Subject: PARIS and BLACK SEA MOUs
Concentrated Inspection Campaign on Stability Compliance

Gentlemen:

Two Port State Control (PSC) regions, the PARIS MOU and the BLACK SEA MOU, have announced that a three month Concentrated Inspection Campaign (CIC) will be implemented by its members for all tankers (oil, gas and chemical) from 1 September to 30 November 2010. Full details of the CIC are expected to be released in August. Although the CIC has been announced as “Tanker Damage Stability”, PSC Officers will be checking if the tanker is provided with a trim and stability booklet that has been approved under:

- MARPOL Annex I, for oil tankers,
- IBC Code, for chemical carriers; or
- IGC Code, for gas carriers,

as such approvals include a review of the tanker’s compliance with damage stability requirements under the appropriate regulations applicable to the certification provided to the tanker.

PSC Officers will also check that the actual loading condition (as documented by the master for arrival and departure conditions) is found to be in compliance with the approved trim and stability information used onboard. It is anticipated that minor deviations between actual and allowable loading may be accepted (e.g. 1% variation by weight in cargo and ballast tanks and 2 cm on GM/KG). However, a tolerance for acceptable deviations has not yet been specified, as far as we are aware.

This campaign appears to be connected with the ongoing discussions at the IMO SLF Subcommittee on tanker damage stability concerning the need to develop guidance for the approval of stability information/software and the verification of actual loading conditions in light of a number of reports of tankers being loaded significantly beyond the limits of the approved stability information onboard.

**Stability Approvals Provided by ABS**

Stability information submitted by the owner/operator is verified by ABS for compliance with both intact and damage stability criteria. Such approvals can be categorized into three types:

- Specific loading conditions
- Allowable limit curves in terms of draft vs. GM or KG; and
- Onboard Stability Software

However, particular attention is drawn to the scope of approvals provided by ABS with respect to loading instruments. In the event a loading instrument including stability software has been installed on a ship contracted for construction:
on/after 1 July 2005, then approval is required under IACS Unified Requirement L5 (“Onboard Computers for Stability Calculations”) and the approval letter for that loading instrument will indicate that the stability software associated with that instrument has been reviewed for compliance with intact and damage stability criteria under IACS UR L5 and/or the ABS Rules, which contain the same requirements as IACS UR L5;

before 1 July 2005, then a review of the stability software was performed only if so requested by the submitter.

If the stability software contained in the loading instrument is not approved, then the PSCO may question its use in lieu of the approved stability booklets.

Means of Assessing Actual Loading Conditions

The following paragraphs summarize the different characteristics of stability information submitted for approval.

Specific loading condition approval

This is considered the most inflexible of the approvals provided as actual loading conditions need to be consistent with the approved conditions. This is due to the impact that cargo loading variations have on methods and assumptions applied in the damage stability analysis to determine compliance with the relevant criteria. These variations include percent filling within a tank, variations of tank fullness relative to adjacent tanks, specific gravity of cargo and free surface. As a consequence, compliance with the applicable damage stability criteria for any loading condition other than those approved in the stability booklet should not be assumed.

Allowable limit curves

Although these curves add greater flexibility than approved specific loading conditions, compliance with these curves can be somewhat complex and cumbersome due to the need to take into account the variations of cargo loading mentioned above. So, judgments made by ship's personnel that an actual loading condition is conservative and therefore in compliance with the allowable limits should not be rendered without applying the instructions contained in the approved stability booklet. For chemical tankers, which normally have much more subdivision than oil tankers or gas carriers, the increased loading possibilities (in terms of tank ullage and cargo characteristics) are considered to afford even greater degrees of complexity in applying these limit curves and their associated instructions.

Stability Software

The most flexible approach to load tankers is afforded by approved stability software as the loading is not restricted to the conditions and instructions that accompany the first two types of approval as discussed above. ABS has applied IACS Unified Requirement L5 for approval of stability software when the owner decides to use stability software on ships contracted for construction on/after 1 July 2005. The requirements of IACS Unified Requirement L5 have been incorporated into Part 3, Chapter 3, Appendix 3 of the ABS Rules for Building and Classing Steel Vessels. Using onboard stability software that has not been approved by ABS or, in the case of a transfer of class, by the previous class society (provided the previous class society has been authorized by the flag Administration with which the tanker is registered), may not be acceptable to the PSC. Stability software for tankers approved in accordance with IACS UR L5 has been checked for compliance with both the applicable intact and damage stability criteria.
The use of stability software onboard does not remove the need to maintain onboard the approved trim and stability booklet as is required under the relevant Conventions and Codes as mentioned above.


Very Truly Yours,

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Cc: ABS Assistant Chief Surveyors
Cc: ABS Country Managers