

Annex

Guidance for Compliance with Vague Expressions in Certain Provisions of Merchant Shipping Regulations

Item No.	Merchant Shipping Regulations		Provisions with vague expressions	Specific requirements	Reference
1	Merchant Shipping (Safety) (Cargo Ship Construction and Survey) (Ships Built Before 1 September 1984) Regulations, Cap. 369R		<u>Regulation 50(1)</u> Automatic control systems and an alarm system, <i>to the satisfaction of the Certifying Authority</i> ^{#1} , shall be provided for all important functions including pressures, temperatures and fluid levels. The control system shall be such that through the necessary automatic arrangements the services needed for the operation of the main propulsion machinery and its auxiliaries are ensured.	This Administration accepts any automatic control and alarm systems for main propulsion machinery and its auxiliaries, which comply with the Recognized Organization's ^{#2} (RO) rules for automatic control and alarm systems.	(i) SOLAS Reg. II-1/53.4 in IMO resolution MSC.1(XLV); and (ii) RO's rules for automatic control and alarm systems.

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2	Merchant Shipping (Safety) (Cargo Ship Construction and Survey) (Ships Built On or After 1 September 1984) Regulations, Cap. 369S	(a)	<p><u>Regulation 3A(3)</u> Where a double bottom is required by this regulation to be fitted in a ship, its depth shall be <i>to the satisfaction of the Certifying Authority</i> and the inner bottom shall be continued out to the ship's sides in such a manner as to protect the bottom to the turn of the bilge.</p>	<p>For ships built after 1 January 2009, this Administration accepts any depth provided that such depth shall not be less than the value calculated by the following formula: $h = B/20$ where h = depth of the double bottom; and B = breadth of the ship. However, in no case is the value of h to be less than 760 mm, and need not be taken as more than 2,000 mm.</p>	<p>SOLAS Reg. II-1/9.2 in resolution MSC.194(80).</p>
		(b)	<p><u>Regulation 5(1)</u> In every ship the watertight decks, trunks, tunnels, duct keels and ventilators shall be of the same strength as the watertight bulkheads at corresponding levels. The means used for making them watertight and the arrangements adopted for closing openings in them shall be <i>to the satisfaction of the Certifying Authority</i>. Watertight ventilators and trunks shall be watertight at least up to the freeboard deck.</p>	<p>This Administration accepts the means and arrangements for making the openings in watertight decks, trunks, tunnels etc. watertight provided they meet RO's hose or flooding test requirements.</p>	<p>SOLAS Reg. II-1/16-1.1 in resolution MSC.194(80).</p>
		(c)	<p><u>Section 22(2)(k)</u> Every oil fuel pipe shall be made of steel or other suitable material except that flexible pipes may be permitted in positions where the <i>Certifying Authority is satisfied</i> that they</p>	<p>This Administration accepts that (i) flexible pipes/hoses for fuel oils may only be installed in clearly visible and readily accessible locations.</p>	<p>(i) SOLAS Reg. II-2/4.2.2.5.1 in IMO resolution MSC.99(73);</p>

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			<p>are necessary; such flexible pipes and their attachments shall be constructed <i>to the satisfaction of the Certifying Authority</i>.</p> <p>(d) <u>Regulation 39(1)</u> An automatic control system, and an alarm system shall be provided <i>to the satisfaction of the Certifying Authority</i> for all important functions including pressures, temperatures and fluid levels. The control system shall be such that through the necessary automatic arrangements the services needed for the operation of the main propulsion machinery and its auxiliaries are ensured.</p> <p>(e) <u>Regulation 52(1)(f)</u> The width and continuity of the means of escape shall be <i>to the satisfaction of the Director</i>.</p>	<p>However, such installations are to be approved by a RO; and</p> <p>(ii) flexible hoses/pipes should meet the fire test standards in ISO 15540:1999 Fire resistance of hose assemblies – Test methods and ISO 15541:1999 Fire resistance of hose assemblies – Requirements for the test bench</p> <p>for ships built on or after 1 July 2002</p> <p>This Administration accepts any automatic control and alarm systems for main propulsion machinery and its auxiliaries, which comply with the RO's rules for automatic control and alarm systems.</p> <p>This Administration accepts the width, and continuity of escape routes which comply with the requirements in section 3 of chapter 13 of the Fire Safety Systems (FSS) Code for ships built on or after 1 July 2002.</p>	<p>(ii) RO' rules for flexible pipes/hoses for fuel oil;</p> <p>(iii) ISO 15540:1999; and</p> <p>(iv) ISO 15541:1999</p> <p>(i) SOLAS Reg. II-1/53.4 in IMO resolution MSC.1(XLV); and</p> <p>(ii) RO's rules for automatic control and alarm systems.</p> <p>(i) SOLAS Reg. II-2/13.3.3.5 in IMO resolution MSC.99(73); and</p> <p>(ii) Section 3 of chapter 13 of FSS Code.</p>

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		(f)	<p><u>Regulation 52(2)</u> In all cargo spaces intended for the carriage of motor vehicles with fuel in their tanks for their own propulsion where the crew is normally employed the number and locations of escape routes to the open deck shall be <i>to the satisfaction of the Director</i> but shall in no case be less than two and shall be as widely separated as possible.</p>	<p>This Administration accepts that for ships built on or after 1 July 2002, at least two means of escape shall be provided in ro-ro spaces where the crew are normally employed. The escape routes shall provide a safe escape to the lifeboat and liferaft embarkation decks and shall be located at the fore and aft ends of the space.</p>	<p>SOLAS Reg. II-2/13.6 in IMO resolution MSC.99(73).</p>
		(g)	<p><u>Regulation 52(5)</u> From machinery spaces other than machinery spaces of Category A, escape routes shall be provided <i>to the satisfaction of the Director</i> having regard to the nature and location of the space and the number of persons normally employed in that space.</p>	<p>This Administration accepts that for ships built on or after 1 July 2002, from machinery spaces other than those of category A, two escape routes shall be provided except that a single escape route may be accepted for spaces that are entered only occasionally and for spaces where the maximum travel distance to the door is 5 m or less.</p>	<p>SOLAS Reg. II-2/13.4.2.3 in resolution MSC.99(73).</p>
3	Merchant Shipping (Safety)(Fire Protection) (Ships Built Before 25 May 1980) Regulations, Cap. 369 W	(a)	<p><u>Schedule 1 (2)(a) (i)</u> The inert gas system shall be designed, constructed and tested <i>to the satisfaction of the Director</i>.</p>	<p>This Administration accepts any inert gas system which is designed, constructed and tested in accordance with the RO's rules for such system.</p>	<p>RO's rules for inert gas system.</p>

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		(b)	<p><u>Schedule 1(2)(s)(vii)</u> In relation to the water seal mentioned in sub-subparagraph (i)(G) arrangements shall be made <i>to the satisfaction of the Director</i> for the maintenance of an adequate reserve of water at all times and the integrity of the arrangements to permit the automatic formation of the water seal when the gas flow ceases.</p>	<p>This Administration accepts the water seal arrangements which are to ensure prevention of backflow of hydrocarbon vapours under all operating conditions.</p>	
4	Merchant Shipping (Safety) (Fire Appliances) (Ships Built On or After 25 May 1980 but Before 1 September 1984) Regulations, Cap. 369 X	(a)	<p><u>Regulation 51(2)(a)(i)</u> The inert gas system shall be designed, constructed and tested <i>to the satisfaction of the Director</i>.</p>	<p>This Administration accepts any inert gas system which is designed, constructed and tested in accordance with the RO's rules for such system.</p>	RO's rules for inert gas system.
		(b)	<p><u>Regulation 51(2)(s)(vii)</u> In relation to the water seal referred to in subparagraph (i)(G), arrangements shall be made <i>to the satisfaction of the Director</i> for the maintenance of an adequate reserve of water at all times for the automatic formation of the water seal when the gas flow ceases.</p>	<p>This Administration accepts the water seal arrangements which are to ensure prevention of backflow of hydrocarbon vapours under all operating conditions.</p>	
		(c)	<p><u>Regulation 51A(1)(a)</u> Every inert gas system fitted in accordance with regulation 46(1A)(a) shall be designed, constructed and tested <i>to the satisfaction of the Director</i> and shall comply with the following requirements of this regulation.</p>	<p>This Administration accepts any inert gas system which is designed, constructed and tested in accordance with the RO's rules for such system.</p>	RO's rules for inert gas system.

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		<p>(d) <u>Regulations 51A(12) and 51B(12)(a)</u> The arrangements for inerting, purging or gas-freeing of empty tanks as required by subregulation (2) shall be <i>to the satisfaction of the Director</i></p> <p>(e) <u>Regulation 51B(1)(a)</u> Every inert gas system fitted in accordance with regulation 46(1A)(b) shall be designed, constructed and tested <i>to the satisfaction of the Director</i> and shall comply with the following requirements of this regulation.</p> <p>(f) <u>Regulation 75</u> In every ship where a fixed fire extinguishing installation not required by these regulations is provided, such an installation shall be <i>to the satisfaction of the Director</i>.</p> <p>(g) <u>Schedule 12 – item 13(b)</u> The type, number and spacing of detectors shall be <i>to the satisfaction of the Director</i> taking into account the conditions of ventilation and other factors prevailing in the space in which the detectors are installed.</p>	<p>This Administration accepts the arrangements for purging and/or gas freeing of empty tanks should comply with RO's rules relating to inerting, purging and gas-freeing.</p> <p>This Administration accepts any inert gas system which is designed, constructed and tested in accordance with the RO's rules for such system.</p> <p>This Administration accepts that any fixed fire extinguishing installation should comply with the RO's rules for such installation.</p> <p>This Administration accepts that any fire detectors and their installation should comply with RO's rules for fire detectors.</p>	<p>RO's rules for inerting, purging and gas-freeing of empty tanks.</p> <p>RO's rules for inert gas system.</p> <p>RO's rules for fixed fire extinguishing installation.</p> <p>RO's rules for fire detectors.</p>

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5	Merchant Shipping (Safety)(Fire Protection)(Ships Built On or After 1 September 1984) Regulations, Cap. 369 Y	(a)	<p><u>Regulation 49(3)(a)</u> Every inert gas system provided in accordance with this regulation shall be designed, constructed and tested <i>to the satisfaction of the Director</i>.</p>	<p>This Administration accepts any inert gas system which is designed, constructed and tested in accordance with</p> <ul style="list-style-type: none"> (i) the RO's rules for such systems for ships built before 1 July 2002; or (ii) the requirements in chapter 15 of the FSS Code for ship built on or after 1 July 2002. 	<ul style="list-style-type: none"> (i) SOLAS Reg. II-2/4.5.5.3.2 in IMO resolution MSC.99(73); (ii) RO's rules for inert gas system; and (iii) Chapter 15 of the FSS Code.
		(b)	<p><u>Regulation 49(8)</u> Where a liquid cargo (other than one of those referred to in subregulation (2)) which presents particular fire hazards is intended to be carried a means or system of fire extinguishing appropriate to the cargo to be carried shall be provided <i>to the satisfaction of the Director</i>.</p>	<p>For ships built on or after 1 July 2002, this Administration accepts the fixed deck foam fire-extinguishing systems for cargo tank protection which comply with SOLAS Reg. II-2/10.8 and chapter 14 of the FSS Code. In addition, in any chemical tanker the type of foam concentrate should be appropriate for the chemicals listed in the Certificate of Fitness.</p>	<ul style="list-style-type: none"> (i) SOLAS Reg. II-2/10.8 in IMO resolution MSC.99(73); and (ii) Chapter 14 of the FSS Code.
		(c)	<p><u>Regulation 66</u> In every ship where a fixed extinguishing system not required by these regulations is provided, such a system shall be <i>to the satisfaction to the Director</i>, shall be installed outside the space or spaces protected by such systems and shall be so arranged that a fire in the space or spaces protected will not put any such system out of action.</p>	<p>This Administration accepts any fixed fire extinguishing system which is not required by these regulations, if fitted,, complying with</p> <ul style="list-style-type: none"> (i) the RO's rules for such systems for ships built before 1 July 2002; or (ii) the requirements of the fixed fire extinguishing systems stipulated in SOLAS Reg. II-2/10.4 and chapters 	<p>SOLAS Reg. II-2/10.4 in IMO resolution MSC.99(73).</p>

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			<p>(d) <u>Regulations 75A(3), 91A(3), 112A(3), 128A(3)</u> If the space below the helicopter deck is of a high fire risk, the insulation standard shall be <i>to the satisfaction of the Director</i>.</p> <p>(e) <u>Regulation 125(1)(f)</u> The width and continuity of the means of escape shall be <i>to the satisfaction of the Director</i>.</p> <p>(f) <u>Regulation 125(2)</u> In all cargo spaces intended for the carriage of motor vehicles with fuel in their tanks for their own propulsion where the crew is normally employed the number and locations of escape routes to the open deck shall be <i>to the satisfaction of the Director</i> but shall in no case be less than 2 and shall be as widely separated as possible.</p>	<p>5,6,7 and 8 of the Fire Safety Systems Code for ships built on or after 1 July 2002.</p> <p>This Administration accepts that the deckhead in the space below the helicopter deck shall be insulated to "A-60" class standard for ships built on or after 1 July 2002.</p> <p>This Administration accepts that the width and continuity of escape routes shall be in accordance with the requirements in section 3 of chapter 13 of the FSS Code for ships built on or after 1 July 2002.</p> <p>This Administration accepts that for ships built on or after 1 July 2002, at least two means of escape shall be provided in ro-ro spaces where the crew are normally employed. The escape routes shall provide a safe escape to the lifeboat and liferaft embarkation decks and shall be located at the fore and aft ends of the space.</p>	<p>SOLAS Reg. II-2/18.3.1 in IMO resolution MSC.99(73).</p> <p>(i) SOLAS Reg. II-2/13.3.3.5 in IMO resolution MSC.99(73); and (ii) Section 3 of chapter 13 of the FSS Code.</p> <p>SOLAS Reg. II-2/13.6 in IMO resolution MSC.99(73).</p>

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		(g)	<p><u>Regulation 125(5)</u> From machinery spaces other than machinery spaces of Category A, escape routes shall be provided <i>to the satisfaction of the Director</i> having regard to the nature and location of the space and the number of persons normally employed in that space.</p>	<p>This Administration accepts that for ships built on or after 1 July 2002, from machinery spaces other than those of category A, two escape routes shall be provided except that a single escape route may be accepted for spaces that are entered only occasionally and for spaces where the maximum travel distance to the door is 5 m or less.</p>	<p>SOLAS Reg. II-2/13.4.2.3 in Resolution MSC.99(73).</p>
		(h)	<p><u>Regulation 142 (1) (f)</u> The width and continuity of the means of escape shall be <i>to the satisfaction of the Director</i>.</p>	<p>This Administration accepts that the width and continuity of escape routes shall be in accordance with the requirements in section 3 of chapter 13 of the FSS Code for ships built on or after 1 July 2002.</p>	<p>(i) SOLAS Reg. II-2/13.3.3.5 in IMO resolution MSC.99(73); and (ii) Section 3 of chapter 13 of the FSS Code.</p>
		(i)	<p><u>Regulation 142(4)</u> From machinery spaces other than those of Category A, escape routes shall be provided <i>to the satisfaction of the Director</i> having regard to the nature and location of the space and the number of persons normally employed in that space.</p>	<p>This Administration accepts that for ships built on or after 1 July 2002, from machinery spaces other than those of category A, two escape routes shall be provided except that a single escape route may be accepted for spaces that are entered only occasionally and for spaces where the maximum travel distance to the door is 5 m or less.</p>	<p>SOLAS Reg. II-2/13.4.2.3 in IMO resolution MSC.99(73).</p>

