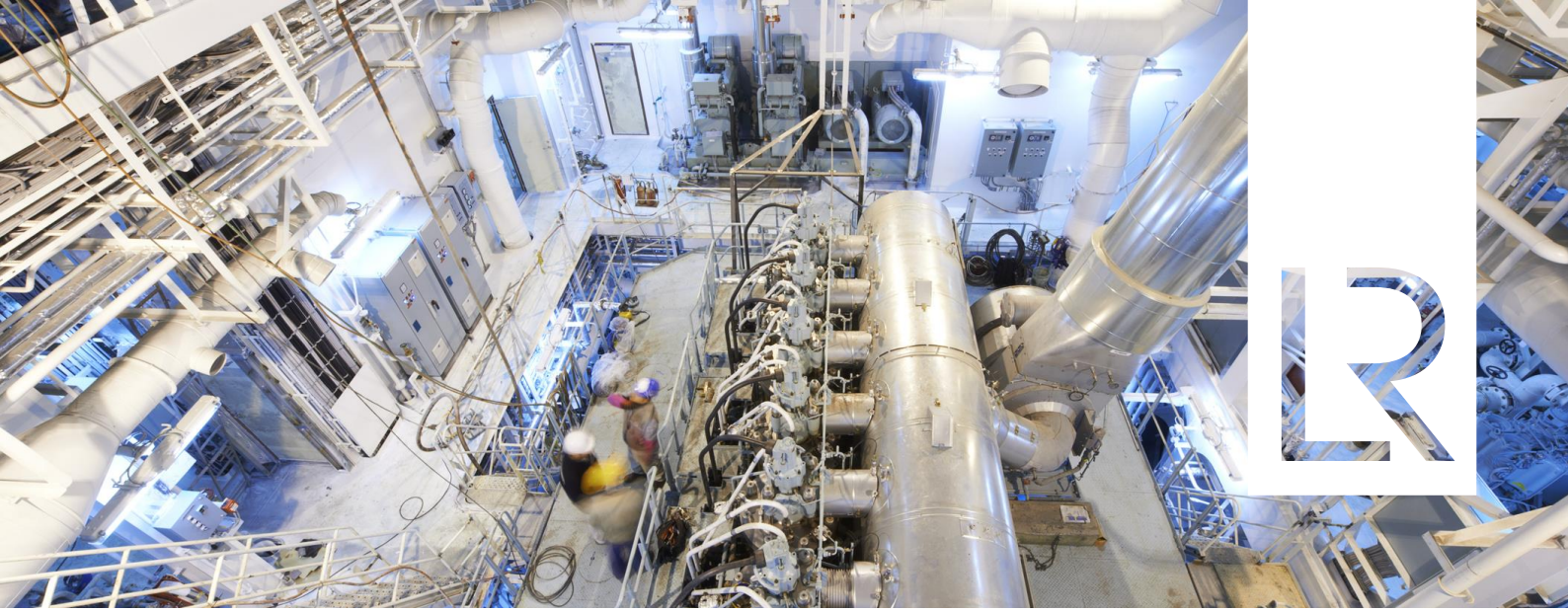


February 2024

06/2025: Engine Room Means of Escape Arrangements

Applicability: shipowners, ship operators, ship managers and ship masters.

Compliance with SOLAS

One of the fire safety objectives of SOLAS chapter II-2 is to "provide adequate and readily accessible means of escape for passengers and crew". As such, one of the options for compliance with SOLAS reg. II-2/13 for means of escape from machinery spaces is the fitting of a vertical escape trunk "from the lower part of the space".

IACS UI SC277 (applicable to ships contracted from 1 February 2016) and MSC.1/Circ.1511 both include the following interpretation "the lower part of the space should be regarded as the lowest deck level, platform or passageway within the space".

PSC Inspections

Recently, PSC inspections in Asia have been raising deficiencies against ships (built after IACS UI SC277 and MSC.1/Circ.1511 became effective) where the escape trunk does not proceed all the way to the lowest level of the engine room and which instead have short, inclined stairs leading from the bottom level of the engine room to the lowermost door of the engine room escape trunk.

Certain PSC inspections have also required ships' crews to demonstrate an effective evacuation of an injured crew member from the lowest level of the engine room to the escape trunk, as part of a rescue drill (as required by SOLAS Reg. III/19.3). Deficiencies have subsequently been raised by PSC inspectors where the rescue drill was not considered satisfactory. (Procedures for PSC inspections, including conducting drills, are detailed in IMO Resolution A.1185(33).)

IMO Discussion Outcome

A recent IMO sub-committee (SDC 11) rejected a request to add a clause in the MSC.1/Circ.1511 interpretation that the escape trunk could be located up to 2.3m from the engine room lowest level, on the basis that the proposal goes beyond the scope of an interpretation. The IMO sub-committee came to the following conclusions:

1. It confirmed that the lower part of the space should be regarded as either the lowest deck level or a platform or passageway.

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2. It noted that the majority of the delegations which intervened had agreed that the UI was not intended to be understood as "whichever is lowest" of the lowest deck level, platform or passageway; and
3. It invited IMO sub-committee III 11 (scheduled for July 2025) to consider the need for potential guidance in the context of the harmonisation of PSC activities.

Recommended next steps

For ships subject to IACS UI SC277 and MSC.1/Circ.1511, where the engine room escape trunk does not lead to the lowest level of the engine room, the following measures are recommended:

- A technical justification should be developed [and reviewed by the flag Administration or its Recognised Organisation] which should detail why the escape arrangement did not extend to the lowest platform.
- The technical justification should provide justifiable reasons why the trunk cannot be led to the lowest level. These could include:
    - Insufficient space due to any restrictions, e.g. ship's hull lines, side shell stiffening, structural design arrangements.
    - Equipment or machinery in the way, e.g. shaft or stern seal equipment.
    - Maintenance envelope or access required to maintain equipment or withdraw shafts.
- The technical justification should explain how the as-fitted arrangements provide for safe escape, e.g. short, inclined ladder of suitable width, sufficient access platform area at entrance door, easy access to inclined ladder.
- The technical justification should be kept onboard the ship, available to be presented to Port State Control or other parties when required.

For all ships, where the engine room escape trunk does not lead to the lowest level of the engine room, the following measures are recommended:

- Operators should ensure they have adequate procedures in the ship's Safety Management System (SMS) to cover rescue drills for evacuating injured persons from the engine room.
- In addition, the crew should familiarise themselves with the arrangement on board and practise and record rescue drills, as per the Company SMS requirements.

For further information

For further information or advice, please get in touch with statutorysupport@lr.org.

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