INTERNATIONAL MARITIME ORGANIZATION

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SUB-COMMITTEE ON SHIP SYSTEMS AND EQUIPMENT
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REVIEW SOLAS CHAPTER II-2 AND ASSOCIATED CODES TO MINIMIZE THE INCIDENCE AND CONSEQUENCIES OF FIRES ON RO-RO SPACES AND SPECIAL CATEGORY SPACES OF NEW AND EXISTING RO-RO PASSENGER SHIPS

Comments on the report of the Correspondence Group on Fire Protection

Submitted by IACS

SUMMARY

Executive summary:	This document provides comments on the report of the Correspondence Group on Fire Protection related to reviewing of SOLAS chapter II-2 and associated codes to minimize the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships
Strategic direction, if applicable:	Other work
Output:	OW 36
Action to be taken:	Paragraph 15
Related document:	SSE 6/6

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 provides comments on document SSE 6/6 (Japan), containing the report of the Correspondence Group on Fire Protection related to reviewing of SOLAS chapter II-2 and associated codes to minimize the incidence and consequences of fires on ro-ro spaces and special category spaces of new and existing ro-ro passenger ships.

Background

2 IACS participated in the work of this Correspondence Group and would like to extend its deepest appreciation to the Coordinator and the other participants for the constructive discussions in the Group. While various issues to minimize incidence and consequences of fires on ro-ro passenger ships were considered by the Group, it is noted that consensus had not been reached on a number of issues. The context of likely fires occurring in ro-ro spaces can be multifarious and, therefore, discussions on possible effective solutions have been

extensive. The FIRESAFE reports may provide inputs for consolidating the texts that are currently in square brackets in the Group's report and could be used as references in further deliberations on the issue.

3 IACS's comments on the work undertaken by the Correspondence Group are provided in the following paragraphs. Reference is made to paragraphs of 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" (hereafter referred to as the "draft guidelines"), as set out in annex 1 to document SSE 6/6.

Comments

Prevention/Ignition (section 1 of the draft guidelines)

4 Regarding the square brackets in paragraph 1.1.1 of the draft guidelines, IACS suggests that the ship's power supply equipment and cables in ro-ro and special category spaces intended for power supply to vehicles or cargo units be visually inspected prior to the commencement of every voyage; daily during patrolling at sea; and as per the routines recommended by the original equipment manufacturer (OEM) for maintenance by the crew who are trained for the task according to an established procedure.

5 IACS considers that paragraph 1.4.1*bis* should be retained, i.e. shock testing should be conducted for all electrical connections.

6 IACS can agree that in paragraph 1.5.3 the temperature rise on the live parts of socket outlets and plugs should not exceed 30°C.

7 IACS is of the view that paragraph 1.10.1*bis* should be retained, i.e. records should be maintained.

Detection and decision (section 2 of the draft guidelines)

8 IACS considers the text in square brackets in paragraphs 2.2.1 and 2.2.2 should be retained. Video monitoring systems can be effective for rapid confirmation of the outbreak of a fire as a supplement to the activation of fire detection alarms and they also facilitate the initiation of a rapid response. Therefore, an effective CCTV monitoring system should be provided in the ro-ro and special category spaces for continuous monitoring of the entire space and records should be maintained as far as practicable. IACS agrees that continuous monitoring of the CCTV by the crew need not be ensured.

Extinguishment (section 3 of the draft guidelines)

9 Regarding subsection 3.1 of the draft guidelines, IACS suggests that the revision of the requirements for fire-fighter's outfits to be used in ro-ro spaces need not be considered with the view to retaining standardization. However, the number of outfits and their stowage in close proximity may need to be considered.

10 Regarding subsection 3.2 of the draft guidelines, IACS suggests that the remote control of fixed water-based fire-fighting systems for ro-ro spaces and special category spaces from a position outside the space should include a provision for direct access to the distribution valves. Also, the recommendations in the *Revised guidelines for the design and approval of fixed water-based fire-fighting systems for ro-ro spaces and special category spaces* (MSC.1/Circ.1430/Rev.1), *Guidelines for the approval of fixed water-based fire-fighting systems for ro-ro spaces and special category spaces equivalent to that referred to in*

*resolution A.123(V) (*MSC.1/Circ.1272*)* and the *Recommendation on fixed fire extinguishing systems for special category spaces* (resolution A.123(V)), as applicable, should be referred to in considering all the arrangement requirements of the system.

11 Regarding the text in square brackets in paragraph 3.6.1 of the draft guidelines, IACS suggests that the fire drills required by SOLAS regulation II-2/15.3 for ro-ro spaces or special category spaces be conducted according to an established procedure.

12 With regard to the text in square brackets in paragraph 3.6.2 of the draft guidelines, IACS suggests that smoke extraction be considered as a strategy that is to be contemplated in the context of the arrangement of the space and the size of the fire. A smoke extraction system should only be used for securing access to the area in which a fire has broken out during the initial phase of fire-fighting but it should be stopped as soon as the fire starts to develop/propagate.

Containment (section 4 of the draft guidelines)

13 IACS considers that the text in square brackets in paragraph 4.1.2 of the draft guidelines should be retained. It is also suggested that increased levels of structural fire protection be provided and the structural integrity be specifically designed to withstand the stipulated temperature differential for a longer time period up to 180 or 240 minutes, which may be the likely time needed for evacuation.

14 IACS is of the opinion that the text in square brackets in paragraph 4.2 of the draft guidelines should be retained. Openings in the ro-ro spaces should not compromise the integrity or accessibility of any life-saving appliances (LSA) or evacuation route. Verification by means of simulations should be carried out considering the criteria of the minimal distance from the opening. This would enable the establishment of a minimum distance for permanent openings forward and aft in the side bulkhead of ro-ro spaces below LSA. However, IACS has no proposal for such a specific minimum distance.

Action requested of the Sub-Committee

15 The Sub-Committee is invited to consider the comments and proposals above, and take action, as appropriate.