
External Access to Means of Escape

Notice to all Recognised Organisations, Shipowners, Masters, and Shipbuilders

This notice should be read with SOLAS II-2/2 and II-2/13, MSC/Circ.847, ISPS Code A/9.4.2 and B/9.18-9.24.

PLEASE NOTE:-

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 and you should consider seeking independent legal advice if you are unsure of your own legal position.

Summary

This MGN highlights the conflict between safety and security with regards to means of escape and provides advice on the methods to overcome the conflict.

1. Introduction

1.1 The conflict between international safety and security requirements with regard to locking the doors on escape routes while providing a means of escape is frequently reported by ship operators and designers.

1.2 This MGN assists those involved in the design, construction, operation and certification of UK ships in identifying a safe means of complying with both the safety and security requirements for escapes.

2. Background

2.1 Many parts of the ISPS Code require doors to be secured against unauthorised access. This includes doors on escape routes. For safety reasons such locks must not impede emergency escape. Over the years many ways for overcoming this conflict have been adopted. Unfortunately some unacceptable methods do not allow access from outside the space in an emergency.

2.2 SOLAS II-2/2.2.1.6 outlines the functional requirements of escape routes, one of which is "*protection of means of escape and access for fire fighting*".

Passenger Ships

2.3 SOLAS II-2/13.3.2.6.1 requires “Cabin and stateroom doors shall not require keys to unlock them from inside the room. Neither shall there be any doors along the designated escape route which require keys to unlock them when moving in the direction of escape.”

2.4 Normally latched escape doors providing escape from public spaces are required to be fitted with a means of quick release. The system for quick release is required to meet specific requirements outlined in SOLAS II-2/13.3.2.6.2. For this reason, not all of the acceptable methods of achieving both safety and security requirements listed in para. 3.3 below may be acceptable for passenger escapes on passenger ships.

Cargo Ships

2.5 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/Circ.1120 outlines the philosophy that “means of escape” referenced in SOLAS II-2/13.3.3 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). Doors along any designated escape routes which require keys to unlock them when moving in the direction of escape should not be permitted.”

2.6 The UK interpretation of SOLAS is that all doors on all escape routes must be accessible in both directions in an emergency.

3. Guidance on Compliance with International Requirements

3.1 Methods of Securing Doors

3.1.1 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.

3.2 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

3.3 Examples of acceptable methods:-

- Key-pad door locks which in their failure mode open the lock
- Swipe-card locks which in their failure mode open the lock
- 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
- Latch dogs with a removable handle that require a special shaped head for opening them externally, with the handle readily available for emergency use.
- Use of customs tags to show restricted area has not been breached coupled with a patrol system to verify integrity of tag
- Door alarm coupled with a response system to investigate when alarm sounds

3.4 The acceptable methods described above also require appropriate operational procedures to be in place to ensure that the means of access is readily accessible in an emergency. Examples of this are: procedures for access to and use of keys and codes; or searches of restricted areas to verify their integrity after a suspected breach.

3.4 If existing locking arrangements fall within the description of any of the unacceptable methods, the locking arrangements should be changed to comply with the international requirements.

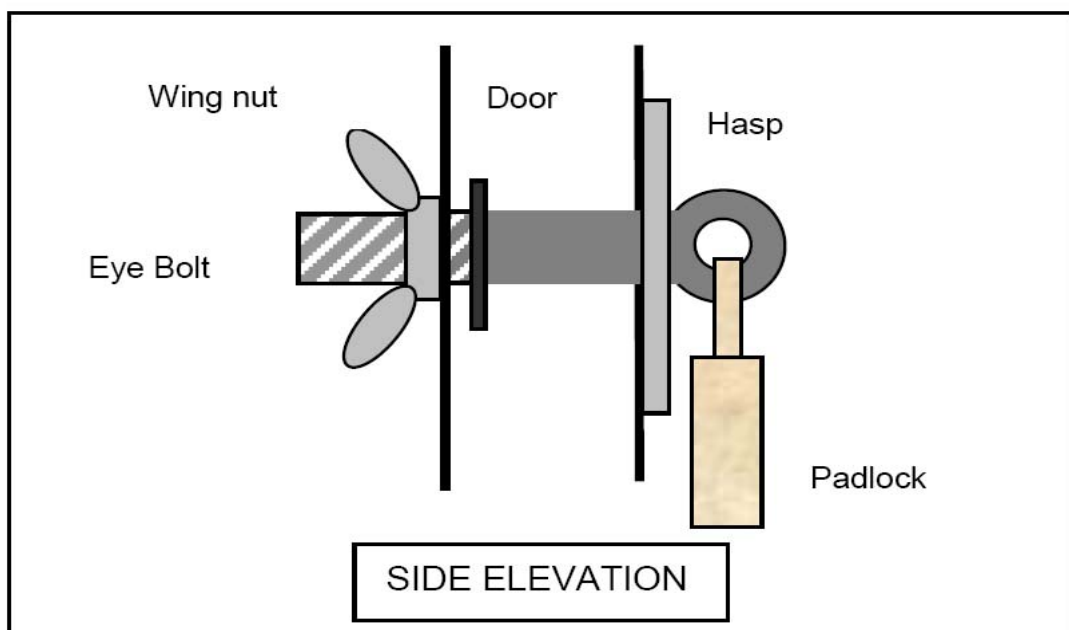
3.5 This may involve the removal of internal locking devices that cannot be disconnected from the outside in emergency situations and ensuring that doors which are locked internally using conventional door locks and keys can still be opened externally.

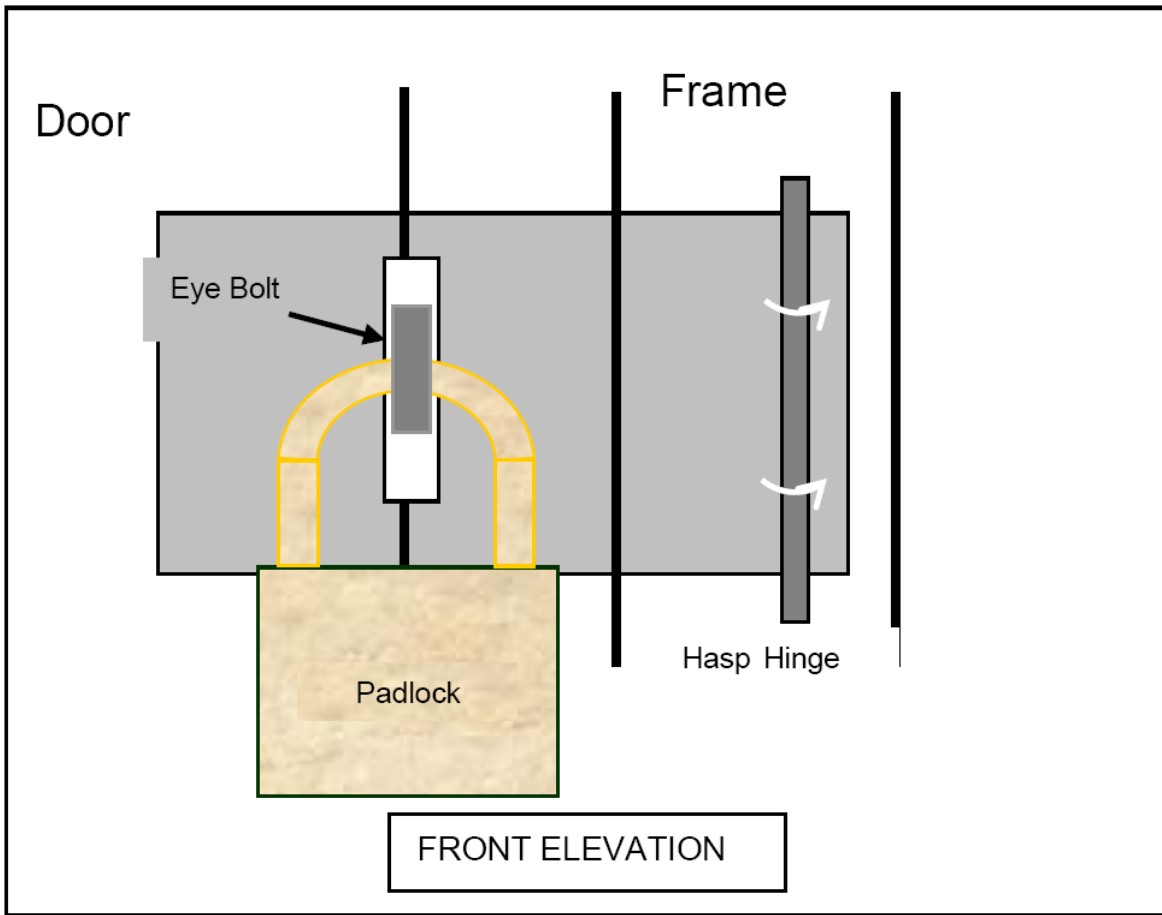
3.6 Changes should be implemented as soon as practicable. In the meantime, any shipboard emergency procedures should take account of the locking arrangements in place.

4. Examples of door securing devices with internal release

4.1 The following diagrams and pictures illustrate two examples of compliance with requirements, in conjunction with appropriate operational procedures to ensure that the locking arrangements are readily accessible in an emergency.

4.2 Diagrams of an acceptable arrangement (not for passenger escapes on passenger ships).





4.3 Pictures of an acceptable arrangement (not for passenger escapes on passenger ships).

Locked



Unlocked



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