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Agenda item 14

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SHIP SYSTEMS AND EQUIPMENT

Comments on document MSC 101/14

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SUMMARY

Executive summary: This document comments on annex 3 to the report SSE 6/18 that contains the draft MSC Circular on Interim guidelines for minimizing the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships. The comments highlight concerns that some of the recommendations contained in the draft interim guidelines introduce, de facto, new construction and/or carriage requirements without adequate technical justifications or following due procedures.

Strategic direction, if applicable: Other work

Output: OW 36

Action to be taken: Paragraph 20

Related documents: MEPC/Circ.315; MSC/Circ.765; SSE 6/18, annex 3 and MSC 101/14

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *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 comments on paragraph 2.6 of document MSC 101/14.

Background

2 At SSE 6, the Sub-Committee further developed the draft Interim guidelines for minimizing the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships, the outcome of which is presented in annex 13 to document SSE 6/18 containing a draft MSC circular for approval by MSC 101 (paragraph 2.6 of MSC 101/14).

Discussion

3 The co-sponsors have been actively involved in the review of SOLAS chapter II-2 and associated codes relating to fires on new and existing ro-ro passenger ships and would like to express support for the review work thus far.

4 However, we also have concerns regarding the application and interpretation of the proposed interim guidelines which pre-empt the development of the proposed draft amendments to SOLAS chapter II-2. There are three issues that contribute undermining the technical validity of the interim guidelines:

- .1 the FIRESAFE II study, which provides a significant basis in the development in the interim guidelines, has not been released to the Sub-Committee;
- .2 observation that the SSE 6 WG did not possess sufficient knowledge to debate new and existing ships' electrical systems and specifications; and
- .3 sections in the guidance that apply to new ships introduce de facto mandatory regulatory amendments without adequate justification or consideration.

5 When it comes to proposing new requirements for ships, MSC/Circ.765/MEPC/Circ.315 provides guidance for the Committees and Sub-Committees, and also references any application of new provisions to existing ships:

"1.2 Scope

In the case when the relevant Committee is satisfied that it is appropriate to consider proposals for new requirements or amendments to existing requirements for new ships and when such proposals relate to the construction of the ship, the Committee may decide that these guidelines should be used. After confirming that a compelling need has been demonstrated as required by resolutions A.500(XII) and A.777(18) in accordance with the *Guidelines on the organization and method of work of the Maritime Safety Committee and Marine Environment Protection Committee and their subsidiary bodies*, the guidelines may then serve to enable the Committees to make well-informed decisions on suitable measures for existing ships."

6 By means of example, the co-sponsors note that draft interim guidelines recommend that:

"1.4 Shock/waterproof rating of electrical connections

1.4.1 In addition to SOLAS regulation II-2/20.3.2, sockets should be provided with a degree of protection of at least IP56 in accordance with standard IEC 60529."

7 During the SSE 6 WG deliberations, it was apparent that the WG did not possess thorough knowledge of ships' electrical systems, which inter alia resulted in very extensive and rather uninformed discussions on "circuit breakers" and "earth fault devices" and other specific electrical protection matters. Due to the lack of expertise, such matters should therefore have been referred to another body for consultation, rather than brought forward as applicable to all ships.

8 Several delegations raised their concerns during the WG deliberations and while there was general recognition that such provisions are voluntary in nature, the submitters are concerned that a recommendation to broaden the application of a standard for shock/waterproof rating may very well lead to some existing ro-ro passenger ships being mandated to re-fit their connections, without any technical justification offered.

9 If this particular recommendation is approved by the Committee, then IP56 as per IEC 60529 will later almost by default become a SOLAS carriage requirement for new ships, based on non-expert views for guidance purposes. It must be noted that the co-sponsors do not wish to contest the validity of, for example, a certain IP-standard, which may very well be the appropriate measure, but such measures should be better evidenced before being agreed.

10 Another example along the same lines pertains to the suggested provisions for LSA:

"5. INTEGRITY OF LIFE-SAVING APPLIANCES AND EVACUATION

5.1 For new and existing ships, the following safety distances (measured horizontally) are recommended to avoid jeopardizing life-saving appliances and embarkation stations in case of fire in ro-ro and special category spaces:

1. Survival craft and Marine evacuation systems stowed and in a position to be deployed:
 1. more than 6 m from a cargo space side opening
 2. more than 8 m from cargo on weather deck
2. Survival craft embarkation stations and muster stations located:
 1. more than 6 m away from a cargo space side opening
 2. more than 13 m from cargo on weather deck

5.2 Equivalent arrangements to the satisfaction of the Administration, providing at least the same level of protection could be considered."

11 Review of LSA and evacuation in relation to ro-ro spaces is supported. However, the ship arrangements which would benefit from the proposed distances is not evident, nor the criteria to be used in applying equivalence.

12 The above interim guidelines are explicitly suggested to be applicable to existing ships and, if included, it is reasonable to expect that those safety distances will become SOLAS requirements later on.

13 It would therefore be necessary to understand the basis for these distances to ensure the correct application and consequences are obtained so that the safety of other onboard arrangements are not compromised.

14 During the SSE 6 deliberations, the safety distances suggested were quoted to come from the FIRESAFE II study,* which has yet to be presented to the Committee and also yet to be reviewed by the FSA Expert Group.

15 The only safeguard for the shipowner would be "the satisfaction of the Administration", which is a term that the co-sponsors in general do not wish to promulgate as a regulatory benchmark.

16 Provisions applicable to new ships in section 4 of the draft interim guidelines on containment impose de facto new construction standards which have been agreed without adequate justification or following the requisite procedures for what is essentially an amendment to SOLAS chapter II-1. While highlighting the findings from the FIRESAFE II study that the proposed measures are not cost effective even for newbuilds, the co-sponsors consider it premature to have these requirements imposed through guidelines without adequate justification.

Proposals

17 Recognizing the schedule for the development of the SOLAS chapter II-2 amendments and our concerns regarding interim guidance, it is requested that the recommendations provided by the draft interim guidelines are carefully considered prior to adoption into SOLAS amendments or referenced guidance.

18 There needs to be a pragmatic approach to implementation of the interim guidelines until such time that these measures have been validated by proper justification and research.

19 Sections of the draft interim guidelines that are not based on existing provisions of the SOLAS Convention should be held in abeyance until the related amendments are approved by the Committee.

Action requested of the Committee

20 The Committee is invited to note the information provided and take action, as appropriate.

* In the FIRESAFE II Combined Assessment report, there is a footnote in relation to LSA and permanent openings, which reads: "Note 1: The 8 m and 13 m criterion here is proposed as an additional output of the study. This value would benefit from being further discussed."