

MSC Guidelines for Review of Locks and Latches in Doors in Escape Paths

Procedure Number: SOLAS-49

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References

- ❑ SOLAS 2004 Cite: II-2/13.3.2.6.2
- ❑ MSC/Circ. 1120

Contact Information

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Reference Text

“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 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.”

Guidance

The use of thumb-turn latches, locks and other devices which do not open when a force is applied in the direction of escape are not appropriate in doors within or leading from public spaces (as defined in SOLAS II-2/3.39). Doors, gates, or other barriers in interior partitions (whether full height or not) located within public spaces, through which passengers are expected to escape must have a door-latching mechanism incorporating a device that releases the latch upon the application of a force in the direction of escape flow.

All doors in the escape path, from any area within a public space to the stair, must meet the requirements of II-2/13.3.2.6.2. Likewise, doors in corridors, stairs and other spaces that form part of the escape route from any accommodation space must not require any key, tool, or special knowledge to open the door in the direction of escape.

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Background

Doors used to divide a public space into smaller areas or control access to or from dining rooms, activity rooms or other public spaces must be provided with escape hardware as described in II-2/13.3.2.6. The concern is that a required escape door that can be locked when an area like a restaurant is not “Open,” may inadvertently be left locked when the space is occupied resulting in loss of egress capability. Preventing passengers from entering a “Closed” area or space does not reduce or alter the requirements of II-2/13.3.2.6.

Disclaimer

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative, you may contact The Marine Safety Center, who is responsible for implementing this guidance.