

Subject :

Entry into force of the Harmonized System
of Survey and Certification (HSSC)

NKTECHNICAL INFORMATION

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After 11 years, the condition for the 1988 Protocol of SOLAS and Load Line Convention regarding the Harmonized System of Survey and Certification (HSSC), which were adopted in 1988, have finally been met and will enter into force on 3 February, 1999. The abstract of the protocol is summarized hereunder for your information. Further details of the procedure will be announced shortly.

1 Objectives

Due dates of certificates required by the international conventions, i.e., SOLAS, Load Line and MARPOL Convention as well as mandatory codes, i.e., IGC (International Gas Carrier), IBC (International Bulk Chemical) and BCH (Bulk Chemical) may not become due on the same day. For this reason, a ship may be required to undergo a survey immediately after one required by another convention. In order to solve the problem, HSSC introduced the idea of "Anniversary Dates", which enable a ship to undergo surveys required by different conventions and codes on the same day, thus contributing to the convenience of the ship owner and for the smooth execution of surveys.

2 Details of survey and certification

Validation periods of certificates are to be unified as five years. Ships are allowed to undergo annual surveys within a 3 month range before/after the anniversary date. At the renewal of the certificates, ships are allowed to undergo renewal surveys within 3 month prior to the expiry date, while maintaining the new expiry date 5 years after the original expiry date and not five years after the survey date.

Please make reference to the attached table for the comparison of existing system and HSSC.

In addition, please note that the forms for relevant certificates will be modified upon the introduction of HSSC.

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3 Problems emanating from the procedure for amending conventions

There are two schemes available in amending conventions adopted by IMO, namely, tacit acceptance procedure and explicit acceptance procedure. In accordance with the former scheme, the amendments to the convention adopted by IMO will enter into force automatically unless the contracting governments of the convention, the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant shipping, notify objection to the Secretary General of IMO. However for the latter case, positive notifications by contracting governments as required by the convention is necessary for the entry into force of the amendments. Regarding amendments procedures necessary for the introduction of HSSC, in case of the SOLAS convention and the Load Line convention, the explicit procedure is applied, while tacit procedure is applied for MARPOL Convention as well as IGC, IBC and BCH codes. Due to this reason, for SOLAS convention and Load Line convention, only those states which ratified the 1988 protocol are required to comply with HSSC among whole contracting governments of the convention. However for MARPOL and the relevant codes, all member contracting Governments are required to comply with HSSC, regardless of the ratification of the 1988 protocol.

As a result, for a state which has not ratified the 1988 protocol, existing certificates will be issued for SOLAS and Load Line conventions but HSSC certificates will be issued for MARPOL convention as well as IGC, IBC and BCH codes. This inconsistency was pointed out at the IMO's BLG Sub-Committee held in April 1999, and subsequently the Maritime Safety Committee at its seventy first session held in May 1999, approved a draft Assembly Resolution allowing states which have not yet ratified the 1988 protocol, to issue HSSC certificates. Nevertheless, objection on such treatment was expressed by a member country from a legal view point.

4 Technical amendments to the Load Line Convention

With regard to the technical aspects of the Load Line convention, amendments to the definition of dimensions, introduction of inclining test, amendments to requirements on scuppers, windows and freeing ports, amendments to treatments of reduced free board, amendments to Zones and Areas for the application of the convention are made. (Generally, these amendments are already incorporated into our Classification Rules. There will be only editorial changes, but no substantive impact on the current practice)

In addition, future amendments to the Load Line convention will be made by tacit scheme which is now allowed in the 1988 protocol.

Comparison between existing system and HSSC

item	existing system	HSSC
validation periods of certificates	SC: 5 years SE: 2 years SR: 1 year LL: 5 years IOPP: 5 years IGC/IBC/BCH: 5 years	5 years, including SE/SR
validation period of the new certificate after the renewal	counted from the completion date of the renewal survey (remaining validity of the existing certificate at the renewal survey will not be accounted)	counted from the expiration date of the existing certificate (in case the renewal survey is carried out within 3 months periods prior to the expiration date)
extension of the validity	up to the type of certificates. Some allow five month, some do not allow at all	Within 3 months
Survey dates - Intermediate survey for SC - SE	- 6 months before and after the mid-point of the validation periods of the certificate - to be renewed every 2 years	- introduction of AD(Anniversary Date) -At the second or third anniversary date - to be renewed every 5 years. During the five year validity a periodical survey at second or third anniversary date is required.