entire bulk carrier, i.e. all new and existing parts and spaces, as follows.

10 Regulation 4 – Damage stability requirements applicable to bulk carriers

10.1 Regulation 4.1 should be applied.

10.2 Regulation 4.2 applies, based on the Unified interpretations of SOLAS regulations XII/4.2 and XII/5.2 (MSC.1/Circ.1178).

10.3 Regulation 4.3 should not be applied.

10.4 Regulation 4.4 should be applied.

10.5 Regulation 4.5 should not be applied.

10.6 Regulations 4.6 and 4.7 should be applied.

11 Regulations 5.1 and 5.2 – Structural strength of bulk carriers

Regulation 5.1 should apply. Regulation 5.2 should apply, based on the Unified interpretations of SOLAS regulations XII/4.2 and XII/5.2 (MSC.1/Circ.1178).

12 Regulation 6.1 – Structural and other requirements for bulk carriers

This regulation should not be applied.

13 Regulation 6.2 – Structural and other requirements for bulk carriers

This regulation should be applied.

14 Regulation 6.3 – Structural and other requirements for bulk carriers

This regulation should be applied.

15 Regulation 6.4 – Structural and other requirements for bulk carriers

This regulation should be applied.

16 Regulation 7.1 – Survey and maintenance of bulk carriers

This regulation should not be applied. However, SOLAS regulation XI-1/2 is applicable.

17 Regulation 7.2 – Survey and maintenance of bulk carriers

This regulation should be applied.

18 Regulation 8 – Information on compliance with requirements for bulk carriers

18.1 Regulation 8.1 should be applied.

18.2 Regulations 8.2 and 8.3 should not be applied.

19 Regulation 9 – Requirements for bulk carriers not being capable of complying with regulation 4.3 due to the design configuration of their cargo holds

This regulation should not be applied.

20 Regulation 10 – Solid bulk cargo density declaration

20.1 Regulation 10.1 should be applied.

20.2 Regulation 10.2 should not be applied.

21 Regulation 11 – Loading instrument

21.1 Regulation 11.1 should be applied.

21.2 Regulation 11.2 should not be applied.

21.3 Regulation 11.3 should be applied.

22 Regulation 12 – Hold, ballast and dry space water ingress alarms

22.1 Regulations 12.1 and 12.2 should be applied.

22.2 Regulation 12.3 should not be applied.

23 Regulation 13 – Availability of pumping systems

23.1 Regulations 13.1 should be applied.

23.2 Regulation 13.2 should not be applied.

24 Regulation 14 – Restrictions from sailing with any hold empty

This regulation should not be applied.

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APPENDIX 2

UNIFIED INTERPRETATIONS ON THE APPLICATION OF MARPOL REQUIREMENTS TO CONVERSIONS OF SINGLE-HULL OIL TANKERS TO DOUBLE-HULL OIL TANKERS OR BULK CARRIERS

MARPOL ANNEX I

REGULATIONS FOR THE PREVENTION OF POLLUTION BY OIL

1 For single-hull oil tanker conversion into double-hull oil tanker

For the purpose of determining the application date for the requirements of regulation 20.4* of MARPOL Annex I, where an oil tanker has undergone a major conversion, as defined in regulation 1 of MARPOL Annex I, that has resulted in the replacement of the forebody, including the entire cargo carrying section, the major conversion completion date of the oil tanker shall be deemed to be the date of delivery of the ship referred to in regulation 20.4 of MARPOL Annex I, provided that:

- .1 the oil tanker conversion was completed before 6 July 1996;
- .2 the conversion included the replacement of the entire cargo section and forebody and the tanker complies with all the relevant provisions of MARPOL Annex I applicable at the date of completion of the major conversion; and
- .3 the original delivery date of the oil tanker will apply when considering the 15 years of age threshold relating to the first CAS survey to be completed in accordance with regulation 20.6 of MARPOL Annex I.

2 For single-hull oil tanker conversion into bulk carrier

2.1 The relevant requirements of MARPOL Annex I should be applied to the entire bulk carrier.

2.2 With regard to conversions from single-hull oil tankers to bulk, regulation 12A of MARPOL Annex I should be applied to the entire bulk carrier, i.e. all new and existing fuel oil tanks.

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* Refer to Unified Interpretation 37 to MARPOL Annex I – Major conversion in respect of regulation 20.4, adopted by MEPC 55.

APPENDIX 3

**UNIFIED INTERPRETATIONS ON THE APPLICATION OF LOAD LINES REQUIREMENTS
TO CONVERSIONS OF SINGLE-HULL OIL TANKERS TO
DOUBLE-HULL OIL TANKERS OR BULK CARRIERS**

INTERNATIONAL CONVENTION ON LOAD LINES, 1966

Article 10 – Repairs, alterations and modifications

- 1 For single-hull oil tankers converted to double-hull oil tankers:
 - .1 the ship should meet the requirements of the regulations contained in chapter III (Freeboards) of Annex I of the Load Line Convention in effect at the date of conversion. In cases where there are no changes to the parameters which result in a change of the minimum freeboard; and where there is no decrease in magnitude of freeboard assigned after conversion, using the Convention previously applicable to the ship in determining any change or decrease as mentioned above, the converted ship should continue to comply with at least the requirements previously applicable to the ship; and
 - .2 any structure and/or equipment such as doors, hatches, and cable lockers, etc., which is newly added, replaced, or modified is to comply with the requirements of the regulations contained in chapter II (Conditions of assignment of freeboard) of Annex I of the Convention in effect at the date of conversion.
- 2 For single-hull oil tankers converted to bulk carriers:
 - .1 any such conversion should be regarded as a modification of a major character and the ship should meet all the requirements of the regulations annexed to the Convention (including regulation 39) in effect at the date of conversion; and
 - .2 notwithstanding the above, the requirements of the regulations contained in chapter II (Conditions of assignment of freeboard) of Annex I of the Convention in effect at the date of conversion should be applied only to the structure and/or equipment, which is newly added, replaced or modified.