

MSC Guidelines for Review of Overhanging Decks

Procedure Number: SOLAS-29

Revision Date: 4/6/2016

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References

- ❑ SOLAS II-2/9.2.2.3.2.2(5) (previously II-2/26.2.2(5))

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-29**.

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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.”

Guidance

In general, any partially enclosed area that is covered with an overhanging deck in excess of 10 meters is considered an enclosed space requiring fire protection appropriate for the fire load and use (including sprinklers and detection). Similar areas covered for less than 10 meters are considered type 5 areas, provided that all of the high risk areas (i.e., galley ranges) beneath the overhang are adequately separated from the surrounding areas.

Forward mooring decks typically do not have sufficient permanent openings to be considered category 5 spaces and are typically considered category 11. Aft mooring decks may be considered category 5 if they have sufficient permanent openings without closures. When category 5 is applied to a mooring deck that is partially enclosed, we consider the following as the minimum protections consistent with the regulations: (1) no escape paths cross the mooring deck, (2) the area is provided with a manual or automatic deluge system, (3) no storage of combustible materials is permitted, (4) ignition sources are limited to the maximum extent possible, and (5) the mooring deck is not used to satisfy the access requirement of SOLAS II-1/42.1.2

Background

We have experienced many arrangements where inappropriate fire loads are being located beneath overhanging decks. Primarily, we are concerned with mooring decks and cooking areas. However, other high fire risk arrangements should be addressed.

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Three key factors are evaluated to determine the fire risk of the space beneath an overhanging deck: the presence of high fire risk features such as machinery, cooking equipment, combustible or flammable storage areas under the overhanging deck; the degree of enclosure of the open deck area; and the proximity of any overhanging deck to vital areas and equipment onboard the vessel (i.e., escape routes, lifesaving appliances, emergency equipment, ventilation inlets and exhausts).

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.