

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**

**Unified interpretation on the minimum width of external
escape routes on cargo ships**

Submitted by IACS

SUMMARY

Executive summary: This document provides a draft unified interpretation on the minimum width of external escape routes on cargo ships, with a view to facilitating the safe and timely evacuation of crews, as well as resolving the differences of interpretations among the Administrations and port State control officers (PSCOs) on this matter

Strategic direction: 1.1

High-level action: 1.1.2

Output: 1.1.2.3

Action to be taken: Paragraph 9

Related documents: SSE 3/12/2 and SSE 3/16, paragraphs 12.25 and 12.26

Introduction

1 The Sub-Committee on Ship Systems and Equipment (SSE), at its third session, considered document SSE 3/12/2 (IACS), which sought clarification on the minimum width of external escape routes (including ladders and passageways) located on the open decks of cargo ships.

2 The report of SSE 3 (SSE 3/16, paragraph 12.26) states:

"... the Sub-Committee endorsed the view that neither SOLAS chapter II-2 nor the FSS Code contained specific requirements for the width of external portions of escape routes, as described in paragraph 5 of document SSE 3/12/2, and that the width of external portions of escape routes was a matter for the flag State. The Sub-Committee also endorsed the view that Port State Control officers should accept such arrangements, in accordance with the Procedures for Port State Control, and invited the III Sub-Committee to emphasize this fact to PSC MOUs..."

3 Noting that III 3 decided that it could not consider the above-mentioned outcome from SSE 3 without prior consideration of the matter by the MSC, IACS remains concerned about this issue. Though it is recorded in document SSE 3/16 that the minimum width of the external portion of escape routes was a matter for the flag State to decide, some PSCOs question the appropriateness of the arrangements on some ships. Furthermore, IACS is concerned that it would increase the burden on Administrations, shipowners and shipyards, which would have to consider the appropriate width of external escape routes on a ship-by-ship basis.

Discussion

4 SOLAS regulation II-2/13.1 states:

"The purpose of this regulation is to provide means of escape so that persons on board can safely and swiftly escape to the lifeboat and liferaft embarkation deck ..."

5 It is acknowledged that there are no requirements relating to the width of external escape routes on cargo ships in either SOLAS or the FSS Code. However, external routes are part of the means of escape to the lifeboat and liferaft embarkation deck. IACS considers that a certain minimum width should be provided, in order that the entire escape route facilitates the safe and timely evacuation of the crew. Consequently, IACS proposes consideration of a unified interpretation on the minimum width of external escape routes on cargo ships so as to provide global and consistent implementation of the requirement that "persons on board can safely and swiftly escape to the lifeboat and liferaft embarkation deck".

6 In considering the minimum width of external escape routes on cargo ships, IACS notes the following relevant provisions regarding internal escape routes:

.1 SOLAS regulation II-2/13.3.3.5 (means of escape from control stations, accommodation and service spaces in cargo ships):

"The width, number and continuity of escape routes shall be in accordance with the requirements in the Fire Safety Systems Code."

.2 FSS Code, chapter 13, paragraph 3:

"Stairways and corridors used as means of escape shall be not less than 700 mm in clear width...."

.3 *Unified interpretations of SOLAS chapter II-2, the FSS Code, the FTP Code and related fire test procedures* (MSC/Circ.1120):

"Escape (and access) routes in ro-ro cargo spaces to be arranged with a minimum clearance of 600 mm in width."

.4 *Unified interpretations of SOLAS chapter II-2* (MSC.1/Circ.1434):

"1 Access routes to the controls for closure of the ventilation system 'permit a rapid shutdown' and adequately 'take into account the weather and sea conditions' if the routes:

.1 are clearly marked and at least 600 mm clear width;..."

.5 *Unified interpretations of SOLAS regulations II-9 and II-13 (MSC.1/Circ.1511):*

"Inclined ladders/stairways in machinery spaces being part of, or providing access to, escape routes but not located within a protected enclosure should not have an inclination greater than 60° and should not be less than 600 mm in clear width..."

7 Taking into account the provisions identified in paragraph 6 above, a reasonable minimum width of external escape routes could be 600 mm or 700 mm. In this regard, considering that "unenclosed" external escape routes are not the same as internal escape routes, as they are enclosed by ceilings and bulkheads that in emergency situations may be more likely to become obstructed thereby hindering escape; IACS considers that the minimum width for an external escape route does not need to be more stringent than that required for internal escape routes. In that sense, the minimum width of all parts of external escape routes should be 600 mm, as proposed in document SSE 3/12/2, which was supported by some Member States at SSE 3.

Proposal

8 With a view to facilitating the safe and timely evacuation of crews as well as avoiding possible different understandings being taken by Administrations, recognized organizations, PSCOs and other stakeholders, IACS proposes the draft unified interpretation as set out in the annex to clarify that the minimum width of external escape routes on cargo ships should be at least 600 mm.

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 to take action as appropriate.

ANNEX

DRAFT UNIFIED INTERPRETATION OF SOLAS REGULATION II-2/13

SOLAS REGULATION II-2/13

Minimum width of external escape routes on cargo ships

"The purpose of this regulation is to provide means of escape so that persons on board can safely and swiftly escape to the lifeboat and liferaft embarkation deck..."

Interpretation

Ladders and passageways which are not enclosed and which are used as part of escape routes located in external open spaces on cargo ships, should not be less than 600 mm in clear width and should not be inclined more than 60° from the horizontal.
