

# ABS REGULATORY NEWS

No. 01/2026



## ESCAPE FROM MACHINERY SPACES OF CATEGORY A

This Regulatory News provides an update and guidance on the latest developments regarding the arrangements for the emergency escape trunk from Category A machinery spaces.

Note: This Regulatory News supersedes the Regulatory News **No.01/2025** and **No.10/2025**.

### BACKGROUND

SOLAS regulations II-2/13.4.1 and 13.4.2 specify the requirements for the means of escape from machinery spaces on passenger and cargo ships, respectively. Those regulations require one of the two means of escape from machinery spaces to be located inside a protected enclosure from the "lower part of the space".

The term "lower part" refers to the protected enclosure but is not explicitly defined in the SOLAS regulations. In this context, IACS proposed a unified interpretation, which was approved by the IMO Maritime Safety Committee during its 95th session in June 2015. This unified interpretation was released as MSC.1/Circ.1511 and applies to vessels with a keel laying date on or after January 1, 2016. The document specifies the "lower part" as the "lowest deck level, platform, or passageway within the space."

To be noted that the IACS unified interpretations, SC 277 for cargo ships and SC 276 for passenger ships, provide the same clarification for vessels contracted for construction on or after February 1, 2016. Specifically, they state that the term "lower part of the space it serves" should be understood as referring to "the lowest deck level, platform, or passageway within that space."

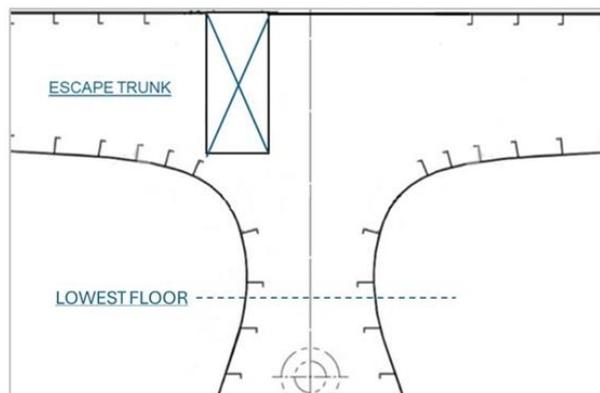


Figure 1: Example of structural restrictions and the geometry of the shell line that prevents the escape trunk from extending from the lowest floor of the engine room

### KEY NOTES

#### Application:

- Passenger and cargo ships above 500 GT

#### References:

- SOLAS regulations II-2/13.4.1 and 13.4.2
- MSC.1/Circ.1511 - Unified Interpretations of SOLAS Regulations II-2/9 and 13
- IACS SC 277 - Escape from machinery spaces on cargo ships
- IACS SC 276 - Escape from machinery spaces on passenger ships
- [MSC.1/Circ.1689](#)

## THE ISSUE AND INVOLVED PARTIES

### ***Industry Practice***

Due to hull form restrictions and/or aft end structure optimization in the design of the machinery space on certain ships, it is not technically feasible to provide access to the protected emergency escape trunk from the absolute lowest deck level to a safe position outside.

For such arrangements, industry practice dictates that access to the protected enclosure is provided by an inclined steel ladder or stairway with an inclination not exceeding 60°. The clear width must be no less than 600 mm and shall comply with SOLAS regulation II-2/13.4.1.5. Such ladder or stairway commonly has a vertical height ranging from 1 to 2.5 meters. This design aims to provide safe and quick passage to the protected enclosure in the event of an emergency.

### ***PSC Authorities***

Due to varying interpretations, there has been a noticeable rise in the number of vessels with these arrangements being targeted and, in some cases, detained. This occurrence stems from claims that they do not meet the requirements of the unified interpretation, which states that the term applies only to the lowest deck, platform, or passageway, whichever is the lowest.

Detentions can occur following unsatisfactory drill performance. In most cases, the drill involves a combined fire and evacuation scenario. If the drill does not meet the satisfaction of the Port State Control (PSC) authority, the vessel is detained. It is worth noting that these detentions included vessels that had already received agreement or acceptance from the flag Administration regarding the as-built arrangement of the escape trunk. Ships have been released under the condition to either undergo modifications during their next dry docking or after PSC accepted that no modifications are feasible and was satisfied with the evacuation drill.

### ***Flag Administration***

A detailed technical engineering statement is required to justify why the emergency escape trunk cannot be extended to the lowest deck, platform, or passageway in its current as-built location. This statement must be officially accepted by the flag Administration to facilitate the release of the vessels by the PSC authority. Additionally, the process includes comprehensive evacuation procedures outlined in the vessel's Safety Management System (SMS), crew training, regular drills, and an efficient drill conducted in the presence of the PSC Authority.

## RECENT DISCUSSIONS AT IMO

In the context of PSC inspections, the Maritime Safety Committee, at its 110th session (MSC 110) noted the existence and impact of divergent interpretations of SOLAS regulations II-2/13.4.1 and 13.4.2, regarding the term "lower part" used in connection with the means of escape from spaces below the bulkhead deck for passenger ships, and from category A machinery spaces for cargo ships. In previous discussions, the Sub-Committee on Ship Design and Construction (SDC 11) had confirmed that the terms "lower part of the space" should be regarded as either the lowest deck level or a platform or passageway.

To progress resolution of the issue, the Committee had approved a new output for SDC 12 to review SOLAS regulations II-2/13.4.1.1 and 13.4.2.1, with a view to clarifying the requirements for escape arrangements from the lower part of machinery spaces.

During the discussions, the Sub-Committee noted the approach to approval of escape arrangements in accordance with SOLAS regulations II-2/13.4.1.1 and 13.4.2.1, their safe use over more than four decades, and that there was absence of clear evidence of any safety concerns. Consequently, the Sub-Committee

decided that no changes to the SOLAS regulations were necessary and considered that this agenda item was to be closed out.

Additionally, in light of the inconsistent interpretation of the term “lower part”, MSC 110 had approved circular [MSC.1/Circ.1689](#) recalling the responsibility of flag States to approve the relevant arrangements in compliance with SOLAS regulations II-2/13.4.1 and 13.4.2, and that the PSC officer (PSCO) should in principle accept the design arrangement approved by the flag State and when appropriate consult with the flag Administrations in accordance with the Procedures for Port State Control, 2023 (resolution A.1185(33)).

Therefore, following the closing-out of this agenda item, the Sub-Committee recommended that MSC 111 revoke [MSC.1/Circ.1689](#).

## GENERAL RECOMMENDATIONS

Until the final formal closing-out of this agenda item by MSC 111 (May 2026), it is recommended that a copy of [MSC.1/Circ.1689](#) is kept on board which may be brought to the attention of concerned parties, including PSC officers.

## REFERENCES

Document	Title
SOLAS Convention	Regulations II-2/13.4.1 and 13.4.2
MSC.1/Circ.1511	Unified Interpretations of SOLAS Regulations II-2/9 and 13
IACS SC 276	Escape from machinery spaces on passenger ships
IACS SC 277	Escape from machinery spaces on passenger ships
Res. A.1185(33)	Procedures for Port State Control
<a href="#">MSC.1/Circ.1689</a>	Escape arrangements from the lower part of machinery spaces

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