

PAME I-2020: Agenda item 6.2(c)

Implementation of the Polar Code

Submitted by Norway

- **Facilitating a harmonised implementation of the Polar Code**
- **Status of the development of an overview of the interpretation of the Polar Code**

Background

In order to ensure the success of the Polar Code it is of great importance to work towards facilitating a harmonised implementation and enforcement of the Polar Code. Cooperation is the key to solving these challenges, and both the IMO and Arctic Council have important roles to play.

An overview of the interpretation of the Arctic and Observer States can, in our opinion, contribute to an efficient implementation of the polar code. Furthermore, the exercise can contribute to establish a "common ground" for interpretation as well as give PAME an overview of any remaining challenges. This will also be a valuable background for discussions at IMO and a possible future revision of the code.

PAME II 2018 welcomed Norway's proposal to compile a list that summarizes how Arctic and Observer State understands and applies the Polar Code. Arctic and Observer States was invited to make submissions, based on a circulated template. As of 17 January 2020, submissions have been made by the following states; Denmark, UK, US, Iceland, the Russian Federation, Poland, Canada and Spain. There have been two replies from Spain, and for information purposes both replies are reflected in the attached document containing an overview of all submissions.

Norway has undertaken a preliminary analysis of the submissions which will be presented at the SEG group during PAME I 2020. This document intends to give a brief overview of the main findings of the analysis and recommendations for further action. A document containing more detailed information on the preliminary analysis undertaken by Norway, is currently being developed and will be forwarded to the SEG group for discussion.

The relationship between ship category, ice/polar class, ice conditions and POLARIS as a decision support tool

The assigned ship category is a result of the ice class assigned to the ship and its compliance with all relevant requirements related that category. Furthermore, POLARIS, or similar accepted tools, shall only be used as a decision support tool on board during operation, not for determining the ship category.

The feedback received indicates agreement on the method for assigning ship category. Details relating to which ice class corresponding to a given ship category differs and should be further discussed.

Norway recommends to PAME that more information is collected from Arctic States on this topic.

Ice conditions - category C ship

In accordance with Rule 2.3 of the introduction of the polar code, category C ship may operate in "open water or in ice conditions less severe than those included in categories A and B." Submissions show differences in interpretation. This is an issue where Norway believes a common interpretation would be useful. This is in general supported, but no consensus was reached.

Norway invites states to further discuss the need for a common interpretation, and possible ways forward.

The Polar Water Operation Manual (PWOM)

There is consensus among the States that the Polar Water Operation Manual (PWOM) should be a living document used on board and updated as necessary. Furthermore, the PWOM is considered to be part of the ISM and should be approved and audited accordingly. The PWOM should be reviewed in connection with the issuance of a Polar Ship Certificate and contain the ships limitations.

Ice accretion and damage stability calculations

This is a highly complex technical issue concerning whether ice accretion should be included in the loading conditions or not when the loading conditions are checked against damage stability limiting curves. This issue was discussed in SDC 1 but no consensus was reached.

Norway is of the opinion that this issue should be considered resubmitted to the IMO SDC committee for discussion.

Removing ice accretion

Some of the feedback received emphasize that prescribing means of ice monitoring and removing may reduce the operational flexibility of the vessel and crew, as well as resisting implementation and development of new technologies. Others are in favour of developing a common interpretation. In our opinion no further action is needed from PAME at this stage.

S_{mom} , probability to survive heeling moments

The feedback received on this topic are few and to some extent limited. This technical issue should be further discussed in IMO.

Manning and training

Russia has in its submissions included interpretations relating to requirements for manning and training, which were not a part of the original template for submission.

Norway welcomes this submission from Russia and suggest that PAME extend the project to also include interpretations with regard to manning and training.

Recognised organisations (RO)

Several of the states refers to the practice and interpretations by Recognized Organizations (RO). There is varying degree of involvement of the administrations in the process of issuing polar code certificates. In order to develop a comprehensive list of interpretations on the Polar Code, good cooperation with ROs is crucial. The ASBPIF has an important role in this regard.

Way forward

The original template from Norway on the interpretation of the Polar Code was developed in 2018. During this time maritime administrations have gained significantly more experience on the implementation of the polar code. The Russian federation has driven our attention to manning and training. Furthermore, IMO has published interim guidelines, and consequential work related to the polar code is in its final stages in the IMO.

Norway is of the opinion that the overview of Arctic and observer states interpretations should be further developed, and new topics such as manning and training should be included.

Some topics of high technical complexity, as indicated above, should be considered submitted to IMO for further deliberation.

For interpretation where consensus is or may be reached by the Arctic States, proposals for unified interpretations should be considered submitted to IMO for decision. Due consideration must however be given to the best timing of such submission to IMO.

Recommendation(s) to PAME I-2020:

Norway recommends:

- PAME encourage member governments to further work towards a harmonized implementation of the Polar Code.
- PAME agrees to further develop the overview of the Arctic States interpretation of the Polar Code.