

MSC Guidelines for Review of 30% Open Requirement for Common Spaces

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S. E. HEMANN, CDR, Chief, Hull Division

References

- ❑ SOLAS II-2/9.2.2.3.2.2 (previously II-2/26.2)
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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-44**.

E-Mail: msc@uscg.mil

Phone: (202) 795-6730

Website: <http://homeport.uscg.mil/msc>

Reference Text

"...Smaller, enclosed rooms within a space that have less than 30% communicating openings to that space are considered separate spaces. The fire integrity of the boundary bulkheads and decks of such smaller rooms shall be prescribed in tables 9.1 and 9.2..."

Guidance

With respect to the 30% open determination for common spaces, the Coast Guard expects that windows, louvers, and ceiling area will not be considered as contributing to the 30% open requirement.

For Cargo Ships: sanitary spaces located within the pilot house are considered to be part of the pilot house and should be treated in a manner similar to Radio Rooms and Chart Rooms as described in note 'e' following Table 9.6

Background

We frequently come across multiple spaces that are considered common to one another. While SOLAS is clear that the boundary between these areas should be at least 30% open to be considered common, it is unclear on what methods are acceptable to achieve the level of openness (communicating openings).

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.