Bulker Q&As and CIs on the IACS CSR Knowledge Centre

KCID No.	Ref.	Type	Topic	Date completed	Question/CI	Answer	Attachment
194	2/1.1.1.2 Table 2.1.1	Question	damage stability	2006/10/2	In current design of bulk carrier with ship's length of 169.5m and after peak bulkhead and aft machinery bulkhead being the same, total number of bulkheads is 7, but CSR requires 8 bulkheads to such ships not required to comply with subdivision requirements. Regarding this requirements, is it acceptable for such ships complying with the requirements on damage stability?	Yes. Ships complying with subdivision requirement need not follow the requirement on the number of watertight bulkhead indicated in Table 1.	
195 attc	2/1.3.1.1	Question	after peak bulkhead	2006/10/31	Are the example case specified below (see attachment) complied with the requirements that "the after peak bulkhead may be stepped below the bulkhead deck, provided the degree of safety of ships as regards subdivision is not thereby diminished.	Yes, if the fire door may be regarded as safe for the purpose of subdivision.	Y
314	2/ 1.2.1.2	Question	SOLAS II-1	2006/12/22	whichever gives the smallest measurement" should be added to be in accordance with SOLAS Ch.II-1, Part B, Reg.11 and for clarification.	That is correct. The words "whichever gives the smallest measurement" should be added at the end of the requirement to be in accordance with SOLAS Ch.II-1, Reg.11.	
351	Ch 2/Sec 3	Question	PMA	2007/2/22	PMA is in principle a SOLAS matter. The cause of the probable argument is due to the following:- 1. The necessity of safe access is set out in CSR Ch1, S3, 2.5.1, however, it is not clear whether the requirements are relevant to SOLAS PMA or not. In this respect, the applicability of PMA appears more explicit in CSR-DHOT, S5, 5.1. 2. CSR is required for ships having L of 90 m or more, while PMA as part of SOLAS is required for ships having GT of 20,000 or more. 3. There must be many ships of which the particulars lie between the 90 m in length and 20,000 in gross ton, which is left unclear when interpreting for SAFCON purposes. 4. Taking this opportunity, it is worth consideration that reference to SOLAS, not as classification matters, be harmonised between CSR-BC and CSR-DHOT. The International Regulations are transcribed in CSR-BC, which is user-friendly while on the other hand may cause a possibility of unnecessary misinterpretations. CSR-DHOT appears simple and clear for that matter. 5. Could you please confirm if all the PMA matters are strictly SOLAS items, not a class requirement? The requirements of means of access are set out in Ch1, S3, 2.5 and Ch2, S3, however, it does not appear explicit that PMA is a class requirement. Is it that the stipulations in Italic are not class requirements but SOLAS or other international regulations? SOLAS Reg.II-1/3-6 requires PMA for ships of which the gross ton is equal to or greater than 20,000, while CSR is to apply to ships of which the length is equal to or greater than 90 m. Such being the case, the following question could arise with respect to SAFCON, which should cause a dispute. 1: Bulk Carriers >=90m but =<20,000GT --> Class item 2: Bulk Carriers >=90m and >=20,000GT --> Class & SAFCON item.	As suggested, the requirements for PMA arrangements and ship structure access manual should follow SOLAS II-1/3-6 and need not be applied to bulk carriers not more than 20,000 gross tonnage. As for Ch.2/Sec.3.1 and 3.2, all paragraphs are extracted from the corresponding section of Resolution MSC.158(78) in association with IACS UI SC191. Therefore, the stipulations in Italic character mean to follow SOLAS requirements. Accordingly, the 2nd and 3rd sentences of Ch.1/Sec.3/2.5.1 will be corrected and the clear application requirement will be added in the Ch 2 Sec 3.	

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439	Text 2/1.1.1.2	Question	Additional Bulkheads	2007/6/20	In Chapter 2, section 1.1.1.2 "Additional bulkheads" it is stated that "For ships not required to comply with subdivision regulations, transverse bulkheads adequately speced, and not less in number than indicated in Tab 1, are to be fitted." Would you like to explain "subdivision regulations"?	The Subdivision regulations" is the damage stability required by SOLAS in Chapter 11-1, Part B-1 and Chapter Xll, regulation 4. All bulker with CSR notation are required to comply with subdivision regulations. Consequently, the Table 1 will not enforce on the CSR bulkers.	
517	2/1.1.1.2	CI	Number of watertight bulkheads	2007/8/20	Number of watertight bulkheads Minimum number of bulkheads is indicated in Ch2, Sec1, Table 1. Does it include bulkheads required in 1.1.1 such as collision bulkhead, after peak bulkhead and E/R bulkhead(s)?	Yes, it includes bulkheads required in 1.1.1.	
793	2/2.2.1.3	Question	fire protection	2009/1/29	In SOLAS II-I/Reg.10.6.3, paint locker is considered as a spacing containing flammable liquids. If this is the case also in CSR BC Rule, the paint locker inside a deckhouse is required to have a cofferdam, which seems to be beyond SOLAS requirement and require current ordinal design of ships to be changed. In addition, it is considered that the current SOLAS requirement is sufficient, considering the past experiences. Hence, it would be appreciated to inform us of a definition and an example of 'spaces intended for the carriage of flammable liquids.' If the definition is same as that of SOLAS, then it would be requested to modify the requirement to be line with SOLAS requirement.	Firstly, this requirement is not a SOLAS requirement. Secondly, the current SOLAS requirements regarding the fire protection are considered sufficient as you mentioned. Therefore, we will delete the requirement Ch 2 Sec2 [2.1.3] with a rule change proposal.	
798	2/1.3.1.1	Question	Bulkhead	2009/3/3	SOLAS Ch II-1, Part B, Reg. 11, Para 8 states "Bulkheads shall be fitted separating the machinery space from cargo and passenger spaces forward and aft and made watertight up to the freeboard deck". LR's Rules allow the after peak bulkhead to terminate at the first watertight deck above the load waterline in the aft peak, recognizing that the after peak bulkhead isn't separating the machinery space from a cargo or passenger space aft. However, CSR BC Rules, Ch 2, Sect 1, 3.1.1, whilst referring to SOLAS Ch II-1, Pt B, Reg 11, states that the after peak bulkhead is to be watertight to the freeboard deck. Can we have clarified the reason for this higher standard of subdivision than required by SOLAS and LR's Rules, or does this require a corrigendum? It is also noted that the CSR OT Rules are in line with SOLAS and LR's Rules	This paragraph will be modified in order to comply with applicable SOLAS Regulations. The corrigenda will be issued.	
853	2/3.1.1.1	Question	means of access	2009/1/24	According to Resolution 151(78), the SOLAS Reg.II-1/3.6 apply to "Access to and within spaces in, and forward of, the cargo area of oil tankers and bulk carriers". In CSR BC Ch 2, Sec 3 the item 1.1 refers to Resolution 151(78), but its title states "Means of access to cargo and other spaces", which is not exactly the same scope of application as in SOLAS Reg.II-1/3.6. Is it intentional in CSR-BC or is the scope of application to be considered as being exactly the same as in SOLAS?	The scope of application should be considered as being exactly the same as in SOLAS Reg.II-1/3.6, i.e. applicable to "Access to and within spaces in, and forward of, the cargo area of oil tankers and bulk carriers". The CSR-BC will be modified accordingly by a RCP.	

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903	Text 2/1.2.1.1	question	collision bulkhead	2009/6/26	Regarding the arrangement of collision bulkhead in Ch 2, Sec 1, [2.1.1], the text of the requirement is coming from SOLAS Ch. II-1, Part B, Reg. 11 and states that "A collision bulkhead is to be fitted which is to be watertight up to the freeboard deck. This bulkhead is to be located at a distance from the forward perpendicular FPLL of not less than 5 per cent of the length LLL of the ship or 10 m, whichever is the less, and not more than 8 per cent of LLL ". However, this text is modified by Annex 2 of MSC 216(82), which is entered into force since 1st january 2009, and wich states in SOLAS Ch. II-1, Part B-2, Reg 12.1 that "A collision bulkhead shall be fitted which shall be watertight up to the bulkhead deck. This bulkhead shall be located at a distance from the forward perpendicular of not less than 0.05L or 10 m, whichever is the less, and, except as may be permitted by the Administration, not more than 0.08L or 0.05L + 3 m, whichever is the greater." The text in CSR-BC should be modified accordingly. More generally, the requirements in CSR-BC coming from SOLAS and modified by MSC 216(82) should be updated accordingly.	We agree with your comment and will update the rules accordingly.	
1007	2/3.1.2.1	Interpretation	Safe access to cargo holds	2010/2/1	Requirement in Ch 2, Sec 3, [1.2.1] mentions that "Safe access to cargo holds, cofferdams, ballast tanks and other spaces in the cargo area are to be direct from the open deck and ....." . In addition requirement in [1.2.3] states that "Each cargo hold is to be provided with at least two means of access as far apart as practicable. In general, these accesses are to be arranged diagonally.....". In case of a bulk carrier having a forecastle extending afterward the forward bulkhead of forward cargo hold, the forward access may be arranged from the main deck but inside forecastle spaces, which cannot be considered as being from the "open deck" Our interpretation is that such forward access is allowed provided that the forecastle spaces are considered safe, i.e. not intended for the carriage of oil or hazardous cargoes.	It is agreed that the forward access to the forward cargo hold may be arranged from main deck inside forecastle spaces provided that those spaces are considered safe, i.e. not intended for the carriage of oil or hazardous cargoes.	
1009	2/3.2	CI	Definition of single side and double side bulk carriers	2010/1/18	In Ch 2, Sec 3, [2], some requirements are applicable specifically to single side bulk carriers (as in [2.9] and [2.11]) and some others are applicable to double side bulk carriers (as in [2.8] and [2.10]). There is no definition in CSR-BC on what is a single side bulk carrier and what is a double side bulk carrier. As these requirements are originally IMO requirements for means of access, it is assumed that single side and double side bulk carriers are defined according to SOLAS Ch XII/1. Please confirm this interpretation. If this interpretation is correct, it should be convenient to add such definitions in CSR-BC.	The proposed interpretation is correct. Definitions of single side and double side bulk carriers will be added to CSR-BC, in accordance with those of SOLAS Ch XII/1.	

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1082 attc	2/2.5.1.1	RCP	Definition "T1" specified in Ch.2/Sec.2/5.1.1 of CSR for Bulk Carriers based on Reg.39(1)	2010/11/15	We consider that a rule change for CSR Bulk Carriers should be immediately implemented as follows: The definition "T1" specified in Ch.2/Sec.2/5.1.1 of CSR for Bulk Carriers based on Reg.39(1) of ILLC should be amended according to Res.MSC.223(82) as attached. In addition, other requirements referred to in International Conventions may need to be amended accordingly. Please consider.	The text will be amended accordingly. As other international texts are included in CSR BC, a complete review will be made and its results will be included in a future rule change.	Y
1091	2/2.5.1.1	RCP	Table 3/1.4-3 3/6.7.3.6 11/1.1.1.1	2011/6/6	The spelling of 'shear strake' shall be corrected to 'sheer strake' in the following sections.. 1. Chapter 3, Section 1 Table 4-3: Shear strake at strength deck 2. Chapter 3, Section 6 7.3.6 Sheer strake ...If the shear strake is rounded, its radius, in mm, is to be not less than 17ts, where ts is the net thickness, in mm, of the sheer strake. 3. Chapter 11, Section 1 1.1 Cut-outs, plate edges 1.1.1 ...This also applies to cutting drag lines, etc., in particular to the upper edge of shear strake and analogously to weld joints, changes in sectional areas or similar discontinuities.	Thank you for your comment. This will be considered in the next editorial correction.	

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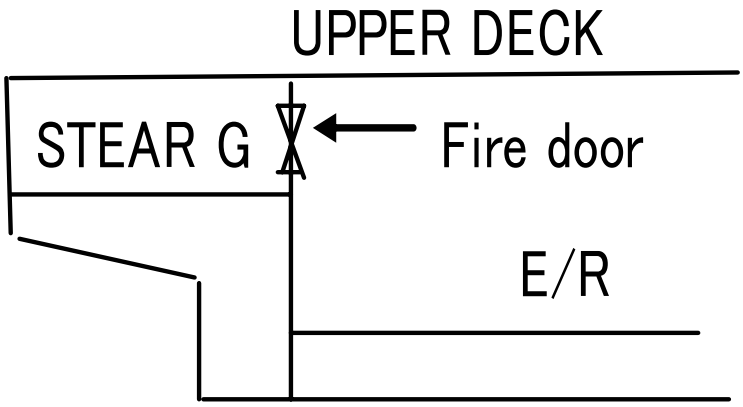

ANNEX 9

RESOLUTION MSC.223(82)

(adopted on 8 December 2006)

ADOPTION OF AMENDMENTS TO THE PROTOCOL OF 1988 RELATING TO THE INTERNATIONAL CONVENTION ON LOAD LINES, 1966, AS AMENDED

THE MARITIME SAFETY COMMITTEE,

RECALLING Article 28(b) of the Convention on the International Maritime Organization concerning the functions of the Committee,

RECALLING FURTHER article VI of the Protocol of 1988 relating to the International Convention on Load Lines, 1966 (hereinafter referred to as the "1988 Load Lines Protocol") concerning amendment procedures,

HAVING CONSIDERED, at its eighty-second session, amendments to the 1988 Load Lines Protocol proposed and circulated in accordance with paragraph 2(a) of article VI thereof,

1. ADOPTS, in accordance with paragraph 2(d) of article VI of the 1988 Load Lines Protocol, amendments to the 1988 Load Lines Protocol, the text of which is set out in the Annex to the present resolution;

2. DETERMINES, in accordance with paragraph 2(f)(ii)(bb) of article VI of the 1988 Load Lines Protocol, that the said amendments shall be deemed to have been accepted on 1 January 2008, unless, prior to that date, more than one third of the Parties to the 1988 Load Lines Protocol or Parties the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant fleet, have notified their objections to the amendments;

3. INVITES the Parties concerned to note that, in accordance with paragraph 2(g)(ii) of article VI of the 1988 Load Lines Protocol, the amendments shall enter into force on 1 July 2008 upon their acceptance in accordance with paragraph 2 above;

4. REQUESTS the Secretary-General, in conformity with paragraph 2(e) of article VI of the 1988 Load Lines Protocol, to transmit certified copies of the present resolution and the text of the amendments contained in the Annex to all Parties to the 1988 Load Lines Protocol;

5. FURTHER REQUESTS the Secretary-General to transmit copies of this resolution and its Annex to Members of the Organization, which are not Parties to the 1988 Load Lines Protocol.

ANNEX

AMENDMENTS TO THE PROTOCOL OF 1988 RELATING TO THE INTERNATIONAL CONVENTION ON LOAD LINES, 1966, AS AMENDED

ANNEX B
ANNEXES TO THE CONVENTION AS MODIFIED BY THE PROTOCOL OF 1988 RELATING THERETO

ANNEX I
REGULATIONS FOR DETERMINING LOAD LINES

CHAPTER II
CONDITIONS OF ASSIGNMENT OF FREEBOARD

Regulation 22 – Scuppers, inlets and discharges

1 In paragraph (4) of the regulation, the reference to "(2)" is replaced by reference to "(1)".

CHAPTER III
FREEBOARDS

Regulation 39 – Minimum bow height and reserve buoyancy

2 In paragraph (1) of the regulation, the words "d_l is the draught at 85% of the depth D, in metres;" are replaced by the words "d_l is the draught at 85% of the least moulded depth, in metres;".

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