

SUB-COMMITTEE ON SHIP SYSTEMS AND
EQUIPMENT
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Agenda item 16

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

Clarification on the storage requirements for fire-fighter's outfits in tankers

Submitted by IACS

SUMMARY

Executive summary: This document seeks the advice of the Sub-Committee on the storage requirements for fire-fighter's outfits in tankers, in accordance with SOLAS regulations II-2/10.10.2.1, 10.10.2.3 and 10.10.3.1

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 9

Related documents: None

Introduction

1 Recently, the attention of IACS member societies has been drawn to port State control deficiencies and associated discussions regarding the storage of fire-fighter's outfits in tankers that are required to be provided with more than two fire-fighter's outfits, in accordance with SOLAS regulations II-2/10.10.2.1, 10.10.2.3 and 10.10.3.1.

2 SOLAS regulations II-2/10.10.2.1, 10.10.2.3 and 10.10.3.1 state:

"10.10.2.1 Ships shall carry at least two fire-fighter's outfits."

"10.10.2.3 In addition, in tankers, two fire-fighter's outfits shall be provided."

"10.10.3.1 The fire-fighter's outfits or sets of personal equipment shall be kept ready for use in an easily accessible location that is permanently and clearly marked and, where more than one fire-fighter's outfit or more than one set of personal equipment is carried, they shall be stored in widely separated positions."

Discussion

3 According to the above regulations, the fire-fighter's outfits or sets of personal equipment shall be provided and stored in widely separated positions when more than one fire-fighter's outfit or more than one set of personal equipment is carried. In cargo ships, other than tankers, only two fire-fighter's outfits are required to be provided on board, so there is no need for an interpretation of the phrase "stored in widely separated positions".

4 However, in tankers, when two additional fire-fighter's outfits are to be provided in accordance with SOLAS regulation II-2/10.10.2.3, IACS is aware of differing interpretations regarding the separation and storage of these four sets of fire-fighter's outfits.

5 For example, the following three options are considered possible to comply with the requirement in SOLAS regulation II-2/10.10.3.1 for a tanker to be provided with four sets of fire-fighter's outfits:

Option 1: 2 sets + 2 sets stored in widely separated positions (i.e. 2-2 in two different positions); or

Option 2: 1 set + another 1 set + the other 2 sets stored in widely separated positions (i.e. 1-1-2 in three different positions); or

Option 3: 4 sets of fire-fighter's outfits stored in widely separated positions individually (i.e. 1-1-1-1 in four different positions).

6 If the expression "they shall be stored in widely separated positions" is read literally, all sets of fire-fighter's outfits, relative to each, shall be widely separated and, therefore, option 3 above appears correct.

7 However, considering that fire-fighting can be more effective when two or more fire-fighters work in a fire-fighting team, a more appropriate understanding would be that the four sets of fire-fighter's outfits need not necessarily be stored in widely separated positions individually and, therefore, options 1, 2 and 3 above may all be acceptable.

Proposal

8 The Sub-Committee is requested to consider and decide which option or options in paragraph 5 above are acceptable, noting that if it is considered that this issue can be addressed by a unified interpretation, IACS will draft such an interpretation, with a view to submitting it to the Sub-Committee's next session for its consideration.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider the foregoing discussion and the proposal in paragraph 8 above, and take action, as appropriate.
