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Agenda item 20

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## ANY OTHER BUSINESS

### Clarification on the application of the fire protection provisions for incinerators and waste stowage spaces

Submitted by IACS

#### SUMMARY

*Executive summary:* This document identifies several discrepancies between annex 2 to resolution MEPC.244(66) and SOLAS chapter II-2 with regard to the fire protection requirements for incinerator spaces and waste stowage spaces, and proposes a course of action to remove those discrepancies

*Strategic direction, if applicable:* 1 and 6

*Output:* Not applicable

*Action to be taken:* Paragraph 11

*Related documents:* MEPC 62/7/6; FP 56/20, FP 56/23; MEPC 65/22; MSC 92/26; and MEPC 66/4/1

#### Introduction

1 Annex 2 to the 2014 *Standard specification for shipboard incinerators* (resolution MEPC.244(66)), is entitled "Fire protection requirements for incinerators and waste stowage spaces".

2 IACS has identified the following discrepancies between annex 2 to resolution MEPC.244(66) (hereafter referred to as "annex 2") and SOLAS chapter II-2 with regard to the fire protection requirements for incinerator spaces and waste stowage spaces:

- .1 SOLAS regulation II-2/10.5.1.1 requires that a combined incinerator and waste storage space shall be provided with any one of the fixed fire-extinguishing systems specified in regulation II-2/10.4.1, whereas paragraph 4 of annex 2 specifies the fitting of an automatic sprinkler system; and

- .2 a fixed fire detection and fire alarm system is required for enclosed spaces containing incinerators (SOLAS regulation II-2/7.4.1.3) and service spaces on board passenger ships that carry more than 36 passengers (SOLAS regulation II-2/7.5.2), whereas annex 2 does not mention the need for such a system in a combined incinerator and waste storage space or an independent waste storage space.

## Discussion

3 Regarding paragraph 2.1 above, IACS considers that a combined incinerator space and waste storage space can be protected by any fixed fire-extinguishing system as per SOLAS regulation II-2/10.4.1 and that such protection is not limited to being provided by an automatic sprinkler system, as recommended in annex 2.

4 SOLAS regulation II-2/10.2.1 prescribes the fire-extinguishing capacity of fire hydrants to protect the machinery spaces and service spaces of any ship. SOLAS regulation II-2/10.3.2 requires service spaces of all ships to be protected by portable fire extinguishers of an appropriate type and sufficient number.

5 IACS considers that the above measures, i.e. a fixed fire detection and fire alarm system, a fixed fire-extinguishing system, the provision of fire hydrants and an appropriate number of suitable portable fire extinguishers, represent adequate and appropriate fire safety arrangements for such spaces, and it is not necessary to install an additional automatic sprinkler system, as specified in annex 2.

6 IACS notes that resolution MEPC.244(66) was developed on the basis of *Standard specification for shipboard incinerators* (resolution MEPC.76(40)). During the development of resolution MEPC.244(66), IACS identified discrepancies between annex A2 to resolution MEPC.76(40) and SOLAS chapter II-2, and "recognized that annex A2 to resolution MEPC.76(40) may need to be modified, or even deleted, if the MSC decides to develop appropriate amendments to SOLAS" (MEPC 62/7/6, paragraph 9). However, after reviewing the reports of subsequent sessions of the Committees and the Sub-Committee on Fire Protection, IACS is unable to find any resolution of this issue.

7 The Secretariat, in document MEPC 66/4/1, proposed amendments to the references to the SOLAS II-2 regulations referred to in annex A2 to resolution MEPC.76(40), however, the technical fire protection provisions were kept unchanged. IACS notes that the fire protection provisions in annex 2 are the same as those in annex A2 to resolution MEPC.76(40).

8 In addition, IACS notes that:

- .1 As onboard equipment, incinerators have been provided with sufficient technical specifications in annex 1 to resolution MEPC.244(66). Annex 2 refers to fire protection measures for the spaces where the incinerator is installed and is not necessarily considered as part of the technical specification of the incinerator itself.
- .2 Based on the discussion of document FP 56/20 (IACS) by the Sub-Committee on Fire Protection (FP 56/23, paragraphs 9.28 to 9.30), both MEPC 65 (MEPC 65/22, paragraph 11.71) and MSC 92 (MSC 92/26, paragraph 8.22) endorsed the view of FP 56 that the survey and certification of the fire protection arrangements of incinerator spaces and waste stowage spaces should fall under the scope of the SOLAS Convention. However, annex 2 to resolution MEPC.244(66) still includes fire protection provisions.

## **Proposal**

9 IACS considers that the fire safety requirements of SOLAS chapter II-2 are sufficient for incinerators and waste storage spaces, and that the fire protection of such spaces is not limited to the provisions of annex 2. Therefore, it is proposed that the provisions in annex 2 to resolution MEPC.244(66) be either amended to align with SOLAS chapter II-2 or, taking into account the previous decisions of the Committees as explained in paragraph 8.2 above, be deleted.

## **The way forward**

10 If the proposal in paragraph 9 is agreed, in principle, by the Sub-Committee, IACS offers to develop a document proposing a new output to amend or delete annex 2 from resolution MEPC.244(66), with a view to seeking the necessary Member State co-sponsorship.

## **Action requested of the Sub-Committee**

11 The Sub-Committee is invited to consider the discussion of the issue in paragraphs 3 to 8, the proposal in paragraph 9 and the way forward in paragraph 10 above, and take action, as appropriate.

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