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Agenda item 12

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

Installation of manually operated call points (MOCPs) on cargo ships

Submitted by IACS

SUMMARY

Executive summary: This document discusses fundamental principles regarding the installation of manually operated call points in the context of SOLAS regulation II-2/7.7 and provides the Sub-Committee with the understanding of IACS, with a view to developing a unified interpretation on the matter, focusing on cargo ships

Strategic direction: 1.1

High-level action: 1.1.2

Output: 1.1.2.3

Action to be taken: Paragraph 15

Related documents: FP 55/8/6, FP 55/23 (paragraph 8.14); SSE 1/17/12, SSE 1/21 (paragraph 17.45); SSE 3/12/16 and SSE 3/16 (paragraphs 12.18 and 12.19)

Introduction

1 Regarding the installation of manually operated call points (MOCPs) as required by SOLAS regulation II-2/7.7, IACS unified interpretation (UI) SC241 was considered at FP 55. Taking into account the comments made by Member States at FP 55, the issue was further considered at SSE 1. However, SSE 1 was unable to reach a conclusion on the common understanding provided by IACS (SSE 1/21, paragraph 17.45). A draft revised version of IACS UI SC241 was considered at SSE 3. Nevertheless, while the Sub-Committee did not agree with this text, it requested Member States to communicate to their port State control officers (PSCOs) that, when conducting inspections, they recognize that a common view on the location of manually operated call points required under SOLAS regulation II-2/7.7 has not been agreed. In particular, the locations of manually operated call points at "each exit", for service spaces and store rooms of lower fire risk, such as those containing no flammable

materials, and at each exit from a navigation bridge, irrespective of whether or not a control panel is located in the navigation bridge, are subject to the discretion of the flag Administration (SSE 3/16, paragraphs 12.18 and 12.19).

2 Notwithstanding the above, and noting that the location of MOCPs, especially on cargo ships, has been frequently raised during port State control (PSC) inspections as a deficiency owing to the various understandings among Member States regarding SOLAS regulation II-2/7.7, IACS remains concerned that the above statement in the report of SSE 3 is insufficient to avoid difficulties being experienced during PSC inspections. Furthermore, IACS considers that the efficient survey and certification of ships will be hampered if recognized organizations have to consult Administrations regarding the location of MOCPs on a ship-by-ship basis.

3 In this regard, IACS urges the Sub-Committee to continue its efforts to develop a clear interpretation on SOLAS regulation II-2/7.7, especially in relation to cargo ships. While it would be better to leave the location of MOCPs for passenger ships to the discretion of Administrations, as the arrangements on these ships can vary widely, IACS considers it crucial to have a common understanding of this issue in relation to cargo ships, in order to avoid unnecessary PSC interventions. With a view to providing a basis for a unified interpretation that is focussed on cargo ships, IACS would like to set the fundamental principles on the location of MOCPs, in particular on the four points that SSE 3 identified as those where further work may be warranted (SSE 3/16, paragraphs 12.18.4.1 to 12.18.4.4), as follows:

- .1 the expression "each exit" needs clarification;
- .2 service spaces and store rooms of lower fire risk, such as those containing no flammable materials, should be exempted from having a manually operated call point;
- .3 manually operated call points must be provided at each exit from a navigation bridge irrespective of whether or not a control panel is located in the navigation bridge; and
- .4 a single manually operated call point may serve several exits to open decks in close proximity."

SOLAS requirements regarding MOCPs

4 SOLAS regulation II-2/7.7 provides:

"...One manually operated call point shall be located at each exit. Manually operated call points shall be readily accessible in the corridors of each deck such that no part of the corridor is more than 20 m from a manually operated call point."

Clarification of "each exit" (SSE 3/16, paragraph 12.18.4.1)

5 Regarding the text of SOLAS regulation II-2/7.7, IACS considers that "each exit" does not mean all the doors within the accommodation block. If MOCPs are required to be installed at all the doors (see the black round marks in figure 1 below), there would be an unnecessary number of MOCPs. It should be noted that this is not consistent with the current practice on cargo ships.

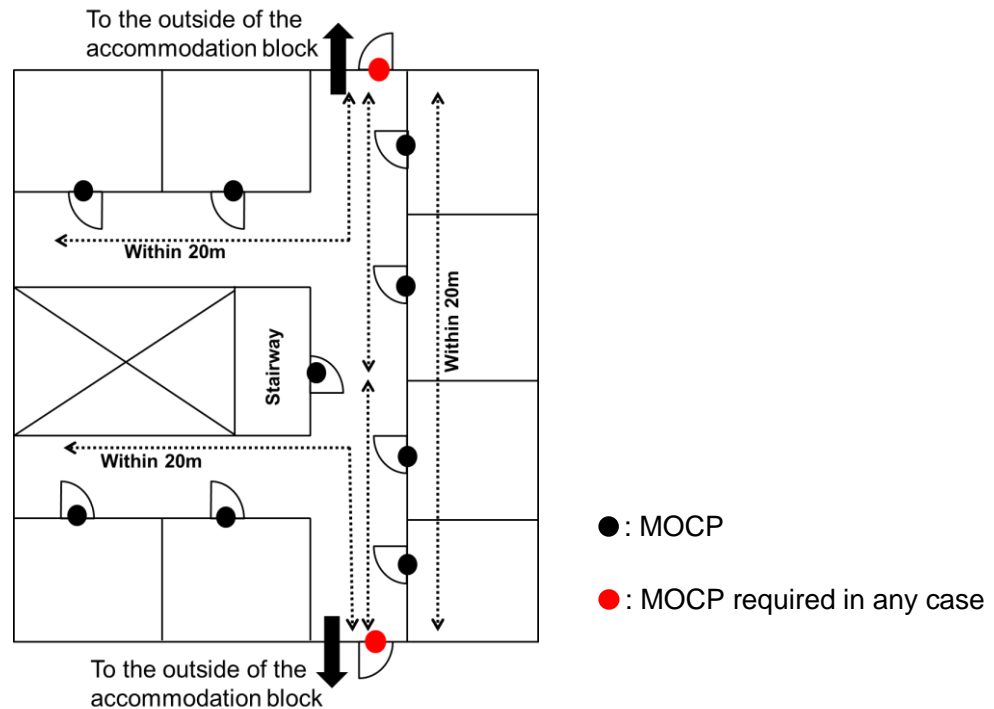


Figure 1: MOCPs in the accommodation block of a cargo ship

6 IACS considers that it is reasonable to interpret "exit" as the "doors leading to the outside of the accommodation block", but not "all the doors within the accommodation block". This would mean that only those MOCPs shown with red marks in figure 1 would be required, provided that all the exits from the internal spaces are located within 20 m of the exits leading to the outside of the accommodation block. When considering figure 1 above, IACS notes that there are cases where the exits do not lead directly to the open deck, e.g. deck levels that have an internal stairway with citadels. In such cases, where the internal stairway provides the only exit from a particular deck level, IACS considers that this "internal stairway" should be regarded as the "exit" from that deck and, therefore, a MOCP is required at the entrance to the internal stairway at that deck level.

Possibility of single MOCP serving several exits to open decks in close proximity (SSE 3/16, paragraph 12.18.4.4)

7 It can be interpreted that the requirement regarding accessibility of MOCPs, which states that no part of a corridor is more than 20 m from a manually operated call point within the accommodation block, can also be applicable to the exits directly leading to the open deck that are situated on the external boundary or in the vicinity of the accommodation block, as often found on a cargo ship.

8 At SSE 3, some Member States objected to the draft revised UI SC241 provided in document SSE 3/12/16 on the basis that, by literally reading the regulation, MOCPs need to be installed at each exit, even though those exits are located within a range of 20 m, as shown by the black round marks in figure 2 below.

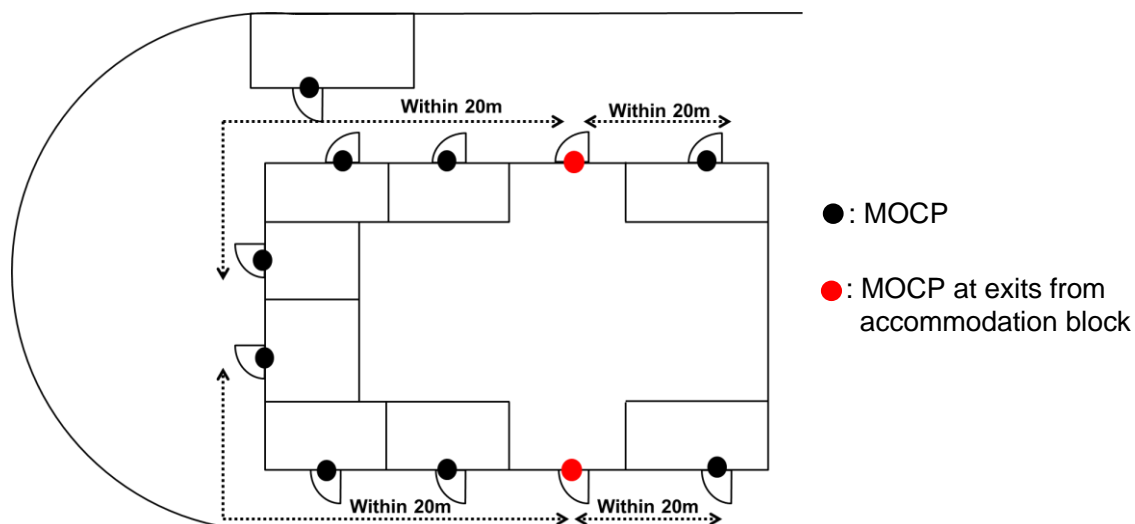


Figure 2: MOCPs at the exits from an accommodation block on a cargo ship

9 IACS considers that one MOCP covering a range of 20 m is sufficient, on the basis that wherever a crew member is, the MOCP can be readily and swiftly activated in the event of a fire. In this regard, if multiple exits are located within the range of 20 m on an outside boundary or in the vicinity on the same deck, IACS considers that one MOCP at each exit from the accommodation block, shown in the red round marks in figure 2 above, can serve for the other exits as well. IACS understands that this is in line with the current practice on cargo ships.

Necessity of MOCPs for service spaces/store rooms of lower fire risk (SSE 3/16, paragraph 12.18.4.2)

10 As SOLAS regulation II-2/7.7 stipulates that MOCPs shall be installed "throughout the accommodation spaces, service spaces and control stations", IACS considers that MOCPs shall be installed in accordance with the principles stated in paragraphs 4 to 6 above. However, it is noted that the regulation makes no mention of spaces that are "away" from the accommodation block.

11 Considering that a MOCP is activated manually, it is questionable whether it is effective to install an MOCP for the spaces "away" from the accommodation block, where the crew is not normally employed, such as the bosun's store and other deck stores, regardless of the fire risk the space might have. Therefore, IACS is of the view that exits from service spaces and store rooms that are located away from the accommodation block do not need a MOCP.

Necessity of MOCPs in the navigation bridge (SSE 3/16, paragraph 12.18.4.3)

12 IACS has noted the recent increase of control panels on navigation bridges that include the ability to initiate the fire alarm at the control panel. In this regard, IACS considers that it is not necessary to have MOCPs at the exits from the navigation bridge, provided that the functionality of a MOCP is built into the control panel installed on the navigation bridge and that the exits are within 20 m from such a control panel. If the distance between the exits of the navigation bridge and the control panel exceeds 20 m, as may be found on passenger ships, then MOCPs should be provided to such exits even if the functionality of a MOCP has been fitted into the control panel.

Summary

13 On the four issues that SSE 3 identified as those where further work may be warranted, as explained in paragraph 12.18.4 of document SSE 3/16, IACS has the following understanding in relation to the application of SOLAS regulation II-2/7.7 on cargo ships:

- .1 "each exit" does not mean "all the doors of the spaces within the accommodation block" but means "the doors leading to the outside of the accommodation block";
- .2 one MOCP can serve several exits to open decks in close proximity provided that such exits are located within 20 m from the MOCP on the same deck;
- .3 a MOCP is not required for service spaces and store rooms that are located away from the accommodation block; and
- .4 MOCPs are not required at the exits from the navigation bridge provided that the functionality of a MOCP is fitted into the control panel installed on the navigation bridge and that the exits are within 20 m from such a control panel.

14 Finally, noting that SSE 3 recognized the views on the location of MOCPs, as required by SOLAS regulation II-2/7.7, varies among Member States, the Sub-Committee is invited to note that IACS UI SC241, which has been uniformly implemented by IACS members since 1 December 2010, will continue to be applied by IACS members until an agreed revised unified interpretation is finalized, unless written instructions to apply a different interpretation are provided by the Administration on whose behalf they are authorized to act as a recognized organization.

Action requested of the Sub-Committee

15 The Sub-Committee is invited to:

- .1 consider the foregoing and, in particular, the understanding provided in paragraph 13 above and the information in paragraph 14 above, and take action as appropriate; and
- .2 note that IACS is ready to develop an appropriate unified interpretation focusing on the application of SOLAS regulation II-2/7.7 to cargo ships that would take into account the Sub-Committee's decision on this matter, for consideration at a subsequent session of the Sub-Committee.