



SUB-COMMITTEE ON FIRE PROTECTION  
53rd session  
Agenda item 12

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## CONSIDERATION OF IACS UNIFIED INTERPRETATIONS

### Interpretation of SOLAS regulation II-2/3.41

Submitted by the International Association of Classification Societies (IACS)

#### SUMMARY

<b><i>Executive summary:</i></b>	This document requests guidance on the interpretation of the second part of the definition provided in SOLAS regulation II-2/3.41 starting with “and/or goods (...)” and on the application of SOLAS regulation II-2/20 to spaces containing vehicles and/or tractors other than those powered by petrol engines
<b><i>Strategic direction:</i></b>	1.1
<b><i>High-level action:</i></b>	1.1.2
<b><i>Planned output:</i></b>	1.1.2.1
<b><i>Action to be taken:</i></b>	Paragraph 10
<b><i>Related document:</i></b>	1974 SOLAS Convention, as amended

#### Background

- 1 SOLAS regulation II-2/3.41 provides the following definition:

“*Ro-ro spaces* are spaces not normally subdivided in any way and normally extending to either a substantial length or the entire length of the ship in which motor vehicles with fuel in their tanks for their own propulsion and/or goods (packaged or in bulk, in or on rail or road cars, vehicles (including road or rail tankers), trailers, containers, pallets, demountable tanks or in or on similar stowage units or receptacles) can be loaded and unloaded normally in a horizontal direction”.

- 2 When a space is defined as a ro-ro space, SOLAS regulation II-2/20 details particular requirements for the ventilation system (II-2/20.3.1), electrical equipment and wiring (II-2/20.3.2 and 3.3), and fire extinction (II-2/20.6). These dedicated requirements deviate from the requirements for a general cargo or multi-purpose dry cargo space.

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3 Further, considering the carriage and/or use of various types of vehicles and tractors, some of which are powered by electric motors (with batteries or fuel cells), hydrogen combustion engines, etc.; the requirements of SOLAS regulation II-2/20 are not considered to cover any other possible fire risks, because they seem to be assuming the use of a specific fuel as the power source of motor vehicles. In particular, the term “explosive petrol” is clearly stated in regulation II-2/20.3.2.1.

### Discussion

4 IACS wishes to bring to the attention of the Sub-Committee the instance of a multi-purpose dry cargo ship, which is equipped for carriage of ro-ro cargo and the transport of trailers and vehicles (all without fuel in their tanks), in a cargo hold equipped with ramps or reinforced hull doors in accordance with the international regulations.

5 The trailers or vehicles to be transported in such a multi-purpose dry cargo hold do not have any fuel in their tanks and are towed on board by a suitable means, e.g., electrically driven tractor, during loading/unloading processes in the port. Typically, the trailers are loaded with containers, pallets or other packaging. Loading and unloading processes are normally conducted without moving any hatch covers.

6 The fire risk addressed by the safety provisions of SOLAS regulation II-2/20 emanates from vehicles having fuel in their tanks. *Inter alia*, this is clearly stated in the design standard given in the Recommendation on fixed fire-extinguishing systems for special category spaces (resolution A.123(V)) and the Guidelines for the approval of alternative fixed water-based fire-fighting systems for special category spaces (MSC/Circ.914, superseded by MSC.1/Circ.1272) for the fixed fire-extinguishing system required for vehicle, special category and ro-ro spaces. In the case described above, however, there are no vehicles with fuel in their tanks being transported in the cargo hold.

### Proposed interpretation

7 In the opinion of IACS, SOLAS regulation II-2/20 is not applicable to cargo spaces of a multi-purpose dry cargo ship as described in paragraphs 4 and 5 above.

8 It is IACS’s interpretation of SOLAS regulation II-2/3.41 that the second part of the text (starting with the words “and/or goods ...”) is intended to solely apply to the mechanical transportation of the mentioned goods by motor vehicles with fuel oil in their own tanks.

9 In view of the above, the definition given in SOLAS regulation II-2/ 3.41 would be much clearer, and the application of SOLAS regulation II-2/20 justified, if it was interpreted in the following way:

“*Ro-ro spaces* are spaces not normally subdivided in any way and normally extending to either a substantial length or the entire length of the ship in which motor vehicles with fuel in their tanks for their own propulsion and/or goods (packaged or in bulk, in or on rail or road cars, vehicles (including road or rail tankers), trailers, containers, pallets, demountable tanks or in or on similar stowage units or other receptacles) *carried or towed by motor vehicles with fuel in their tanks for their own propulsion* can be loaded and unloaded normally in a horizontal direction”.

### Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the foregoing and take action as appropriate.