



## TECHNICAL CIRCULAR No. 017 of 24 July 2011

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To:	All Surveyors
Applicable to flag:	All Flags
Subject:	Issuance of Exemption Certificates for Fixed-gas Fire-Fighting Systems
Reference:	POLLUTION - MEPC 187(59) MARPOL Annex I-Amendments

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### **Issuance of Exemption Certificates for Fixed-gas Fire-fighting Systems**

#### **PURPOSE**

SOLAS Regulation II-2/53.1 was amended under the 1996 Amendments, such that any exemption previously granted by the flag Administration, relative to the provision of a fixed-gas fire-extinguishing system within cargo spaces that were not documented by an exemption certificate, must (as of 1 July 1998) be documented with an exemption certificate and a list of cargoes intended to be carried under the exemption granted, as contained in MSC/Circ.1146. This also applies to the renewal of previously issued exemption certificates. Further, in order to avoid possible problems with Port State Control, many Owners are requesting that existing exemption certificates be replaced (prior to the expiration date) by new exemption certificates that comply with the amended regulation. The Regulation number changed to II-2/10.7 when the new chapter II-2 came into force under the 2000 SOLAS amendments on 1 July 2002.

#### **APPLICABILITY**

1. In addition to the previous SOLAS requirements addressing fixed-gas fire-extinguishing systems, cargo spaces on cargo ships  $\geq 2000$  gt or cargo spaces in any ship engaged in the carriage of dangerous goods constructed on or after 1 July 2002 need to be fitted with a fixed carbon-dioxide or inert gas fire-extinguishing system complying with provisions of the Fire Safety Systems Code, or by a fire-extinguishing system that gives equivalent protection in accordance with SOLAS II-2/10.7.1.3 or II-2/10.7.2, respectively.
2. An exemption can only be granted by the Flag Administration for the ship indicating that certain cargo spaces are exempted from being fitted with a fixed-gas fire-extinguishing system, provided that the following three (3) conditions are complied with:

- Vessel is fitted with steel hatch covers and an effective means of closing all ventilators and other openings leading to the cargo spaces;
  - Cargo carried in the cargo space is limited to solid bulk cargoes that are non-combustible or constitute a low fire risk, as contained in the attached Table 1 of MSC/Circ.1146.
  - No dangerous goods requiring a fixed fire-extinguishing system or not included in the accepted list are to be carried in the hold or directly above the hold under consideration for exemption.
3. Requests for the exemption and allowance for the carriage of cargoes other than those in Table 1 of MSC/Circ.1146 must be accompanied by documentation stating that such cargoes are non-combustible or constitute a low-fire risk, and are subject to approval by the Flag Administration in each instance.
  4. Based on the above, at the next survey, the Owner should be informed of this SOLAS amendment and that:
    - An exemption certificate is needed, with an attached list of cargoes which may be carried, for ships which have been exempted from the fitting of fixed-gas fire-extinguishing systems in cargo holds but which exemption has not been documented by an exemption certificate; or
    - Renewals of existing exemption certificates, upon their expiry, are to be in accordance with the amended regulation and are to include an attached list of cargoes which may be carried; or
    - It may be prudent to obtain an exemption certificate complying with the amended regulation, including an attached list of cargoes which may be carried, in order to avoid delays involved with questions which may be raised by Port State Control Officers.
  5. In each case, the Owner is to confirm from the cargoes indicated in Table 1 of the MSC/Circ.1146 which cargoes are to be indicated in the list that is attached to the exemption certificate. The Surveyor shall use the attached list of cargoes to indicate which cargoes may be carried by crossing out the cargoes on the list that are not applicable, then shall sign, date, and stamp the list. Should a cargo that is carried not be on the attached list, please refer to item 4 for guidance. This list shall be attached to the exemption certificate. The Surveyor may photocopy the list from the process instruction for use.
  6. A copy of the interim exemption certificate and the attached list of cargoes, confirmed by the Owner, shall be faxed to the appropriate ABS Contact Office, who will in turn transmit it to the Administration for issuance of the full term exemption certificate, except in the case of Panama where owners must submit the application directly to the administration.
  7. When filling out the exemption certificate form, if requested by Conarina Head Office, is to be completed to read:

THIS IS TO CERTIFY:

That the Ship is under the authority conferred by Regulation II-2/10.7.1.4 of the Convention exempted from the requirements of (Insert appropriate SOLAS Regulation from Table A, based on keel laying date) of the Convention.

<b>Table A</b>	
<b><u>Appropriate SOLAS Regulation</u></b>	<b><u>Keel Laying Date</u></b>
51(a)(i) of 1948 SOLAS	Prior to 26 May 1965
65(f)(i) of 1960 SOLAS	On/after 26 May 1965 but prior to 25 May 1980
II-2/52(f)(i), as applicable, of 1974 SOLAS	On/after 25 May 1980 but prior to 1 September 1984
II-2/53.1.1 of 1974 SOLAS, 1981 Amendments	On/after 1 September 1984 but prior to 1 July 1998
II-2/53.1.1 of 1974 SOLAS, 1996 Amendments	On/after 1 July 1998 but prior to 1 July 2002
II-2/10.7.1.3 and II-2/10.7.2 of 1974 SOLAS, 2000 Amendments	On/after 1 July 2002

8. Insert the following paragraph, if any on which the Exemption Certificate is granted:

Cargo Spaces (indicate applicable hold numbers) have been exempted from being fitted with a fixed-gas fire-extinguishing system for the carriage of non-combustible or low fire risk cargoes, which are indicated on the attached list.

**ANNEX to MSC/Circ. 1146**

**List of solid bulk cargoes that are non-combustible or constitute a low fire risk**

Cargoes listed in regulation **II-2/10.7.1.4**

Ore Coal (Coal and Brown Coal Briquettes) Grain Unseasoned timber

Cargoes listed in the Code of Safe Practice for Solid Bulk Cargoes (BC Code), which are not combustible or constitute a low fire risk.

The following cargoes categorized into Group A in the BC Code :

Blende (zinc sulphide)	Magnetite-taconite
Cement copper	Manganese concentrate
Chalcopyrite	Nefeline syenite (mineral)
Coal Slurry	Nickel concentrate
Coke Breeze	Nickel ore concentrate
Copper concentrate	Pentahydrate crude
Copper nickel	Pyrites
Copper Ore Concentrate	Pyrites (cupreous, fine, flotation, or sulphur)
Copper Precipitates	Pyritic ashes (iron)
Galena (lead sulphide)	Pyritic cinders
Ilmenite clay	Silver lead concentrate
Iron concentrate	Silver lead ore concentrate
Iron concentrate ( pellet feed, sinter feed)	Slig (iron ore)
Iron ore (concentrate, pellet feed, sinter feed)	Zinc and lead calcines
Lead and zinc calcines (mixed)	
Lead and zinc middlings	Zinc and lead middlings
Lead concentrate	Zinc concentrate
Lead ore concentrate	Zinc ore (burnt ore)
Lead ore residue	Zinc ore (calamine)
	Zinc ore (concentrates)
Lead silver concentrate	Zinc ore (crude)
Lead silver ore	Zinc sinter
Lead sulphide	Zinc sludge
Lead sulphide (galena)	Zinc sulphide
Magnetite	Zinc sulphide (blende)

The following cargoes categorized into Group B in the BC Code:

Aluminum processing by-products, UN3170	Petroleum coke*
Aluminum ferrosilicon powder (including briquettes), UN 1395	Pitch Prill
Aluminum silicon powder, uncoated, UN 1398	Radioactive Material, Low Specific Activity Material (LSA-1), UN 2912
Calcined pyrides (Pyritic ash)	Radioactive Material, Surface Contaminated Object(s) (SCO-1), UN 2913
Direct reduced iron briquettes, hot moulded	Silicomanganese
Ferrophosphorus (including briquettes)	Sulphur (lump or coarse grained powder), UN 1350
Ferrosilicon, containing more than 30% but less than 90% silicon (including briquettes) UN 1408	Vanadium ore
Ferrosilicon containing 25% to 30% silicon, or 90% or more silicon (including briquettes)	Woodchips with moisture content of 15% or more

Fluorspar (calcium fluoride)	Wood pulp pellets with moisture content of 15% or more
Lime (unslaked)	Zinc ashes, UN 1435
Magnesia (unslaked)	Zinc dross
Peat Moss	Zinc residues
Pencil pitch	Zinc skimmings

\* When loaded and transported under the provisions of the BC Code.

The following cargoes categorized into Group C in the BC Code:

Alfalfa	Limestone
Alumina	Magnesia (deadburned) (deadburned magnesite, magnesia clinker, electrofused magnesia, magnesite clinker)
Alumina, calcined (Calcined clay)	Magnesite, natural (Magnesium Carbonate)
Alumina silica	Manganese ore
Alumina silica, pellets	Marble chips
Ammonium nitrate fertilizers (non-hazardous)	Milorganite
Ammonium sulphate	Monoammonium phosphate
Antimony ore and residue (Stibnite)	Muriate of potash
Barytes	Peanuts (in shell)
Bauxite	Pebbles (sea)
Biosludge	Pellets (concentrates)
Borax anhydrous (crude or refined)	Perlite rock
Borax (Pentahydrate crude,)	Phosphate, defluorinated
Calcium nitrate fertilizer	Phosphate rock, calcined
Carborundum	Phosphate rock, uncalcined
Cement	Pig iron
Cement clinkers	Potash
Chamotte	Potassium Chloride (Muriate of Potash)
Chrome Ore	Potassium sulphate
Chrome pellets	Pumice
Chromite Ore (Chromium Ore)	
Clay	Pyrite (containing copper and iron)
Coke)	Pyrophyllite
Colemanite	Quartz
Copper granules	Quartzite
Copper matte	Rasorite (anhydrous)
Cryolite	Rutile sand
Diammonium phosphate	Salt
Dolomite	Salt cake
Felspar lump	Salt rock
Ferrochrome	Sand (foundry, quartz, silica, potassium, felspar, soda felspar)
Ferrochrome, exothermic	Scrap metal (see also ferrous metal borings, shavings, turnings or cuttings, group B)
Ferromanganese	Seed cake (non-hazardous)
Ferromanganese, exothermic	Soda ash (dense and light)
Ferronickel	Stainless steel grinding dust
Fertilizers without nitrates, non-hazardous	Stone chippings

Fishmeal (no-self heating properties)	Sugar (raw, raw brown, refined white)
Fly ash	Sulphate of potash and magnesium
Granulated slag	Superphosphate
Gypsum	Superphosphate, triple granular
Ilmenite sand	Taconite pellets
Iron ore	Talc
Iron ore pellets	Tapioca
Iron pyrites	Urea
Ironstone	Vermiculite
Labradorite	White quartz
Lead ore	Zircon sand

**REFERENCES:**

SOLAS Regulation II-2/53.1

**ATTACHMENTS:**

ANNEX to MSC/Circ. 1146

Kindest Regards,  
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