

SUB-COMMITTEE ON SHIP SYSTEMS AND
EQUIPMENT
4th session
Agenda item 12

SSE 4/12/12
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**UNIFIED INTERPRETATION TO PROVISIONS OF IMO SAFETY,
SECURITY, AND ENVIRONMENT-RELATED CONVENTIONS**

**Clarification on the application of SOLAS regulation II-2/20.6.2 and MSC.1/Circ.1275
regarding the arrangement of portable fire extinguishers
for ro-ro spaces and vehicle spaces**

Submitted by the Republic of Korea and IACS

SUMMARY

Executive summary: This document seeks clarification on the application of SOLAS regulation II-2/20.6.2.1 and the *Unified interpretation of SOLAS chapter II-2 on the number and arrangement of portable fire extinguishers on board ships* (MSC.1/Circ.1275) regarding the arrangement of portable fire extinguishers in ro-ro spaces and vehicle spaces, with a view to facilitating the global and consistent implementation of these provisions

Strategic direction: 1.1

High-level action: 1.1.2

Output: 1.1.2.3

Action to be taken: Paragraph 10

Related documents: FP 51/WP.6 and MSC.1/Circ.1275

Introduction

1 SOLAS regulation II-2/20.6.2 refers to the arrangements of portable fire extinguishers in vehicle spaces and ro-ro spaces.

2 The Maritime Safety Committee (MSC), at its eighty-fourth session, approved the *Unified interpretation of SOLAS chapter II-2 on the number and arrangement of portable fire extinguishers on board ships* (MSC.1/Circ.1275) with a view to providing more specific guidance when applying the relevant SOLAS regulations as referred to in paragraph 1.1 of the annex to the mentioned circular.

3 However, MSC.1/Circ.1275 appears to raise an inconsistency with respect to SOLAS regulation II-2/20.6.2 regarding the minimum number of portable fire extinguishers in ro-ro spaces and vehicle spaces. In this regard, the co-sponsors would like to seek clarification on the application of SOLAS regulation II-2/20.6.2 and MSC.1/Circ.1275 regarding the arrangement of portable fire extinguishers in ro-ro spaces and vehicle spaces.

Discussion

4 SOLAS regulation II-2/20.6.2.1 states:

"Portable extinguishers shall be provided at each deck level in each hold or compartment where vehicles are carried, spaced not more than 20 m apart on both sides of the space."

5 According to the table in MSC.1/Circ.1275 on the minimum number and distribution of portable fire extinguishers in the various types of spaces on board ships, it is stated, regarding the minimum number of extinguishers in ro-ro spaces and vehicle spaces, that:

"No point if space is more than 20 m walking distance from an extinguisher at each deck level."

6 In accordance with the above SOLAS regulation and unified interpretation, the co-sponsors consider that two different interpretations are possible as follows:

- .1 the distance between two consecutive fire extinguishers is to be a maximum of 20 m, in accordance with SOLAS regulation II-2/20.6.2 (see figure 1 below); or
- .2 the maximum distance between two consecutive fire extinguishers can be 40 m, in accordance with the interpretation in MSC.1/Circ.1275 (see figure 2 below).

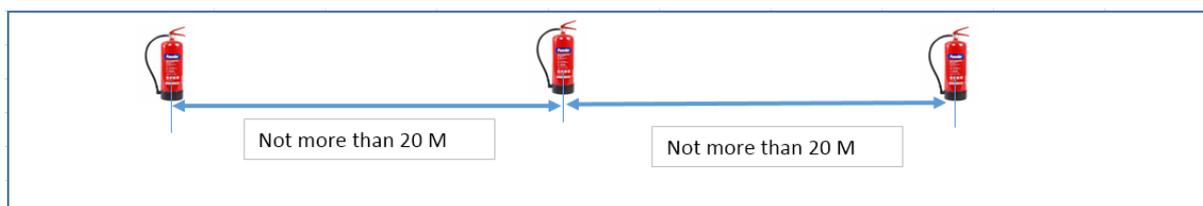


Figure 1: Distance between fire extinguishers as per SOLAS regulation II-2/20.6.2

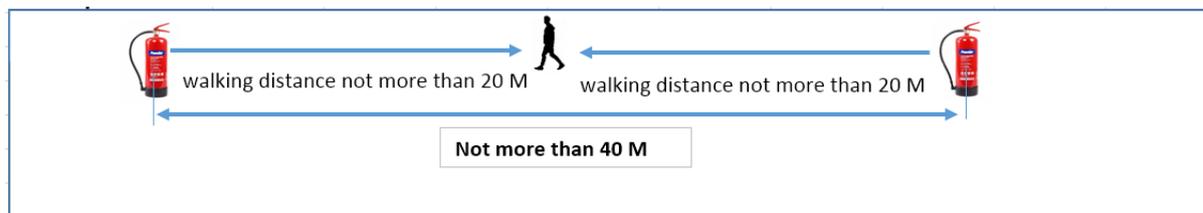


Figure 2: Distance between fire extinguishers as per MSC.1/Circ.1275

7 Having carefully considered the matter, the co-sponsors have agreed that the mandatory SOLAS requirement is to prevail over the non-mandatory interpretation in the MSC circular where any inconsistency exists between the two instruments. Hence, the co-sponsors are of the opinion that the distance between two consecutive fire extinguishers is to be a maximum of 20 m, on both sides of the space, in accordance with SOLAS regulation II-2/20.6.2.1.

8 Taking into account paragraphs 6 and 7 above, the co-sponsors consider that this specific part of MSC.1/Circ.1275 needs to be reviewed and amended, in order to facilitate the global and consistent arrangement of portable fire extinguishers in ro-ro spaces and vehicle spaces.

9 If the Sub-Committee agrees to undertake such a review of MSC.1/Circ.1275, the co-sponsors consider that there is a typographical error in the text as compared to the draft circular prepared by the Sub-Committee on Fire Protection in document FP 51/WP.6 (Report of the Drafting Group):

FP 51/WP.6

"No point **in** space is more than 20 m walking distance from an extinguisher at each deck level"

MSC.1/Circular 1275

*"No point **if** space is more than 20 m walking distance from an extinguisher at each deck level"*

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the foregoing, in particular the proposal to amend and correct MSC.1/Circ.1275, and take action, as appropriate.
