13 November 2014

To: All AMSA Recognised Organisations

Memorandum on the Fitting of Safety Pins, Fixed CO2 Fire Extinguishing System Cylinder Valves

During the course of a recent PSC inspection, a Code 17 deficiency was issued by the AMSA surveyor citing that the instructions for the engine room fixed CO2 fire extinguishing system in relation to safety pins on cylinder valves was not available. The deficiency stemmed from the discovery that the fixed CO2 fire extinguishing system cylinder valve safety pins were still in place, thus rendering the system inoperative.

The response to this deficiency from the ship’s Master, ship operator and the equipment manufacturer was positive, indicating agreement with the deficiency and providing effective corrective / preventive actions whereby the safety pins have been removed and procedures have been put in place to ensure that there is no recurrence of this incident on board and throughout the fleet and the Flag Administration has been informed accordingly. Furthermore, the equipment manufacturer, Tyco Marine Services Korea, validated AMSA’s assertion that safety pins should be removed from all cylinders.

On the strength of the information provided the AMSA surveyor was prepared to close the deficiency; however, we subsequently received an email from the RO stating that: “Fixed CO2 gang can be operated with safety pin. This is a normal condition and removal of safety pin is only for maintenance and manual operation.”

AMSA disagrees with this reasoning in the strongest possible terms, based on the following.

With regard to SOLAS and the Fire Systems Safety Code, the fixed fire-extinguishing system must be fully operable at all times. The CO2 system is rendered inoperable whilst the safety pins are in position. The pins are normally installed in the cylinder valve as a safety device during the transportation, installation and testing phases. They must be removed to commission the system.
Action

You may wish to consider, in routine communication with shipowners and managers, advising that every vessel master should immediately attend the CO2 room and personally ensure the vessel has a fully operational system and that no safety pins have been left in the valves. Verification of the check and location of the pins (in or out) when inspected should be forwarded to their Designated Persons on completion of the inspection.

Yours sincerely,

[Signature]

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