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To: Relevant departments of the Headquarters of CCS, the Society's surveyors, Plan Approval Centers, related shipowners, ship management companies, shipyards and designers

## Notice on MSC.1/Circ.1535/Rev.1 - Unified Interpretations relating to the Protocol of 1988 relating to the International Convention on Load Lines, 1966 Issued by IMO

### 1. Background

The Maritime Safety Committee of International Maritime Organization (IMO), at its 101th session (5 to 14 June 2019), approved MSC.1/Circ.1535/Rev.1 i.e. amendments to MSC.1/Circ.1535 to include text to the unified interpretations of regulation 27(13)(e) of the 1988 Protocol to the International Convention on Load Lines, 1966. This circular supersedes MSC.1/Circ.1535. The revised unified interpretation applies to the relevant provisions since its release.

### 2. Main content

Interpretation of regulation 27(13) (e) for unprotected openings is added. Unprotected openings include ventilators (complying with regulation 19(4) of the International Convention on Load Lines, 1966) that for operational reasons have to remain open to supply air to the engine-room, emergency generator room or closed ro-ro and vehicle spaces (if the same is considered buoyant in the stability calculation or protecting openings leading below) for the effective operation of the ship. Where it is not technically feasible to treat some closed ro-ro and vehicle space ventilators as

unprotected openings, Administrations may allow an alternative arrangement that provides an equivalent level of safety.

This Notice is made public on CCS website ([www.ccs.org.cn](http://www.ccs.org.cn)), and is to be distributed to relevant ship owner and shipping management companies etc. by CCS branches within their responsible areas. Please contact Technology & information Department of CCS for any inquiry in the implementation. E-mail address: [ti@ccs.org.cn](mailto:ti@ccs.org.cn).

Annex: MSC.1/Circ.1535/Rev.1- UNIFIED INTERPRETATIONS RELATING TO THE  
PROTOCOL OF 1988 RELATING TO THE INTERNATIONAL CONVENTION ON  
LOAD LINES, 1966

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**UNIFIED INTERPRETATIONS RELATING TO THE PROTOCOL OF 1988  
RELATING TO THE INTERNATIONAL CONVENTION ON LOAD LINES, 1966**

1 The Maritime Safety Committee, at its ninety-sixth session (11 to 20 May 2016), in order to facilitate global and consistent implementation of requirements concerning sill and coaming heights for openings on top of deckhouses and companionways of the 1988 Load Lines Protocol, approved *Unified interpretations relating to the Protocol of 1988 relating to the International Convention on Load Lines, 1966* (MSC.1/Circ.1535), prepared by the Sub-Committee on Ship Design and Construction, at its third session.

2 The Maritime Safety Committee, at its 101st session (5 to 14 June 2019), approved amendments to MSC.1/Circ.1535 to include text to the unified interpretations of regulation 27(13)(e) of the 1988 Protocol to the International Convention on Load Lines, 1966, prepared by the Sub-Committee on Ship Design and Construction, at its sixth session. The amended text of the Unified Interpretations is set out in the annex.

3 Member States are invited to apply the annexed unified interpretations and to bring them to the attention of all parties concerned.

4 This circular supersedes MSC.1/Circ.1535.

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**ANNEX****UNIFIED INTERPRETATIONS RELATING TO THE PROTOCOL OF 1988 RELATING TO  
THE INTERNATIONAL CONVENTION ON LOAD LINES, 1966****Regulation 13 – Position of hatchways, doorways and ventilators**

1 For the purpose of these regulations, two positions of hatchways, doorways and ventilators are defined as follows:

Position 1 – Upon freeboard decks and raised quarterdecks, or other exposed decks\* lower than one standard height of superstructure above the freeboard deck, and upon exposed decks\* situated forward of a point located a quarter of the ship's length from the forward perpendicular that are located lower than two standard heights of superstructure above the freeboard deck.

Position 2 – Upon exposed decks\* situated abaft a quarter of the ship's length from the forward perpendicular and located at least one standard height of superstructure above the freeboard deck and lower than two standard heights of superstructure above the freeboard deck.

Upon exposed decks\* situated forward of a point located a quarter of the ship's length from the forward perpendicular and located at least two standard heights of superstructure above the freeboard deck and lower than three standard heights of superstructure above the freeboard deck.

**Regulation 20 – Air pipes**

2 Where air pipes to ballast and other tanks extend above:

- .1 the freeboard deck; or
- .2 other exposed decks\* lower than two standard heights of superstructure above the freeboard deck,

the exposed parts of the pipes should be of substantial construction, and the height from the deck to the point where water may have access below should be at least:

- .1 760 mm on the freeboard deck or other exposed decks\* lower than one standard height of superstructure above the freeboard deck; and
- .2 450 mm on other exposed decks\* lower than two standard heights of superstructure above freeboard deck.

**Note:** Flush bolted access covers, which are of substantial construction and are secured by gaskets and closely spaced bolts to maintain water tightness, are not subject to the minimum sill height requirements.

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\* "Exposed decks" include top decks of superstructures, deckhouses, companionways and other similar deck structures.

## **Regulation 27 – Types of ships**

### **Regulation 27(13)(e)**

3        Unprotected openings include ventilators (complying with regulation 19(4) of the International Convention on Load Lines, 1966) that for operational reasons have to remain open to supply air to the engine-room, emergency generator room or closed ro-ro and vehicle spaces (if the same is considered buoyant in the stability calculation or protecting openings leading below) for the effective operation of the ship. Where it is not technically feasible to treat some closed ro-ro and vehicle space ventilators as unprotected openings, Administrations may allow an alternative arrangement that provides an equivalent level of safety.

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