M-Notices – March 2009

MGN 382 (M) — Fire Protection of Balconies and Other External Areas of Passenger Ships
Amendments to the SOLAS global safety of life at sea regulations entered into force on 1 July 2008, applying to cabin balconies on passenger ships. The changes are detailed in this marine guidance note, and are applicable to new ships constructed on or after that date, and to existing ships on the date of the first subsequent survey.

The International Maritime Organisation has also produced guidelines for evaluating the fire risk of other external areas, which are also covered in the M note.

The regulatory amendments affect the design requirements for balcony fire detection and fire suppression systems.

They require divisions between individual balconies to be of non-combustible material in existing and new ships, and capable of being opened on new ships to allow access from adjacent balcony or deck areas.

Surface finishes, except for hardwood decking, must be of low-flame spread type, as defined in IMO resolution A.653 (16). Such finishes other than for deck coverings must be limited to calorific potential on existing and new ships, measured in line with ISO 1716.

On new ships, surface finishes must also be incapable of producing excessive smoke and toxic products of combustion. And primary deck coverings must be incapable of producing smoke, toxic or explosive hazards.

On new and existing ships, balcony furniture and furnishings should comply with restricted fire risk specifications, or else fire detection, fire alarm and fixed pressure water spraying systems should be fitted.

The Marine & Coastguard Agency recognises that some shipowners may have installed fire detection or extinguishing systems on cabin balconies before IMO adopted the relevant circulars. Such systems, provided they remain effective, can continue top be used on UK ships provided they meet the following requirements. Water-spraying fire extinguishing systems must be able to demonstrate effective spray coverage of the deck area of any balcony, and the system flow rate should be sufficient to simultaneously supply three or more adjacent balconies.

And fire detection and alarm systems should be operated by heat, smoke or other product of combustion, or by flame on each balcony. They must also be arranged to give a visible or audible alarm at a crewed control station or similar crewed space, and the detector heads must comply with a recognised standard, and be capable of being tested for correct operation and restored to normal surveillance without renewal of any component.

External areas on passenger ships have routinely been assumed to have little or no fire risk, so till now their design has not needed to comply with the SOLAS requirement applicable to interior spaces. But the guidance note points out: ‘While this assumption may be accurate for general open deck areas, the continual evolution of new types of passenger amenities on open deck areas may be introducing levels of fire risk.’

Guidelines have been developed to provide administrations and designers with a tool that may be used early in the design process to assess the fire risk of external areas. Risk assessments should consider such factors as: what the space is used for, including who has access to it, and any restriction of access due to security reasons; presence of combustible materials, and of sources of ignition; ready accessibility for fire-fighting operations; ease of escape; proximity of ventilation intakes; proximity to essential systems; the possibility of an external fire spreading to more than one internal fire zone; and relationship to escape routes, assembly stations and evacuation routes to survival craft.

Recommended mitigation measures to be used in conjunction with the risk assessment are also covered in the M note.

MIN 343 (M+F) — Changes to MCA's 2002 SOLAS V Publication, Arising Out of Amendments to SOLAS Chapter V
This M note gives guidance on the survey, certification and compliance implications for ships required to transmit LRIT long range identification and tracking information, under changes to SOLAS regulations implemented in the UK on 31 December 2008.

In advance of published European LRIT policy and UK legislation, the note provides information on the requirements for onboard provision and testing of functional LRIT systems. The UK has appointed authorised testing application service providers (ATASP) to carry out conformance testing. On completion of successful testing, ATASPs issue conformance test reports on the MCA's behalf. The reports should be completed within a suitable period prior to the date of the first radio survey after 31 December 2008, the note points out.

To comply with minimum requirements, shipborne radio equipment forming part of the GDMSS global distress and safety system should: be capable of automatically transmitting, without onboard human intervention, the ship's LRIT information at six-hour intervals to a LRIT data centre; be capable of being configured remotely to transmit LRIT information at variable intervals; be capable of transmitting LRIT information following receipt of polling commands; interface directly to the shipborne global navigation satellite system equipment, or have internal positioning capability; be supplied with energy from the main and emergency sources of electrical power; and be tested for electromagnetic compatibility taking account of IMO recommendations. Exemptions and equivalence will be considered on a case by case basis, says the note.

It also contains information on port state control and detentions relating to LRIT, including what should happen if a ship is not transmitting due to outside failure of the LRIT system. In such circumstances, contracting governments should 'not impose sanctions… no grounds arise for either delaying or detaining the ship' as long as its conformance test report and related radio certificate are valid, the note says.

The ship should notify the port state of the situation, but to do so the ship needs to be made aware of the failure of the system or the circumstances involved. 'Those causing the failure of the system or those involved in the prevailing situation should advise the ship accordingly,' the note adds. And it suggests that administrations should determine the maximum duration of such failure beyond which the ship would need to inform the contracting governments.

MIN 341 (M+F) — MCA Occupational Health and Safety Leaflets and Posters
This lists the MCA's occupational health and safety leaflets, and its posters, which are available in A4 or A3 size. These can be ordered free of charge from: MCA Customer Line, EC Group, Europe Park, Magnet Road, Grays, Essex RM20 4DN; tel: 0845 6032431; fax: 01375 484556; email: **mca@ecgroup.uk.com**

MIN 344 (M) — Boatmasters' Licence Regulations: General Exemption
Vessels in the circumstances given in this note are exempt from the Boatmasters' Licence Regulations. The notice relates to vessels operating commercially on inland waterways and in limited coastal areas.