

SUB-COMMITTEE ON SHIP SYSTEMS AND
EQUIPMENT
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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**

**IACS unified interpretation SC 269/Rev.2 of SOLAS regulation II-2/13.4.2 relating to the
means of escape from the steering gear spaces in cargo ships**

Submitted by IACS

SUMMARY

Executive summary: This document provides revision 2 of IACS UI SC 269 containing a unified interpretation of SOLAS regulation II-2/13.4.2 relating to the means of escape from the steering gear spaces in cargo ships.

*Strategic direction,
if applicable:* 7

Output: 7.1

Action to be taken: Paragraph 12

Related documents: SSE 8/15/1; SSE 10/13, SSE 10/20 and MSC 108/20

Background

1 SSE 9 considered document SSE 8/15/1 (IACS), containing the updated draft unified interpretation relating to the means of escape from the steering gear space in cargo ships according to SOLAS regulation II-2/13.4.2 and referred it to the Fire Protection (FP) Correspondence Group for further consideration and advice to SSE 10.

2 The FP Correspondence Group did not indicate a particular objection to the technical content of the updated draft interpretation, however, concluded that a new output might be needed. SSE 10 noted that the technical basis for such a conclusion should be clarified. SSE 10 further concluded that an IMO interpretation was not needed and invited IACS to note the comments made and take action, as appropriate (SSE 10/20, paragraph 12.17).

3 To provide the necessary clarity, IACS has adopted revision 2 of IACS UI SC 269, as provided in the annex.

Discussion

4 SOLAS regulation II-2/13.4.2.1 addresses the means of escape from machinery spaces of category A.

5 SOLAS regulation II-2/13.4.2.2 addresses dispensations from two means of escape, as follows:

"4.2.2 Dispensation from two means of escape

In a ship of less than 1,000 gross tonnage, the Administration may dispense with one of the means of escape required under paragraph 4.2.1, due regard being paid to the dimension and disposition of the upper part of the space. In addition, the means of escape from machinery spaces of category A need not comply with the requirement for an enclosed fire shelter listed in paragraph 4.2.1.1. In the steering gear space, a second means of escape shall be provided when the emergency steering position is located in that space unless there is direct access to the open deck."

6 SOLAS regulation II-2/13.4.2.3 addresses the means of escape from machinery spaces other than those of category A, as follows:

"4.2.3 Escape from machinery spaces other than those of category A

From machinery spaces other than those of category A, two escape routes shall be provided except that a single escape route may be accepted for spaces that are entered only occasionally, and for spaces where the maximum travel distance to the door is 5 m or less."

7 IACS understands that SOLAS regulation II-2/13.4.2.2 under the heading "Dispensation from two means of escape" discusses different situations where two means of escape might not be required. Therefore, the last sentence of SOLAS regulation II-2/13.4.2.2 should be read independently from the previous sentences. This understanding was confirmed by the FP Correspondence Group to SSE 10, as per paragraphs 4 to 6 of document SSE 10/13.

8 The IACS UI SC 269/Rev.2 provided in the annex clarifies that the last sentence of SOLAS regulation II-2/13.4.2.2 applies regardless of ship size. The interpretation further recognizes that the last sentence of SOLAS regulation II-2/13.4.2.2 should be read in conjunction with SOLAS regulation II-2/13.4.2.3, as steering gear spaces are typically regarded as "other machinery spaces".

Consideration of IACS UI SC 269/Rev.2 against the safeguards introduced by MSC 108

9 IACS UI SC 269/Rev.2 is considered to meet the following three safeguards for consideration of interpretations, as established by MSC 108 (MSC 108/20, paragraph 19.6.3):

- .1 UIs are not meant to amend mandatory requirements in Conventions and associated instruments;
- .2 UIs should not go beyond the interpretation of requirements; and
- .3 UIs should not contradict the text of requirements.

10 IACS UI SC 269/Rev.2 merely rephrases the text of SOLAS based on the understanding that the last sentence of SOLAS regulation II-2/13.4.2.2 should be read independently from the previous two sentences. Therefore, the interpretation is not considered to amend any mandatory requirements, does not go beyond a clarification of the requirements and does not to contradict the text of the SOLAS regulation.

Application of IACS UI SC 269/Rev.2

11 The Sub-Committee is invited to note that IACS members will be implementing UI SC269/Rev.2 from 1 January 2026, unless Administrations advise them otherwise in writing.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to note the foregoing and take action, as appropriate.

ANNEX

IACS UNIFIED INTERPRETATION SC 269/REV.2 OF SOLAS REGULATION II-2/13.4.2 ON MEANS OF ESCAPE FROM THE STEERING GEAR SPACE IN CARGO SHIPS

The last sentence of SOLAS regulation II-2/13.4.2.2 reads:

"4.2.2 Dispensation from two means of escape

...In the steering gear space, a second means of escape shall be provided when the emergency steering position is located in that space unless there is direct access to the open deck."

SOLAS regulation II-2/13.4.2.3 reads:

"4.2.3 Escape from machinery spaces other than those of category A

From machinery spaces other than those of category A, two escape routes shall be provided except that a single escape route may be accepted for spaces that are entered only occasionally, and for spaces where the maximum travel distance to the door is 5 m or less."

Interpretation

- 1 Steering gear spaces which do not contain the emergency steering position need only have one means of escape.
- 2 Steering gear spaces containing the emergency steering position can have one means of escape provided it leads directly onto the open deck. Otherwise, two means of escape are to be provided but they do not need to lead directly onto the open deck.
- 3 The dispensations allowed in the last sentence of SOLAS regulation II-2/13.4.2.2 and by SOLAS regulation II-2/13.4.2.3 are to apply regardless of the ship's size.

Notes:

- 1 This Unified Interpretation is to be uniformly implemented by IACS Societies on ships contracted for construction on or after 1 July 2016.
- 2 Rev.1 of this Unified Interpretation is to be uniformly implemented by IACS Societies on ships contracted for construction on or after 1 January 2018.
- 3 Rev.2 of this Unified Interpretation is to be uniformly implemented by IACS Societies on ships contracted for construction on or after 1 January 2026.
- 4 The "contracted for construction" date means the date on which the contract to build the vessel is signed between the prospective owner and the shipbuilder. For further details regarding the date of "contract for construction", refer to IACS Procedural Requirement (PR) No. 29.