1. In 1.16.1.2.5 it is required that “Classification societies shall update the vessel substance list at each renewal of the class . . .” and in case of “… amendments to Table C of chapter 3.2 which have become relevant in the meantime. If these amendments require an update of the vessel substance list, the owner of the vessel shall request this from a classification society.”

2. This could result in a situation where a vessel owner has to apply for a new substance list because of changes in Table C and as a consequence of a class renewal some weeks or months later the substance list has to be issued again for the same vessel as this is explicitly required in connection with the class renewal.

3. This situation has led to discussion between owners and classification societies about the sense of this requirement.

4. Therefore the Safety Committee is invited to discuss whether it makes sense to amend 1.16.1.2.5 so that the issuance of a new substance list at the class renewal is not always required.

5. A possible formulation could be as follows:

“Classification societies shall update the vessel substance list at each renewal of the class of a vessel on the basis of the annexed Regulations in force at the time. A new substance list does not need to be issued for renewal of the class if the design and equipment of the vessel and the version of the annexed Regulations have not changed since the last issue of the vessel substance list.”