



DEPARTMENT OF TRADE AND INDUSTRY

Locking of Doors on Escape Routes

The aim of this notice is to clarify The Isle of Man Ship Registry's interpretation of the safety/security conflict created by the security requirement to secure escape route doors and the safety requirement to have them available for escape and access in an emergency.

Documents referred to in this notice:

SOLAS II-2 (2004 Consolidated Edition)

MSC Circular 847 (Interpretations of vague expressions and other vague wording in SOLAS II-2)

Most regulations and notices are available on the Isle of Man Government web site: <http://www.gov.im/dti/shipping> or by contacting marine.survey@gov.im

Introduction

There exists a well known conflict between safety and security with regard to locking the doors on escape routes. Numerous parts of the ISPS Code require the locking or securing of these access points to prevent unauthorised access to the ship. For safety reasons such locks must not impede any emergency escape from these areas. Over the years there has been many ways adopted for overcoming this conflict. Unfortunately some do not allow access from outside the space in an emergency. This is unacceptable.

This MSN clarifies the Isle of Man Ship Registry recommendations on the acceptability of the various methods currently in use.

It must be stressed that this MSN does not introduce any "extra" Isle of Man requirements, but only clarifies SOLAS.

Regulations

Many parts of the ISPS Code require doors to be secured against unauthorised access. This includes doors on escape routes.

Although SOLAS II-2 13.4.2.1.2 does not explicitly require every door leading to the open deck to be capable of being opened from both sides, MSC Circular 847 outlines the philosophy that means of escape must be accessible from both sides. It states

“The escape routes are routes for escape and also for access. Accordingly, the locking arrangement should be such that it does not obstruct these two objectives (escape and access) and that the doors in the way of escape routes can be opened from both sides.”

In addition SOLAS II-2 Reg. 2.2.1.6 outlines the functional requirements of escape routes one of which is “protection of means of escape **and access for fire fighting**”.

It is therefore concluded that the Isle of Man Ship Registry’s interpretation of SOLAS is that all doors, on all escape routes must be capable of being accessed in both directions in an emergency situation.

Methods of Securing Doors

It is recognised that security requires that access to “restricted areas” is controlled. Both the safety and security requirements have to be met and various methods of achieving this have been employed.

Examples of unacceptable methods:

- ‘dead bolt latches’ on the inside
- Planks of wood across the door handles internally
- Internally lashed doors with emergency knife
- Door locks with no external keyhole

Examples of acceptable methods:

- key-pad door locks,
- a padlock key control system and an internal quick release device;
- door locks with internal release device and an external lock with key control system.
- Dogs with a removable handle that require a special shaped head for opening them externally. The handle should be readily available for emergency use.

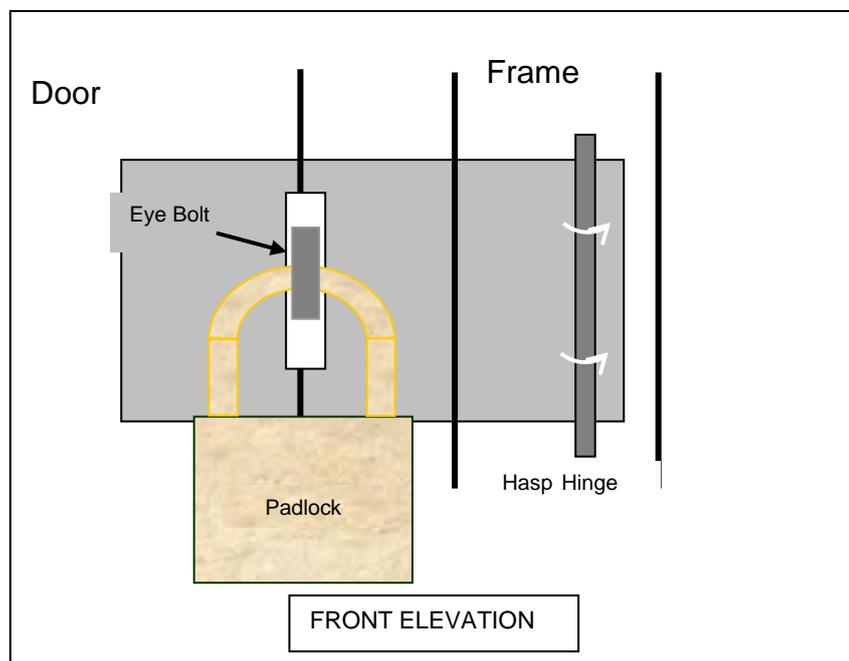
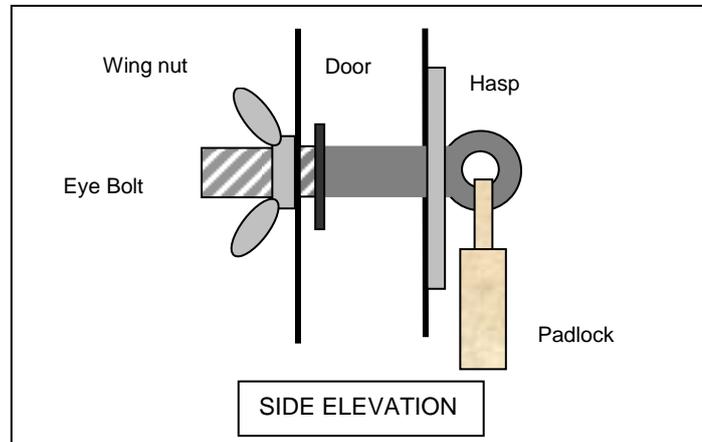
Phase in of compliance

The vast majority of the present locking arrangements comply with the above. However if required it is recommended that vessels change their locking arrangements on-board vessels to comply with this shipping notice.

This may involve the removal of internal locking devices that cannot be disconnected from the outside in emergency situations and ensuring that doors which are locked internally using conventional door locks and keys can still be opened externally.

This should be implemented as soon as practical no later than the end of December 2009 (this may be extended to no later than the vessels next scheduled dry-docking only if hot work is required). In the meantime, any shipboard emergency procedures should take account of the locking arrangements in place.

EXAMPLE OF DOOR SECURING DEVICE AND INTERNAL RELEASE



Isle of Man Ship Registry
April 2009

Please note - The Isle of Man Ship Registry cannot give Legal Advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular

case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.