

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**

**Clarification of SOLAS regulation II-2/13.4.2 relating to the means of escape from the
steering gear space on cargo ships**

Submitted by IACS

SUMMARY

Executive summary: This document discusses SOLAS regulation II-2/13.4.2 relating to the means of escape from machinery spaces other than those of category A. In particular, IACS seeks to clarify these provisions with regard to the means of escape from the steering gear space in cargo ships.

Strategic direction: 1.1

High-level action: 1.1.2

Output: 1.1.2.3

Action to be taken: Paragraph 14

Related documents: SSE 3/12 and SSE 3/16, paragraphs 12.21 and 12.22

Introduction

1 With regard to SOLAS regulation II-2/13.4.2, on the means of escape from machinery spaces other than those of category A, this document discusses the application of these provisions in the context of the means of escape from the steering gear space in cargo ships.

Background

2 SOLAS regulations II-2/13.4.2.2 and 13.4.2.3 state:

"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.

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."

Discussion

3 The original version of IACS unified interpretation (UI) SC269 on means of escape from the steering space on cargo ships was submitted in the annex to document SSE 3/12 (IACS). Noting that a number of delegations expressed the view that the proposal was not totally in line with the relevant SOLAS requirements and, therefore, could not be considered as an interpretation, but as an amendment, the Sub-Committee agreed to take no action regarding the IACS UI (SSE 3/16, paragraphs 12.21 and 12.22).

4 Since SSE 3, IACS has discussed this issue further and has consulted those few Administrations that did not support the version of the UI submitted to SSE 3. It appears that the concerns were limited to paragraphs 2 and 3 of the UI, and these issues are discussed in paragraphs 5 to 11 below.

5 Paragraph 2 of the version of the UI submitted to SSE 3 stated:

"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."

6 Regarding the text in paragraph 5 above, it was expressed that there has to be two means of escape, even if one of them led to an open deck. It was also opined that one of the means of escape is to be provided by means of a stairway, and not a ladder within a trunk because such an arrangement would lead to the crew using the vertical access ladder, which, especially for those spaces with high ceilings, is not easy to climb if it is being used in an emergency situation as a means of escape. Another explanation of the rationale for requiring two means of escape is the difficulty of escaping from the steering gear spaces in conditions of heavy list.

7 In the view of IACS, SOLAS regulation II-2/13.4.2.2 is clear. If direct access to the open deck is provided from a steering gear space containing the emergency steering position, then a second means of escape is not needed. In addition, there is no condition on the size of the steering gear space in SOLAS in the context of the application of this regulation. IACS, therefore, understands that a requirement for two means of escape to be provided from the steering gear space containing the emergency steering position, despite the provision of a means providing direct access to the open deck, goes beyond the requirements of, and would necessitate an amendment to, regulation II-2/13.4.2.2.

8 Furthermore, neither SOLAS regulation II-2/13.4.2.2 itself, nor SOLAS regulation II-2/13.4.2.1 to which the former regulation refers, require a means of escape to be provided in the form of a stairway. Moreover, in the context of cargo ships, SOLAS requirements regarding means of escape from machinery spaces including the steering gear space do not refer to the FSS Code – though it is acknowledged that the means of escape from accommodation spaces, service spaces and control stations are required to comply with paragraph 3 of chapter 13 of the FSS Code. That is to say, IACS is unaware of any requirement specifying that the means of escape from a steering gear space shall be provided by a stairway and, therefore, it is our understanding that the introduction of such a requirement could not be done by means of a unified interpretation, but an amendment would again be necessary.

9 Paragraph 3 of the version of the UI submitted to SSE 3 stated:

"3. Direct access to the open deck

Escape routes that pass only through stairways and/or corridors that have fire integrity protection equivalent to steering gear spaces are considered as providing a "direct access to the open deck."

10 Regarding the text in paragraph 9 above, it was expressed that this means the escape route from the steering gear space, which only passes through stairways and/or corridors, can have a level of fire integrity protection lower than that of the spaces through which the escape route travels, e.g. A-0, the standard fire integrity protection for a steering gear room.

11 Having no intention to undermine the SOLAS requirements, noting that SOLAS regulation II-2/9.2.3.3.2 states, inter alia, "...where it is possible to assign two or more classifications to a space, it shall be treated as a space within the relevant category having the most stringent boundary requirements...", IACS has revised this paragraph of the UI, so that the fire integrity of the escape route is at least equivalent to the space through which it travels.

Proposal

12 Taking into account the further consideration of this issue as discussed above, IACS has revised UI SC269 accordingly. A copy of revision 1 of this IACS UI is provided in the annex to this document.

13 The Sub-Committee is invited to note that IACS members will uniformly implement revision 1 of IACS UI SC269 on ships contracted for construction on or after 1 January 2018, unless they are provided with written instruction to apply a different interpretation by the Administration on whose behalf they are authorized to act as a recognized organization.

Action requested of the Sub-Committee

14 The Sub-Committee is invited to consider the foregoing and the latest version of IACS UI SC269, as set out in the annex, and decide as appropriate.

ANNEX

SC 269 Means of escape from the steering gear space in cargo ships

(Dec
2014)
(Rev.1
Aug
2016)

Last sentence of SOLAS Chapter II-2, Regulation 13.4.2.2 reads:

"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 Chapter II-2, Regulation 13.4.2.3 reads:

"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. Direct access to the open deck.

Escape routes that pass only through stairways and/or corridors are considered as providing a "direct access to the open deck", provided that the escape routes from the steering gear spaces have fire integrity protection equivalent to:

- steering gear spaces; or
- stairways/corridors,

whichever is the more stringent.

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 is to be uniformly implemented by IACS Societies on ships contracted for construction on or after 1 January 2018.
3. 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.

End of
Document