ANNEX 1

Interpretations regarding implementation of international statutory requirements which contain references "to the satisfaction of the Administration"

International Convention for the Safety of Life at Sea (SOLAS), 1974 and its Protocol 1988, as amended

	Regulation	Statutory Requirement	MARINA Guidance
	Item		
Cha 1	pter II-1 Cons	truction - Structure, subdivision and stability, machinery and electrical 2.3 The construction and materials of all means of access and their attachment to the ship's structure shall be to the satisfaction of the Administration. The means of access shall be subject to survey prior to, or in conjunction with, its use in carrying out surveys in accordance with regulation I/10.	installations IACS UI SC 190 and IACS UI SC191 for application of SOLAS II-1/3-6 which should comply with requirements as set in IMO Resolutions MSC. 134(76), MSC. 158(78), MSC. 151(78).
2	II-1/3-6	5.3 For oil tankers of less than 5,000 tonnes deadweight, the Administration may approve, in special circumstances, smaller dimensions for the openings referred to in paragraphs 5.1. and 5.2 above, if the ability to traverse such openings or to remove an injured person can be proved to the satisfaction of the Administration.	In compliance with the Rules of IACS member accredited by the Administration
3	II-1/13	7.1.3 Each power operated sliding watertight door shall be fitted with the necessary equipment to open and close the door using electric power, hydraulic power, or any other form of power that is acceptable to the Administration.	-Not Applicable for Hydraulic Power Sliding Watertight Doors Inspection Guidelines on Manual Operated Watertight Doors Sealing Arrangements -visual inspection of rubber gaskets with respect to wear, aging, hardening, distortion -replacement due to maker's lifespan recommendation or resulting from visual inspection, as there could be cracks due to ageing or hardening etc cleanliness (surface shall not be painted over) - greasing of surface - visual inspection of the packing retaining channels Refer to IACS Unified Interpretation SC156 Rev.2 Jan 2021 Doors shall be of approved design and substantial construction in accordance with the requirements of the classing society and shall be of a strength equivalent to that of the subdivision bulkheads in which they are fitted.
4	II/1-5	1.1 The master shall be supplied with such information satisfactory to the Administration as is necessary to enable him by rapid and simple processes to obtain accurate guidance as to the stability of the ship under varying conditions of service.	 Stability Information is developed on basis of the following IMO requirements: MSC/Circ.456 – Guidelines for the preparation of intact stability information; MSC/Circ.706 – Guidance on intact stability of existing tankers during transfer operations; MSC.1/Circ.1228 – Revised guidance to the master for avoiding dangerous situations in following and quartering seas. MSC 267(85) – Adoption of the International Code on Intact Stability, 2008 Regulation 10 of International Convention on Load Lines IACS Rec.60 – Intact Stability of Tankers during Liquid Transfer Operations

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			It is also in compliance with the Rules of IACS member accredited by the Administration.
5	II-1-5	5.2/5.3 The Administration may allow the inclining test of an individual cargo ship to be dispensed with provided basic stability data are available from the inclining test of a sister ship and it is shown to the satisfaction of the Administration that reliable stability information for the exempted ship can be obtained from such basic data.	 MSC/Circ.1158 – Unified Interpretation SOLAS II-1; and 2008 IS CODE, Part B, Chapter 8, Sec.8.1
6	II/1-15	2. The arrangement and efficiency of the means for closing any opening in the shell plating shall be consistent with its intended purpose and the position in which it is fitted and generally to the satisfaction of the Administration.	 IACS UR S8 – Bow Doors and Inner Doors IACS UR S9 – Side Shell Door and Stern Doors
7	II/1-15	8.5 All shell fittings and valves required by this regulation shall be of steel, bronze or other approved ductile material. Valves of ordinary cast iron or similar material are not acceptable. All pipes to which this regulation refers shall be of steel or other equivalent material to the satisfaction of the Administration.	IACS UR P2 – Rules for Piping Design, construction, and testing
8	II/1-16	1.1 The design, materials and construction of all watertight doors, sidescuttles, gangway and cargo ports, valves, pipes, ash-chutes and rubbish chutes referred to in these regulations shall be to the satisfaction of the administration	 Pipes and valves to be in compliance with IACS UR P2 and recognized national / international standard Gangway and cargo ports are to comply with relent rules classification society who are RO to Administration Watertight doors, side scuttles, ash-chutes and rubbish chutes are to comply with recognized national / international standard
9	II/1-16	1. Watertight decks, trunks, tunnels, duct keels and ventilators shall be of the same strength as watertight bulkheads at corresponding levels. The means used for making them watertight, and the arrangements adopted for closing openings in them, shall be to the satisfaction of the Administration. Watertight ventilators and trunks shall be carried at least up to the bulkhead deck in passenger ships and up to the freeboard deck in cargo ships.	In compliance with the Rules of IACS member accredited by the Administration
10	II/1-20	2 Water ballast should not in general be carried in tanks intended for oil fuel. In ships in which it is not practicable to avoid putting water in oil fuel tanks, oily-water separating equipment to the satisfaction of the Administration shall be fitted, or other alternative means, such as discharge to shore facilities, acceptable to the Administration shall be provided for disposing of the oily-water ballast.	Refer to Annex I – Regulations for the Prevention of Pollution by Oil. • Part C – Control of Operational Discharge of Oil • Regulation 16 – Segregation of oil and water ballast and carriage of oil in forepeak tanks
11	II-1/ 29	1. Unless expressly provided otherwise, every ship shall be provided with a main steering gear and an auxiliary steering gear to the satisfaction of the Administration. The main steering gear and the auxiliary steering gear shall be so arranged that the failure of one of them will not render the other one inoperative	The main steering gear and axillary steering gear are to comply with requirements of SOLAS Ch. II-1/Reg.29.3 and 29.4. For non-traditional steering gear may comply with IACS UI SC 242 Rev.2.
12	II-1/29	2.1 All the steering gear components and the rudder stock shall be of sound and reliable construction to the satisfaction of the Administration. Special consideration shall be given to the suitability of any essential component which is not duplicated. Any such essential component shall, where appropriate, utilize antifriction bearings such as ball bearings, roller-bearings or sleeve-bearings which shall be permanently lubricated or provided with lubrication fittings.	 UI SC242 rev2 IACS Int.2011/Rev.2 IACS UR M-42 – Steering Gear

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13	II-1/41	4. Where the total installed electrical power of the main generating sets is in excess of 3 MW, the main busbars shall be subdivided into at least two parts which shall normally be connected by removable links or other approved means; so far as is practicable, the connection of generating sets and any other duplicated equipment shall be equally divided between the parts. Equivalent arrangements may be permitted to the satisfaction of the Administration.	In compliance with the Rules of IACS member accredited by the Administration
14	II-1 / 42	The location of the emergency source of electrical power and associated transforming equipment, if any, the transitional source of emergency power, the emergency switchboard and the emergency electric lighting switchboards in relation to the main source of electrical power, associated transforming equipment, if any, and the main switchboard shall be such as to ensure to the satisfaction of the Administration that a fire or other casualty in spaces containing the main source of electrical power, associated transforming equipment, if any, and the main switchboard or in any machinery space of category A will not interfere with the supply, control and distribution of emergency electrical power. As far as practicable, the space containing the emergency source of electrical power, associated transforming equipment, if any, the transitional source of emergency electrical power and the emergency switchboard shall not be contiguous to the boundaries of machinery spaces of category A or those spaces containing the main source of electrical power, associated transforming equipment, if any, or the main switchboard.	Guidelines from IACS UR E 15 shall be adopted
15	II-1/45	 1.2 The Administration may require additional precautions for portable electrical equipment for use in confined or exceptionally damp spaces where particular risks due to conductivity may exist. 2. Main and emergency switchboards shall be so arranged as to give easy access as may be needed to apparatus and equipment, without danger to personnel. The sides and the rear and, where necessary, the front of switchboards shall be suitably guarded. Exposed live parts having voltages to earth exceeding a voltage to be specified by the Administration shall not be installed on the front of such switchboards. Where necessary, nonconducting mats or gratings shall be provided at the front and rear of the switchboard. 3.2. The requirement of paragraph 3.1 does not preclude under conditions approved by the Administration the use of: impressed current cathodic protective systems; limited and locally earthed systems; or insulation level monitoring devices provided the circulation current does not exceed 30 mA under the most unfavourable conditions. Where the hull return system is used, all final subcircuits, i.e. all circuits fitted after the last protective device, shall be two- wire and special precautions shall be taken to the satisfaction of the Administration. 	 Compliance with Electrical Standards referred by IEC UI SC7 - Precautions against shock, fire and other hazards of electrical origin UI SC8 - Precautions against shock, fire and other hazards of electrical origin
16	II-1/45	5.4 Where cables which are installed in hazardous areas introduce the risk of fire or explosion in the event of an electrical fault in such areas,	In compliance with the Rules of IACS member accredited by the Administration

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		special precautions against such risks shall be taken to the satisfaction of the Administration.	
17		9.3 Accumulator batteries shall not be located in sleeping quarters except where hermetically sealed to the satisfaction of the Administration.	In compliance with the Rules of IACS member accredited by the Administration
18	II-1/45	11 In tankers, electrical equipment, cables and wiring shall not be installed in hazardous locations unless it conforms with standards not inferior to those acceptable to the Organization. However, for locations not covered by such standards, electrical equipment, cables and wiring which do not conform to the standards may be installed in hazardous locations based on a risk assessment to the satisfaction of the Administration, to ensure that an equivalent level of safety is assured.	UI SC274 IACS Int. 2015/Rev.1 2021
19	II-1/53	1 The special requirements for the machinery, boiler and electrical installations shall be to the satisfaction of the Administration and shall include at least the requirements of this regulation.	IACS UI SC14
Cha	pter II-2 Const	ruction - Fire Protection, Fire Detection and Fire Extinction	
20	II-	The type of foam concentrates for use in chemical tankers shall be to the	Refer to Paragraph 3 of IMO MSC.1/Circ.1312
	2/1.6.2.1.2	satisfaction of the Administration taking into account the guidelines developed by the Organization	3 Tests for Type Approval of Foam Concentrates For foam concentrate type approval, the tests under paragraphs 3.1 to 3.14 below should be performed by the foam concentrate manufacturer at laboratories acceptable to the Administration
21	II-2/1.6.6	Chemical tankers and gas carriers shall comply with the requirements for tankers, except where alternative and supplementary arrangements are provided to the satisfaction of the Administration, having due regard to the provisions of the International Bulk Chemical Code and the International Gas Carrier Code, as appropriate.	Chemical tankers and gas carriers complying with the provisions of the International Bulk Chemical Code and the International Gas Carrier Code are considered as complying with the requirements for tankers carrying crude oil or petroleum products having a flashpoint not exceeding 60°C (Reference IMO Website- https://www.imo.org/en/OurWork/Environment/Pages/IBCCode.aspx) Ships constructed after 1986 carrying substances identified in chapter 17 of the IBC Code must follow the requirements for design, construction, equipment and operation of ships contained in the Code. Ships subject to the Code shall be designed to one of the following standards: • A type 1 ship is a chemical tanker intended to transport chapter 17 products with very severe environmental and safety hazards which require maximum preventive measures to preclude an escape of such cargo. • A type 2 ship is a chemical tanker intended to transport chapter 17 products with appreciably severe environmental and safety hazards which require significant preventive measures to preclude an escape of such cargo. • A type 3 ship is a chemical tanker intended to transport chapter 17 products with sufficiently severe environmental and safety hazards which require a moderate degree of containment to increase survival capability in a damaged condition. Thus, a type 1 ship is a chemical tanker intended for the transportation of products considered to present the greatest overall hazard and type 2 and type 3 for products of progressively lesser hazards.

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			Accordingly, a type 1 ship shall survive the most severe standard of damage and its cargo tanks shall be located at the maximum prescribed distance inboard from the shell plating.
			Code for the Construction Equipment of Ships Carrying Dangerous Chemicals in Bulk (BCH Code)
			Under regulation 11 of MARPOL Annex II, chemical tankers constructed before 1 July 1986 must comply with the requirements of the Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (BCH Code) – the predecessor of the IBC Code. The BCH Code remains as a recommendation under the 1974 SOLAS Convention.
22	II- 2/2.4.2.2.5	.1 Oil fuel pipes and their valves and fittings shall be of steel or other approved material, except that restricted use of flexible pipes shall be permissible in positions where the Administration is satisfied that they are necessary. Such flexible pipes and end attachments shall be of approved fire-resisting materials of adequate strength and shall be constructed to the satisfaction of the Administration. For valves fitted to oil fuel tanks and under static pressure, steel or spheroidal-graphite cast iron may be accepted. However, ordinary cast iron valves may be used in piping systems where the design pressure is lower than 7 bar and the design temperature is below 60°C.	IACS Requirements for Fire Protection F35 and ISO 15540 & 15541. Hose clamps and similar types of attachments for flexible pipes are not permitted
23	II-2/4	5.1.4.4 Where cargo wing tanks are provided, cargo oil lines below deck shall be installed inside these tanks. However, the Administration may permit cargo oil lines to be placed in special ducts provided they are capable of being adequately cleaned and ventilated to the satisfaction of the Administration. Where cargo wing tanks are not provided, cargo oil lines below deck shall be placed in special ducts.	IACS UR F26 RO's are authorized for approval of general ship structure based on their standard guidelines and rules for design, construction and survey of ships, any novel arrangements must be submitted to the Administration for review and assessment on a case by case basis
24	II-2/4	5.6.3: The arrangements for inerting, purging or gas-freeing of empty tanks as required in paragraph 5.5.3.1 shall be to the satisfaction of the Administration and shall be such that the accumulation of hydrocarbon vapours in pockets formed by the internal structural members in a tank is minimized and that: .1. on individual cargo tanks, the gas outlet pipe, if fitted, shall be positioned as far as practicable from the inert gas/air inlet and in accordance with paragraph 5.3 and regulation 11.6. The inlet of such outlet pipes may be located either at deck level or at not more than 1 m above the bottom of the tank; .2. the cross-sectional area of such gas outlet pipe referred to in paragraph 5.6.3.1 shall be such that an exit velocity of at least 20 m/s can be maintained when any three tanks are being simultaneously supplied with inert gas. Their outlets shall extend not less than 2 m above deck level; and .3. each gas outlet referred to in paragraph 5.6.3.2 shall be fitted with suitable blanking arrangements.	(Reference IACS UI SC58 Rev.2) 1. The outlets mentioned in Reg. II-2/4.5.6.3 are to be located in compliance with Reg. II-2/4.5.3.4.1.3 as far as the horizontal distance is concerned. 2. Reference is made to MSC/Circ.677 - Revised standards for the design, testing and locating of devices to prevent the passage of flame into cargo tanks in oil tankers, and MSC/Circ.450/Rev.1 - Revised factors to be taken into consideration when designing cargo tank venting and gas-freeing arrangements. (MSC/Circ. 1120)
25	II-2/5	2.2.5 In passenger ships, the controls required in paragraphs 2.2.1 to 2.2.4 and in regulations 8.3.3 and 9.5.2.3 and the controls for any required fire-extinguishing system shall be situated at one	LSA and FFE plans are submitted to the Administration, for review and approval

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		control position or grouped in as few positions as possible to the satisfaction of the Administration. Such positions shall have a safe access from the open deck.	
26	II-2 / 4	5.3.3 The venting system shall be provided with devices to prevent the passage of flame into the cargo tanks. The design, testing and locating of these devices shall comply with the requirements established by the Administration based on the guidelines developed by the Organization. Ullage openings shall not be used for pressure equalization. They shall be provided with self- closing and tightly sealing covers. Flame arresters and screens are not permitted in these openings.	-IMO Circulars MSC/Circ.677 as amended; and -MSC/Circ.450/Rev.1
27	II- 2/4.5.5.1.1	1 For tankers of 20,000 tonnes deadweight and upwards, the protection of the cargo tanks shall be achieved by a fixed inert gas system in accordance with the requirements of the Fire Safety Systems Code, except that, in lieu of the above, the Administration, after having given consideration to the ship's arrangement and equipment, may accept other fixed installations if they afford protection equivalent to the above, in accordance with regulation I/5. The requirements for alternative fixed installations shall comply with the requirements in paragraph 5.5.4.	Refer to MSC.365(93), which reproduced below: "5.5.4.2 For tankers of 8,000 tonnes deadweight and upwards but less than 20,000 tonnes deadweight constructed on or after 1 January 2016, in lieu of fixed installations as required by paragraph 5.5.4.1, the Administration may accept other equivalent arrangements or means of protection in accordance with regulation I/5 and paragraph 5.5.4.3."
28	II- 2/4.5.5.2.1	The requirements for inert gas systems contained in the Fire Safety Systems Code need not be applied to: .1. chemical tankers and gas carriers when carrying cargoes described in regulation 1.6.1, provided that they comply with the requirements for2.2.5 inert gas systems on chemical tankers established by the Administration, based on the guidelines developed by the Organization;	Refer to MSC.365(93) as per below: 5.5.2 Inert gas systems of chemical tankers and gas carriers 5.5.2.1 The requirements for inert gas systems contained in the Fire Safety Systems Code need not be applied to chemical tankers constructed before 1 January 2016, including those constructed before 1 July 2012, and all gas carriers: .1 when carrying cargoes described in regulation 1.6.1, provided that they comply with the requirements for inert gas systems on chemical tankers established by the Administration, based on the guidelines developed by the Organization*; or .2 when carrying flammable cargoes other than crude oil or petroleum products such as cargoes listed in chapters 17 and 18 of the International Bulk Chemical Code, provided that the capacity of tanks used for their carriage does not exceed 3,000 m3 and the individual nozzle capacities of tank washing machines do not exceed 17.5 m3/h and the total combined throughput from the number of machines in use in a cargo tank at any one time does not exceed 110 m3/h." -For inert gas system on chemical tankers, IMO resolution A.567(14) and Corr.1 may be referred
29	II-2/7	3.2 The function of fixed fire detection and fire alarm systems shall be periodically tested to the satisfaction of the Administration by means of equipment producing hot air at the appropriate temperature, or smoke or aerosol particles having the appropriate range of density or particle size, or other phenomena associated with incipient fires to which the detector is designed to respond.	Testing equipment to be in accordance with the manufacturer's recommendations / instructions. The function of fixed fire detection and fire alarm systems required by the relevant regulations of this chapter shall be tested under varying conditions of ventilation after installation.
30	II-2/7	6. A fixed fire detection and fire alarm system or a sample extraction smoke detection system shall be provided in any cargo space which, in the opinion of the Administration, is not accessible, except where it is shown to the satisfaction of the Administration that the ship is engaged on voyages of such short duration that it would be unreasonable to apply this requirement.	Administration will determine this on a case by case basis. However, we will be adopting requirements of the FSS Code on Chapter 9 Fixed Fire Detection and Fire Alarms Systems for those that in compliance with this requirement.

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31 II-2		3.4 In passenger ships, the controls required by paragraph 3.3 shall be situated at one control position or grouped in as few positions as possible to the satisfaction of the Administration. Such positions shall have a safe access from the open deck.	LSA and FFE plans are submitted to the Administration, via the RO/LCS, for review and approval. As for Passenger ships, LSA and FFE plans are to be submitted to the Administration for approval after examination by RO/LCS.
32 II-2	2/9	2.2.3.1 In addition to complying with the specific provisions for fire integrity of bulkheads and decks of passenger ships, the minimum fire integrity of all bulkheads and decks shall be as prescribed in tables 9.1 and 9.2. Where, due to any particular structural arrangements in the ship, difficulty is experienced in determining from the tables the minimum fire integrity value of any divisions, such values shall be determined to the satisfaction of the Administration.	The Administration requires on passenger ships <i>carrying not more than 36 passengers</i> the minimum fire integrity of all bulkheads and decks shall be complying with the requirements set in other regulations of SOLAS Part II-2, but shall satisfy specific provisions be as prescribed in tables 9.1 and 9.2. of the Chapter II-2/Regulation 9. Where, due to any particular structural arrangements in the ship, difficulty is experienced in determining from the tables the minimum fire integrity value of any divisions, such values shall be agreed with the Administration in a case to case basis.
33 II-2		2.3.3.4 External boundaries which are required in regulation 11.2 to be of steel or other equivalent material may be pierced for the fitting of windows and sidescuttles provided that there is no requirement for such boundaries of cargo ships to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors may be constructed of materials which are to the satisfaction of the Administration	The Administration determines that external boundaries to be of steel or other equivalent material may be pierced for the fitting of windows and side scuttles provided that there is no requirement for such boundaries of cargo ships to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors shall be constructed of other materials agreed by the Administration.
34 II-2	2/9	2.4.2.4 External boundaries which are required in regulation 11.2 to be of steel or other equivalent material may be pierced for the fitting of windows and sidescuttles provided that there is no requirement for such boundaries of tankers to have "A" class integrity. Similarly, in such boundaries which are not required to have "A" class integrity, doors may be constructed of materials which are to the satisfaction of the Administration.	The Administration determines that external boundaries on tankers which are required to be of steel or other equivalent material may be pierced for the fitting of windows and sidescuttles provided that there is no requirement for such boundaries of tankers to have "A" class integrity. Similarly, in such boundaries which may not be required to have "A" class integrity, doors may be constructed of materials which are to be agreed by the Administration.
35 II-2.		2.3.2.1 Ships shall be provided with fire hoses the number and diameter of which shall be to the satisfaction of the Administration.	The design of the piping system must be taken into consideration in determining the number of fire hoses, The minimum diameter of a fire hose must be 38 mm, and Every fire hose must have the same diameter, but hoses in machinery spaces and other interior locations may have a smaller diameter than hoses in other locations if the smaller diameter is for the purpose of convenient handling https://tc.canada.ca/en/marine-transportation/marine-safety/part-iv-solas-chapter-ii-2-construction-fire-protection-fire-extinction
36 II-2		3.2.1 Accommodation spaces, service spaces and control stations shall be provided with portable fire extinguishers of appropriate types and in sufficient number to the satisfaction of the Administration.	Refer to IMO MSC.1Circ.1275
37 II-2		7.1.2 Where it is shown to the satisfaction of the Administration that a passenger ship is engaged on voyages of such short duration that it would be unreasonable to apply the requirements of paragraph 7.1.1 and also in ships of less than 1,000 gross tonnage, the arrangements in cargo spaces shall be to the satisfaction of the Administration, provided that the ship is fitted with steel hatch covers and effective means of closing all ventilators and other openings leading to the cargo spaces.	The cargo spaces shall be fitted with steel hatch covers and effective means of closing all ventilators and other openings leading to the cargo spaces. In compliance with the Rules of IACS member accredited by the Administration.

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38	II-2/10	7.3.2.4 The operational performance of each mobile water monitor shall be tested during initial survey on board the ship to the satisfaction of the Administration	MSC 92/96. Add.1 under Regulation 10- Fire fighting, paragraph 7.3.2.4.(Annex 13, Page 11) The test shall verify that:
			.1 the mobile water monitor can be securely fixed to the ship structure ensuring safe and effective operation; and .2 the mobile water monitor jet reaches the top tier of containers with all required monitors and water jets from fire hoses operated simultaneously."
39	II-2/13	3.1.4 If a radiotelegraph station has no direct access to the open deck, two means of escape from, or access to, the station shall be provided, one of which may be a porthole or window of sufficient size or other means to the satisfaction of the Administration.	The clear opening size of a porthole or window is 600mm X 600 mm
40	II-2/13	3.2.6.2 Escape doors from public spaces that are normally latched shall be fitted with a means of quick release. Such means shall consist of a door- latching mechanism incorporating a device that releases the latch upon the application of a force in the direction of escape flow. Quick release mechanisms shall be designed and installed to the satisfaction of the Administration.	Refer to SOLAS II-2/13.3.2.6.2 guidelines: Quick release mechanisms shall be designed and installed to the satisfaction of the Administration and, in particular: .1 consist of bars or panels, the actuating portion of which extends across at least one half of the width of the door leaf, at least 760 mm and not more than 1120 mm above the deck; .2 cause the latch to release when a force not exceeding 67 N is applied; and . 3 not be equipped with any locking device, set screw or other arrangement that prevents the release of the latch when pressure is applied to the releasing device
41	II-2/13	3.4 Emergency Escape Breathing Devices. Number and location shall be determined by the Administration.	-In compliance with the Rules of IACS member accredited by the Administration" -MSC/Circ.1081 shall also adopted
42	II-2/13	5.1 In special category and open ro-ro spaces to which any passengers carried can have access, the number and locations of the means of escape both below and above the bulkhead deck shall be to the satisfaction of the Administration and, in general, the safety of access to the embarkation deck shall be at least equivalent to that provided for under paragraphs 3.2.1.1, 3.2.2, 3.2.4.1 and 3.2.4.2. Such spaces shall be provided with designated walkways to the means of escape with a breadth of at least 600 mm. The parking arrangements for the vehicles shall maintain the walkways clear at all times.	In compliance with the Rules of IACS member accredited by the Administration
43	II-2/19	3.1.2 The quantity of water delivered shall be capable of supplying four nozzles of a size and at pressures as specified in regulation 10.2, capable of being trained on any part of the cargo space when empty. This amount of water may be applied by equivalent means to the satisfaction of the Administration.	IMO MSC/Circ.1120 shall be adopted Hydrants for dangerous goods The number and position of hydrants should be such that at least two of the required four jets of water, when supplied by single lengths of hose, may reach any part of the cargo space when empty; and all four jets of water, each supplied by single lengths of hose may reach any part of ro-ro cargo spaces.
44	II-2/20	4.1 The fixed fire detection system shall be capable of rapidly detecting the onset of fire. The type of detectors and their spacing and location shall be to the satisfaction of the Administration taking into account the effects of ventilation and other relevant factors. After being installed the system shall be tested under normal ventilation conditions and shall give an overall response time to the satisfaction of the Administration.	 FSS Code on Chapter 9 Fixed Fire Detection and Fire Alarms Systems; IMO MSC/Circ.1120; and MSC.1/Circ.1615 shall also be adopted

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45	111/4	2.2 Before giving approval to life-saving appliances and arrangements, the Administration shall ensure that such life-saving appliances and arrangements have successfully undergone, to the satisfaction of the Administration, tests which are substantially equivalent to those specified in those recommendations.	We refer to IMO Resolution MSC.81(70) - Revised Recommendation on Testing of Life-Saving Appliances (amended by Resolution MSC.226(82).
46	III/7	3 An immersion suit, complying with the requirements of section 2.3 of the Code or an anti-exposure suit complying with section of the Code, of an appropriate size, shall be provided for every person assigned to crew the rescue boat or assigned to the marine evacuation system party. If the ship is constantly engaged in warm climates where, in the opinion of the Administration thermal protection is unnecessary, this protective clothing need not be carried.	Exemption to the requirements shall be applied as the Administration is in a Tropical Country. Therefore, application for exemption shall be submitted to the Administration.
47	III/32	3.2 An immersion suit complying with the requirements of section 2.3 of the Code shall be provided for every person on board the ship. However, for ships other than bulk carriers, as defined in regulation IX/1, these immersion suits need not be required if the ship is constantly engaged on voyages in warm climates where, in the opinion of the Administration, immersion suits are unnecessary.	Exemption to the requirements shall be applied as the Administration is in a Tropical Country. Therefore, application for exemption shall be submitted to the Administration.
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48	IV/16	1 Every ship shall carry personnel qualified for distress and safety radiocommunication purposes to the satisfaction of the Administration.* The personnel shall be holders of certificates specified in the Radio Regulations as appropriate, any one of whom shall be designated to have primary responsibility for radiocommunications during distress incidents.	MARINA has issued Manning requirement for ships not GMDSS and GMDSS compliant taken into account NTC Rules and Regulation
49 CH4	IV/17	A record shall be kept, to the satisfaction of the Administration and as required by the Radio Regulations, of all incidents connected with the radiocommunication service which appear to be of importance to safety of life at sea. ety of Navigation	GMDSS log book to be maintained and entries could include following: a) records of communications relating to distress, urgency and safety traffic, records of important incidents connected with the radio service, regular positions of the ship, b) results of tests (daily, weekly and monthly) carried out on the radio equipment c) Retention period of such GMDSS log book can be of 3 years Unless specified by MARINA, generic format of GMDSS log books may be used.

	Regulation Item	Statutory Requirement	MARINA Guidance
50	V/1	4 The Administration shall determine to what extent the provisions of regulations 15 - 28 do not apply to the following categories of ships: 1. ships below 150 gross tonnage engaged on any voyage; 2. ships below 500 gross tonnage not engaged on international voyages; and 3. fishing vessels.	Refer to PMMRR 1997, as amended, requirement under Chapter XI - Safety of Navigation. This chapter deals with safety of navigation and applies to ships including those towed or pushed by a tug or other such ships, and they shall comply with regulations relating to the prevention of collisions (COLREG) and the routeing measures adopted by the IMO. The subject covered include danger messages, routeing, misuse of distress signals, obligations and procedures for sending distress messages, signaling lamps, shipborne navigational equipment, nautical publications, international code of signals, and lifesaving signals. (Basically, from the IMO Model Codes/SOLAS 1974) We also refer to Philippine Ship Safety Rules and Regulations for Passenger Ships Part A and Part B under Chapter XI – Safety of Navigation
51	V/23	3.3.1.3 Safe and convenient access to, and egress from, the ship shall be provided by either: 1. a pilot ladder requiring a climb of not less than 1.5 m and not more than 9 m above the surface of the water so positioned and secured that 1.1. it is clear of any possible discharges from the ship; 1.2. it is within the parallel body length of the ship and, as far as is practicable, within the mid-ship half length of the ship; 1.3 each step rests firmly against the ship's side; where constructional features, such as rubbing bands, would prevent the implementation of this provision, special arrangements shall, to the satisfaction of the Administration, be made to ensure that persons are able to embark and disembark safely;	Salient points from IMO Resolution A.1045 (27) which is pilot ladder should be certified by the manufacturer as complying with SOLAS, Chapter V/Reg.23 or ISO 799:2004 Where rubbing bands or other constructional features might prevent the safe approach of a pilot boat, these should be cut back to provide at least 6 metres of unobstructed ship's side. Specialized offshore ships less than 90 m or other similar ships less than 90 m for which a 6 m gap in the rubbing bands would not be practicable, as determined by the Administration, do not have to comply with this requirement. In this case, other appropriate measures should be taken to ensure that persons are able to embark and disembark safely."
CHA	APTER VI – Sat	fety of Cargoes	
52	VI/3	1 When transporting a solid bulk cargo which is liable to emit a toxic or flammable gas, or cause oxygen depletion in the cargo space, an appropriate instrument for measuring the concentration of gas or oxygen in the air shall be provided together with detailed instructions for its use. Such an instrument shall be to the satisfaction of the Administration	In compliance with the Rules of IACS member accredited by the Administration
53	VI/6	1 Prior to loading a solid bulk cargo, the master shall be in possession of comprehensive information on the ship's stability and on the distribution of cargo for the standard loading conditions. The method of providing such information shall be to the satisfaction of the Administration.	 IMSBC Code Part B – Special provisions for solid bulk cargoes under regulation 7 (Loading, unloading and stowage of solid bulk cargoes) The Code of Practice for the Safe Loading and Unloading of Bulk Carriers (BLU Code) adopted by the Organization by resolution A.862(20), as amended