



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

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CONSIDERATION OF IACS UNIFIED INTERPRETATIONS

Clarification on the implementation of resolution MSC.265(84)

Submitted by the International Association of Classification Societies (IACS)

SUMMARY

<i>Executive summary:</i>	This document seeks clarification from the Sub-Committee on the implementation of resolution MSC.265(84)
<i>Strategic direction:</i>	1.1
<i>High-level action:</i>	1.1.2
<i>Planned output:</i>	1.1.2.1
<i>Action to be taken:</i>	Paragraph 6
<i>Related documents:</i>	Resolution MSC.265(84) and MSC 84/24, paragraph 9.4 and annex 14

Background

1 The Maritime Safety Committee, at its eighty-fourth session, adopted the amendments to the Revised Guidelines for approval of sprinkler systems equivalent to that referred to in SOLAS regulation II-2/12 (resolution A.800(19)), by means of resolution MSC.265(84), inviting Governments to apply the amendments when approving equivalent sprinkler systems on or after 9 May 2008.

Discussion

2 Paragraph 9.4 of document MSC 84/24 reads as follows:

“9.4 The Committee adopted resolution MSC.265(84) on Amendments to the Revised Guidelines for approval of sprinkler systems equivalent to that referred to in SOLAS regulation II-2/12 (resolution A.800(19)), set out in annex 14, having endorsed the decision of the Sub-Committee that the amendments should apply only to new approvals for equivalent sprinkler systems and that existing type approvals already issued to confirm compliance with the present Revised Guidelines (resolution A.800(19)) should remain valid for six years after 1 July 2009.”

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3 Further, paragraph 1-1.1 of the annex to resolution MSC.265(84) states:

“1-1.1 The present Guidelines apply to equivalent sprinkler systems **installed** on or after 9 May 2008”.

4 A system meeting resolution A.800(19) should, in the opinion of IACS, be acceptable until 30 June 2009. This is based on our understanding and recollection of the discussion during MSC 84 and paragraph 9.4 of document MSC 84/24. However, this would seem to contradict operative paragraph 2 of resolution MSC.265(84). If a system is already approved but not yet installed on board – installation is allowed until 30 June 2015 based upon paragraph 1-1.2 of the annex to resolution MSC.265(84) (as corrected by document MSC 84/24/Add.2/Corr.1); but this would appear to contravene paragraph 1-1.1 of the annex to resolution MSC.265(84).

5 Based on the discussion in paragraph 4 above, the following interpretation is proposed:

Resolution MSC.265(84) shall apply to equivalent sprinkler systems installed on or after 1 July 2009. A system meeting resolution A.800(19) should be acceptable until 30 June 2009. If a system is already approved in accordance with resolution A.800(19), but not yet installed on board the ship, the extension of the installation is allowed until 30 June 2015.

Action requested of the Sub-Committee

6 The Sub-Committee is invited to consider the foregoing, in particular the interpretation proposed in paragraph 5 above, and take action as appropriate.
