



Maritime &
Coastguard
Agency

MARINE GUIDANCE NOTE

MGN 627(M) – Amendment 2 **Guidance on changes and available** **exemptions against requirements** **introduced by the Merchant Shipping** **(Safety Standards for Passenger** **Ships on Domestic Voyages)** **(Miscellaneous amendments)** **Regulations 2022**

Notice to all Shipowners, Recognised Organisations, Shipbuilders, Shiprepairers, Ship Masters and Surveyors.

This notice replaces MSN 627(M) Amendment 1 and should be read in conjunction with *The Merchant Shipping (Safety Standards for Passenger Ships on Domestic Voyages) (Miscellaneous Amendments) Regulations 2022*, MSN 1699(M) Amendment 3 and MSN 1670(M) Amendment 2.

Summary

This MGN provides guidance on:

- a) changes implemented by the Merchant Shipping (Safety Standards for Passenger Ships on Domestic Voyages) (Miscellaneous Amendments) Regulations 2022 (UK Statutory Instruments 2022 No. 1269) (“the amending Regulations”) as a result of the older domestic passenger vessels Grandfather Rights review; and
- b) amendments to the exemption provision made by the amending Regulations.

The exemptions dealt with in this MGN include:

- a) permanent exemptions, which allow alternative arrangements in the circumstances specified;
- b) temporary exemptions permitted against some or all of the new requirements introduced by the amending Regulations to facilitate an extension of the two-year phase-in period afforded by the Regulations.

This Amendment 2 gives clarifications in the following paragraphs:

- a) 2.4 on fire detection requirements
- b) 2.5 on the application of fixed firefighting requirements.
- c) 2.6 on the requirements for powered bilge-pumps.
- d) 2.7 on the requirements for bilge alarms.

1. Introduction / background

1.1 The Merchant Shipping (Safety Standards for Passenger Ships on Domestic Voyages) (Miscellaneous Amendments) Regulations 2022 (“the amending Regulations”) implement legislative changes which have arisen from the review of standards for older domestic passenger vessels. The review examined the differences between the standards to which older and newer vessels were required to comply, and sought to make changes to the technical requirements which would, where possible, close that gap.

1.2 The amending Regulations do this by amending the following existing Regulations:

- 1.2.1 the Merchant Shipping (Life-Saving Appliances for Passenger Ships of Classes III to VI(A) Regulations 1999 (SI 1999/2723);
- 1.2.2 the Merchant Shipping (Fire Protection: Small Ships) Regulations 1998 (SI 1998/1011);
- 1.2.3 the Merchant Shipping (Passenger Ship Construction: Ships of Classes III to VI(A) Regulations 1998 (SI 1998/2515).

1.3 These changes do not affect vessels operating under, and in compliance with, MSN 1823(M).

2. Main changes

2.1 Liferafts. The amending Regulations amend the Merchant Shipping (Life-Saving Appliances for Passenger Ships of Classes III to VI(A)) Regulations 1999 to broaden the existing requirement, so that all domestic passenger vessels operating at sea or on Category C and/or D waters are required to carry 100% liferaft provision for all persons onboard. The aim of this is to achieve 100% dry-shod evacuation. It should be noted that the buoyant apparatus capacity requirement will normally have changed when the liferaft capacity requirement has changed, so it is strongly recommended that the relevant table in the above Regulations is consulted.

2.2 Lifejackets/ Buoyancy Aids. The amending Regulations amend the Merchant Shipping (Life-Saving Appliances for Passenger Ships of Classes III to VI(A)) Regulations 1999 to

extend the lifejacket / buoyancy aid carriage obligations such that all the relevant domestic passenger vessels operating on Category B waters are required to carry lifejacket / buoyancy aids for 100% of persons onboard. The existing Regulations permit the issue of exemptions to Life-Saving Appliance requirements which may be subject to conditions, including up to an equivalent level of safety where necessary. The Maritime and Coastguard Agency (“the MCA”) will consider issuing an exemption from the requirement to carry 100% lifejacket / buoyancy aids provision where a vessel operating on Category B waters can be evacuated directly to the bank without need for persons to enter the water. For this exemption to be granted, the evacuation arrangements must be to the satisfaction of the MCA – this approval may require a practical demonstration at a location on the vessel’s normal route, specified by the surveyor. For example, this may be where the vessel is at highest risk, or a dry-shod evacuation is most challenging.

2.3 Lifejacket lights. The amending Regulations amend the Merchant Shipping (Life-Saving Appliances for Passenger Ships of Classes III to VI(A) Regulations 1999 to require that lifejackets (and, where applicable, Buoyancy Aids) on all relevant passenger vessels operating on Category C and D waters be fitted with approved, automatically activated lights. The MCA will consider issuing an exemption from the requirement that lifejackets must be fitted with lights when a vessel does not sail more than one hour before sunrise, or more than one hour after sunset, and that this restriction is recorded on the passenger ship safety certificate. The exemption will only be issued when the MCA is satisfied that adequate arrangements have been recorded in the ship’s Domestic Safety Management system to ensure the Master has the authority to return the vessel to a berth in deteriorating daylight conditions.

2.4 Fire detection. The amending Regulations amend the Merchant Shipping (Fire Protection: Small Ships) Regulations 1998 to require that Class III-VI(A) vessels be fitted with a fixed, fully addressable fire detection system in any passenger sleeping accommodation, installed and arranged to detect the presence of fire in that space and in the corridors, stairways and escape routes associated with such space. Any unmanned machinery space which is located underdeck, or which is not situated at the control position, also requires a fully addressable fire detection system. These systems must be of a kind approved by the Secretary of State, but do not need to be Marine Equipment Directive or UK Marine Equipment Regulation approved. If they comply with the British Standards Organisation’s BS EN 54 standard, this will normally be considered satisfactory. Fire detection systems provide a valuable early awareness of fire and hence increase the chances of extinguishing it promptly.

2.5 Fixed Firefighting. The amending Regulations amend the Merchant Shipping (Fire Protection: Small Ships) Regulations 1998 to require fixed firefighting systems to be fitted in every Class III to VI(A) passenger vessel, including those which are not fully-decked. Fixed firefighting systems are a proven effective method of fighting fires within machinery spaces and are extensively required throughout modern standards. All fixed firefighting systems must be of a kind approved by the Secretary of State, through the MCA. A list of indicative standards for fixed firefighting systems is provided in the Annex. For vessels of less than 24 metres in length with boxed engines, the fixed firefighting requirement may be met with alternative arrangements (such as a permanently fixed fire extinguisher utilising fixed pipework). Such alternative arrangements are conditional on the proviso that opening the machinery space is not required to fight the fire, and that the MCA surveyor is satisfied with the alternative arrangements. Where the requirement for a fixed firefighting system is satisfied by the use of an aerosol fixed firefighting system, the system shall be installed in accordance with section 5 of MGN 657 (M/F): Requirements for fixed aerosol fire extinguishing systems for use in small vessel machinery spaces, as amended. For vessels with non-standard methods of propulsion, e.g., steam, exemptions against this requirement will be considered on a case-by-case basis. To avoid any uncertainty around

the classification of machinery spaces, it is noted that only spaces containing internal combustion machinery greater than 375kW in aggregate or those containing oil-fired boilers or other oil-fired units are Category A machinery spaces, irrespective of whether such machinery is used for main propulsion machinery or not.

2.6 Powered bilge pumps. The amending Regulations amend the Merchant Shipping (Passenger Ship Construction: Ships of Classes III to VI(A) Regulations 1998 to require the carriage of powered bilge pumps to meet the minimum bilge pump requirement. This requirement increases the efficiency of bilge pumping, and does not preclude the carriage of additional hand-powered bilge pumps which are in excess of the minimum requirements. It should be noted that, although a second means of powered pumping must be powered from a source independent of the main engine pump, the sources of power are not required to be in separate locations.

2.7 Bilge alarms. The amending Regulations amend the Merchant Shipping (Passenger Ship Construction: Ships of Classes III to VI(A) Regulations 1998 to require that bilge alarms be fitted in all compartments containing propulsion machinery, and in any other compartment where bilge water can accumulate, excluding void spaces, where bilge levels cannot be readily seen. Alarms shall include an audible, and a separate visual, warning at the control position for each space in which an alarm is fitted. Such systems facilitate the detection of water ingress and hence can help to prevent catastrophic flooding or foundering. Once activated, the audible alarm must continue to sound until acknowledged by positive action, and shall not automatically cease sounding of its own accord. A non-latching alarm, i.e. an alarm that stops sounding automatically when the water level drops back down, may be permitted in some scenarios. These will be assessed on a case-by-case basis. When vessels are not carrying passengers and are not in use, the alarm may be isolated. The Domestic Safety Management system must clearly state the circumstances in which the alarm may be isolated, and the action that must be taken by the crew to reinstate the alarm prior to operation.

2.8 Damage stability. Merchant Shipping Notice 1699(M) has been amended to require that relevant passenger vessels operating on Category C waters meet either the one-compartment stability standard or achieve compliance with the buoyancy test (110% buoyancy). Where vessels are assessed for compliance with the buoyancy test standard, it is expected that the operator demonstrates that the required extent of residual buoyancy is available when considering the effect of completely flooding the vessel's largest space or compartment, at or below the waterline, by flooding, or a damage that breaches the hull below the waterline. Supporting calculations may be carried out by computer modelling, or by direct volumetric calculation from first principles.

2.9 This requirement does not apply to Class V vessels operating on non-tidal waters in daylight or Class VI passenger vessels. Additionally, Class V vessels built before 31st October 1992 operating on tidal Category C waters in daylight hours which are considered low operational risk – as demonstrated by an assessment carried out to an agreed standard and covering an agreed set of minimum considerations – may be exempted from the requirements. A risk assessment and request for exemption should be submitted to the MCA detailing the operational risk profile of the ship.

3. Temporary exemptions enabling extension

3.1 The amending Regulations require vessels to comply with the updated requirements by the date of the first passenger ship renewal survey after 29 December 2024. However, existing Regulations allow the Secretary of State, through the MCA, to issue exemptions.

The MCA will consider issuing exemptions from any of the new requirements at the point they come into force if an alternative timescale for implementation is contained in an implementation plan, produced by the owner, and that plan is agreed with the Secretary of State, through the MCA. The policy intention of this approach is to allow flexibility to a vessel owner who is striving to comply with the new requirements but is encountering genuine and intractable obstacles to bringing their vessel or vessels into timely compliance. Exemptions will not be issued on the basis of convenience alone.

3.2 The default position will be that the MCA will require compliance with all obligations by the deadline date. Exemptions will only be permitted where the MCA considers the owner has valid reasons for not implementing the new requirements by the specified date, taking into account all circumstances, and as part of an overall implementation plan which the owner has agreed with the MCA.

3.3 Any owner wishing to agree a staged implementation plan with the MCA is advised to do so well in advance of the deadline date, to avoid a situation where a plan is not agreed, and the owner's vessel is unable to gain a certificate to operate.

4. General

4.1 Owners are reminded that the MCA cannot guarantee the granting of an exemption in every case, and also that such exemptions will not be issued to allow a vessel's continued operation simply because of delay by an owner. Owners wishing to obtain an exemption are therefore encouraged to contact their local MCA Marine Office with a proposed implementation plan at the earliest possible opportunity so that, should the desired exemption not be granted, they have time to comply with the new requirements prior to the default deadline date.

More information

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Please note that all addresses and telephone numbers are correct at time of publishing.

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Indicative standards for fixed Fire Suppression systems and components on ships subject to the changes introduced by the Merchant Shipping (Safety Standards for Passenger Ships on Domestic Voyages) (Miscellaneous Amendments) Regulations 2022 (“Grandfather Rights”)

The standards in this list are not mandatory, but indicative, and are intended to assist operators and regulators to establish consistent and appropriate standards for fire suppression systems on passenger domestic vessels which are subject to the Merchant Shipping (Safety Standards for Passenger Ships on Domestic Voyages) (Miscellaneous Amendments) Regulations 2022.

Please note the International Standards Organization (ISO) standards in this list are subject to updates and amendment following the date of this publication. Therefore, when referencing the standards, the reader is strongly advised to check for updates on the ISO website, and if any are found, to check with the MCA HQ Ship Standards to confirm that the updated standards are still deemed suitable.

Standard	Description
ISO 3500:2005	Gas cylinders — Seamless steel CO2 cylinders for fixed fire-fighting installations on ships
ISO 3500:2005/Amd 1:2010	Gas cylinders — Seamless steel CO2 cylinders for fixed fire-fighting installations on ships — Amendment 1
ISO 4642-1:2015	Rubber and plastics hoses, non-collapsible, for fire-fighting service — Part 1: Semi-rigid hoses for fixed systems
ISO 4642-2:2015	Rubber and plastics hoses, non-collapsible, for fire-fighting service — Part 2: Semi-rigid hoses (and hose assemblies) for pumps and vehicles
ISO 7076-1:2012	Fire protection - Foam fire extinguishing systems — Part 1: Foam proportioning equipment
ISO 7076-2:2012	Fire protection - Foam fire extinguishing systems — Part 2: Low expansion foam equipment
ISO 7076-3:2016	Fire protection — Foam fire extinguishing systems — Part 3: Medium expansion foam equipment

ISO 7076-4:2016	Fire protection — Foam fire extinguishing systems — Part 4: High expansion foam equipment
ISO 7076-5:2014	Fire protection — Foam fire extinguishing systems — Part 5: Fixed compressed air foam equipment
ISO 7076-6:2016	Fire protection — Foam fire extinguishing systems — Part 6: Vehicle mounted compressed air foam systems
ISO 7076-6:2016/Amd 1:2020	Fire protection — Foam fire extinguishing systems — Part 6: Vehicle mounted compressed air foam systems — Amendment 1
ISO 14520-1:2023	Gaseous fire-extinguishing systems — Physical properties and system design — Part 1: General requirements
ISO 14520-5:2019	Gaseous fire-extinguishing systems — Physical properties and system design — Part 5: FK-5-1-12 extinguishant
ISO/DIS 14520-5	Gaseous fire-extinguishing systems — Physical properties and system design — Part 5: FK-5-1-12 extinguishant
ISO 14520-8:2019	Gaseous fire-extinguishing systems — Physical properties and system design — Part 8: HFC 125 extinguishant
ISO 14520-9:2019	Gaseous fire-extinguishing systems — Physical properties and system design — Part 9: HFC 227ea extinguishant
ISO 14520-10:2019	Gaseous fire-extinguishing systems — Physical properties and system design — Part 10: HFC 23 extinguishant
ISO 14520-11:2016	Gaseous fire-extinguishing systems — Physical properties and system design — Part 11: HFC 236fa extinguishant
ISO 14520-12:2015	Gaseous fire-extinguishing systems — Physical properties and system design — Part 12: IG-01 extinguishant
ISO 14520-13:2015	Gaseous fire-extinguishing systems — Physical properties and system design — Part 13: IG-100 extinguishant

ISO 14520-14:2015	Gaseous fire-extinguishing systems — Physical properties and system design — Part 14: IG-55 extinguishant
ISO 14520-15:2015	Gaseous fire-extinguishing systems — Physical properties and system design — Part 15: IG-541 extinguishant
ISO 14520-17:2022	Gaseous fire-extinguishing systems — Physical properties and system design — Part 17: Halocarbon Blend 55
ISO 14557:2021	Fire-fighting hoses — Rubber and plastics suction hoses and hose assemblies
ISO 15371:2015	Ships and marine technology — Fire-extinguishing systems for protection of galley cooking equipment
ISO 15779:2011	Condensed aerosol fire extinguishing systems — Requirements and test methods for components and system design, installation and maintenance — General requirements
ISO 16003:2008	Components for fire-extinguishing systems using gas— Requirements and test methods — Container valve assemblies and their actuators; selector valves and their actuators; nozzles; flexible and rigid connectors; and check valves and non-return valves