# MSC Guidelines for Furniture and Storage in Category 3, 9 and 5/9 Spaces

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### References

- □ SOLAS 2014 Cite: II-2/9.2.2.3.2.2 (3)
- □ SOLAS 2001 Cite: II-2/26.2.2 (3)
- □ MSC.1/Circ. 1274
- □ FTP Code, Resolution MSC.61(67)

# Contact Information

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### Reference Text

SOLAS II-2/9.2.2.3.2.2

- (3) Corridors Passenger and crew corridors and lobbies
- (5) Open deck spaces ... shall have no significant fire risk
- (9) Sanitary and similar spaces

MSC.1/Circ. 1274 Annex, Part 1:

- 1.1 External areas have routinely been assumed to have little or no fire risk, and have not been required to comply with SOLAS chapter II-2 requirements applicable to interior spaces.
- 1.2 While this assumption may be accurate for general open deck areas, the continual evolution of new types of passenger amenities on open deck areas may be introducing levels of fire risk that are not fully accounted for by the existing regulations.

#### Guidance

Limited storage of combustible materials is permitted in category 3, dual 5/9 and 9 spaces. The combustible materials should be necessary for the functional utility of the space, be limited to an amount needed for daily use, and contained within a locker or cabinet. The lockers or cabinets used shall be of restricted fire risk, determined in accordance with the Fire Test Procedures Code, and shall not restrict the escape route or safety functions provided by the space. Lockers and cabinets used for storage of combustible material exceeding a deck area of 0.5 m<sup>2</sup>, should be protected with an automatic fire suppression system. Lockers and cabinets, used for storage of combustible material with a deck area in excess of 1 m<sup>2</sup>, should be

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provided with fixed fire detection and fire alarm system in addition to fire suppression. The aggregate deck area of all lockers and cabinets, in any one space utilizing this guideline, shall be less than 4 m<sup>2</sup>. Spaces subject to the guideline with any single locker, used for storage of combustible material, with a deck area in excess of 2 m<sup>2</sup>, or a group of lockers with an aggregate deck area exceeding 4 m<sup>2</sup> should be provided with a separate category (7) or (13) storage space and protected as required by SOLAS II-2.

Furniture, such as lockers and cabinets, shall not be permitted in passenger and crew corridors forming escape routes in cabin areas.

The addition of unprotected storage in excess of 0.5 m<sup>2</sup>, sales kiosks, lounge seating, etc. is inconsistent with the category 3, dual 5/9 and 9 designations.

## **Background**

The use of corridors and stairways which serve as primary or secondary escape routes is compromised by the presence of combustible material, furniture, or outfitting associated with other categories of spaces. In all cases, furniture, decorations and other hazards must be outside of the required clear width for escape and must be fixed, or otherwise controlled, to prevent it from obstructing the escape path in the event of a fire or other emergency. Open decks and sanitary spaces have historically been considered to be of little to no fire risk. The addition of unprotected storage or excessive protected storage on an open deck requires additional evaluation as described in MSC.1/Circ. 1274.

#### 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.