Proposed amendment to the draft proposal for Regulation 13

Submitted by Norway

Paragraph 2(a) should read as follows:

(a) The moulded draft amidship \( (d_m) \) in metres shall not be less than:

\[
\begin{align*}
  d_m &= 1.0 + 0.02 \text{ L}
\end{align*}
\]

The Norwegian Delegation has carefully considered WP/CONF/C.2/WP.37 and wishes to submit the following comments:

The data on ballast draft experiences, presented at this Conference, pertain to ships where the provision of ballast has been completely left to the decision of the Master and where no attempts have been made neither in ship design nor operation to attain or establish a minimum ballast condition. In the opinion of this delegation the proposed formula in WP/CONF/C.2/WP.37 of

\[
\begin{align*}
  d_m &= 2 + 0.02 \text{ L}
\end{align*}
\]

fairly well portrays an average practice of today. It does not, however, give due credit to experiences gathered from ships which have operated under similar weather conditions as considered in WP/CONF/C.2/WP.37 at smaller ballast draft, nor does it give any credit to the development potential of ships which will be designed on the basis of this Convention.
The data on ballasting practices on some Norwegian tankers submitted in MP/CONF/C.2/INF.2 were presented as the ratio between displacement in ballasted and fully loaded conditions. In order to equate these experiences to the formulae proposed in MP/CONF/C.2/WP.37 we have attached to this document a graph showing the length and draft of the ships together with their calculated mean ballast drafts.

As may be seen from the diagram the proposed formulae in MP/CONF/C.2/WP.37 gives a ballasted displacement for the investigated ships of above 50% for the smaller ships and about 40% for the large ships. Even though some of these ships are recorded as having carried only about 35-38% ballast under conditions of Beaufort 8 and Seastate 7 it should be noted that these ships have operated without any restriction w.r.t. amount of ballast which has been left completely to the judgement of the Master. It is therefore possible that the amount of ballast might have been further reduced without endangering the safe passage of the ship.