

MSC Guidelines for Review of Access to Stairway Enclosures

Procedure Number: SOLAS-26

Revision Date: 07/27/2018

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References

- ❑ SOLAS 2014 Cite: II-2/13.3.2.3
 - ❑ SOLAS 1974 Cite: II-2/29.2
 - ❑ MSC/Circ. 1120: 13.3.2.3
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Contact Information

If you have any questions or comments concerning this document, please contact the Marine Safety Center by e-mail or phone. Please refer to Procedure Number: **SOLAS-26**.

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Reference Text

“Stairway enclosures in accommodation and service spaces shall have direct access to the corridors and be of a sufficient area to prevent congestion, having in view the number of persons likely to use them in an emergency. Within the perimeter of such stairway enclosures, only public toilets, lockers of non-combustible material providing storage for non-hazardous safety equipment and open information counters are permitted. Only corridors, lifts, public toilets, special category spaces and open ro-ro spaces to which any passengers carried can have access, other escape stairways required by paragraph 3.2.4.1 and external areas are permitted to have direct access to these stairway enclosures. Public spaces may also have direct access to stairway enclosures except for backstage of a theatre. Small corridors or "lobbies" used to separate an enclosed stairway from galleys or main laundries may have direct access to the stairway provided they have a minimum deck area of 4.5 m², a width of no less than 900 mm. and contain a fire hose station.”

MSC/Circ.1120: 13.3.2.3 - Direct access to stairway enclosures.

Direct access to escape stairway enclosures is only intended for those areas of an accommodation space as defined in regulation 3.39 for public spaces. Portions of an accommodation space that serve a purpose different than that of a public space such as theatre backstage areas, should not have direct access to escape stairway enclosures.

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Guidance

This guidance does not apply to atriums or other spaces equipped with an approved smoke extraction or smoke management system. Only public spaces meeting the definition of SOLAS II-2 Regulation 3.39 may have direct access to stairs. We recommend that only large public spaces (greater than 50m² and more than 50 occupants) such as halls, dining rooms, and large lounges should be permitted to directly access stairs due to the potential need to rapidly evacuate a large number of people. This need is balanced with the risk of introducing smoke and fire to a stairway. Small spaces and spaces only serving a limited number of people, such as small lounges, should not have direct access to stairs because the risk of introducing smoke into the stair is higher and the number of people needing to evacuate is small. Shopping areas that form large category 8 spaces do not meet the definition of public space contained in SOLAS II-2/Regulation 3.39 and should not have direct access to a stair.

Background

This guidance has been updated based on industry feedback to clarify the expectations of the USCG in regards to what constitutes a large public space. Based on our recent experiences during Initial Control Verification Examinations, the 50m² and 50 person capacity creates a simple method to determine large or small. Below this threshold, case-by-case discussions will be necessary to determine the balance between egress speed and the risk of smoke spread to a stair.

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.
