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WORK PROGRAMME OF THE COMMITTEE AND SUBSIDIARY BODIES

Proposal for a new output to revise resolution MEPC.244(66)

Submitted by China, the Russian Federation and IACS

SUMMARY

Executive summary: This document proposes a new output to develop amendments to the *2014 Standard specification for shipboard incinerators* (resolution MEPC.244(66)) by revising the provisions of its annex 2 on fire protection requirements for incinerators and waste stowage spaces, to remove the discrepancies between resolution MEPC.244(66) and SOLAS chapter II-2

Strategic direction, if applicable: 1

Output: Not applicable

Action to be taken: Paragraph 16

Related documents: SSE 7/20/7, SSE 7/21 (paragraph 20.46) and resolution MEPC.244(66)

Introduction

1 This document is submitted in accordance with the provisions of the *Organization and method of work of the Maritime Safety Committee and the Marine Environmental Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2) on the submission of proposals for new outputs and proposes to amend or delete annex 2 of resolution MEPC.244(66) to remove the discrepancies between resolution MEPC.244(66) and SOLAS chapter II-2.

Background

2 IACS has identified several discrepancies between annex 2 to resolution MEPC.244(66) and SOLAS chapter II-2 with regard to the fire protection requirements for incinerators and waste stowage spaces, for example:

- .1 SOLAS regulation II-2/10.5.1.1 requires that a combined incinerator and waste stowage 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 carrying more than 36 passengers (SOLAS regulation II-2/7.5.2), whereas annex 2 to resolution MEPC.244(66) does not mention the need for such a system in a combined incinerator and waste stowage space or an independent waste stowage space.

3 Based on these observations, IACS submitted document SSE 7/20/7 on clarification of the application of the fire protection provisions for incinerators and waste stowage spaces. The identified discrepancies were discussed by SSE 7 and a course of action was proposed to remove those discrepancies.

4 In particular, SSE 7 agreed on the need for clarifying the application of the fire protection provisions for incinerators and waste stowage spaces, and invited IACS and interested Member States and international organizations to submit proposals for a relevant new output to MEPC for amending or deleting annex 2 to resolution MEPC.244(66), as appropriate, in accordance with the Committees' method of work (MSC-MEPC.1/Circ.5/Rev.2) (SSE 7/21, paragraph 20.46).

5 Based on that invitation, the co-sponsors agreed that an amendment to resolution MEPC.244(66) is the necessary solution to eliminate the inconsistency between annex 2 to resolution MEPC.244(66) and SOLAS chapter II-2.

IMO's objectives

6 The main goal of the proposal is to review the fire protection requirements for incinerators and waste stowage spaces as specified in annex 2 to resolution MEPC.244(66) and delete the conflicting requirements as appropriate. This clearly lies within IMO's strategic directions SD 1 "Improve implementation" and SD 6 "Ensure regulatory effectiveness".

Need

7 The co-sponsors consider that annex 2 to resolution MEPC.244(66) could be deleted completely upon the review by SSE 7 and Member States' agreement to remove its discrepancies relative to SOLAS chapter II-2, thereby facilitating global and consistent implementation of SOLAS.

Analysis of the issue

8 In annex 2 to resolution MEPC.244(66), the construction and insulation of incinerator spaces and waste stowage spaces, as well as their space category according to SOLAS regulation II-2/9.2 are specified. However, annex 2 of resolution MEPC.244(66) also provides detailed requirements on fire detection and fire-extinguishing in such spaces, which are inconsistent with the relevant requirements as stated in SOLAS regulations II-2/7 and 10 (paragraph 2 above).

9 The co-sponsors have considered the following issues:

- .1 resolution MEPC.244(66) was developed on the basis of the *Standard specification for shipboard incinerators* (resolution MEPC.76(40)), however, annex 2 to resolution MEPC.244(66) refers to the fire protection measures for the incinerator spaces and waste stowage spaces, which are not necessarily a part of the technical specifications of the incinerator itself; and

- .2 meanwhile, the fire safety requirements of SOLAS chapter II-2 are considered sufficient for incinerator and waste stowage spaces such that the fire protection of these spaces need not be addressed by the recommendations under annex 2 to resolution MEPC.244(66).

Analysis of implications

10 No costs to the maritime industry are anticipated. The purpose is to delete annex 2 to resolution MEPC.244(66), so that the requirements in SOLAS are implemented to alleviate possible inconsistencies or misunderstandings in the application of the fire safety provisions to incinerator and waste stowage spaces. As such, the administrative burden to the Organization and to the Member States is anticipated to be significantly reduced and may approach zero. The complete checklist for identifying administrative requirements and burdens is set out as annex 1 to this document.

Benefits

11 A clearer understanding, together with greater efficiency and consistency when implementing respective provisions in resolution MEPC.244(66) and requirements of SOLAS, are anticipated.

Industry standards

12 SOLAS is the fundamental regulatory instrument specifying fire protection requirements for ships, including incinerator spaces and waste stowage spaces.

Output

13 The following new output is proposed for inclusion in the Committee's work programme, with the output being placed on the agenda of the SSE Sub-Committee:

"Amendments to resolution MEPC.244(66)"

to review annex 2 to the resolution, delete the conflicting requirements relative to SOLAS (the whole annex could be deleted based on the discussion provided under paragraph 9 above), and re-number the original annexes 3, 4 and 5 as annexes 2, 3 and 4, respectively.

Human element

14 As the proposal is to review and delete the fire protection requirements for incinerator spaces and waste stowage spaces, which are contradictory to those already covered in SOLAS chapter II-2, no impact on the human element is anticipated. The completed checklist for considering human element issues contained in MSC-MEPC.7/Circ.1 is set out in annex 2 to this document.

Urgency

15 It is proposed that the output should be included in the IMO's Strategic Plan and priorities for the 2022-2023 biennium.

Action requested of the Committee

16 The Committee is invited to consider the proposals in paragraphs 13 and 15 and take action as appropriate.

ANNEX 1

CHECKLIST FOR IDENTIFYING ADMINISTRATIVE REQUIREMENTS

This checklist should be used when preparing the analysis of implications required in submissions of proposals for inclusion of outputs. For the purpose of this analysis, the term "administrative requirement" is defined in accordance with resolution A.1043(27), as an obligation arising from a mandatory IMO instrument to provide or retain information or data.

Instructions:

- (A) If the answer to any of the questions below is **YES**, the Member State proposing an output should provide supporting details on whether the requirements are likely to involve start-up and/or ongoing costs. The Member State should also give a brief description of the requirement and, if possible, provide recommendations for further work, e.g. would it be possible to combine the activity with an existing requirement?
- (B) If the proposal for the output does not contain such an activity, answer **NR** (Not required).
- (C) For any administrative requirement, full consideration should be given to electronic means of fulfilling the requirement in order to alleviate administrative burdens.

1. Notification and reporting? Reporting certain events before or after the event has taken place, e.g. notification of voyage, statistical reporting for IMO Members	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
2. Record keeping? Keeping statutory documents up to date, e.g. records of accidents, records of cargo, records of inspections, records of education	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
3. Publication and documentation? Producing documents for third parties, e.g. warning signs, registration displays, publication of results of testing	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
4. Permits or applications? Applying for and maintaining permission to operate, e.g. certificates, classification society costs	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
5. Other identified requirements?	NR <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		

ANNEX 2

CHECKLIST FOR CONSIDERING HUMAN ELEMENT ISSUES BY IMO BODIES

<p>Instructions: If the answer to any of the questions below is:</p> <p>(A) YES, the preparing body should provide supporting details and/or recommendation for further work. (B) NO, the preparing body should make proper justification as to why human element issues were not considered. (C) NA (Not Applicable) – the preparing body should make proper justification as to why human element issues were not considered applicable.</p>	
<p>Subject being assessed: (e.g. resolution, instrument, circular being considered)</p> <p>Fire protection requirements for incinerators and waste stowage spaces; Resolution MEPC.244(66) and SOLAS chapter II-2.</p>	
<p>Responsible Body: (e.g. Committee, Sub-Committee, Working Group, Correspondence Group, Member State)</p> <p>Marine Environment Protection Committee and the SSE Sub-Committee</p>	
1. Was the human element considered during development or amendment process related to this subject?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
2. Has input from seafarers or their proxies been solicited?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
3. Are the solutions proposed for the subject in agreement with existing instruments? (Identify instruments considered in comments section)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
4. Have human element solutions been made as an alternative and/or in conjunction with technical solutions?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
5. Has human element guidance on the application and/or implementation of the proposed solution been provided for the following:	
• Administrations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
• Ship owners/managers?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
• Seafarers?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
• Surveyors?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
6. At some point, before final adoption, has the solution been reviewed or considered by a relevant IMO body with relevant human element expertise?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
7. Does the solution address safeguards to avoid single person errors?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
8. Does the solution address safeguards to avoid organizational errors?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
9. If the proposal is to be directed at seafarers, is the information in a form that can be presented to and is easily understood by the seafarer?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
10. Have human element experts been consulted in development of the solution?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<p>11. HUMAN ELEMENT: Has the proposal been assessed against each of the factors below?</p>	
<input type="checkbox"/> CREWING. The number of qualified personnel required and available to safely operate, maintain, support, and provide training for system.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> PERSONNEL. The necessary knowledge, skills, abilities, and experience levels that are needed to properly perform job tasks.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> TRAINING. The process and tools by which personnel acquire or improve the necessary knowledge, skills, and abilities to achieve desired job/task performance.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

<input type="checkbox"/> OCCUPATIONAL HEALTH AND SAFETY. The management systems, programmes, procedures, policies, training, documentation, equipment, etc. to properly manage risks.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> WORKING ENVIRONMENT. Conditions that are necessary to sustain the safety, health, and comfort of those on working on board, such as noise, vibration, lighting, climate, and other factors that affect crew endurance, fatigue, alertness and morale.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> HUMAN SURVIVABILITY. System features that reduce the risk of illness, injury, or death in a catastrophic event such as fire, explosion, spill, collision, flooding, or intentional attack. The assessment should consider desired human performance in emergency situations for detection, response, evacuation, survival and rescue and the interface with emergency procedures, systems, facilities and equipment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<input type="checkbox"/> HUMAN FACTORS ENGINEERING. Human-system interface to be consistent with the physical, cognitive, and sensory abilities of the user population.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<p>Comments: (1) Justification if answers are NO or Not Applicable. (2) Recommendations for additional human element assessment needed. (3) Key risk management strategies employed. (4) Other comments. (5) Supporting documentation.</p> <p>Human element is not considered further as the proposal is to remove inconsistencies in existing requirements only.</p>	
