

Brussels, 19 July 2016 (OR. en)

11295/16

MAR 197 OMI 51

#### **'I' ITEM NOTE**

From:	General Secretariat of the Council
To:	Permanent Representatives Committee
No. Cion doc.:	11081/16 MAR 193 OMI 49
No. prev. doc.:	11157/16 MAR 194 OMI 50
Subject:	IMO – Union submission to be submitted to the 97th session of the Committee on Maritime Safety (MSC 97) of the IMO in London from 21 – 25 November 2016 concerning a new work programme item in relation to fire safety of ro-ro passenger ships  - Approval

# **INTRODUCTION**

- 1. On 14 July 2016, the <u>Commission</u> transmitted to the Council a Commission Staff Working Document containing a draft submission to the 97<sup>th</sup> session of the Maritime Safety Committee ('MSC') of the International Maritime Organization ('IMO') concerning a new work programme item in relation to fire safety of ro-ro passenger ships. The deadline for transmitting the draft submission to the IMO Secretariat is 19 August 2016.
- 2. The purpose of the submission is to propose that further work be carried out by the IMO in order to enhance fire protection on board ro-ro passenger ships, in particular taken into account the conclusions drawn from investigations into fire incidents and analyses of the fire safety situation on board such ships. To that end, it is proposed that a new unplanned output be established for MSC concerning fires on ro-ro decks of passenger ships.

### WORK WITHIN THE COUNCIL

- 3. The draft submission was examined by the <u>Shipping Working Party</u> at its meetings on 15 and 19 July 2016. At the meeting on 19 July, consensus was reached on the substance of the submission, with some modifications which are marked in <u>bold underline</u> (new text) or <u>strikethrough</u> (deleted text) in the annex.
- 4. However, there is no agreement on who should submit the draft submission. The <u>Commission</u> maintains the view that the draft submission should be made by "the European Commission on behalf of the European Union", while the <u>Member States</u> consider that it should be made by the Member States and the European Commission.
- 5. Given the urgency and importance of the matter, it was agreed at working party level to propose to transmit the submission in the name of the Member States and the European Commission, while taking good note of the position of the Commission.

### **CONCLUSION**

- 6. In the light of the above, the <u>Permanent Representatives Committee</u> is invited to
  - approve the text of the draft submission in the annex, with a view to transmitting it to the International Maritime Organization on 19 August 2016 at the latest.

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MARITIME SAFETY COMMITTEE

MSC 97/19/XX

97<sup>th</sup> session

Agenda item 19 Original: ENGLISH

#### **WORK PROGRAMME**

### Fire safety of ro-ro passenger ships

Submitted by Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the United Kingdom and the European Commission

#### **SUMMARY**

Executive summary: This paper proposes the establishment of a new unplanned

output for the Committee concerning fires on ro-ro decks of

passenger ships.

Strategic direction: 5.2

High-level action: 5.2.1, 5.2.2

Planned output: No related provisions

Action to be taken: Paragraph 34

Related documents MSC-MEPC.1/Circ.4/Rev.4, MSC-MEPC.7/Circ.1, FSI 20/5/3,

FSI 21/5, FP 56/13, SSE 2/INF.3, MSC 96/6/2, MSC 96/25,

MSC 96/INF.3 and MSC 96/16/1

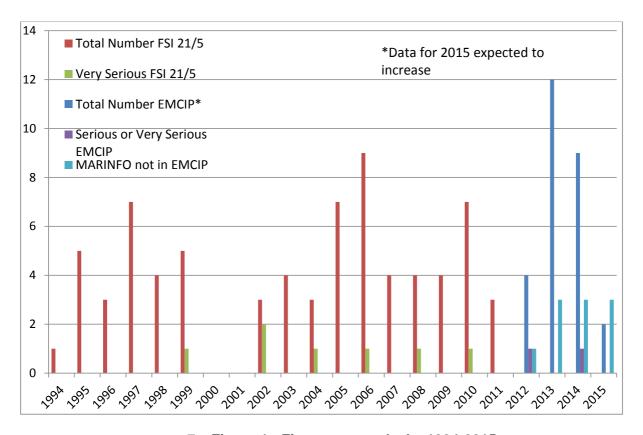
#### **Introduction and Background**

- 1 This document is submitted in accordance with paragraph 4.8 and Annex I of the Guidelines on the Organization and Method of Work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.4/Rev.4) on the submission of proposals for new unplanned outputs.
- 2 A number of concerns have been identified with regards to the fire safety of ro-ro ships. Those concerns and a description of some possible solutions are provided in this paper.
- Document FSI 20/5/3 (United Kingdom) drew attention to a vehicle deck fire on the ro-ro passenger ship **Commodore Clipper** (GISIS reference C0008451) which occurred in 2010. This document recalled other vehicle deck fire casualties; namely, **AI Salaam Boccaccio 98** (GISIS reference C0005748), **Und Adriyatik** (GISIS reference C0007200), **Lisco Gloria** (GISIS reference C0008391) and **Pearl of Scandinavia** (GISIS reference C0008286), and proposed that the Sub-Committee carefully considers the safety issues identified by the fire on **Commodore Clipper**, together with those contained in the marine accident reports on the ro-ro passenger ships **Lisco Gloria** and **Pearl of Scandinavia**.
- 4 Following discussions in the Sub-Committee, FSI tasked the Casualty Analysis Correspondence Group to consider all available data on accident reports on ro-ro ferry vehicle deck fires and to provide a conclusion and recommendations on actions to be taken. The Casualty Analysis Correspondence Group reported in FSI 21/5, giving an analysis of available data on ro-ro ferry vehicle deck fires, while paragraphs 60 to 66 provided extracts from some of the casualty reports with a summary of the main findings. Paragraph 67.1 states that:

"it is requested that the following reports be forwarded to the sub-committees as proposed to note the information provided and take action as appropriate: **Commodore Clipper** to the FP, DE and SLF Sub-Committees; **Lisco Gloria** and **Pearl of Scandinavia** to the FP and DE Sub-Committees. Having considered the information gathered on ro-ro passenger ship fires the group noted that while some of the findings are addressed in legislation, not all of the legislation is applicable to existing ships and some aspects applicable to new ships may need re-examination;"

- Indeed, these reports were forwarded to SDC 1 (January 2014) and SSE 1 (March 2014). SDC1 concluded: "In considering the above casualties, the Sub-Committee, ......invited interested Member Governments and international organizations to submit proposals for new outputs to the Committee in accordance with the Guidelines on the organization and method of work" (SDC1/26, paragraph 24.6). SSE 1 concluded: "The Sub-Committee, recalling the decision of MSC 92 (MSC 92/26, paragraph 22.29) regarding the approach to be taken in Sub-Committee deliberations on casualty analysis, decided to take no action at this time on the matters forwarded to DE 57 and SSE 1 in the absence of a clear link to existing outputs." (SSE 1/21, paragraph 20.10).
- Recent events in 2014 and 2015 have seen two further very serious casualties (Norman Atlantic and Sorrento) where the ships suffered fires originating in the ro-ro deck and resulting in total loss of the ships.

In addition to the statistics included in FSI 21/5, in September 2015 EMSA performed an analysis of fires on ro-ro decks as reported in the EMCIP database (European Marine Casualty Information Platform). The result is shown in Figure 1. It should be noted that this database does not reflect the world fleet in total and for this reason the figure includes some additional data points that were drawn from the MARINFO database, which is a platform that gathers data from four commercial data providers.



7. Figure 1 - Fires on ro-ro decks 1994-2015

8 Further to that, in SSE 2/INF.3, Germany presented a study on fire safety in connection with the transport of vehicles connected to the power distribution system of the ship and hybrid or electrically powered vehicles on ro-ro and ro-ro passenger ships, which was then complemented by MSC 96/16/1 (Austria et al.) and MSC 96/INF.3 (Germany) containing some additional information in relation to specific risk mitigation measures. As a result, MSC 96 (MSC 96/25, paragraph 16.12) "invited interested Member States to submit a justification for a new output on Review of SOLAS regulation II-2/20 for consideration at the next session".

# **IMO's objectives**

- 9 There are a number of well-reported ro-ro passenger ship casualties, many of which are listed in paragraph 3 of this paper. Consideration of these incidents, as well as the work required under this proposed new output, all relate to IMO objective 5.1 on ensuring that all systems related to enhancing the safety of human life at sea are adequate, including those concerned with large concentrations of people and 5.2 on enhancing technical, operational and safety management standards. In particular, the following sub-points are applicable due to the nature of the historical and recent incidents:
  - 5.2.1 Keep under review the technical and operational safety aspects of all types of ships, including fishing vessels.
  - 5.2.2 Development and review of training and watch-keeping standards and operational procedures for maritime personnel.

# Compelling need

- 10 The accidents listed at paragraph 3, as well as other very serious casualties in 2014 and 2015, involve ro-ro ferries, and have already demonstrated the vulnerability of ro-ro ships to fires on their vehicle decks. The severity of such fires, and therefore the ability to manage fire situations, has been highlighted and is of paramount importance for to be considered by the IMO.
- 11 The severity of fires on ro-ro ships is aggravated by cargo being stowed close together in space, while the existing extinguishing methodologies have been shown to be limited in their effectiveness. Closely parked vehicles can shield fire sources from fixed water sprays, and limit the potential for a fire team to move around the deck with hoses.
- 12 New vehicle technologies, such as lithium-ion batteries and fuel cells, exacerbate the firefighting issues by increasing the amount of fire hazard in one open space, and by generating high quantities of toxic by-products in the event of a fire.
- 13 Permanent openings distributed in the side plating may aggravate the spread of ro-ro space fires. These openings may prevent launching of survival craft or other LSA, impeding the evacuation of passengers and crew.
- 14 The quantity of fire-fighting medium required for fixed fire-fighting systems, such as CO<sub>2</sub> or dry powder, and the need for closing down the space, does not allow their use for smothering fires on open ro-ro vehicle decks. However, the alternative existing fire extinguishing systems, such as water mist or water spray, equally have their limitations.

#### Analysis of the issue

- 15 The configuration of ro-ro passenger ships provides for a space consisting of a single horizontal fire zone continuing without interruptions for, up to, the full length of the ship. Should a fire on a ro-ro deck either not be extinguished or contained longitudinally, then the integrity of every MVZ (main vertical zone) above the ro-ro space may potentially be compromised.
- 16 There is evidence to suggest that existing suppression systems may not be capable of extinguishing all fires, particularly those involving commercial vehicles, or in preventing the spread of fire longitudinally. FSI 21/5 stated:
  - ".. there were 14 occasions during which drencher systems were used to combat the fire, seven of which were considered successful deployments the remaining seven were considered unsuccessful or partially successful."
- 17 Current A60 boundaries may not prove to be sufficiently robust to prevent the vertical spread of fire, risking the integrity of all fire zones above a ro-ro deck. In this eventuality it is likely that the ship must be abandoned since there is no longer any safe area.
- 18 In relation to specific ignition risks, FSI 21/5 summary of findings stated:
  - "....A significant number of the incidents have occurred as a result of electrical fires, particularly relating to refrigerated trailers, but also in some cases from the ship's own equipment."

In the analysis of fires on ro-ro passenger ships from 1994 to 2011, FSI 21/5 Annex 6 goes on to state:

- "...the biggest source of fires has been from reefer containers (20), 12 of which were electrical fires. Electrical fires in vehicles also represent a significant portion of the total."
- 19 A ro-ro deck facilitates the accumulation of large quantities of water as a result of water ingress through structural breaches or from the accumulation of fire extinguishing water; this has led to well documented stability problems associated with the free surface effect and, to some extent, these issues have been addressed. However, solutions to fire related issues requiring greater quantities of extinguishing water, and solutions involving boundary cooling of upper decks, may entail further consideration of existing mitigation methods.
- 20 In light of the vulnerability of all MVZs in the event of an uncontained ro-ro deck fire it is necessary to re-evaluate the adequacy of the casualty threshold and safe area concept in the safe return to port regulations.
- 21 The transport of hybrid or electric powered vehicles leads to an increased fire hazard. In particular, if the vehicles are connected to the power distribution system of the ship for charging, a higher risk of ignition can be expected. Overall, this leads to a higher risk of fire and thus measures are needed to be taken on order to ensure the ships' safety.

- 22 Fuel cell vehicles present special risks. When using hydrogen, as it is lighter than air, it can collect under the ceiling of the vehicle deck and may cause a severe explosion with catastrophic consequences for the ship and the persons on board. Leaking hydrogen cannot be detected by the sensors currently in use on ships. The applicable provisions for the prevention of explosions are targeted at gases that are heavier than air and require appropriate explosion protection on vehicle decks only for installations near the floor.
- 23 In the light of the number of casualties resulting in total loss as a result of failure to suppress, extinguish, contain longitudinally and to contain within A60 boundaries, fires on ro-ro decks, aspects of regulations relating to ro-ro passenger ships need to be re-examined.
- 24 It is acknowledged that from the analysis new and existing ships may need different risk treatments and implementing measures <u>also taking into account the practical and economic impact on existing ships</u>.
- 25 Possible areas that should be considered in the analysis include:
  - Fire hazards such as fires igniting from vehicle cabs, from reefer units, from vehicle engines, from cargo units in general or from ship's equipment, are common sources of fire ignition on board of ro-ro passenger ships.
  - Fire growth mechanisms such as slow and fast growth should be analysed.
  - Fire detection; early detection facilitates early and complete extinguishing of undeveloped fires. The effects of wind on fire detection on open ro-ro decks may be considered.
  - Fire suppression; effective suppression may buy time for fire extinguishing or permit an orderly evacuation in cases where it is acknowledged that fire extinguishment is unlikely.
  - Fire extinguishing; there are instances of failure to extinguish fires despite the proper operation of extinguishing systems. Alternative extinguishing solutions should be sought but given the substantial potential fire load it may have to be accepted that extinguishing may not always be possible once a fire is established; particularly in the case of commercial vehicle fires.
  - Fixed fire extinguishing systems their pumping efficiency, sprinklers and drencher requirements. The effects of wind on fire extinguishing on open ro-ro decks may be considered.
  - Fire containment longitudinally, within the ro-ro deck; there is evidence that it is not always possible under current arrangements to contain a fire longitudinally.
  - Boundary containment; existing A60 boundary containment has not proven to be effective in containing all fires until such time as they are no longer a threat to adjacent fire zones.
  - Standards of ship's electrical power supply to cargo/vehicles; this has been identified in FSI 21/5 as a significant source of ro-ro deck fires.
  - Carriage of vehicles not powered by diesel or petrol; there is a need to examine the risks associated with alternative vehicle fuels such as LNG or fuel cells with vehicles carrying hydrogen, and the available methods of fire detection, suppression, containment and extinguishment should be analysed. This area is particularly critical due to the relatively new technologies being developed for vehicles and the absence of best practise already available to be used as guidance.
  - Placing of embarkation and launching areas of Life Saving Appliances (LSA); there have been identified arrangements of LSA leading to equipment being hindered when required for evacuation as a result of proximity to fire, particularly in way of permanent openings distributed in the side plating.
  - Casualty threshold and safe area concepts with respect to ro-ro passenger ships.

- Exchange of best practice in procedures for crew training, fire monitoring and fire extinguishing.
- Design criteria for user friendliness in fire extinguishing systems as they should be easy and readily understandable to operate.

## **Analysis of implications**

A completed Checklist for identifying administrative requirements and burdens is attached at Annex 1. However, because there are no specific proposed actions at this stage, it is not possible to provide evidence of the implications; this will depend on the outcome of the work.

#### **Benefits**

27 The work proposed by this paper will present significant benefits to the safety of life at sea by enhancing the standards of safety of ro-ro vessels.

# **Industry standards**

28 There are many technological solutions <u>and maybe also operational</u> to the issues presented in this paper but it <u>also</u> is possible that the work required under this item will need to include the development of new performance and testing standards for innovative solutions.

#### Output

29 The output in SMART terms is as follows:

**Specific** – The intended output is amendments to SOLAS and associated Codes to address the fire safety concerns raised in this paper, by developing measures to reduce the incidence of fires on the vehicle decks of new and existing Ro-Ro passenger ships and to mitigate the consequences of those that do occur.

**Measurable** – To at least address the issues identified in FSI 21/5 and subsequent casualty investigations.

**Achievable** – Specific Risk Control Options (RCOs) were already identified in document MSC 96/INF.3 while additional research is scheduled to be carried out by the co-sponsors with EMSA in 2016 and 2017, in order to identify feasible RCOs according to the FSA Guidelines.

**Realistic** – The already identified RCOs include simple solutions such as extended training for fire-fighting and reviewing the power distribution for vehicles and other best operational practices as suggested by INTERFERRY in MSC 96/6/2. While these elements provide only an indication of some available options, they are evidence that realistic solutions are available also for the issues highlighted in 25.

**Time-Bound** – It is intended that this will take a maximum of 3 years to complete through the Sub-Committee on Ship Systems and Equipment with support as required from the Sub-Committees on Ship Design and Construction and Human Element, Training and Watchkeeping.

#### **Human element**

30 The completed checklist on human element issues contained in MSC-MEPC.7/Circ.1 are included as annex 2.

### Priority/urgency and target completion date

- 31 With direct relevance to the objective of ensuring that all systems related to enhancing the safety of human life at sea are adequate, and noting the significant number of ro-ro casualties reported to FSI 20 and FSI 21, it is believed that this work is of paramount importance.
- 32 This initiative should be considered by the Organization as soon as possible and be included in the planned High-level Action Plan of the Organization and priorities for the 2016-2017 biennium. The SSE Sub-Committee with the support of the SDC and HTW Sub-committees if needed, is expected to need three sessions to complete its work starting from SSE 4 in 2017.

### **Action Required**

33 It is proposed that the Committee establish a New Unplanned Output on its Work Programme, for action by the Sub-Committee on Ship Systems and Equipment, with support as required from the Sub-Committees on Ship Design and Construction and Human Element, Training and Watchkeeping, with 3 sessions required to complete it.

# **Action requested of the Committee**

34 The Committee is invited to consider the information provided above and agree to the request for a New Unplanned Output as proposed in paragraph 33.

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#### Annex 1

#### CHECKLIST FOR IDENTIFYING ADMINISTRATIVE REQUIREMENTS AND BURDENS

The Checklist for Identifying Administrative Requirements and Burdens should be used when preparing the analysis of implications required of submissions of proposals for inclusion of unplanned outputs.

For the purpose of this analysis, the terms "administrative requirements" and "burdens" are defined as in Resolution A1043(27), i.e. administrative requirements are defined as an obligation arising from future IMO mandatory instruments to provide or retain information or data, and administrative burdens are defined as those administrative requirements that are or have become unnecessary, disproportionate or even obsolete.

#### Instructions:

- (A) If the answer to any of the questions below is **YES**, the Member State proposing an unplanned output should provide supporting details on whether the burdens are likely to involve start-up and/or ongoing costs. The Member State should also make a brief description of the requirement and, if possible, provide recommendations for further work (e.g. would it be possible to combine the activity with an existing requirement?).
- (B) If the proposal for the unplanned output does not contain such an activity, answer **NR** (Not required)

Notification and reporting?	NR		Yes	
Reporting certain events before or after the event has taken place, e.g. notification of voyage, statistical report for IMO Members, etc.	x	•	Start-up Ongoing	
Description: (if the answer is yes)				
	T	_		
2. Keeping statutory documents up to date, e.g.	NR		Yes	
records of accidents, records of cargo, records of inspections, records of education, etc.	x	•	Start-up	
Description: (if the answer is yes)				
Producing documents for third parties, e.g warning	NR	T	Yes	
signs, registration displays, publication of results of testing, etc.	Х	•	Start-up	
Description: (if the answer is yes)	1			

4. Permits or applications? Applying for and maintaining permission to operate, e.g. certificates,	NR		Yes
classification society costs, etc.	Х	•	Start-up
Description: (if the answer is yes)	·		
5. Other identified burdens?	NR		Yes
	X	•	Start-up
Description: (if the answer is yes)		•	

#### Annex 2

# CHECKLIST FOR CONSIDERING HUMAN ELEMENT ISSUES BY IMO BODIES (MSC-MEPC.7/Circ.1)

#### Instructions:

If the answer to any of the questions below is:

- (A) YES, the preparing body should provide supporting details and/or recommendation for further work.
- (B) NO, the preparing body should make proper justification as to why human element issues were not considered.
- (C) NA (Not Applicable), the preparing body should make proper justification as to why human element issues were not considered applicable.

**Subject Being Assessed:** (e.g. Resolution, Instrument, Circular being considered)

New Unplanned Output on Ch. II-2 of SOLAS

**Responsible Body**: (e.g. Committee, Sub-committee, Working Group, Correspondence Group, Member State)

SDC, SSE and HTW

Note – all responses are marked as not applicable because no specific outputs are proposed so an analysis of human element cannot be conducted. However, it is foreseen that solutions related to human element issues will be considered.

1.	Was the human element considered during development or amendment process related to this subject?	Yes	No	~	NA
2.	Has input from seafarers or their proxies been solicited?	Yes	No	~	NA
3.	Are the solutions proposed for the subject in agreement with existing instruments?	Yes	No	~	NA
	(Identify instruments considered in comments section)				
4.	Have human element solutions been made as an alternative and/or in conjunction with technical solutions?	Yes	No	~	NA

5.	Has human element guidance on the application and/or	Yes	No	~	NA
	implementation of the proposed solution been provided				
	for the following:				
	Administrations?	Yes	No	~	NA
	Ship owners/managers?	Yes	No	~	NA
	Seafarers?	Yes	No	~	NA
	Surveyors?	Yes	No	~	NA
6.	At some point, before final adoption, has the solution been reviewed or considered by a relevant IMO body with relevant human element expertise?	Yes	No	~	NA
7.	Does the solution address safeguards to avoid single person errors?	Yes	No	~	NA
8.	Does the solution address safeguards to avoid organizational errors?	Yes	No	~	NA
9.	If the proposal is to be directed at seafarers, is the information in a form that can be presented to and is easily understood by the seafarer?	Yes	No	~	NA
10.	Have human element experts been consulted in development of the solution?	Yes	No	~	NA
11.	HUMAN ELEMENT: Has the proposal been assessed agbelow?	gainst each	of the f	acto	ors
	CREWING. The number of qualified personnel required and available to safely operate, maintain, support, and provide training for system.	Yes	No	~	NA
	PERSONNEL. The necessary knowledge, skills, abilities, and experience levels that are needed to properly perform job tasks.	Yes	No	~	NA
		I			

TRAINING. The process and tools by which personnel acquire or improve the necessary knowledge, skills, and abilities to achieve desired job/task performance	Yes	No	~	NA
OCCUPATIONAL HEALTH AND SAFETY. The management systems, programmes, procedures, policies, training, documentation, equipment, etc. to properly manage risks.	Yes	No	~	NA
WORKING ENVIRONMENT. Conditions that are necessary to sustain the safety, health, and comfort of those on working on board, such as noise, vibration, lighting, climate, and other factors that affect crew endurance, fatigue, alertness and morale.	Yes	No	•	NA
HUMAN SURVIVABILITY. System features that reduce the risk of illness, injury, or death in a catastrophic event such as fire, explosion, spill, collision, flooding, or intentional attack. The assessment should consider desired human performance in emergency situations for detection, response, evacuation, survival and rescue and the interface with emergency procedures, systems, facilities and equipment.	Yes	No	~	NA
HUMAN FACTORS ENGINEERING. Human-system interface to be consistent with the physical, cognitive, and sensory abilities of the user population.	Yes	No	~	NA

### Comments:

(1) Justification if answers are NO or Not Applicable.

No existing instruments cover the aims of the proposal.

Guidance is planned to supplement the proposed amended regulation.

Being a new proposal, it is not mature to involve human element experts at this stage.

- (2) Recommendations for additional human element assessment needed. To be performed by the HTW Sub-Committee.
- (3) Key risk management strategies employed. None
- (4) Other comments. None
- (5) Supporting documentation. None

### Annex 3

# CHECK/MONITORING SHEET FOR THE PROCESS OF AMENDMENTS TO THE CONVENTION AND RELATED MANDATORY INSTRUMENTS

# (PROPOSAL / DEVELOPMENT)

# Part I – Submitter of the proposal (refer to section 3.2.1.1)\*

1	Submitted by (Document Number and submitter) [MSC 97/19/X]
2	Meeting session MSC 97
3	Date (date of the submission)

# Part II – Details of the proposed amendment(s) or new mandatory instrument (refer to sections 3.2.1.1 and 3.2.1.2)\*

High-level action plan
5.2.1
Planned output
Amendment of SOLAS
Recommended type of amendments (MSC.1/Circ.1481) (delete as appropriate)
Four-year cycle of entry into force
Intended instrument(s) to be amended (SOLAS,)
SOLAS
Intended application (scope, size, type, tonnage/length restriction, service ational/non-international), activity, etc.)
The proposed amended regulation should involve all
Application to new/existing ships (i.e. if intended to be a retro-active application)
Proposed coordinating sub-committee
Sub-Committee on Ship Systems and Equipment (SSE)
Anticipated supporting sub-committees
Ship Design and Construction (SDC) and Human Element, Training and Watchkeeping (HTW)
Time scale for completion
[2019]
Expected date(s) for entry into force and implementation/application
[1 January 2024]
Any relevant decision taken or instruction given by the Committee