

Unified Interpretations on Fire-fighting Equipment

Object of Amendment

Rules for the Survey and Construction of Steel Ships Part R
Guidance for the Survey and Construction of Steel Ships Part R

Reason for Amendment

The IMO recently considered comprehensive amendments to SOLAS Chapter II-2 in response to some fire incidents on ro-ro passenger ships. Additional fire safety measures for ro-ro spaces and special category spaces, as well as requirements for fixed fire detection and alarm systems in accommodation spaces, service spaces and control stations, were examined. At the 108th session of the IMO Maritime Safety Committee (MSC108) in May 2024, amendments to SOLAS Chapter II-2 were adopted as resolution MSC.550(108).

In response to the adoption of MSC.550(108), IACS reviewed IACS Unified Interpretations (UI) SC73(Rev.2) and SC160(Rev.1), respectively related to regulations II-2/20 and II-2/7 of SOLAS.

As a result of its review, IACS adopted UI SC73(Rev.3), which deletes the exemption provisions for fire-fighting equipment on weather decks, as it is clearly specified in regulation II-2/20 that such equipment is not required on weather decks. In addition, IACS adopted UI SC160(Rev.2), which clarifies the location where fixed fire detection and alarm systems are required in accommodation spaces, service spaces and control stations.

Accordingly, relevant requirements are amended based on UI SC73(Rev.3) and UI SC160(Rev.2).

Outline of the Amendment

The main amendments are as follows:

- (1) Amend requirements for fire-fighting equipment, such as fixed fire detection systems, in accordance with UI SC73(Rev.3) to clarify such equipment is not required on weather decks.
- (2) Amend requirements for fixed fire detection and alarm systems in accordance with UI SC160(Rev.3) to clarify such systems are required in control stations and cargo control rooms regardless of the location of such spaces.

Effective Date and application

- (1) 20.4.1, Part R of the Rules for the Survey and Construction of Steel Ships and R7.5.1-1., Part R of the Guidance for the Survey and Construction of Steel Ships
This amendment applies to ships the keels of which are laid or which are at a similar stage of construction on or after 1 January 2027.
- (2) Other than (1) above
Effective date of this amendment is 1 January 2027.

An asterisk (*) after the title of a requirement indicates that there is also relevant information in the corresponding Guidance.

ID:DX26-01

Amended-Original Requirements Comparison Table (Unified Interpretations on Fire-fighting Equipment)

Amended	Original	Remarks
RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS Part R FIRE PROTECTION, DETECTION AND EXTINCTION Chapter 20 PROTECTION OF VEHICLE AND RO-RO SPACES 20.4 Detection and Alarm 20.4.1 Fixed Fire Detection and Fire Alarm Systems* Except as provided in 20.4.3-1, <u>vehicle spaces, special category spaces and ro-ro spaces</u> are to be provided <u>with</u> a fixed fire detection and fire alarm system complying with the requirements of Chapter 29. The fixed fire detection system is to be capable of rapidly detecting the onset of fire. The type of detectors and their spacing and location are to be determined taking into account the effects of ventilation and other relevant factors. After being installed the system is to be tested under normal ventilation conditions and is to give an overall response time to the satisfaction of the Society.	RULES FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS Part R FIRE PROTECTION, DETECTION AND EXTINCTION Chapter 20 PROTECTION OF VEHICLE AND RO-RO SPACES 20.4 Detection and Alarm 20.4.1 Fixed Fire Detection and Fire Alarm Systems* Except as provided in 20.4.3-1, <u>there is</u> to be provided a fixed fire detection and fire alarm system complying with the requirements of Chapter 29. The fixed fire detection system is to be capable of rapidly detecting the onset of fire. The type of detectors and their spacing and location are to be determined taking into account the effects of ventilation and other relevant factors. After being installed the system is to be tested under normal ventilation conditions and is to give an overall response time to the satisfaction of the Society.	MSC.550(108)
The effective date of the establishment is according to EFFECTIVE DATE AND APPLICATION (A)		

Amended-Original Requirements Comparison Table (Unified Interpretations on Fire-fighting Equipment)

Amended	Original	Remarks
20.5 Fire-extinction 20.5.2 Portable Fire Extinguishers* 2 In addition to the provision of -1 above, the following fire extinguishing appliances are to be provided in vehicle, <u>ro-ro and special category</u> spaces intended for carriage of motor vehicles with fuel in their tanks for their own propulsion: (1) at least three water fog applicators deemed as appropriate by the Society; and (2) one portable foam applicator unit complying with the provisions of Chapter 24 provided that at least two such units are available in the ship for use in such spaces.	20.5 Fire-extinction 20.5.2 Portable Fire Extinguishers* 2 In addition to the provision of -1 above, the following fire extinguishing appliances are to be provided in vehicle <u>and ro-ro</u> spaces intended for carriage of motor vehicles with fuel in their tanks for their own propulsion: (1) at least three water fog applicators deemed as appropriate by the Society; and (2) one portable foam applicator unit complying with the provisions of Chapter 24 provided that at least two such units are available in the ship for use in such spaces.	SOLAS II-2/20.6.3.2
The effective date of the establishment is according to EFFECTIVE DATE AND APPLICATION (B)		

Amended-Original Requirements Comparison Table (Unified Interpretations on Fire-fighting Equipment)

Amended	Original	Remarks
GUIDANCE FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS Part R FIRE PROTECTION, DETECTION AND EXTINCTION R7 DETECTION AND ALARM R7.5 Protection of Accommodation and Service Spaces and Control Stations R7.5.1 Fire Detection and Fire Alarm Systems 1 With respect to the requirements of 7.5.1, Part R of the Rules, the <u>fixed fire detection and fire alarm system is only relevant for service spaces located within the accommodation block. Service spaces built away from the accommodation block need not be fitted with such a system. A fire detection and fire alarm system is, however, required for control stations and cargo control rooms regardless of location.</u>	GUIDANCE FOR THE SURVEY AND CONSTRUCTION OF STEEL SHIPS Part R FIRE PROTECTION, DETECTION AND EXTINCTION R7 DETECTION AND ALARM R7.5 Protection of Accommodation and Service Spaces and Control Stations R7.5.1 Fire Detection and Fire Alarm Systems 1 With respect to the requirements of 7.5.1, Part R of the Rules, the <u>deckhouses, boatswain's lockers, etc. which are separated from accommodation spaces may not be deemed as service spaces.</u>	IACS UI SC160(Rev.2)
The effective date of the establishment is according to EFFECTIVE DATE AND APPLICATION (A)		

Amended-Original Requirements Comparison Table (Unified Interpretations on Fire-fighting Equipment)

Amended	Original	Remarks
R20 PROTECTION OF VEHICLE AND RO-RO SPACES R20.4 Detection and Alarm R20.4.1 Fixed Fire Detection and Fire Alarm Systems (Deleted) <u>1</u> (Omitted)	R20 PROTECTION OF VEHICLE AND RO-RO SPACES R20.4 Detection and Alarm R20.4.1 Fixed Fire Detection and Fire Alarm Systems <u>1</u> <u>With respect to the provisions of 20.4.1, Part R of the Rules, the requirement of the fire detection needs not apply to weather decks used for the carriage of vehicle.</u> <u>2</u> (Omitted)	IACS UI SC73(Rev.3) IACS UI SC73(Rev.3) TB 2. 20.4.1, Part R of the Rules for the Survey and Construction of Steel Ships, was amended by MSC.550(108). As the requirement for fixed fire detection system has been clarified to apply only to vehicle spaces, special category spaces, and ro-ro spaces, and not to weather decks, the related provisions are deleted.

Amended-Original Requirements Comparison Table (Unified Interpretations on Fire-fighting Equipment)

Amended	Original	Remarks
R20.5 Fire-extinction R20.5.1 Fixed Fire-extinguishing Systems (Deleted) <u>1</u> (Omitted) <u>2</u> (Omitted) <u>3</u> (Omitted) <u>4</u> (Omitted) <u>5</u> (Omitted) <u>6</u> (Omitted) R20.5.2 Portable Fire Extinguishers <u>1</u> With respect to the requirements of 20.5.2-1, Part R of the Rules, portable extinguishers need not be provided at ro-ro spaces etc. on weather decks <u>intended for the carriage of vehicles</u>, except the one positioned at each entrance to the spaces.	R20.5 Fire-extinction R20.5.1 Fixed Fire-extinguishing Systems <u>1</u> With respect to the provisions of 20.5.1, Part R of the Rules, the requirement of the fixed fire-extinguishing system needs not apply to weather decks used for the carriage of vehicle. <u>2</u> (Omitted) <u>3</u> (Omitted) <u>4</u> (Omitted) <u>5</u> (Omitted) <u>6</u> (Omitted) <u>7</u> (Omitted) R20.5.2 Portable Fire Extinguishers <u>1</u> With respect to the requirements of 20.5.2-1, Part R of the Rules, portable extinguishers need not be provided at ro-ro spaces etc. on weather decks, except the one positioned at each entrance to the spaces. <u>Portable foam applicators also need not to be provided on weather decks.</u>	IACS UI SC73(Rev.3) IACS UI SC73(Rev.3) TB 2. As the requirement for fixed fire-extinguishing system has been clarified by the amendment of 20.5.1, Part R of the Rules for the Survey and Construction of Steel Ships, to apply only to vehicle spaces, special category spaces, and ro-ro spaces, and not to weather decks, the related provisions are deleted. IACS UI SC73(Rev.3) IACS UI SC73(Rev.3) TB 2. As the requirement for portable foam applicators has been clarified by the amendment of 20.5.2, Part R of the Rules for the Survey and

Amended-Original Requirements Comparison Table (Unified Interpretations on Fire-fighting Equipment)

Amended	Original	Remarks
		Construction of Steel Ships, to apply only to vehicle spaces, special category spaces, and ro-ro spaces, and not to weather decks, the related provisions are deleted.
The effective date of the establishment is according to EFFECTIVE DATE AND APPLICATION (B)		
EFFECTIVE DATE AND APPLICATION (A) 1. This amendment applies to ships the keels of which are laid or which are at a similar stage of construction on or after the 1 January 2027 of establishment. EFFECTIVE DATE AND APPLICATION (B) 1. The effective date of the amendments is 1 January 2027.		