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Shipping Guidance Notice – 167

REG-UI 009:

IMPACT OF IGF INTERIM GUIDANCE ON ADA PROCESS

To: Shipowners, Operators, Masters, & Recognised Organisations

1. References

- SOLAS Chapter II-1, Regulation 55 - Alternative design and arrangements
- IGF Code, Part A, Section 2.3 - Alternative design
- REG Unified Interpretation REG UI-009

2. Summary

The purpose of this Shipping Guidance Notice (SGN) is to bring to the attention of applicable stakeholders the publication by the Red Ensign Group (REG) of British Registries of REG UI-009.

REG UI-009 provides guidance on how non-mandatory interim guidelines effect the alternative design arrangement (ADA) process.

The application of ADA process for the period between interim guidelines being adopted and becoming mandatory is clear and will lead to consistency across the REG.

REG-UI 009 is appended to this notice and additionally accessible via; https://www.redensigngroup.org/publications/

3. Application

The requirements contained within REG UI-009 should be noted by Gibraltar registered ships subject to Part G of SOLAS Chapter II-1 and subsequently the IGF Code, making use or wishing to use fuels, appliances and arrangements of low-flashpoint fuel systems which deviate from those set out within the IGF Code, or, fuels not specifically addressed in the IGF Code.

Steve Gomez - Chief Surveyor
For & on behalf of the Maritime Administrator

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Red Ensign Group

Unified Interpretation

REG-UI 009

IMPACT OF IGF INTERIM GUIDANCE ON ADA PROCESS

Notice to all Maritime Authorities, Recognised Organisations, Ship Owners, Ship Operators and Surveyors

This notice should be read with MSC.391(95) ADOPTION OF THE INTERNATIONAL CODE OF SAFETY FOR SHIPS USING GASES OR OTHER LOW-FLASHPOINT FUELS (IGF CODE)

This REG-UI remains extant until rescinded.

Summary

The purpose of this Unified Interpretation is to clarify how the non-mandatory interim guidelines effect the Alternative Design and Arrangements (ADA) process.

1. Current Interpretation

1.1 The International Code of Safety for Ships Using Gases or Other Low-Flashpoint Fuels (IGF Code) currently is mandatory for ships using any low-flashpoint fuel. The preamble states:

"Regulations for other low-flashpoint fuels will be added to this Code as, and when, they are developed by the Organization. In the meantime, for other low-flashpoint fuels, compliance with the functional requirements of this Code must be demonstrated through alternative design."

Section, 2.3 states:
"2.3.2 Fuels, appliances and arrangements of low-flashpoint fuel systems may either:
.1 deviate from those set out in this Code, or
.2 be designed for use of a fuel not specifically addressed in this Code.

Such fuels, appliances and arrangements can be used provided that these meet the intent of the goal and functional requirements concerned and provide an equivalent level of safety of the relevant chapters.

2.3.3 The equivalence of the alternative design shall be demonstrated as specified in SOLAS regulation II-1/55 and approved by the Administration. However, the Administration shall not allow operational methods or procedures to be applied as an

alternative to a particular fitting, material, appliance, apparatus, item of equipment, or type thereof which is prescribed by this Code."

1.2 Interim guidelines have now been written for several other fuels. However, none are yet mandatory and it is not clear how these interim guidelines impact the alternative design and arrangements (ADA) process as required by SOLAS II-1/55.

1.3 This interpretation aims to clarify how the non-mandatory interim guidelines effect the ADA process.

2. New Interpretation

2.1 Until the interim guidelines for use of alternative fuels are made mandatory under the IGF code or otherwise, an ADA process is to be followed. The interim guidelines for the fuel or system components in consideration can be used as a basis for the ADA unless otherwise stated by the administration. In accordance with the ADA process, when the alternative design and arrangements has received final approval, the administration will issue the document of approval and submit the report on approval to the IMO via the IMO Global Integrated Ship Information System (GISIS) website.

3. Comments

3.1 With this new interpretation, the application of ADA for the period between interim guidelines being adopted and becoming mandatory is clear and will lead to consistency across the REG. This application of the ADA process (contained within the REG's own Procedure for Assessment of Alternatives and Equivalents and Notification to IMO) aligns most closely with the intent of the IGF code and interim guidelines and also with the approach of the majority of member states currently dealing with approval of alternative fuels. This therefore ensures a level playing field for all those involved in the approval of alternative fuels.

3.2 All project teams across the REG and globally will be considering the same internationally agreed interim guidelines and applying the same process to gain approval of alternative fuels. The risk that hazards are not sufficiently identified by interim guidelines (due to a lack of operational experience during the interim period) is reduced.

3.3 Delegation to recognised organisations is covered by REG's agreed policy for delegation to ROs, and within each Member's agreement with individual ROs covering the delegation of authority for statutory certification and services.

3.4 Where all risk assessments required by the interim guidelines have been completed and compliance with the prescriptive and functional requirements of the interim guidelines has been confirmed via the plan approval and site survey, the qualitative and quantitative risk analysis as referenced in MSC.1/Circ.1455 are not required.

3.5 Where a vessel is unable to comply with any of the provisions of the interim guidelines, no exemption request is necessary as the 'deviation' can be addressed within the ADA process and within the context of the whole design. However, these deviations should be highlighted to the administration.

More Information

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