Office of
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Technical Letter 2012-01

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Reference: FSS Code
SOLAS II-2

Subject: Anti-Piracy Citadels and CO2 System Safety Considerations

This technical letter is issued in order to clarify the Liberian Administration's policy on installation of an isolation valve in the delivery line to a protected space.

A Citadel as defined in Best Management Practice against Somali based pirates (BMP) is "*A designated pre-planned area purpose built into the ship where, in the event of imminent boarding by pirates, all crew will seek protection. A Citadel is designed and constructed to resist a determined pirate trying to gain entry for a fixed period of time.*"

A widely adopted approach on many ships is to designate and configure the Engine Room or Steering Gear compartment or areas within as a dedicated Citadel.

An important safety consideration to the use of a protected space is that release controls for fixed fire-fighting systems are located outside the protected space concerned (FSS Code Chapter 5 and SOLAS II-2) and this leads to the fear that a toxic gaseous fire-fighting system could be used as a weapon against the crew and force an exit from the Citadel.

However, in acknowledging the extraordinary circumstances which currently prevail, and to accommodate the conflicting demands of crew safety inside and outside the high-risk area, the Liberian Administration has accepted the installation of this additional safety device with the following conditions:

.1 the valve is to be located in a position within the "citadel" that is easily accessible both for use and maintenance;

.2 the valve is to be sealed in the open position by a physical seal which must be broken for the valve to be closed;

.3 the valve is to be contained in a steel cabinet with lockable door, key kept in break glass box next to it with a spare key in similar box in the machinery space control room;

.4 the door to the valve cabinet is to be fitted with an alarm system to give an audible and visual indication within the machinery space when this door is opened. The valve position "open/closed" is to be indicated on the machinery space alarm panel within the control room;

.5 a warning sign is to be fitted:
"Machinery space CO2 system isolation valve – keep open! To be closed by authorized personnel only";

.6 procedures relating to the maintenance, routine checking and use of the isolation valve and safety features are to be included in the Safety Management System;

.7 the isolation valve and safety features are to be subject to periodical service and survey along with the rest of the CO2 system; and

.8 the pipework upstream of the isolation valve is provided with over-pressure protection with discharge to open deck (note that this may also be achieved by means of a three-way valve arrangement with a vent line to outside the space.

Ship-owners choosing to install an isolation valve into the delivery line should be encouraged to submit plans and associated drawings to the Administration's Technical Department for review and approval.

Temporary blocking or disconnection of gaseous fire-fighting system delivery pipework is not an accepted method for prohibiting the release of CO2 into a protected space.

Contact Information:
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