Sjøfartsdirektoratet
Norwegian Maritime Authority

Circular - Series R

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Regulation amending the Regulations on fire protection on ships, implementing resolutions MSC.520(106), MSC.532(107), MSC.550(108) and MSC.555(108) concerning amendments to SOLAS chapter II-2 and the FSS Code

1. Introduction

The Norwegian Maritime Authority has adopted amendments to the Regulations of 1 July 2014 No. 1099 on fire protection on ships (Fire Protection Regulations).

The IMO Maritime Safety Committee (MSC) has adopted amendments to Chapter II-2 of the International Convention for the Safety of Life at Sea (SOLAS) and to the International Code for Fire Safety Systems (FSS Code) through resolutions MSC.520(106), MSC.532(107), MSC.550(108) and MSC.555(108). SOLAS chapter II-2 and the FSS Code have been implemented in Norwegian law through section 2 of the Fire Protection Regulations.

Resolution MSC.520(106) establishes amendments relating to flashpoint requirements. Resolution MSC.550(108) concerns fuel oil parameters other than flashpoint and fire safety requirements for ro-ro passenger ships, fixed fire-extinguishing systems and alarm systems for control stations and cargo control rooms. Resolution MSC.532(107) introduces a prohibition on the use of PFOS in fire-extinguishing media on board ships, while resolution MSC.555(108) implements amendments to chapters 7 and 9 of the FSS Code.

The Regulation will come into force on 1 January 2026.

The regulatory amendments have been subject to consultation under the EEA notification procedure, cf. Act of 17 December 2004 No. 101 on the European notification duty of technical regulations, etc. (EEA Hearing Act) section 4, cf. section 3.

2. Public consultation

The proposed amendments were circulated for review from 28 September to 15 December 2025. Three consultation responses were received. The Directorate of Fisheries and the Ministry of Justice and Public Security had no comments. NHO Sjøfart stated that they support the aim of increased safety and harmonisation with international standards but raised objections concerning the implementation. They also considered that the practical and economic consequences should have been assessed more thoroughly.

As indicated in the consultation documents, the NMA did not intend to introduce substantial amendments to SOLAS chapter II-2 for all vessel groups holding national certificates. Following the consultation, we have identified the need to introduce an exemption in section 3 first paragraph (c), specifically an exemption fromMSC.550(108) for passenger ships of 15 metres in overall length and upwards engaged on domestic voyages.

3. Amendments to the Fire Protection Regulations

To section 2

SOLAS chapter II-2 and the FSS Code have been implemented in Norwegian law through section 2 of the Fire Protection Regulations. The references to the relevant resolutions have therefore been updated in subparagraphs (a) and (b).

To section 3

An exemption has been introduced in section 3 first paragraph (c) from MSC.550(108) for passenger ships of 15 metres in overall length and upwards engaged on domestic voyages.

With regard to cargo ships engaged on domestic voyages and cargo ships engaged on foreign voyages of less than 500 gross tonnage, these are not covered by the exemption in section 3, as the resolution is primarily applicable to passenger ships.

4. Details on the amendments to SOLAS chapter II -2 and the FSS Code

MSC.520(106)

Under SOLAS chapter II-2/4.2.16, a requirement will apply from 1 January 2026 stating that ships carrying oil fuel must have a declaration confirming that the oil fuel complies with the requirements of SOLAS chapter II-2/4.2.1.

In this context, a new item has also recently been added to MARPOL Annex VI, Appendix 5, requiring that the flashpoint be documented in the bunker delivery note.

Within SOLAS chapter II-2/4.2.1, it is primarily item 6 – the declaration that the oil fuel meets the requirements of item 2.1 of this regulation – that is of relevance to suppliers and shipping companies. SOLAS chapter II-2/4.2.1.7 and 4.2.1.8 will have implications for Member States in the form of an obligation to take action in relation to oil fuel suppliers when the conditions set out in the provision are not met.

SOLAS chapter II-2/4.2.1.6 to 4.2.1.8 is also made applicable to all ships, including those constructed before 1 July 2012, see regulation 1, item 2.5.

In SOLAS chapter II-2/3, new definitions are added for *confirmed case (flashpoint), representative sample* and *oil fuel*, related to the new requirements in SOLAS chapter II-2/3.4.2.1.

MSC.532(107)

SOLAS chapter II-2/10.11.2 prohibits the use of PFOS in fire-extinguishing media on ships constructed on or after 1 January 2026. The purpose of the regulation is to protect persons on board from exposure to hazardous substances used in fire-fighting operations, as well as to reduce the environmental impact of such operations. Substances covered by the prohibition must be delivered to an appropriate shore-based reception facility. Although this provision is new in a SOLAS context, the EU has had corresponding rules in place for many years.

The Stockholm Convention on Persistent Organic Pollutants is an international agreement under the auspices of the United Nations. It was signed in Stockholm on 23 May 2001 and entered into force on 17 May 2004. The Convention is implemented in the EU through Regulation (EU)

2019/1021 on persistent organic pollutants. The production and use of PFOS and PFOA (perfluorooctanoic acid) are prohibited under this Regulation.

The Regulations of 1 June 2004 No. 922 relating to restrictions on the use of chemicals and other products hazardous to health and environment (Product Regulations) implement the relevant EU legislation. Section 2-9 of those Regulations governs the use of PFOS in fire-fighting foam. It is prohibited to carry fire-fighting foam containing 0.001% by weight or more of PFOS or PFOS-related compounds.

SOLAS chapter II-2/1 regulates which requirements in SOLAS chapter II-2 apply to existing ships. Through resolution MSC.532(107), the requirements in SOLAS II-2/10.11.2 are also made applicable to ships constructed before 1 January 2026, meaning at the first survey on or after 1 January 2026. MSC.1/Circ.1290 interprets "first survey" as the first annual survey, the first periodical survey or the first renewal survey, whichever is due first after the specified date, unless otherwise provided.

MSC.550(108)
SOLAS chapter II-2/4 on the probability of ignition is amended by introducing a new subparagraph 4.2.1.9. The amendment also has a minor linguistic effect on SOLAS chapter II-2/4.2.1.7 and 4.2.1.8 by adding a new subparagraph to the sequence. The new provision addresses the supply and use of oil fuel, ensuring that such fuel does not endanger ship safety, adversely affect machinery performance or pose a health risk to personnel.

In SOLAS chapter II-2/7, the provision in SOLAS chapter II-2/7.5.2 on the protection of accommodation spaces, service spaces and control stations applicable to passenger ships carrying more than 36 passengers has been amended. The amendment introduces minor linguistic changes by adding two words. In the first sentence, the wording is changed from "shall be installed" to "shall be so installed", and in the third sentence the type of alarm system concerned is clarified. It is now clarified that the requirement for a "fixed fire detection and alarm system" shall read "fixed fire detection and fire alarm system". This provision applies to all ships today, including those operating in trade areas 1 and 2.

In SOLAS chapter II-2/7, the provision in SOLAS chapter II-2/7.5.5, which applies to cargo ships, has been amended. The provision previously contained requirements for fire detection and fire alarm systems for accommodation spaces, control stations and cargo control rooms. The requirement is now also clarified under each of the construction methods.

In SOLAS chapter II-2/9, the former SOLAS chapter II-2/9.6.1 has been deleted. The remaining paragraphs have therefore been renumbered accordingly. The provision is now covered by SOLAS chapter II-2/20.

Several amendments have been made to SOLAS chapter II-2/20, including changes relating to camera surveillance, structural fire protection and transitional provisions. The dates from which the various requirements apply to different types of ships are specified throughout the regulation, depending on whether the ship is constructed before 1 July 2012, between 1 July 2012 and 1 January 2026, or on or after 1 January 2026. The heading has been amended to include weather decks intended for the carriage of vehicles, cf. the amendment in SOLAS chapter II-2/20.1.1.

SOLAS chapter II -2/20.3.1.5 on permanent openings has been amended so that it now applies only to cargo ships, as new and stricter requirements for passenger ships follow from the amendments to SOLAS chapter II -2/20.5.

In SOLAS chapter II-2/20.4, a paragraph has been added under the heading to clarify that the upgrading requirements in 20.4.1.6 – concerning fixed fire detection and fire alarm systems compliant with the FSS Code, installed in special category spaces, open and closed ro-ro cargo spaces and vehicle spaces on existing passenger ships – shall be complied with no later than the first renewal survey after 1 January 2028. SOLAS chapter II-2/20.4.1 further specifies when the new requirements for fixed fire detection and fire alarm systems enter into force, and for which ships. The requirements in paragraphs 4.1.1 to 4.1.4 apply only to passenger ships constructed on or after 1 January 2026. Passenger ships constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the requirements in paragraph 4.1.6 and the previously applicable requirements in paragraph 4.1. The requirements in paragraph 4.1.5 apply to cargo ships constructed on or after 1 January 2026. Cargo ships constructed before 1 January 2026 shall comply with the previously applicable requirements in paragraph 4.1.

SOLAS chapter II-2/20.4.1.1 requires that passenger ships be fitted with a detection system with individually identifiable detectors that complies with the FSS Code. At the same time, the previous possibility to omit a detection system for ships with continuous fire patrols in special category spaces has been removed. The new SOLAS chapter II-2/4.1.1.1 requires that the detection system shall consist of both smoke and heat detectors.

In SOLAS chapter II-2/20.4.1.2 and 20.4.1.3, new requirements are introduced stipulating that where a fixed water-based sprinkler system is used in vehicle spaces, special category spaces and ro-ro cargo spaces, a fire detection and fire alarm system shall be provided covering the same sections as the sprinkler system. Furthermore, the fire detection and fire alarm system shall be designed with a system interface that provides a logical and clearly presented display of information, enabling rapid and correct understanding and decision-making.

SOLAS chapter II-2/20.4.1.4 introduces a new requirement for detection systems on weather decks intended for the carriage of vehicles. A fixed fire detection and fire alarm system shall be installed for the area on the weather deck designated for the transport of vehicles. The fixed fire detection system shall be capable of rapidly detecting the onset of fire at any location within the area. The type of detectors, detector spacing and positioning shall be considered satisfactory by the Administration, taking into account the effect of weather conditions, obstructions caused by cargo and other relevant factors.

SOLAS chapter II-2/20.4.1.5 establishes requirements for detection systems on cargo ships.

SOLAS chapter II-2/20.4.1.6 applies to existing passenger ships and constitutes an upgrading requirement, stipulating that all passenger ships shall be fitted with both smoke and heat detectors in the regulated spaces by the first survey after 1 January 2028.

The second sentence of SOLAS chapter II-2/20.4.3.1, which permitted the omission of a fixed fire detection and fire alarm system provided that an efficient fire patrol system was in place, has been removed as a consequence of the amendments to SOLAS chapter II-2/20.4.4.

SOLAS chapter II-2/20.4.4 introduces requirements for video monitoring, which entail that parts of the ship shall be continuously monitored, and that recorded footage shall be capable of being replayed subsequently either at a control station or in the safety centre. The requirements in paragraphs 4.1.1 to 4.1.4 apply only to passenger ships constructed on or after 1 January 2026. Passenger ships constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the requirements in paragraph 4.1.6 and the previously applicable requirements in paragraph 4.1. The requirements in paragraphs 4.4.1 and 4.4.2 will apply to ships constructed on or after 1 January 2026.

Passenger ships with vehicle spaces, special category spaces or ro-ro cargo spaces constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the requirements in paragraphs 4.4.1 and 4.4.2 no later than the first survey on or after 1 January 2028.

Cargo ships constructed before 1 January 2026 shall comply with the previously applicable requirements in paragraph 4.1. The requirement will apply to all passenger ships with such spaces, with existing ships required to comply by the first periodical survey after 1 January 2028. SOLAS chapter II-2/4.4.1 sets out the requirement for an efficient and continuous video monitoring system covering the entire cargo area. The system shall provide an immediate playback function to enable rapid identification of the location of a fire, insofar as is practicable. Cameras shall be installed such that the entire area is covered and positioned sufficiently high to monitor cargo and vehicles after loading. SOLAS chapter II-2/4.4.2 establishes the requirement that recordings shall be available for seven days. It is also specified that the crew is not required to monitor the camera feed continuously.

It is assumed that the company complies with the relevant provisions of the Act of 15 June 2018 No. 38 on the processing of personal data (the Personal Data Act), the Act of 21 June 2013 No. 102 relating to employment protection, etc. for employees on board ships (the Ship Labour Act), and the Regulations of 25 January 2019 No. 53 on control measures for employees covered by the Ship Labour Act. Depending on the circumstances, the Act of 17 June 2005 No. 62 relating to working environment, working hours and employment protection, etc. (the Working Environment Act) and the Regulations of 2 July 2018 No. 1107 on camera surveillance in undertakings may also be applicable. These provisions constitute a legal basis for processing under the Personal Data Act, as the company has a statutory obligation to conduct video surveillance. The company has an independent responsibility to safeguard the privacy of both employees and passengers.

SOLAS chapter II-2/20.5 continues to address structural fire protection, but it is now more detailed for passenger ships constructed on or after 1 January 2026. It is specified at the outset that passenger ships constructed before 1 January 2026 shall comply with the previously applicable requirements of the provision. Although the provision is new, it has no implications for existing ships.

SOLAS chapter II-2/20.5.1.1 is a continuation of the existing SOLAS chapter II-2/20.5. It requires structural fire protection for special category spaces and ro-ro spaces on passenger ships carrying more than 36 passengers.

SOLAS chapter II-2/20.5.1.2 is a new regulation governing any internal decks within a special category space or a ro-ro space. This is in reference to SOLAS chapter II-2/20.2.2.1, which

permits special category spaces extending over more than one deck, provided that the total free height available for vehicles does not exceed 10 m. If the water-based fire-extinguishing system does not have the capacity to cover simultaneously both above and below the internal deck, an A-30 division is now required.

SOLAS chapter II-2/20.5.2.1 is a continuation of the former provision SOLAS chapter II-2/20.3.1.5, but it also introduces new requirements for openings in ro-ro spaces and special category spaces, establishing a minimum horizontal safety distance of 6 metres from specified areas.

SOLAS chapter II-2/20.5.2.2 exempts openings fitted with closing arrangements, such as ramps and doors, from the safety distance requirement in SOLAS chapter II-2/20.5.2.1. The closing arrangement shall be made of steel for all decks located below accommodation spaces and shall meet at least “A-0” standard beneath mustering and embarkation stations.

SOLAS chapter II-2/20.5.2.3 permits, under certain conditions, openings in ro-ro cargo spaces located beneath accommodation spaces, control stations and working spaces that are normally occupied by the crew.

SOLAS chapter II-2/20.5.2.4 permits openings for mechanical ventilation of ro-ro and special category spaces located beneath accommodation spaces, working spaces and control stations in superstructures, provided that the opening is protected by a closing device, with a closing arrangement that is unlikely to become inaccessible in the event of a fire in the ro-ro cargo space, and which can be operated from an easily accessible location. The closing device shall be made of steel or other fire-resistant material. Such openings are not permitted beneath survival craft, the emergency generator, or air intakes serving the machinery spaces.

SOLAS chapter II-2/20.5.2.5 specifies that air intakes serving machinery used for the ship’s main propulsion, power generation and emergency power generation shall, in any case, be located so that the risk of contamination from a fire in the ro-ro cargo space or special category space is minimised.

SOLAS chapter II-2/20.5.3 regulates the arrangement of weather decks intended for the carriage of vehicles. This has not previously been regulated under SOLAS chapter II-2/20. Safety distances from specified areas are also required here, including the distance between designated driving lanes and accommodation spaces, as well as the distance between survival craft and embarkation stations. There is also a requirement that air intakes serving machinery used for the ship’s main propulsion, power generation and emergency power generation shall be located so that the risk of contamination from a fire on a weather deck intended for the carriage of vehicles is minimised.

The new SOLAS chapter II-2 regulation 20.6.2 establishes requirements for monitor-based fire-extinguishing systems on weather decks intended for the carriage of vehicles. This provision is added after the existing SOLAS chapter II-2/20.6.1 (“Fixed fire-extinguishing systems”), and the subsequent paragraph (“Portable fire-extinguishing systems”) and corresponding numbering are renumbered accordingly. SOLAS chapter II-2/20.6.2.3 is a retroactive requirement for a fixed monitor-based fire-extinguishing system for all passenger ships with weather decks intended for the carriage of vehicles. The requirement shall be complied with by the first periodical survey after 1 January 2028.

A new regulation, SOLAS chapter II-2/20.7, has been added, setting out requirements for signage marking areas in accordance with the sections of the extinguishing system, in order to facilitate easier identification of the seat of a fire.

In SOLAS chapter II-2/23, paragraph 6.10 is clarified to specify that it concerns fire alarm systems.

MSC.555(108)
The new FSS Code chapter 7, regulation 2.5 specifies the characteristics of the fixed water-based fire-extinguishing system on the weather deck of ro-ro passenger ships. Regulation 2.4 already establishes requirements for such extinguishing systems. The requirement applies to ro-ro passenger ships constructed on or after 1 January 2026.

The FSS Code chapter 9, regulation 1.1 is amended to take account of the new provisions in the chapter – namely regulations 2.3.1.5 and 2.4.2.2 – which apply to ships constructed on or after 1 January 2026.

Regulation 2.3.1.4 introduces requirements for linear heat detectors, and regulation 2.3.1.5 introduces the standards according to which linear heat detectors must be tested.

Regulation 2.4.2.2 addresses the distribution of fire detectors. The table is amended with a new line for detectors designed to detect both smoke and heat.

In regulation 2.5.1, three new provisions have been added for ro-ro passenger ships constructed on or after 1 January 2026. These concern new requirements for alarm recognition, new information to be provided through the user interface, and provisions governing how the smoke detector function in certain spaces may be temporarily disconnected while vehicles are being loaded and unloaded.

5. Administrative and financial implications
Consequences for the industry and bodies concerned

The amendments to SOLAS chapter II-2/20 will result in increased construction costs for new ro-ro passenger ships compared with the current requirements. In addition, existing ro-ro passenger ships holding a SOLAS certificate will be subject to upgrading requirements that must be complied with by 1 January 2028. These include the requirements for both smoke and heat detection in SOLAS chapter II-2/20.4.1, the requirements for video monitoring in SOLAS chapter II-2/20.4.4, and the requirement for a fixed fire-extinguishing system on weather decks intended for the carriage of vehicles in SOLAS chapter II-2/20.6.2.

Apart from the amendments to SOLAS chapter II-2/20, the resolutions will not entail changes that have economic implications for stakeholders, as the remaining amendments are largely editorial in nature. The Norwegian Maritime Authority therefore assumes that the remaining amendments will entail limited costs for the industry.

Consequences for the authorities
As inspections and certification are already carried out in accordance with the SOLAS Convention and the FSS Code, the amendments are, in the NMA's assessment, encompassed by an already

well-established control and supervision regime. The administrative implications are therefore considered to be limited in scope.

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This document has been electronically approved and therefore does not contain handwritten signatures.

Attachments
Regulation concerning amendments to Regulations on a safety management system
MSC.520(106)
MSC.532(107)
MSC.550(108)
MSC.555(108)