



SUB-COMMITTEE ON FIRE PROTECTION  
54th session  
Agenda item 10

FP 54/10/4  
4 January 2010  
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## CONSIDERATION OF IACS UNIFIED INTERPRETATIONS

### Unified Interpretation of the provisions of the International Code for Fire Safety Systems (FSS Code), chapter 12, paragraph 2.2.1.3

Submitted by the International Chamber of Shipping (ICS) and the International Association of Classification Societies (IACS)

#### SUMMARY

<b><i>Executive summary:</i></b>	Taking account of the comments raised during FP 53, this document provides a revised draft of a part of the unified interpretation that was developed at FP 53 on paragraph 2.2.1.3 of chapter 12 of the International Code for Fire Safety Systems (FSS Code)
<b><i>Strategic direction:</i></b>	2
<b><i>High-level action:</i></b>	2.1.1
<b><i>Planned output:</i></b>	2.1.1.5
<b><i>Action to be taken:</i></b>	Paragraph 12
<b><i>Related documents:</i></b>	FP 53/23, FP 53/WP.8, FP 53/12/3, FP 51/9/9, FP 50/11/3; resolutions MSC.267(85), MEPC.124(53), MEPC.127(53) and MEPC.149(55)

#### BACKGROUND

1 The Sub-Committee has been endeavouring to agree on a Unified Interpretation (UI) of paragraph 2.2.1.3 of chapter 12 of the FSS Code, since IACS first submitted its UI SC 178 to the fifty-first session of the Sub-Committee (FP 51/9/9). The Sub-Committee is reminded that based on discussions at FP 49, MSC 78 and within industry, IACS advised the Sub-Committee (FP 50/11/3) that it had decided to withdraw UI SC 178 until clear guidance is provided at an international level on the matter. At this time, UI SC 178 remains withdrawn.

2 Although the estimations for pitch and roll as contained in the version of IACS UI SC 178 contained in document FP 51/9/9 were agreed at SLF 50, acceptance by this Sub-Committee has not been achieved at the last two sessions (FP 52 and FP 53). This was because of differences of opinion expressed concerning the scope of application to the ship during berthing and Ballast Water Exchange (BWE) conditions.

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3 Accordingly, the Sub-Committee, at its fifty-third session, decided to consider further document FP 53/WP.8 and invited Member Governments and international organizations, especially those Members that were not in favour of the proposal, to submit comments and proposals on this matter to FP 54.

## **DISCUSSION**

4 The understanding of the co-sponsors regarding the concerns raised during FP 53 is provided in paragraphs 5 to 10 below.

### **Berthing conditions**

5 For some ships, the arrival condition without cargo is lighter than the still waterline proposed in document FP 51/9/9 (i.e. the waterline corresponding to 2/3 propeller immersion). Therefore, the use of the 2/3 propeller immersion waterline would place the emergency fire pump sea-chest above the waterline corresponding to an arrival condition without cargo. This could lead to a potentially dangerous situation in the event fire-fighting water is needed and the loading port does not provide a fire-fighting water connection to supply the ship.

6 In reviewing this matter again, the co-sponsors no longer consider it prudent solely to apply a 2/3 propeller immersion waterline criterion to the berthing condition.

7 Taking into account that the 2008 Intact Stability Code, adopted by resolution MSC.267(85), will require the Trim and Stability Booklet, for ships constructed on or after 1 July 2010, to include the “ship in ballast in the arrival condition, without cargo and with 10% stores and fuel remaining”, the co-sponsors consider that such a condition should also be applied to determine the placement of the emergency fire pump sea-chest.

8 The co-sponsors believe that both conditions should be applied as there are no restrictions on the amount and distribution of ballast for the arrival condition which can lead to increased aft drafts so as to accommodate reduced emergency fire pump suction heads.

### **Ballast Water Exchange conditions for transitory exemption**

9 Neither the Guidelines for Ballast Water Exchange (BWE) (resolution MEPC.124(53)), nor the Guidelines for Ballast Water Management Plans (resolution MEPC.127(53)), nor the Guidelines for BWE Design and Construction (resolution MEPC.149(55)), support the notion that BWE is carried out in calm seas. Further, based on studies by some IACS members, it is understood that BWE can take up to 48 h to complete for ships in a heavily ballasted condition (e.g., bulk carriers).

10 In light of the above, the co-sponsors now agree that it is not prudent to provide an exemption from applying roll, pitch and heave to transitory deviations when a ship undertakes BWE.

## **PROPOSALS**

11 To accommodate the above concerns that were raised at FP 53, the following revisions (additions/deletions) to the version of the UI provided in document FP 53/WP.8 are proposed as follows:

“1.2 The emergency fire pump suction should ~~remain~~ be submerged at the waterlines corresponding to the two following conditions:

- .1 ~~a assumed~~ static waterline drawn through the level of 2/3 immersion of the propeller at even keel (for pod or thruster driven ship, special consideration is to be given) ~~in which case roll, pitch and heave need not be applied.~~; and
- .2 the ship in the arrival ballast condition, as per the approved trim and stability booklet, without cargo and with 10% stores and fuel remaining.

For either condition, roll, pitch and heave need not be applied.

1.3 A ship operating solely in sheltered water with SOLAS Certificates shall be subject to compliance with the still water submergence requirements set out in paragraph 1.2.1 above.

- ~~2—The following conditions should not to be considered:~~
- ~~——ballast water exchange condition (assuming that appropriate precaution is taken with respect to fire safety); and~~
  - ~~——berthing condition (during cargo handling at berth)~~

[Paragraphs 3 and 4 are renumbered accordingly]”

#### **ACTION REQUESTED OF THE SUB-COMMITTEE**

12 The Sub-Committee is invited to consider the foregoing discussion and the proposed modification of the UI, as provided in paragraph 11 above, and take action as appropriate.

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