

SUB-COMMITTEE ON SHIP DESIGN AND
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Agenda item 10

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY,
SECURITY, ENVIRONMENT, FACILITATION, LIABILITY AND
COMPENSATION-RELATED CONVENTIONS**

**Draft revision of MSC.1/Circ.1511/Rev.1 on the Unified interpretations of
SOLAS regulations II-2/9 and 13 in relation to regulations II-2/13.4.1 and 13.4.2**

Submitted by IACS

SUMMARY

Executive summary: This document proposes a revision of MSC.1/Circ.1511/Rev.1 on the *Unified interpretations of SOLAS regulations II-2/9 and 13* in relation to regulations SOLAS II-2/13.4.1 and 13.4.2 to clarify the term "lower part" used in connection with the means of escape from spaces below the bulkhead deck.

Strategic direction, if applicable: 7

Output: 7.1

Action to be taken: Paragraph 14

Related documents: SDC 2/21/4 and SDC 2/21/5

Introduction

1 SOLAS regulations II-2/13.4.1 and 13.4.2 specify the requirements for the means of escape from machinery spaces on passenger and cargo ships, respectively. Those regulations require one of the two means of escape from machinery spaces to be located inside a protected enclosure from the "lower part of the space", as follows:

"4.1 Means of escape on passenger ships

Means of escape from each machinery space in passenger ships shall comply with the following provisions.

4.1.1 Escape from spaces below the bulkhead deck

Where the space is below the bulkhead deck the two means of escape shall consist of either:

- .1 (...) One of these ladders shall be located within a protected enclosure that satisfies regulation 9.2.2.3, category (2), or regulation 9.2.2.4, category (4), as appropriate, from the lower part of the space it serves to a safe position outside the space. (...);

...

4.1.4 Escape from machinery control rooms

Two means of escape shall be provided from a machinery control room located within a machinery space, at least one of which will provide continuous fire shelter to a safe position outside the machinery space.

...

4.2 Means of escape of cargo ships

Means of escape from each machinery space in cargo ships shall comply with the following provisions.

4.2.1 Escape from machinery spaces of category A

- .1 (...) One of these ladders shall be located within a protected enclosure that satisfies regulation 9.2.3.3, category (4), from the lower part of the space it serves to a safe position outside the space. (...)"

2 The term "lower part" is used in connection with the protected enclosure and is not defined in SOLAS. In this regard, IACS proposed a unified interpretation which was approved by MSC 95 and released as MSC.1/Circ.1511 (documents SDC 2/21/4 and SDC 2/21/5); it specifies "lower part" as the "lowest deck level, platform or passageway within the space".

3 Recently, IACS experienced a different understanding of MSC.1/Circ.1511 on the unified interpretation of "lower part" and sees the need to clarify and improve the interpretation.

Discussion

4 IACS submitted a draft unified interpretation of SOLAS regulation II-2/13.4.1.1 (passenger ships) to SDC 2 with the following discussion point (SDC 2/21/4, paragraph 5):

"5 The requirements in SOLAS regulation II-2/13.4.1.1 are intended to address means of escape in machinery spaces of category A that include multiple deck levels and/or tween deck platforms. It is considered that these more complex arrangements require clarification on how access to the means of escape is provided. To address this issue draft unified interpretation 3 provided in the annex was developed."

5 The draft interpretation in the annex to the document contained the following paragraph:

"3 Machinery spaces of category A may include working platforms and passageways, or intermediate decks at more than one deck level. In such case, the lower part of the space should be regarded as the lowest deck level, platform or passageway within the space."

6 Document SDC 2/21/5 (IACS) contains the corresponding discussion for SOLAS regulation II-2/13.4.2.1 (cargo ships).

7 In preparing the above interpretation, IACS discussed SOLAS regulations II-2/13.4.1.1 and II-2/13.4.2.1. In this discussion, the following was noted:

- .1 the interpretation should take into account the lowest deck level without trying to define a multilevel machinery space, which might have been beyond the scope of the interpretation;
- .2 some of the terminology used in the interpretation may be regarded as potentially vague, i.e. "smaller" platforms; however, after extensive discussion at the drafting stage, it was considered that being overly prescriptive (e.g. in terms of size $A < x \text{ m}^2$ or height from nearest deck level $H < y \text{ m}$) might have been counterproductive, open to controversy and unnecessarily restrictive; and
- .3 another possible contentious point which was discussed was the formulation for the lower part of the space, which, depending on the design of the ship or space, may potentially lead to a different understanding. It was the intention for that to be the lowest space where crew may normally be employed/working and from which they should escape in normal circumstances.

8 This discussion resulted in the use of the expression in the interpretation as follows:

"In such case, the lower part of the space should be regarded as the lowest deck level, platform or passageway within the space".

9 However, recent experience has shown that, contrary to IACS' intention to describe the part of the space from where the escape trunk should lead (i.e. from the part of the space ("deck level") ranging from the lowest deck to the platform or passageway above it, being considered as within one deck level height, i.e. not only from the lowest deck itself), some parties have understood the term to mean the lowest deck, platform or passageway itself, whichever is the lowest.

10 Further, IACS notes that, in the design of the machinery space of some ships, it is not technically practicable to include the installation of a protected enclosure, stretching from the absolute lowest deck level to a safe position outside, but from a working platform or passageway in the lowest part of the space close to the absolute lowest level, as mentioned in the interpretation.

11 For such arrangements, access to the protected enclosure is provided by an inclined ladder or stairway with an inclination not greater than 60° and in compliance with SOLAS regulation II-2/13.4.1.5 to protect escaping personnel against potential heat and flames from beneath.

12 From paragraphs 7 to 9 above, IACS' understanding is that such a shielded ladder or stairway starting not higher than 2.3 m (corresponding to one deck level height) allows for a safe and fast passage to the protected enclosure in case of an emergency and, therefore, is in line with the intention and wording of SOLAS regulations II-2/13.4.1 and 13.4.2, i.e. "providing a protected enclosure starting in the lower part of the space".

Proposal

13 Based on the discussion in paragraphs 4 to 0 above, IACS prepared the draft revision of the interpretations in MSC.1/Circ.1511/Rev.1 as presented in the annex to clarify that the protected enclosure stretches from the lower part of the space to a safe position outside the space when it starts from the lowest deck level, or any working platform or passageway within the space up to 2.3 m above the lowest deck level.

Action requested of the Sub-Committee

14 The Sub-Committee is invited to consider the foregoing, the proposal in paragraph 13 and the draft revision of MSC.1/Circ.1511/Rev.1 as set out in the annex and to take action, as appropriate.

ANNEX

PROPOSED REVISION OF UNIFIED INTERPRETATIONS OF SOLAS REGULATIONS II-2/9 AND 13

The following changes to MSC.1/Circ.1511/Rev.1 are proposed:*

"...

Regulation 13.4.1

...

3 Machinery spaces may include working platforms and passageways, or intermediate decks at more than one deck level. In such case, the "lower part of the space" should be regarded as the lowest deck level, or any working platform or passageway within the space up to 2.3 m above the lowest deck level. At deck levels, other than the lowest one, where only one means of escape other than the protected enclosure is provided, self-closing fire doors should be fitted in the protected enclosure at that deck level. Smaller working platforms in-between deck levels, or only for access to equipment or components, need not be provided with two means of escape (regulation II-2/13.4.1.1).

...

Regulation 13.4.2

...

3 Machinery spaces of category A may include working platforms and passageways, or intermediate decks at more than one deck level. In such case, the "lower part of the space" should be regarded as the lowest deck level, or any working platform or passageway within the space up to 2.3 m above the lowest deck level. At deck levels, other than the lowest one, where only one means of escape other than the protected enclosure is provided, self-closing fire doors should be fitted in the protected enclosure at that deck level. Smaller working platforms in-between deck levels, or only for access to equipment or components, need not be provided with two means of escape (regulation II-2/13.4.2.1).

..."

* Tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight all modifications and new insertions, including deleted text.