

MARINE ENVIRONMENT PROTECTION  
COMMITTEE  
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Agenda item 6

MEPC 75/6/10  
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## ENERGY EFFICIENCY OF SHIPS

### Comments on document MEPC 75/6/3 (ICS and RINA)

#### Submitted by IMPA

#### SUMMARY

*Executive summary:* This document supports MEPC 75/6/3 and further expresses the extreme concerns of Maritime Pilots that efforts to minimise Air Pollution and improve Engine Efficiency are having severe unintended consequences upon the safety and efficiency of vessels whilst manoeuvring under pilotage in confined waters. This document serves to inform the Member States and others of the concerns of maritime Pilots

*Strategic direction, if applicable:* 3

*Output:* 3.5

*Action to be taken:* Paragraph 11

*Related documents:* MEPC 71/5/13, MEPC 71/INF.28; MEPC 74/5, MEPC 74/5/5, MEPC 74/18; III 6/4/4, III 6/15; MEPC.1/Circ.850/Rev.2; resolutions MSC.137(76), A.960(23) and MEPC.232(65)

#### Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1) and provides comments on document MEPC 75/6/3.

2 IMPA supports document MEPC 75/6/3 having noted with growing concern the continuing debate over minimum power guidelines and being cognisant with Maritime Pilots alarm over the increasing inability of vessels being able to safely manoeuvre themselves under Pilotage.

3 IMPA very much supports the comments in paragraph 29 of document MEPC 75/6/3 which refer to the design trends of modern marine engines, which decreases their

torque/power to the point at which IMPA would question whether these vessels meet the Organisations criteria of being seaworthy, set out in the *Standards for ship manoeuvrability* (resolution MSC.137(76)).

4 IMPA also recognises the issues in paragraph 35 of document MEPC 75/6/3 and strongly supports the need to develop guidelines on all issues where torque is managed by software.

### **Discussion**

5 In document III 6/4/4, IMPA highlighted the influence on "engine management" issues in a number of maritime casualties whilst container vessels were under Pilotage. The report of III 6 noted this point at paragraph 4.24.2 (III 6/15).

6 Since III 6, IMPA has received numerous reports from members about vessels:

- .1 being unable to stem a modest tide unaided as a request for "half ahead" from "slow ahead" was declined by software. The software derived its "speed" from the vessel's Speed Over Ground (SOG) input driven by the Global Positioning System, and not by the Speed Through Water. The Master told the Pilot he could not use the software override button without permission from his office;
- .2 unable to gain speed and steerage before a sharp turn to sea without "assistance" from tugs on transoms;
- .3 where RPM does not drop when the pilot wants the ship to slow, for an inordinate time; and
- .4 unable to offer the mandated % astern RPM; sometimes as little as 22/23% is offered on the Pilot Card contrary to IACS Unified Requirement UR M25. Rev. 4 dated 4 June 2017.

7 IMPA has now circulated its membership to:

- .1 exhort them to use even greater caution at the Master/Pilot Exchange (MPX) when the Pilot Card is discussed, and to ask many more specific questions about the availability of relevant engine power ahead/astern;
- .2 consider also with the Master the need for more tugs; and
- .3 submit current information on vessels performance for IMPA to submit to the Organization.

8 IMPA is aware of some companies who already acknowledge the unintended consequences of the current development of marine engines and mandate to their Bridge teams the overriding of the software of the engine management system whilst under Pilotage. IMPA is also aware of some ports where ships are asked in writing before they call such questions as:

- .1 guaranteed engine RPM within 15 seconds at given draft and equivalent speed;
- .2 ability to override load/torque software;

- .3 confirmation Master has authority regarding, paragraph 7.2; and
- .4 SWL of aft towing bitts/bollards.

### **Conclusion**

9 IMPA recognises the immense pressure the industry is under to reduce pollution and improve engine efficiency. However, the safety of vessels and the protection of the environment is being jeopardised by the unintended consequences of some measures which constrain a vessel's ability to manoeuvre safely in confined waters.

10 IMPA urges the Organization to adopt measures as soon as possible to enable Masters and Pilots to use all available engine power, without interference from software (or company/engine manufacturers) to manoeuvre their vessels in the interest of the vessel's safety and the protection of the environment.

### **Action requested of the Committee**

11 The Committee is invited to consider the comments and proposals contained in this submission and to take action, as appropriate.

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