



TECHNICAL CIRCULAR No. 254 of 06<sup>th</sup> March 2015

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To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Security/emergency escape conflict
Reference:	SOLAS Reg. 13

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**Hazardous occurrence related to security/emergency escape conflict**

**Report text:**

"The Owners have recently had fitted to all the class "A" machinery escape trunks a padlock system that allows the trunk hatch doors to be opened only in the way of escape. I believe this to be in contravention of SOLAS Reg. 13 general requirements:

"3.1.5. Doors in escape routes shall, in general, open in way of direction of escape, except that; .2 doors in vertical emergency escape trunks may open out of trunks in order to permit the trunk to be used for both escape and for access."

"I fail to see how access can be achieved in an emergency if the trunk is locked from the outside. It is my opinion that the locking of these hatches poses a greater threat to the vessel and its crew than any implied attack on the vessel. These hatches have two independent functions: Firstly every Class "A" machinery space is required under SOLAS to have two means of access; one by stairway, and one, may be, by vertical ladder, the second is as a means of escape, under SOLAS the hatches may open outwards, but must be operable in both directions.

"The idiocy of locking emergency escape/access in the name of security should be stopped before someone is injured as a result."

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**Class comments:**

The potential conflict between safety and security can be eliminated with some thought being given to both requirements.

Examples of techniques used by operators:

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- Digital locks with one way and fail open operation (on bridge doors, engine rooms, radio rooms).
- Fixed locks or bolts where possible (as above).
- Remote locking of car deck doors (with fail to safe or unlocked status) by means of hydraulics, compressed air, electronic systems or a combination of these.
- Micro switches or other electronic Intruder Detection Systems.
- Closed circuit TV (including video recording).
- Alarms (local or remote).
- Seals.
- Dedicated manual/physical guarding

The class surveyors are aware of the situation and have given advice to ships' masters. The surveyor will not be specific in requiring one solution over another, it being dependent on pragmatism, the ship type and trading pattern. What is appropriate for a cruise ship may prove inappropriate for a sand dredger.

Escape hatches being padlocked shut from the outside, would be unacceptable.

**REFERENCES:**

- SOLAS Reg. 13

ATTACHMENTS: No.

kindest Regards,  
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