

# MSC Guidelines for Review of Retractable Roofs

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## References

- ❑ SOLAS 2014 Cite: II-2/9.2.2.3.2.2(5)
  - ❑ SOLAS 2001 Cite: II-2/26.2.2(5)
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## Contact Information

If you have any questions or comments concerning this document, please contact the Marine Safety Center by e-mail or phone. Please refer to Procedure Number: **SOLAS-28**.

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## Reference Text

“Open deck spaces and enclosed promenades clear of lifeboat and life raft embarkation and lowering stations. To be considered in this category, enclosed promenades shall have no significant fire risk, meaning that furnishings shall be restricted to deck furniture. In addition, such spaces shall be naturally ventilated by permanent openings.”... “Air spaces (the space outside superstructures and deckhouses).”

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## Guidance

An area beneath a retractable roof should be categorized and protected as an enclosed space, commensurate with its size and use. These spaces are typically considered cat. 8 or cat. 9 depending on furnishings. A category 8 designation is preferred as history has shown it is difficult to restrict the furnishings in such spaces. We consider a category 5 designation to be inappropriate for a space covered by a retractable roof. In general, detection and suppression is required under all areas of permanent overhang (including stages and garages for the roof). Where possible, sprinkler coverage or equivalent arrangements should be provided for areas directly beneath the sliding roof, except in areas directly over pools that have been approved by the Flag Administration. When spaces are repurposed, sprinkler and detection coverage should be re-evaluated to ensure coverage is equivalent to that required for the entire cat. 8 or cat. 9 space. For instance, relaxations in complete coverage afforded to the low fire load associated with a cat. 9 swimming pool would not be acceptable for a cat. 8 lounge or dining room.

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## Background

SOLAS does not address the categorization of a space that has a retractable roof. While in general the space is typical of an open deck, when the roof is closed, the area becomes an enclosed space and therefore the most conservative category assignment applies.

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## Disclaimer

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative, you may contact The Marine Safety Center, who is responsible for implementing this guidance.