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## Passenger Ship Watertight Doors

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations and surveyors

*This Notice supersedes BMA Information Bulletin No.96*

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### 1. Purpose

- 1.1. This Notice provides instructions for applying for authorisation for watertight doors on passenger ships to be opened, or remain open, during navigation.

### 2. Application

- 2.1. This Notice applies to all passenger ships registered in The Bahamas requesting the following authorisations:
- i. On “new” ships for watertight doors to be opened during navigation (MSC.1/Circ.1564);
  - ii. On “existing” ships for watertight doors to be opened, or remain open, during navigation (MSC.1/Circ.1380);
- 2.2. A “new” ship for the purposes of this Notice is one for which the building contract is placed on or after 1 January 2020; or, in the absence of a building contract, the keel of which is laid, or which are at a similar stage of construction, on or after 1 July 2020; or the delivery of which is on or after 1 January 2024. Any ship which is not a “new” ship is an “existing” ship

### 3. Background

- 1.2. The International Maritime Organization (IMO) Maritime Safety Committee (MSC) adopted amendments to Regulation 22 of Chapter II-1 of the International Convention for the Safety of Life at Sea 1974, as amended (SOLAS) in 2017 which included changes to the operation of watertight doors on passenger ships. The principal effect of the amendments is that “new” passenger ships will not be permitted to navigate with any watertight door continuously open<sup>1</sup>.

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<sup>1</sup> Further background information is provided in the Appendix

- 3.1. The amendments, which entered into force on 01 January 2020, do not affect the categorisation of watertight doors on existing passenger ships and any authorisations issued by the Bahamas Maritime Authority (BMA) prior to the entry-into-force date.
- 3.2. The IMO released circular MSC.1/Circ.1564 *Revised Guidance for Watertight Doors on Passenger Ships Which May Be Opened During Navigation* in association with the amendments. This circular removes **Category A** doors and introduces a floatability assessment for **Category B** doors (MSC.1/Circ.1380 required a floatability assessment only for **Category A** doors).
- 3.3. It should be noted that **MSC.1/Circ.1564 does not supersede MSC.1/Circ.1380** – MSC.1/Circ.1380 will continue to apply to existing ships.
- 3.4. A simplified flowchart showing the process for both MSC.1/Circ.1380 and MSC.1/Circ.1564 is provided in Annex C.
- 3.5. The amendments to SOLAS are not retrospective. Consequently, there are different compliance regimes for “new” and “existing” passenger ships. It is essential that designers and builders take the new provisions into account to ensure safe and efficient ship operations.

#### **4. Operational instructions**

- 4.1. Operational instructions for watertight doors shall be incorporated in the ship’s safety management system and the categorisations of watertight doors must be shown in the ship stability information.
- 4.2. Operational instructions shall also be referenced in the List of Operational Limitations in accordance with SOLAS Chapter V requirements. Further information on the content of operational instructions can be found in Annex B.

#### **5. Instructions to Recognised Organisations**

- 5.1. When assessing an application for authorisation for watertight doors to be opened or remain open the Recognised Organisation shall ensure that the application contains the required information in accordance with Annex A of this Notice and paragraph 6 of MSC.1/Circ.1380 or MSC.1/Circ.1564 (as applicable).
- 5.2. The Recognised Organisation shall take into consideration the ship’s operational limitations and impacts on ship operations.

- 5.3. Verification of damage stability and floatability assessment must be carried out and proper consideration must be given to the proposed justification for watertight door categorisations.
- 5.4. Prior to submission of an application to the BMA the following should be confirmed:
- i. Recognised Organisations shall, in submitting the application to the BMA, clearly indicate whether they are supportive, or not, of the application and advise of any relevant recommendation(s).
  - ii. The submission shall include all the required information specified in this Notice.
  - iii. The owners shall be reminded that, in order to avoid any delays, all applications should be submitted via the Recognised Organisations.
  - iv. When the BMA approves the application, the Recognised Organisation shall ensure that the category of the doors is recorded on the Damage Control plan and List of Operational Limitations.
- 5.5. The final decision on the categorisation of watertight doors is at the BMA's discretion.
- 5.6. In the event of transfer of classification society, the gaining society may automatically re-issue the existing authorisation.

## **6. Periodic review**

- 6.1. Recognised Organisations are to review the watertight door plan/categorisation at every Load Line renewal survey to confirm that the arrangements are still valid and appropriate and that no changes have been made to the watertight doors.
- 6.2. Recognised Organisations shall advise the BMA of the results of the review when changes are required and make a new application for categorisation or re-categorisation of the watertight doors. If the review concludes that no changes are required the BMA does not need to be advised.

## **7. Queries**

- 7.1. Any queries on this Notice may be submitted to [tech@bahamasmaritime.com](mailto:tech@bahamasmaritime.com) or any BMA office.



## Annex A - Procedure for approval of watertight door categorisation

- 1) When a Company<sup>2</sup> wishes to apply for watertight doors to be opened, or remain open, during navigation, an application shall be made to the BMA via the Recognised Organisation that classes the ship.
- 2) The Recognised Organisation is to assess the application taking into account the instructions in paragraph 5 of Marine Notice 78 and, following completion of the assessment, forward the application together with the results of the assessment along with its recommendations to the BMA for approval.
- 3) The application must contain the following information:
  - a) a copy of the vessel's Damage Control plan and/or Fire plans, with all watertight doors clearly marked;
  - b) A copy of the shipboard operational instructions with respect to the operation of the watertight doors.
  - c) A copy of the Company's risk assessment that considers the ships survivability including the results of the floatability assessment referred to in the appendix of MSC.1/Circ.1380 or MSC.1/Circ.1564, as applicable.
  - d) For existing ships: a completed checklist of technical standards for the watertight doors being requested to be categorised other than Category C or D. The checklist is found in appendix 2 of MSC.1/Circ.1380.
  - e) The category of watertight door being applied for:
    - **Category A:** a watertight door that may be left open during navigation (**existing ships only**); or
    - **Category B:** a watertight door that may be opened during navigation for a period of time when work in the vicinity of the door requires it being opened. The door must be immediately closed when the work is finished; or
    - **Category C:** a watertight door that shall be closed during navigation, but may be opened to permit the movement of passengers or crew. The door must be immediately closed when transit is complete; or
    - **Category D:** a watertight door that shall be closed BEFORE the voyage commences and shall be kept closed during navigation. This category also includes watertight doors fitted in watertight bulkheads dividing cargo between deck spaces.

Technical standards and descriptions of watertight door categories are provided in MSC.1/Circ.1380 and MSC.1/Circ.1564.

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<sup>2</sup> The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships to which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Merchant Shipping Act

- 4) The reasons and justification for watertight doors to be opened or remain open during navigation for which authorisation is being requested. The justification should include the following:

***Watertight doors, other than those fitted in machinery spaces:***

- whether there is an operational need for the door to remain open (not applicable to “new” ships);
- whether a closed door can be safely and easily opened and closed again;
- the proximity of a competent person in the adjacent area;
- location of watertight doors in passenger and crew accommodation areas, considering familiarity with their primary escape route.

***Watertight doors fitted in machinery spaces:***

- the need to delay the onset of progressive flooding;
- the need for quick and easy surveillance of machinery spaces containing main propulsion machinery, essential auxiliaries, gear boxes, thrust blocks, bilge system, controllable pitch propeller equipment, electrical power generating plant, fuel preparation and heating equipment, etc., having regard to fire risk and the critical nature of a machinery failure;
- the extent to which fire detection systems and bilge water level alarms are fitted;
- whether a machinery control room is provided and the degree of remote control and remote surveillance available;
- the proximity of a competent person in the adjacent compartment.

- 5) The BMA recognises that Companies may already have a system of designating categories of watertight door. Existing systems may be accepted if they are consistent with the categories outlined in MSC.1/Circ.1380 or MSC.1/Circ.1564, as appropriate.

## **Annex B - Information on content of Operational Instructions**

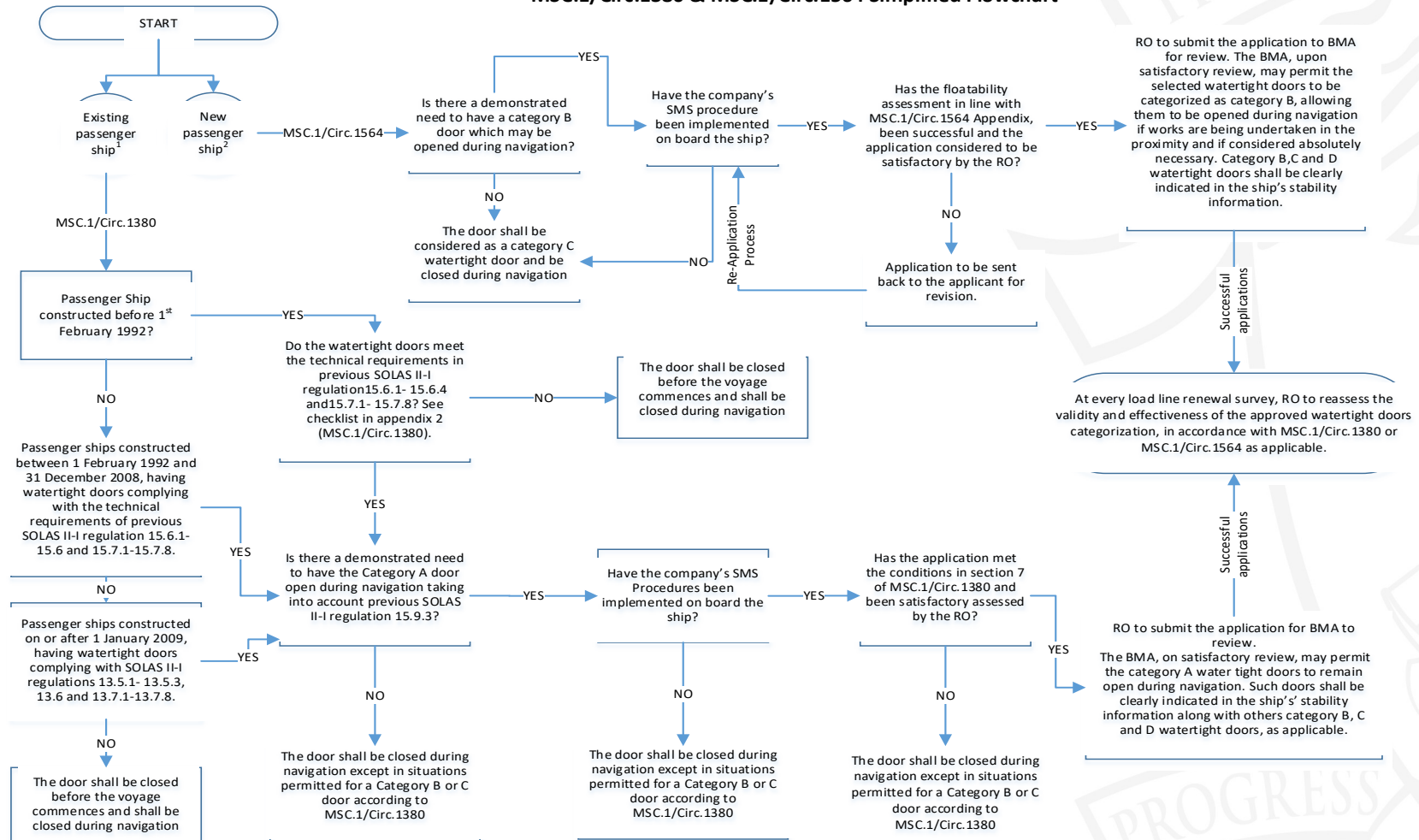
- 1) Operational instructions shall take into account potentially hazardous situations and normal situations, as described below.
- 2) A potentially hazardous situation is defined as a situation when the ship is on a voyage and is operating:
  - a) in waters with high traffic density;
  - b) near coastal waters;
  - c) in heavy weather;
  - d) in dangerous ice conditions;
  - e) in waters where soundings are unreliable;
  - f) during periods of restricted visibility;
  - g) within port limits or compulsory pilotage waters;
  - h) when loose objects are nearby, which could potentially prevent the watertight doors from being closed; or
  - i) under any condition which the ship's Master considers the situation to necessitate all watertight doors to be closed.
- 3) A normal situation is defined as a non-hazardous situation when the ship is on a voyage and operating in conditions other than those described in paragraph 2.
- 4) The operational instructions shall state that whilst underway in potentially hazardous situations, every watertight door (except Category A doors for which the ship satisfies the floatability assessment criteria set out in MSC.1/Circ.1380) shall be closed except when a person is passing through it and if such a door is opened in such circumstances then it shall be closed immediately after transit is complete.
- 5) The operational instructions shall specify that in normal situations, the doors shall be operated in accordance with the category that has been assigned to them.
- 6) A copy of the operational instructions shall be located at the central operating console at the navigation bridge so as to be readily available to the officer in charge of the navigation watch.
- 7) The operational instructions shall state the means of verifying the correct position of all watertight doors.
- 8) The operational instructions shall include procedures for operating watertight doors to permit safe passage of passengers. In particular, watertight doors should only be operated by competent persons, not passengers.
- 9) The assigned category and the meaning of each category of watertight door shall be clearly marked on both sides of the watertight door or the bulkhead adjacent to the door to ensure correct operation.

- 10) The categorisation of the door shall be indicated on or near the central operating console at the navigation bridge so that the correct status of all doors can be ascertained.
- 11) There have been cases of death and injury on board Bahamian ships following operation of the central closing facility on the bridge. Operational instructions must clearly state that central closing of the watertight doors from the bridge console is prohibited, except when testing or in an emergency, in accordance with SOLAS requirements.
- 12) The operational instructions must also include a procedure to ensure that the central closing control is returned to the local control position on the bridge console when closing under test or emergency conditions has been completed.
- 13) For all doors, the central operating console's master mode switch shall be in the local control mode at all times during normal operations.
- 14) Where watertight door operation is integrated in a Safety Monitoring and Control System (SMCS) and it is possible to operate watertight doors from the Engine Control Room (ECR), the following conditions apply:
  - a) Access to watertight door operation from the SMCS workstation in the ECR when the wheelhouse/safety centre switch is in the local control mode is to be password protected and the password is to be controlled so that it is only available to authorised personnel;
  - b) Clear instructions on the circumstances in which the SMCS workstation in the ECR may be used to close watertight doors are to be provided; and
  - c) Watertight doors must not be opened using the SMCS workstation in the ECR without the express permission of the bridge/Officer of the Watch (OOW).



Annex C

MSC.1/Circ.1380 & MSC.1/Circ.1564 Simplified Flowchart



<sup>1</sup> Any ship which is not a "new" ship, as defined in <sup>2</sup>, is an "existing" ship.  
<sup>2</sup> A "new" ship is one for which the building contract is placed on or after 1 January 2020; or in the absence of a building contract, the keel of which is laid or which are at a similar stage of construction on or after 1 July 2020; or the delivery of which is on or after 1 January 2024.

## Appendix - Background information

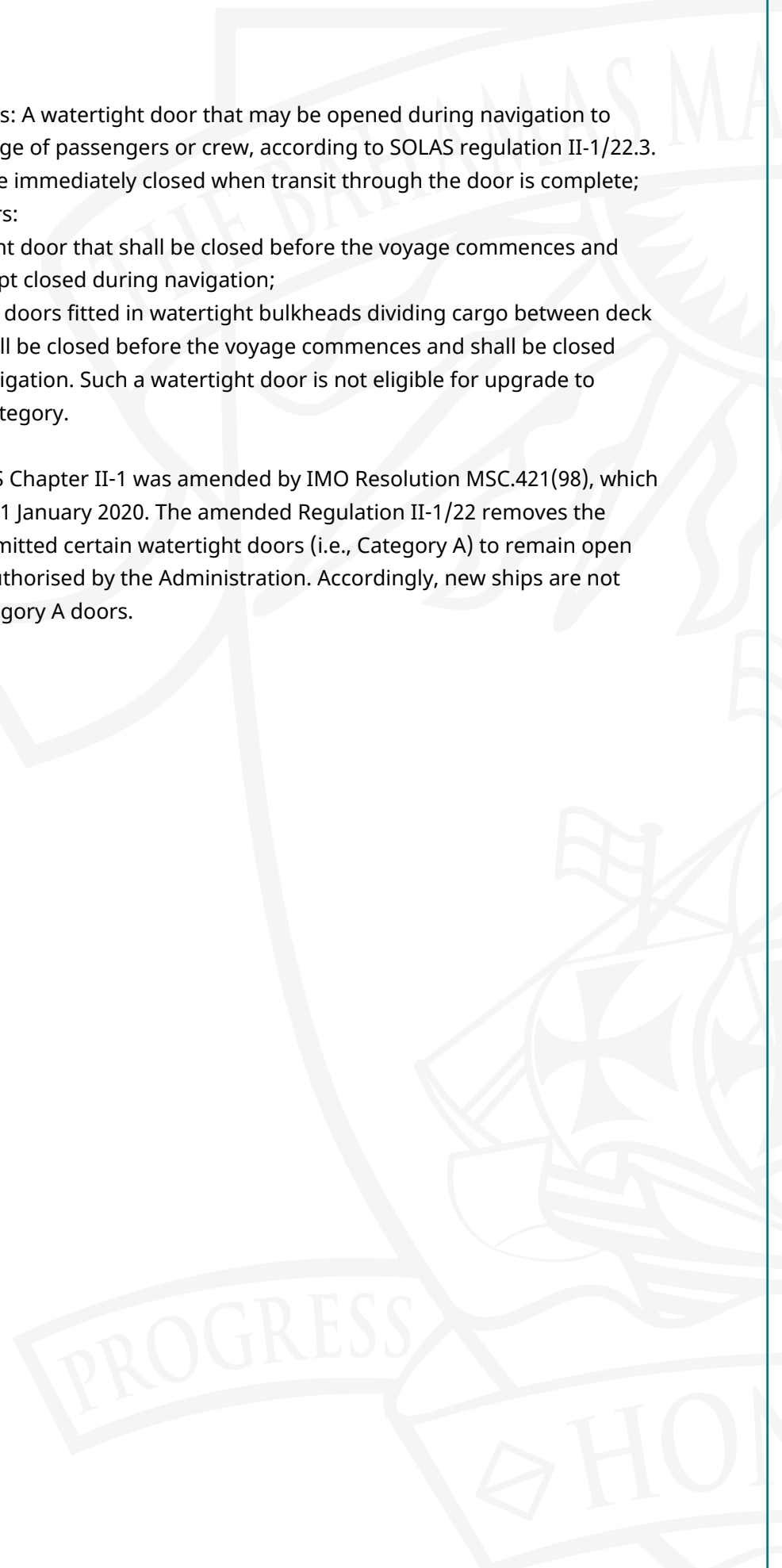
1. Regulation 22 of Chapter II-1 of SOLAS requires, inter alia, that watertight doors shall be kept closed during navigation, except:
  - i. A watertight door may be opened during navigation to permit the passage of passengers or crew, or when work in the immediate vicinity of the door necessitates it being opened. The door must be immediately closed when transit through the door is complete or when the task which necessitated it being open is finished<sup>3</sup>; or
  - ii. Certain watertight doors may be permitted to remain open during navigation only if considered absolutely necessary; that is, being open is determined essential to the safe and effective operation of the ship's machinery or to permit passengers normally unrestricted access throughout the passenger area. Such determination shall be made by the Administration only after careful consideration of the impact on ship operations and survivability. A watertight door permitted to remain thus open shall be clearly indicated in the ship's stability information and shall always be ready to be immediately closed<sup>4</sup>.
2. BMA Information Bulletin No.96, originally issued in 2007, categorised watertight doors as follows:
  - i. Category A – a door that is kept open;
  - ii. Category B – a door that shall be closed, but may be left opened for the length of time that personnel are working in the adjacent compartment. In the case of the crew accommodation area, the presence of a competent person<sup>5</sup>, in the adjacent compartment will satisfy this requirement;
  - iii. Category C - a door that shall be closed, but may be opened to permit passage.
3. The IMO subsequently approved MSC.1/Circ.1380 Guidance for Watertight Doors on Passenger Ships Which May Be Opened During Navigation, in 2010. MSC.1/Circ.1380 categorises watertight doors as follows:
  - i. **Category A** doors: A watertight door that has been permitted to remain open during navigation by the Administration according to SOLAS regulation II-1/22.4;
  - ii. **Category B** doors: A watertight door that may be opened during navigation when work in the immediate vicinity of the door necessitates it being opened. The door must be immediately closed when the task which necessitated it being open is finished (SOLAS regulation II-1/22.3).

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<sup>3</sup> SOLAS Regulation II-1/22.3

<sup>4</sup> SOLAS Regulation II-1/22.4

<sup>5</sup> A "competent person" means a person trained in the safe operation of watertight doors. The BMA accepts on board training and assessment as satisfying this training requirement. Please also refer to [Marine Notice 89](#)

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- iii. **Category C** doors: A watertight door that may be opened during navigation to permit the passage of passengers or crew, according to SOLAS regulation II-1/22.3. The door must be immediately closed when transit through the door is complete;
- iv. **Category D** doors:
- A watertight door that shall be closed before the voyage commences and shall be kept closed during navigation;
  - Watertight doors fitted in watertight bulkheads dividing cargo between deck spaces shall be closed before the voyage commences and shall be closed during navigation. Such a watertight door is not eligible for upgrade to another category.
4. Regulation 22 of SOLAS Chapter II-1 was amended by IMO Resolution MSC.421(98), which entered into force on 01 January 2020. The amended Regulation II-1/22 removes the provision that had permitted certain watertight doors (i.e., Category A) to remain open during navigation, if authorised by the Administration. Accordingly, new ships are not permitted to have Category A doors.