

SUB-COMMITTEE ON SHIP SYSTEMS AND
EQUIPMENT
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Agenda item 12

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY,
SECURITY, AND ENVIRONMENT RELATED CONVENTIONS**

**Draft unified interpretation on the application of SOLAS regulation II-2/9 to the spaces
in the cargo area of tankers**

Submitted by the IACS

SUMMARY

Executive summary: This document provides a draft unified interpretation on the application of SOLAS regulation II-2/9 to the spaces in the cargo area of tankers, with a view to facilitating the global and consistent application of these mandatory provisions

Strategic direction: 1.1

High-level action: 1.1.2

Output: 1.1.2.3

Action to be taken: Paragraph 9

Related documents: SSE 3/12/6 and SSE 3/16 (paragraphs 12.30 and 12.31)

Introduction

1 At SSE 3, the Sub-Committee considered document SSE 3/12/6 (IACS), which sought clarification on the application of SOLAS regulation II-2/9 to the spaces in the cargo area of tankers.

2 The report of SSE 3 states (SSE 3/16, paragraph 12.31):

"Following discussion, the Sub-Committee endorsed that SOLAS regulation II-2/9.2.4 should apply to all the individual spaces within the cargo area of tankers. In this connection, the Sub-Committee invited IACS, taking into account the comments made at this session, to prepare the draft unified interpretation for consideration at SSE 4."

Discussion

3 Noting that there is no provision relating to the fire integrity standards and categories for the general areas in the cargo area of tankers, other than cargo pump-rooms; IACS proposed two understandings in document SSE 3/12/6 (IACS) and sought clarification from the Sub-Committee as to which of the following is appropriate:

- .1 SOLAS regulation II-2/9.2.4 is applicable to all the individual spaces within the cargo area of tankers (option 1); or
- .2 SOLAS regulation II-2/9 is simply applicable to all boundaries of each space within the cargo area, i.e. all spaces located within the cargo area are considered to be cargo spaces (category (8) in table 9.7) (option 2).

4 At SSE 3, the majority of the Member States that spoke were of the view that option 1 was more appropriate (see paragraph 2 above).

5 Having considered the outcome of SSE 3, IACS has prepared a draft unified interpretation as set out in the annex. This is intended to clarify that all the individual compartments, including those in the cargo area, should be categorized and insulated in accordance with SOLAS regulation II-2/9.2.4.

6 IACS has also identified typical spaces within the cargo area of tankers that are not specified in tables 9.7 and 9.8 of SOLAS regulation II-2/9.2.4. IACS has considered the functions, nature and fire risk of those spaces in the context of the relevant SOLAS regulations with a view to determining the appropriate classification of these spaces for the purpose of the application of tables 9.7 and 9.8. For example, a "gas free fan room (for cargo space)" and a "cargo compressor motor room" include auxiliary equipment for cargo handling, such as fans and motors, which may also be in a cargo pump room; thus it is considered appropriate that the category of these, as well as similar spaces, is the same as for a cargo pump room, i.e. category (8).

7 Finally, IACS considers it reasonable to classify a ballast water treatment system room as category (7), because such a room is not associated with cargo handling.

8 The issues considered in paragraphs 6 and 7 above have been included in the draft unified interpretation as set out in the annex.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider the foregoing and the draft unified interpretation as set out in the annex, and take action as appropriate.

ANNEX

DRAFT UNIFIED INTERPRETATION OF SOLAS REGULATION II-2/9

SOLAS REGULATION II-2/9.2.4.2

Application of SOLAS II-2/9 to the spaces in the cargo area of tankers

"2.4.2 Fire integrity of bulkheads and decks

2.4.2.1 In lieu of paragraph 2.3 and in addition to complying with the specific provisions for fire integrity of bulkheads and decks of tankers, the minimum fire integrity of bulkheads and decks shall be as prescribed in tables 9.7 and 9.8."

Interpretation

Individual compartments of tankers, including those permitted to be located in the cargo area, should be categorized as per SOLAS regulation II-2/9.2.4, and thus the fire integrity standards stipulated in the relevant regulations should be applied to the boundaries of each space, except a cargo machinery space or a turret compartment on tankers certified under the IGC Code.

For the purpose of fire protection according to tables 9.7 and 9.8 of SOLAS regulation II-2/9.2.4, the following compartments within the cargo area are classified as:

- .1 category (8):
 - .1 cargo handling gear locker;
 - .2 dry chemical storage room (dry chemicals for use in cargo area, not dry chemicals in general);
 - .3 cargo compressor motor room;
 - .4 cargo re-liquefaction plant room;
 - .5 gas free fan room (for cargo spaces); and
 - .6 enclosed eye wash/shower space.
- .2 category (7):
 - .1 ballast water treatment system room.