

SUB-COMMITTEE ON SHIP SYSTEMS AND
EQUIPMENT
12th session
Agenda item 16

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**EVALUATION OF ADEQUACY OF FIRE PROTECTION, DETECTION AND EXTINCTION
ARRANGEMENTS IN VEHICLE, SPECIAL CATEGORY AND RO-RO SPACES IN ORDER
TO REDUCE THE FIRE RISK OF SHIPS CARRYING NEW ENERGY VEHICLES**

Comments on document SSE 12/12

Submitted by ICS and INTERFERRY

SUMMARY

Executive summary: This document provides comments on document SSE 12/12 (Report of the FP Correspondence Group 2), seeking clarification about the scope of the output.

Strategic direction, if applicable: 7

Output: 7.37

Action to be taken: Paragraph 9

Related documents: SSE 9/20; MSC 107/20; MSC 108/20 and SSE 12/12

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.5) and comments on document SSE 12/12 (Norway).

Background

2 MSC 105 agreed to include in its post-biennial agenda an output on "Evaluation of adequacy of fire protection, detection and extinction arrangements in vehicle, special category and ro-ro spaces in order to reduce the fire risk of ships carrying new energy vehicles" and assigned the SSE Sub-Committee as the associated organ. The work under this output will continue at this session, based on the input of the intersessional Correspondence Group established by SSE 11.

3 The Sub-Committee will recall that, in a previous session (SSE 9), a major amendment to SOLAS chapter II-2 (SSE 9/20, annex 5) was finalized, which focuses primarily on requirements for ro-ro spaces and special category spaces of new and existing ro-ro passenger ships, where SOLAS regulation II-2/20 was amended. The same was agreed at SSE 9 (SSE 9/20, paragraphs 6.7 to 6.12), approved by MSC 107 (MSC 107/20, paragraph 14.16) and adopted by MSC 108 through resolutions MSC.550(108) and MSC.555(108) (MSC 108/20, paragraphs 3.19 and 3.34).

Discussion

4 The Sub-Committee noted that a number of new requirements and amendments had recently been adopted, including, inter alia:

- .1 the arrangement of openings in ro-ro and special category spaces on new ro-ro passenger ships;
- .2 the arrangement of weather decks on new ro-ro passenger ships;
- .3 the provision of water monitors for the protection of weather decks on existing ro-ro passenger ships;
- .4 the installation of linear heat detection systems; and
- .5 the provision of video monitoring systems.

5 It was further noted that the above requirements for ro-ro passenger ships would enter into force in January 2026. In this context, any intention to develop new regulations to further amend or replace the recently adopted amendments would likely lead to regulatory uncertainty and inconsistency in implementation, and could have a significant impact on ongoing and planned investments in the ferry industry, in particular taking into account that the new requirements (January 2026) will also apply to existing ships from 2028, and that a number of shipowners have already initiated or contracted retrofitting and modification projects to ensure compliance.

6 The Sub-Committee also noted that the operational characteristics and risk profiles of ro-ro passenger ships differed substantially from those of pure car carriers (PCCs) and pure car and truck carriers (PCTCs), including but not limited to:

- .1 port access and turnaround arrangements;
- .2 the maximum operating distance from the coastline;
- .3 the availability and accessibility of shore-based rescue services;
- .4 the level of preparedness and response capability of onboard fire-fighting teams; and
- .5 the configuration and layout of vehicle stowage areas.

Proposal

7 The co-sponsors propose that the scope of the work output be amended so as to exclude cargo spaces on ro-ro passenger ships, and to apply solely to vehicle carriers not engaged in the carriage of passengers.

8 Should this approach not be agreed, the work undertaken should, in any case, fully recognize the fundamental distinctions between ro-ro cargo ships and ro-ro passenger ships. In this regard, the recently adopted SOLAS provisions applicable to ro-ro passenger ships should be duly taken into account, with a view to avoiding duplication of effort or the need for further amendment of the ro-ro passenger ship requirements that entered into force this year.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to note the information provided, to consider the proposed way forward in paragraphs 7 and 8, and to take action, as appropriate.
