

SUB-COMMITTEE ON SHIP SYSTEMS AND
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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY AND
ENVIRONMENT RELATED CONVENTIONS**

**Requirements for two-way portable radiotelephone apparatus for fire-fighter's
communication (SOLAS regulation II-2/10.10.4)**

Submitted by IACS

SUMMARY

Executive summary: This document proposes a draft unified interpretation of SOLAS regulation II-2/10.10.4 on the requirements for two-way portable radiotelephone apparatus for fire-fighter's communication, in particular, regarding the term "explosion-proof type or intrinsically safe"

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 6

Related documents: None

Background

1 Amendments to SOLAS regulation II-2/10 that were adopted by resolution MSC.338(91) require, *inter alia*, two two-way portable radiotelephone apparatuses per fire party to be carried on board as follows:

"10.4 Fire-fighter's communication

For ships constructed on or after 1 July 2014, a minimum of two two-way portable radiotelephone apparatus for each fire party for fire-fighter's communication shall be carried on board. Those two-way portable radiotelephone apparatus shall be of an explosion-proof type or intrinsically safe. Ships constructed before 1 July 2014 shall comply with the requirements of this paragraph not later than the first survey after 1 July 2018."

Discussion

2 IACS considers that the requirement in SOLAS regulation II-2/10.10.4 on mitigating the explosion hazard is rather vague and open to interpretation. IACS has further witnessed some inconsistencies in the implementation of this requirement, in particular, with respect to the term "explosion-proof type or intrinsically safe". IACS understands that specifying "intrinsically safe" type equipment is in some ways meaningless without also specifying the need for the certified safe type and further the essential particulars defined in IEC Standards 60079 and 60092-502, e.g. required category of the intrinsically safe apparatus ("ia", "ib", etc.), temperature class or the apparatus group; as "intrinsic safety" is only a method of protection and not the level of it. Specifying the "explosion-proof type" is even vaguer.

3 It is noted that a similar lack of clarity regarding the requirements related to the two-way portable radiotelephone apparatus for fire patrols on passenger ships exists in relation to SOLAS regulation II-2/7.8.3 (two-way portable radiotelephone apparatus). It is noted that MSC/Circ.1120 on *Unified Interpretations of SOLAS Chapter II-2, the FSS Code, the FTP Code and related fire test procedures* provides a unified interpretation (UI) regarding this requirement.

Proposal

4 Taking account of the above analysis, including the clarification provided in MSC/Circ.1120 and with a view to facilitating the global and consistent implementation of the requirements of SOLAS regulation II-2/10.10.4, IACS has developed a draft IACS Unified Interpretation (UI). A copy of this draft UI is provided in the annex to this document.

5 If the Sub-Committee agrees with the proposed draft IACS UI, IACS is of the view that, when finalized, it should be applied to ships contracted for construction on or after [1 January 2020], unless IACS members are provided with written instructions 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

6 The Sub-Committee is invited to consider the foregoing and the draft UI provided in the annex and take action, as appropriate.

ANNEX

UNIFIED INTERPRETATION OF SOLAS REGULATION II-2/10.10.4 (AS AMENDED BY RESOLUTION MSC.338(91))

SOLAS regulation II-2/10.10.4 states:

"10.4 Fire-fighter's communication

For ships constructed on or after 1 July 2014, a minimum of two two-way portable radiotelephone apparatus for each fire party for fire-fighter's communication shall be carried on board. Those two-way portable radiotelephone apparatus shall be of an explosion-proof type or intrinsically safe. Ships constructed before 1 July 2014 shall comply with the requirements of this paragraph not later than the first survey after 1 July 2018."

Interpretation

1. Two-way portable radiotelephone apparatus for fire-fighter's communication required by SOLAS regulation II-2/10.10.4 should be of certified safe type suitable for use in zone 1 hazardous areas, as defined in IEC Publication 60079.
 2. The minimum requirements in respect to the apparatus group and temperature class are to be consistent with the most restrictive requirements for the hazardous area zone on board which is accessible to fire party.
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