FOR: Ship Owners, Ship Managers, Ship Operators, Ship Masters, Ship Officers, Flag State Inspectors

SUBJECT: MAINTENANCE & TESTING REQUIREMENTS OF FIRE-FIGHTING SYSTEMS

DEFINITIONS:

The following abbreviations stand for:

- “BCH Code” – Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk, as amended
- “EEBD” – Emergency Escape Breathing Devices
- “IMO” – International Maritime Organization
- “MODU” – Mobile Offshore Drilling Unit
- “MODU Code” – Code for the Construction and Equipment of Mobile Offshore Drilling Units, as amended
- “MOU” – Mobile Offshore Unit
- “NDT” – Non-destructive Testing
- “SCBA” – Self-Contained Breathing Apparatus
- “SEC” – Cargo Ship Safety Equipment Certificate
- “RO” – Recognized Organization as defined by IMO Resolution A.789(19).
- “SMS” – Safety Management System
- “SOLAS” – International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended
- “UI” – Unified Interpretation

The term “Administration” shall mean Tuvalu Ship Registry.

PURPOSE:

This Marine Circular serves to provide guidance on the maintenance and inspection of all fire protection systems and appliances and specific guidelines applicable to maintenance, testing and examination of fire extinguishers (gas, foam, dry-powder), SCBAs, EEBDs and compressed air cylinders for survival craft air systems etc. It revises an earlier version to incorporate the provisions of MSC.1/Circ.1432 and amendments in MSC.1/Circ.1516.

Please note that this Marine Circular shall not be treated as an exhaustive listing of applicable requirements, but addresses those provisions where the Administration requirements differ, or where the Administration has deemed that additional clarification / emphasis is necessary.
REFERENCES:
1. MSC.1/Circ.1516, dated 08 June 2015
2. MSC.1/Circ.1432, dated 31 May 2012
3. Tuvalu Marine Circular MC-17/2011/1 dated April 2018
4. MSC.1/Circ.1318, dated 11 June 2009
5. MSC.1/Circ.1312, dated 10 June 2009 and Corr.1, dated 22 November 2011
7. MSC.1/Circ.668
8. MSC/Circ.670, dated 05 January 1995

APPLICATION:
This Circular applies to all vessels, including vessels under MODU Code.

CONTENTS:
1. **Shipboard Maintenance Plan**
   1.1 SOLAS II-2/14 requires ships to have a maintenance plan that details the maintenance, testing and inspection of fire protection systems and appliances that is consistent with the vessel’s SMS and be available for inspection.
   1.2 It is important that a plan is consistent with the vessel’s SMS is developed prior to performing any maintenance, inspection and testing to account for all personnel and all foreseeable hazards. The plan shall establish an effective communications system between the inspection personnel and on-duty crew.

2. **Application of Requirements, Guidelines and Recommendations**
   2.1 Ship owners and officers shall follow the applicable requirements of SOLAS (as amended), FSS Code (as amended), MODU Code (1979, 1989 and 2009 editions) and Class requirements with regards to the maintenance, testing and inspection of fire protection systems and appliances.
   2.2 IMO guidance documents provide the minimum recommended levels of maintenance, testing and inspection to be included in an onboard maintenance plan and has been adopted by the Administration, unless stated otherwise in this circular.

3. **Operational Readiness**
   3.1 All fire protection systems and appliances should at all times be in good order and readily available for immediate use while the ship is in service. If a fire protection system is undergoing maintenance, testing or repair, then suitable arrangements should be made to ensure safety is not diminished through the provision of alternate fixed or portable fire protection equipment or other measures. The onboard maintenance plan should include provisions for this purpose. *(MSC.1/Circ.1432, 2)*
   3.2 Should a fire protection system require repairs while the vessel is underway or prior to sailing or in the case of MODUs and MOUs engaged in operations, then approval should be obtained from the Administration for the RO to issue a short term SE certificate.
4. **Maintenance & Testing**  
4.1 Equipment manufacturer’s manuals shall be available onboard. Instructions for shipboard maintenance, and testing, not necessarily by the ship’s crew, of active and passive fire protection systems and appliances, shall be simple for easy understanding and should be illustrated wherever possible.

4.2 The following, as appropriate, should be included for each system or appliance:
   4.2.1 Maintenance and repair instructions;
   4.2.2 Schedule of periodic maintenance;
   4.2.3 List of replaceable parts; and
   4.4.4 Log for records of inspections and maintenance, listing identified non-conformities and their target completion dates.

4.3 Onboard maintenance and inspections should be carried out in accordance with the ship's maintenance plan. *(MSC.1/Circ.1432, 3.1)*

4.4 Certain maintenance procedures and inspections may be performed by competent crew members who have completed an advanced fire-fighting training course, while others should be performed by specialised shore-based maintenance personnel. The maintenance plan shall indicate the inspections and maintenance that are to be completed by competent crew members versus other trained personnel. *(MSC.1/Circ.1432, 3.2)*

4.5 Inspections should be carried out by the crew to ensure that the indicated weekly, monthly, quarterly, annual, two-year, five-year and ten-year actions are taken for the specified equipment, if provided. Records of the inspections should be carried on board the ship, or may be computer-based. In cases where the inspections and maintenance are carried out by trained service technicians other than the ship's crew, inspection reports should be provided at the completion of the testing. *(MSC.1/Circ.1432, 3.3)*

4.6 In addition to the onboard maintenance and inspections stated in these guidelines, manufacturer's maintenance and inspection guidelines should be followed. The quality of water in automatic sprinkler systems is of particular importance and should be maintained in accordance with manufacturer guidelines. Records of water quality should be maintained on board in accordance with the manufacturer's guidelines. *(MSC.1/Circ.1516, 1)*

4.7 Where particular arrangements create practical difficulties, alternative testing and maintenance procedures should be to the satisfaction of the Administration or RO. *(MSC.1/Circ.1432, 3.5)*

5. **Fixed fire detection and alarm systems**  
   **Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.1)*
   5.1 Verify all fire detection and fire alarm control panel indicators are functional by operating the lamp/indicator test switch.

   **Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.10)*
   5.2 Test a sample of detectors and manual call points so that all devices have been tested within five years.

   **Annual testing and inspections:** *(MSC.1/Circ.1432, 7.2)*
   5.3 Test all fire detection systems and fire detection systems used to automatically release fire-extinguishing systems for proper operation, as appropriate;
   5.4 Visually inspect all accessible detectors for evidence of tampering obstruction, etc., so that all detectors are inspected within one year; and
   5.5 Test emergency power supply switchover.

6. **Public address and general alarm systems**  
   **Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.4)*
   6.1 Verify all public address systems and general alarm systems are functioning properly.
7. **Fire Doors**

**Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.3)*
7.1 Verify all fire door control panel indicators, if provided, are functional by operating the lamp/indicator switch.

**Quarterly testing and inspections:** *(MSC.1/Circ.1432, 6.4)*
7.2 Test all fire doors located in main vertical zone bulkheads for local operation.

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.7)*
7.3 Test all remotely controlled fire doors for proper release.

8. **Low-location lighting**

**Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.6)*
8.1 Verify low-location lighting systems are functional by switching off normal lighting in selected locations.

**Five year service:** *(MSC.1/Circ.1432, 9.5)*
8.2 Test the luminance of all systems in accordance with the procedures in resolution A.752(18).

9. **Ventilation systems and fire dampers**

**Quarterly testing and inspections:** *(MSC.1/Circ.1432, 6.3)*
9.1 Test all fire dampers for local operation.

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.6)*
9.2 Test all fire dampers for remote operation;
9.3 Verify galley exhaust ducts and filters are free of grease build-up; and
9.4 Test all ventilation controls interconnected with fire-protection systems for proper operation.

10. **Galley and deep fat cooking fire-extinguishing systems**

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.13)*
10.1 Check galley and deep fat cooking fire-extinguishing systems in accordance with the manufacturer's instructions.

11. **Firefighter's outfits**

**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.5)*
11.1 Verify lockers providing storage for fire-fighting equipment contain their full inventory and equipment is in serviceable condition.

12. **Breathing apparatus**

**Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.5)*
12.1 Examine all breathing apparatus and EEBD cylinder gauges to confirm they are in the correct pressure range.

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.8)*
12.2 Check breathing apparatus air recharging systems, if fitted, for air quality;
12.3 Check all breathing apparatus face masks and air demand valves are in serviceable condition; and
12.4 Check EEBDs according to maker's instructions.

**Five year service:** *(MSC.1/Circ.1432, 9.4)*
12.5 Perform hydrostatic testing of all steel self-contained breathing apparatus cylinders. Aluminium and composite cylinders should be tested to the satisfaction of the Administration.
13. **Marine Portable Fire Extinguishers**

**Periodical inspections and annual servicing:** *(Resolution A.951(23), 9.1)*

13.1 Extinguishers should be subject to periodical inspections in accordance with the manufacturer's instructions and serviced at intervals not exceeding one year.

**Five-year test discharge:** *(Resolution A.951(23), 9.1.1)*

13.2 At least one extinguisher of each type manufactured in the same year and kept on board a ship should be test discharged at five yearly intervals (as part of a fire drill).

**Ten year service:** *(Resolution A.951(23), 9.1.2)*

13.3 All extinguishers together with propellant cartridges should be hydraulically tested in accordance with the recognized standard or the manufacturer's instruction at intervals not exceeding ten years.

**Requirement for inspection and servicing personnel:** *(Resolution A.951(23), 9.1.3)*

13.4 Service and inspection should only be undertaken by, or under the supervision of, a person with demonstrable competence, based on the inspection guide in table 13.4.

**Records of inspections:** *(Resolution A.951(23), 9.2)*

13.5 Records of inspections should be maintained.

   The records should show the date of inspection, the type of maintenance carried out and whether or not a pressure test was performed.

**Miscellaneous:** *(Resolution A.951(23), 9)*

13.6 Extinguishers should be provided with a visual indication of discharge.

13.7 Instructions for recharging extinguishers should be supplied by the manufacturer and be available for use on board.

**Spare Charges:** *(SOLAS 1999/2000 Amend, Chapter II-2, Reg. 10.3.3.3)*

13.8 Spare charges shall be provided for:

   a) 100% of the first 10 extinguishers; and
   b) 50% of the remaining fire extinguishers capable of being recharged on board;
   c) Not more than 60 total spare charges are required.

Instructions for recharging shall be carried on board.

13.9 For fire extinguishers which cannot be recharged onboard, additional portable fire extinguishers of the same quantity, type, capacity and number as determined in paragraph 13.8 above shall be provided in lieu of spare charges.
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Table 9.1.3 – Inspection guide

Table 13.4 Marine Portable Fire Extinguishers Inspection Guide. (Resolution A.951(23), Table 9.1.3)
14. **Portable foam applicators**  
**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.8)*  
14.1 Verify all portable foam applicators are in place, properly arranged, and are in proper condition.  

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.11)*  
14.2 Verify all portable foam applicators are set to the correct proportioning ratio for the foam concentrate supplied and the equipment is in proper order;  
14.3 Verify all portable containers or portable tanks containing foam concentrate remain factory sealed, and the manufacturer's recommended service life interval has not been exceeded;  
14.4 Portable containers or portable tanks containing foam concentrate, excluding protein based concentrates, less than 10 years old, that remain factory sealed can normally be accepted without the periodical foam control tests required in *MSC.1/Circ.1312* being carried out;  
14.5 Protein based foam concentrate portable containers and portable tanks should be thoroughly checked and, if more than five years old, the foam concentrate should be subjected to the periodical foam control tests required in *MSC.1/Circ.1312*, or renewed; and  
14.6 The foam concentrates of any non-sealed portable containers and portable tanks, and portable containers and portable tanks where production data is not documented, should be subjected to the periodical foam control tests required in *MSC.1/Circ.1312.*

15. **Wheeled (mobile) fire extinguishers**  
**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.8)*  
15.1 Verify all extinguishers are in place, properly arranged, and are in proper condition.  

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.12)*  
15.2 Perform periodical inspections in accordance with the manufacturer's instructions;  
15.3 Visually inspect all accessible components for proper condition;  
15.4 Check the hydrostatic test date of each cylinder; and  
15.5 For dry powder extinguishers, invert extinguisher to ensure powder is agitated.  

**Five year service:** *(MSC.1/Circ.1432, 9.2)*  
15.6 Visually examine at least one extinguisher of each type manufactured in the same year and kept on board.  

**Ten year service:** *(MSC.1/Circ.1432, 10.5)*  
15.7 All extinguishers together with propellant cartridges should be hydrostatically tested by specially trained persons in accordance with recognized standards or the manufacturer's instructions.
16. **Fire mains, fire pumps, hydrants, hoses and nozzles**

**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.1)*

- 16.1 Verify all fire hydrants, hose and nozzles are in place, properly arranged, and are in serviceable condition;
- 16.2 operate all fire pumps to confirm that they continue to supply adequate pressure; and
- 16.3 emergency fire pump fuel supply adequate, and heating system in satisfactory condition, if applicable.

**Quarterly testing and inspections:** *(MSC.1/Circ.1432, 6.1)*

- 16.4 Verify international shore connection(s) is in serviceable condition.

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.1)*

- 16.5 visually inspect all accessible components for proper condition;
- 16.6 Flow test all fire pumps for proper pressure and capacity. Test emergency fire pump with isolation valves closed;
- 16.7 Test all hydrant valves for proper operation;
- 16.8 Pressure test a sample of fire hoses at the maximum fire main pressure, so that all fire hoses are tested within five years;
- 16.9 Verify all fire pump relief valves, if provided, are properly set;
- 16.10 Examine all filters/strainers to verify they are free of debris and contamination; and
- 16.11 Nozzle size/type correct, maintained and working.
17. **Water mist, water spray and sprinkler systems**

**Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.7)*

17.1 Verify all control panel indicators and alarms are functional;
17.2 Visually inspect pump unit and its fittings; and
17.3 Check the pump unit valve positions, if valves are not locked, as applicable.

**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.4)*

17.4 Verify all control, pump unit and section valves are in the proper open or closed position;
17.5 Verify sprinkler pressure tanks or other means have correct levels of water;
17.6 Test automatic starting arrangements on all system pumps so designed;
17.7 Verify all standby pressure and air/gas pressure gauges are within the proper pressure ranges; and
17.8 Test a selected sample of system section valves for flow and proper initiation of alarms.
   (Note – The valves selected for testing should be chosen to ensure that all valves are tested within a one-year period.)

**Quarterly testing and inspections:** *(MSC.1/Circ.1516, 2)*

17.9 Assess system water quality in the header tank and pump unit against the manufacturer's water quality guidelines.

**Annual testing and inspections:** *(MSC.1/Circ.1516, 3)*

17.10 Verify proper operation of all water mist, water-spray and sprinkler systems using the test valves for each section;
17.11 Visually inspect all accessible components for proper condition;
17.12 Externally examine all high pressure cylinders for evidence of damage or corrosion;
17.13 Check the hydrostatic test date of all high pressure cylinders;
17.14 Functionally test all fixed system audible and visual alarms;
17.15 Flow test all pumps for proper pressure and capacity;
17.16 Test all antifreeze systems for adequate freeze protection;
17.17 Test all system cross connections to other sources of water supply for proper operation;
17.18 Verify all pump relief valves, if provided, are properly set;
17.19 Examine all filters/strainers to verify they are free of debris and contamination;
17.20 Verify all control/section valves are in the correct position;
17.21 Blow dry compressed air or nitrogen through the discharge piping of dry pipe systems, or otherwise confirm the pipework and nozzles are clear of any obstructions. This may require the removal of nozzles, if applicable;
17.22 Test emergency power supply switchover, where applicable;
17.23 Visually inspect all sprinklers focusing in areas where sprinklers are subject to aggressive atmosphere (like saunas, spas, kitchen areas) and subject to physical damage (like luggage handling areas, gyms, play rooms, etc.) so that all sprinklers are inspected within one year. Sprinklers with obvious external damage, including paint, should be replaced and not included in the number of sprinklers tested in subparagraph 10.26;
17.24 Check for any changes that may affect the system such as obstructions by ventilation ducts, pipes, etc.;
17.25 Test a minimum of one section in each open head water mist system by flowing water through the nozzles. The sections tested should be chosen so that all sections are tested within a five-year period;
17. **Water mist, water spray and sprinkler systems (Continue)**

**Annual testing and inspections: (MSC.1/Circ.1516, 3)**

17.26 Test automatic sprinklers and automatic water mist nozzles in accordance with the following flow chart. (Refer to Figure 17.26a and Figure 17.26b)

**Explanatory notes to the flow chart:**

1. *Functional test* is defined as a test that demonstrates the operation and flow of water from sprinkler head/nozzle.
2. *Type* is defined as each different manufacturer model of sprinkler head/nozzle.
3. *Static/standby pressure* is defined as the constant pressure maintained in the system at all times prior to activation.
4. All testing should be carried out at static/standby pressure.
5. *Failure rate* \( (R_{FB}) \) is the number of sprinkler heads/nozzles to fail testing divided by test sample size multiplied by 100; and

17.27 During basic testing, and extended testing when applicable, of automatic sprinkler heads/nozzles as outlined in subparagraph 17.26, water quality testing should be conducted in each corresponding piping section. Note – should a tested sprinkler fail, assessing the corresponding water quality at that time would assist in determining the cause of failure.

**Five year service: (MSC.1/Circ.1516, 4)**

17.28 Flush all ro-ro deck deluge system piping with water, drain and purge with air;
17.29 Perform internal inspection of all control/section valves; water quality testing should be conducted in all corresponding piping sections, if not previously tested as outlined in paragraph 17.27 within the last five years;
17.30 Check condition of any batteries, or renew in accordance with manufacturer's recommendations; and
17.31 For each section where the water is refilled after being drained or flushed, water quality should meet manufacturer's guidelines. Testing of the renewed water quality should be conducted and recorded as a new baseline reference to assist future water quality monitoring for each corresponding section.

**Ten year service: (MSC.1/Circ.1432, 10.2)**

17.32 Perform a hydrostatic test and internal examination for gas and water pressure cylinders according to flag Administration guidelines or, where these do not exist, EN 1968:2002 + A1.
Figure 17.26a  Basic testing of automatic sprinklers and automatic water mist nozzles.
(MSC.1/Circ.1516, 3)
Part 2 - Extended testing

For each type that has failed Basic testing obtain the Failure rate, \( R_{\text{rec}} \)

- 15% \( \leq R_{\text{rec}} \leq 20\% \)
  - No
  - Yes

**Extended testing Case 1**
(for failure rates between \( 15\% \) \( \leq R_{\text{rec}} \leq 20\% \))

Function test 2 randomly selected sprinklers per sprinkler section. Sprinkler sections should be selected as follows:
- If number of sections >20, test all sections;
- If number of sections is between 20 and 40, test 20 sections;
- If number of sections >40, test 50% of the sections.

AND

- Are there any sections where both sprinkler heads/ nozzles tested failed?
  - Yes
  - No

For the sections where both sprinkler heads/ nozzles tested failed uncertain additional function testing of a further 10 sprinkler heads/ nozzles per affected section.

- Are there any sections where 3 or more of the additional sprinkler heads/ nozzles tested failed?
  - Yes
  - No

For any section with a type failure rate greater than 10%, replace all sprinkler heads/ nozzles of this type.

- No further action required, situation will be monitored at next Annual Survey.

**Extended testing Case 2**
(for failure rates above 20%) Function test 2 randomly selected sprinklers from each sprinkler section. All sprinkler sections to be tested except where the decision has been made to replace all sprinklers at this stage.

- Are there any sections with a failure rate >15%?
  - Yes
  - No

OR

- If the number of sprinkler heads/ nozzles tested in any particular section represents less than 10% of all sprinkler heads/ nozzles installed in that section a decision may be to conduct further function testing limited to 30% of the total number of sprinkler heads/ nozzles in that section and the results can be reassessed with all sprinkler heads/ nozzles tested in that section being considered.

- After further testing are there any sections with a type failure rate >15%?
  - Yes
  - No

For any section with a type failure rate greater than 15% replace all sprinkler heads/ nozzles of this type. Remaining sections will be monitored at next Annual Survey.

Figure 17.26b  Extended testing of automatic sprinklers and automatic water mist nozzles.
(MSC.1/Circ.1516, 3)
18. Foam fire-extinguishing systems  
**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.3)*  
18.1 Verify all control and section valves are in the proper open or closed position, and all pressure gauges are in the proper range.  
**Quarterly testing and inspections:** *(MSC.1/Circ.1432, 6.2)*  
18.2 Verify the proper quantity of foam concentrate is provided in the foam system storage tank.  
**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.4)*  
18.3 Visually inspect all accessible components for proper condition;  
18.4 Functionally test all fixed system audible alarms;  
18.5 Flow test all water supply and foam pumps for proper pressure and capacity, and confirm flow at the required pressure in each section (Ensure all piping is thoroughly flushed with fresh water after service.);  
18.6 Test all system cross connections to other sources of water supply for proper operation;  
18.7 Verify all pump relief valves, if provided, are properly set;  
18.8 Examine all filters/strainers to verify they are free of debris and contamination;  
18.9 Verify all control/section valves are in the correct position;  
18.10 Blow dry compressed air or nitrogen through the discharge piping or otherwise confirm the pipework and nozzles of high expansion foam systems are clear of any obstructions, debris and contamination. This may require the removal of nozzles, if applicable;  
18.11 Take samples from all foam concentrates carried on board and subject them to the periodical control tests in *MSC.1/Circ.1312*, for low expansion foam, or *MSC/Circ.670* for high expansion foam.  
(Note: Except for non-alcohol resistant foam, the first test need not be conducted until 3 years after being supplied to the ship.); and  
18.12 Test all fuel shut-off controls connected to fire-protection systems for proper operation.  
**Five year service:** *(MSC.1/Circ.1432, 9.2)*  
18.13 perform internal inspection of all control valves;  
18.14 flush all high expansion foam system piping with fresh water, drain and purge with air;  
18.15 check all nozzles to prove they are clear of debris; and  
18.16 test all foam proportioners or other foam mixing devices to confirm that the mixing ratio tolerance is within +30 to -10% of the nominal mixing ratio defined by the system approval.

19. Fixed dry chemical powder systems  
**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.6)*  
19.1 Verify all control and section valves are in the proper open or closed position, and all pressure gauges are in the proper range.  
**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.9)*  
19.2 Visually inspect all accessible components for proper condition;  
19.3 Verify the pressure regulators are in proper order and within calibration; and  
19.4 Agitate the dry chemical powder charge with nitrogen in accordance with system manufacturer’s instructions.  
(Note: Due to the powder’s affinity for moisture, any nitrogen gas introduced for agitation must be moisture free.)  
**Two-year testing and inspections:** *(MSC.1/Circ.1432, 8.2)*  
19.5 Blow dry nitrogen through the discharge piping to confirm that the pipe work and nozzles are clear of any obstructions;  
19.6 Operationally test local and remote controls and section valves;  
19.7 Verify the contents of propellant gas cylinders (including remote operating stations);  
19.8 Test a sample of dry chemical powder for moisture content; and  
19.9 Subject the powder containment vessel, safety valve and discharge hoses to a full working pressure test.  
**Ten year service:** *(MSC.1/Circ.1432, 10.3)*  
19.10 Subject all powder containment vessels to hydrostatic or non-destructive testing carried out by an accredited service agent.
20. Fixed gas fire-extinguishing systems

**Weekly testing and inspections:** *(MSC.1/Circ.1432, 4.2)*

20.1 Verify all fixed fire-extinguishing system control panel indicators are functional by operating the lamp/indicator test switch; and

20.2 Verify all control/section valves are in the correct position.

**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.2)*

20.3 Verify containers/cylinders fitted with pressure gauges are in the proper range and the installation free from leakage.

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.3)*

20.4 Visually inspect all accessible components for proper condition;

20.5 Externally examine all high pressure cylinders for evidence of damage or corrosion;

20.6 Check the hydrostatic test date of all storage containers;

20.7 Functionally test all fixed system audible and visual alarms;

20.8 Verify all control/section valves are in the correct position;

20.9 Check the connections of all pilot release piping and tubing for tightness;

20.10 Examine all flexible hoses in accordance with manufacturer's recommendations;

20.11 Test all fuel shut-off controls connected to fire-protection systems for proper operation;

20.12 The boundaries of the protected space should be visually inspected to confirm that no modifications have been made to the enclosure that have created uncloseable openings that would render the system ineffective; and

20.13 If cylinders are installed inside the protected space, verify the integrity of the double release lines inside the protected space, and check low pressure or circuit integrity monitors on release cabinet, as applicable.

**Two-year testing and inspections:** *(MSC.1/Circ.1432, 8.1)*

20.14 All high pressure extinguishing agents cylinders and pilot cylinders should be weighed or have their contents verified by other reliable means to confirm that the available charge in each is above 95 per cent of the nominal charge. Cylinders containing less than 95 per cent of the nominal charge should be refilled; and

20.15 Blow dry compressed air or nitrogen through the discharge piping or otherwise confirm the pipe work and nozzles are clear of any obstructions. This may require the removal of nozzles, if applicable.

**Five-year service:** *(MSC.1/Circ.1432, 8.1)*

20.16 Perform internal inspection of all control valves.

**Ten year service:** *(MSC.1/Circ.1432, 10.1)*

20.17 Perform a hydrostatic test and internal examination of 10 per cent of the system's extinguishing agent and pilot cylinders. If one or more cylinders fail, a total of 50 per cent of the onboard cylinders should be tested. If further cylinders fail, all cylinders should be tested;

20.18 Flexible hoses should be replaced at the intervals recommended by the manufacturer and not exceeding every 10 years; and

20.19 If permitted by the Administration, visual inspection and NDT (non-destructive testing) of halon cylinders may be performed in lieu of hydrostatic testing.
21. **Fixed Carbon Dioxide Fire-Extinguishing Systems**

**Monthly testing and inspections: (MSC.1/Circ.1318, 4)**

At least every 30 days a general visual inspection should be made of the overall system condition for obvious signs of damage, and should include verification that:

21.1 all stop valves are in the closed position;
21.2 all releasing controls are in the proper position and readily accessible for immediate use;
21.3 all discharge piping and pneumatic tubing is intact and has not been damaged;
21.4 all high pressure cylinders are in place and properly secured; and
21.5 the alarm devices are in place and do not appear damaged.

In addition, on low pressure systems the inspections should verify that:

21.6 the pressure gauge is reading in the normal range;
21.7 the liquid level indicator is reading within the proper level;
21.8 the manually operated storage tank main service valve is secured in the open position; and
21.9 the vapour supply line valve is secured in the open position.

**Annual testing and inspections: (MSC.1/Circ.1318, 5)**

The following minimum level of maintenance and inspections should be carried out in accordance with the system manufacturer’s instructions and safety precautions:

21.10 the boundaries of the protected space should be visually inspected to confirm that no modifications have been made to the enclosure that have created uncloseable openings that would render the system ineffective;
21.11 all storage containers should be visually inspected for any signs of damage, rust or loose mounting hardware. Cylinders that are leaking, corroded, dented or bulging should be hydrostatically retested or replaced;
21.12 system piping should be visually inspected to check for damage, loose supports and corrosion. Nozzles should be inspected to ensure they have not been obstructed by the storage of spare parts or a new installation of structure or machinery;
21.13 the manifold should be inspected to verify that all flexible discharge hoses and fittings are properly tightened; and
21.14 all entrance doors to the protected space should close properly and should have warning signs, which indicate that the space is protected by a fixed carbon dioxide system and that personnel should evacuate immediately if the alarms sound. All remote releasing controls should be checked for clear operating instructions and indication as to the space served.
21. **Fixed Carbon Dioxide Fire-Extinguishing Systems (Continue)**

**Minimum recommended maintenance: (MSC.1/Circ.1318, 6)**

21.15 The following maintenance should be carried out (to assist in carrying out the recommended maintenance, examples of service charts are set out in the appendix. Refer to Figure 21.15a and Figure 21.15b):

At least **biennially (intervals of 2 years ± 3 months)** in **passenger ships**; or

At each intermediate, periodical or renewal survey* in **cargo ships**.

* Refer to Survey guidelines under the Harmonized System of Survey and Certification, 2007 (resolution A.997(25)).

.1 All high pressure cylinders and pilot cylinders should be weighed or have their contents verified by other reliable means to confirm that the available charge in each is above 90% of the nominal charge. Cylinders containing less than 90% of the nominal charge should be refilled. The liquid level of low pressure storage tanks should be checked to verify that the required amount of carbon dioxide to protect the largest hazard is available;

.2 The hydrostatic test date of all storage containers should be checked. High pressure cylinders should be subjected to periodical tests at intervals not exceeding 10 years.

.3 The discharge piping and nozzles should be tested to verify that they are not blocked. The test should be performed by isolating the discharge piping from the system and flowing dry air or nitrogen from test cylinders or suitable means through the piping.

21.16 The following maintenance should be carried out by service technicians/specialists trained to standards accepted by the Administration:

At least **biennially (intervals of 2 years ± 3 months)** in **passenger ships**; or

At each renewal survey* in **cargo ships**.

* Refer to Survey guidelines under the Harmonized System of Survey and Certification, 2007 (resolution A.997(25)).

.1 Where possible, all activating heads should be removed from the cylinder valves and tested for correct functioning by applying full working pressure through the pilot lines.

In cases where this is not possible, pilot lines should be disconnected from the cylinder valves and blanked off or connected together and tested with full working pressure from the release station and checked for leakage.

In both cases this should be carried out from one or more release stations when installed.

If manual pull cables operate the remote release controls, they should be checked to verify the cables and corner pulleys are in good condition and freely move and do not require an excessive amount of travel to activate the system;

.2 All cable components should be cleaned and adjusted as necessary, and the cable connectors should be properly tightened. If the remote release controls are operated by pneumatic pressure, the tubing should be checked for leakage, and the proper charge of the remote releasing station pilot gas cylinders should be verified. All controls and warning devices should function normally, and the time delay, if fitted should prevent the discharge of gas for the required time period; and

.3 after completion of the work, the system should be returned to service. All releasing controls should be verified in the proper position and connected to the correct control valves. All pressure switch interlocks should be reset and returned to service. All stop valves should be in the closed position.
## APPENDIX

### EXAMPLE SERVICE CHARTS

#### HIGH PRESSURE CO₂ SYSTEM

<table>
<thead>
<tr>
<th>No.</th>
<th>Text</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Manufacturer</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Number of main cylinders</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Main cylinders capacity (each)</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Number of pilot cylinders</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Pilot cylinder capacity (each)</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Number of distribution lines</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Oldest cylinder pressure test date</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Protected space(s)</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Date flexible hoses fitted/renewed</td>
<td></td>
</tr>
</tbody>
</table>

#### Description of inspection/Tests

<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
<th>Carried out</th>
<th>Not carried out</th>
<th>Not applicable</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Release controls and distribution valves secured to prevent accidental</td>
<td>Carried</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>discharge</td>
<td>out</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Contents in main cylinders checked by weighing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Contents in main cylinders checked by liquid level indicator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Contents of pilot cylinders checked</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>All cylinder valves visually inspected</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>All cylinder clamps and connections checked for tightness</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>7</td>
<td>Manifold visually inspected</td>
<td></td>
<td></td>
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<tr>
<td>8</td>
<td>Manifold tested for leakage, by applying dry working air</td>
<td></td>
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<tr>
<td>9</td>
<td>Main valve and distribution valves visually inspected</td>
<td></td>
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<tr>
<td>10</td>
<td>Main valve and distribution valves tested for operation</td>
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<tr>
<td>11</td>
<td>Time delay devices tested for correct setting</td>
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<tr>
<td>12</td>
<td>Remote release system visually inspected</td>
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<tr>
<td>13</td>
<td>Remote release system tested</td>
<td></td>
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<td>14</td>
<td>Servo tubing/pilot lines pressure tested at maximum working pressure and</td>
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</tr>
<tr>
<td></td>
<td>checked for leakages and blockage</td>
<td></td>
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</tr>
<tr>
<td>15</td>
<td>Manual pull cables, pulleys, gang releases tested, serviced and</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>tightened/adjusted as necessary</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Release stations visually inspected</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>17</td>
<td>Warning alarms (audible/visual) tested</td>
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<td></td>
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<tr>
<td>18</td>
<td>Fan stop tested</td>
<td></td>
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</tr>
<tr>
<td>19</td>
<td>10% of cylinders and pilot cylinder/s pressure tested every 10 years</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>20</td>
<td>Distribution lines and nozzles blown through, by applying dry</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>working air</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>All doors, hinges and locks inspected</td>
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<tr>
<td>22</td>
<td>All instruction and warning signs on installation inspected</td>
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</tr>
<tr>
<td>23</td>
<td>All flexible hoses renewed and check valves in manifold visually inspected</td>
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<tr>
<td></td>
<td>every 10 years</td>
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<tr>
<td>24</td>
<td>Release controls and distribution valves reconnected and system put back</td>
<td></td>
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<tr>
<td></td>
<td>in service</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>Inspection date tags attached</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

* If fitted as part of the CO₂ system.
### Technical description

<table>
<thead>
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<th>No.</th>
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<td>Manufacturer</td>
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<td>No. of tanks</td>
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</tr>
<tr>
<td>3</td>
<td>Tanks' capacity (tonnes)</td>
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<tr>
<td>4</td>
<td>Number of pilot cylinders</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Pilot cylinder capacity (each)</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Number of distribution lines</td>
<td></td>
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<tr>
<td>7</td>
<td>Protected space(s)</td>
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### Description of inspection/Tests

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<th>Not applicable</th>
<th>Comment</th>
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<tbody>
<tr>
<td>1</td>
<td>Tank main service valve closed and secured to prevent accidental discharge</td>
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<tr>
<td>2</td>
<td>Distribution valves verified closed</td>
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<td></td>
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</tr>
<tr>
<td>3</td>
<td>Check correct function of level indicator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Contents of CO₂ tank checked by tank level indicator</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Contents of CO₂ tank checked by riser tube reading</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Contents of CO₂ tank checked by level control valve</td>
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<tr>
<td>7</td>
<td>Supports of tank inspected</td>
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<tr>
<td>8</td>
<td>Insulation on tank inspected</td>
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<tr>
<td>9</td>
<td>Safety valves of tank inspected</td>
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</tr>
<tr>
<td>10</td>
<td>Safety valves of tank tested</td>
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<tr>
<td>11</td>
<td>Contents of pilot cylinders checked</td>
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<tr>
<td>12</td>
<td>Start/stop function of cooling compressors tested</td>
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</tr>
<tr>
<td>13</td>
<td>All connected electrical alarms and indicators tested</td>
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<tr>
<td>14</td>
<td>Main manifold valve inspected</td>
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<td>15</td>
<td>Main manifold valve tested</td>
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<tr>
<td>16</td>
<td>Distribution valves inspected</td>
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<tr>
<td>17</td>
<td>Distribution valves tested</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>18</td>
<td>Release stations inspected</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Total flooding release mechanism inspected</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>20</td>
<td>Total flooding release mechanism tested</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Time delay devices tested for correct setting</td>
<td></td>
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</tr>
<tr>
<td>22</td>
<td>Warning alarms tested</td>
<td></td>
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<tr>
<td>23</td>
<td>Fan stop tested</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>24</td>
<td>Distribution lines and nozzles inspected</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>Distribution lines and nozzles tested</td>
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<tr>
<td>26</td>
<td>Distribution lines and nozzles blown through</td>
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<tr>
<td>27</td>
<td>All doors, hinges and locks inspected</td>
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<td></td>
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<tr>
<td>28</td>
<td>All instruction plates inspected</td>
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<tr>
<td>29</td>
<td>Tank main service valve reopened and secured open</td>
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<tr>
<td>30</td>
<td>System put back in service</td>
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<tr>
<td>31</td>
<td>Inspection date tags attached</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

* If fitted as part of the CO₂ system.
21. **Fixed Carbon Dioxide Fire-Extinguishing Systems (Continue)**

**Ten year service: (MSC.1/Circ.1318, 6.1.2)**

21.17 At least 10% of the total number provided should be subjected to an internal inspection and hydrostatic test**. If one or more cylinders fail, a total of 50% of the onboard cylinders should be tested. If further cylinders fail, all cylinders should be tested.;

** Refer to standard ISO 6406 Periodic inspection and testing of seamless steel gas cylinders.

21.18 Flexible hoses should be replaced at the intervals recommended by the manufacturer and not exceeding every 10 years; and

22. **Fixed Halon Fire-Extinguishing Systems**

**Use of Halon Systems: (MSC.1/Circ.668, 1)**

MSC.1/Circ.668 permits the use of Halons as fire extinguishing media on ships built before 01 October 1994. The Administration has not established a phase-out date for existing Halon systems. However, it should be noted that the release of Halons into the atmosphere when testing existing systems is prohibited. In addition, the European Commission considers that supply of a non-EU flagged ship in an EU-port with Halon an illegal export. Therefore, in a case where Halon is discharged for whatever reason, refilling of such systems on non-EU flagged ships with Halon is not possible and that ship will be detained until a new fixed fire-fighting system is installed on board.

Please refer to **Tuvalu Marine Circular MC-17/2011/1** for more information.

**Minimum Recommended Maintenance**

22.1 **Verification of Cylinder Contents:**

.1 At least biennially (intervals of 2 years ± 3 months), all halon cylinders should be weighed or have their contents verified by other reliable means to confirm that the available charge in each is above 95% of the nominal charge. Cylinders containing less than 95% of the nominal charge should be refilled.

22.2 **Hydrostatic Testing:**

.1 All Halon cylinders must be hydrostatically tested as follows:
   a) after each 20 years of service;
   b) prior to recharging a discharged cylinder; or
   c) when visual inspection reveals a potential defect.

.2 Hydrostatic test dates must be stamped on the cylinders. Hydrostatic testing must be performed by an authorised servicing facility which has been certified by a government agency or Classification Society. The facility must be acceptable to the attending Classification Society surveyor. The same facility should recharge the cylinders after testing to demonstrate serviceability.

.3 Visual inspection and NDT of Halon cylinders may be performed in lieu of hydrostatic testing by an authorised servicing facility which has been certified by a government agency or Classification Society.
22. **Fixed Halon Fire-Extinguishing Systems (Continue)**

**Relaxed Maintenance Schedule**

22.3 Based on the logistical difficulties associated with locating servicing facilities and suppliers for the testing and maintenance of existing fixed Halon fire suppression systems and components, the Administration will consider a relaxed maintenance schedule with regard to the hydrostatic testing of the Halon storage cylinders.

22.4 Consideration for the application of the relaxed hydrostatic testing requirements for the fixed Halon system storage cylinders will be given on a case-by-case basis, and must be approved in writing by the Administration.

22.5 Under the relaxed maintenance schedule, the hydrostatic testing interval of 20 years for the Halon storage may be extended by 5 years provided the following conditions are met:

a) A cylinder has not been discharged during its service history;

b) Cylinder contents are verified by weighing or isotropic measurement;

c) Cylinder pressure/levels are verified to be acceptable;

d) A thorough visual inspection of cylinders reveals no potential defects; and

e) Cylinders are gauged to the extent considered necessary, and the wall thickness readings kept on board for future comparative reference.

22.6 In addition, a thorough examination shall be made of all accessible component parts of the Halon system, including control valves and connections, to verify satisfactory condition and freedom from leakage: and selected control valves shall be opened out for internal examination to the extent necessary.

22.7 Any suspect cylinders that do not meet the provisions stated above must be tested, or taken out of service.

22.8 The cylinder inspection and thickness gauging shall then be repeated annually as part of the annual servicing requirement of the system, until the end of the 5 year extension period.

23. **Fixed aerosol extinguishing systems**

**Monthly testing and inspections:** *(MSC.1/Circ.1432, 5.7)*

23.1 Verify all electrical connections and/or manual operating stations are properly arranged, and are in proper condition; and

23.2 Verify the actuation system/control panel circuits are within manufacturer's specifications.

**Annual testing and inspections:** *(MSC.1/Circ.1432, 7.10)*

23.3 Verify condensed or dispersed aerosol generators have not exceeded their mandatory replacement date. Pneumatic or electric actuators should be demonstrated working, as far as practicable.

**Ten year service:** *(MSC.1/Circ.1432, 10.4)*

23.4 Condensed or dispersed aerosol generators to be renewed in accordance with manufacturer's recommendations.

24. **Alternative Fixed Gas Fire-Fighting Media and Systems**

The Administration recognises that there are other media (e.g. NOVEC™ 1230 fluid, INERGEN®, FM 200®, etc.) that can be used in fixed gas fire-extinguishing systems for machinery spaces and cargo pump rooms. Use of such alternatives shall be subject to approval with any attached conditions, as appropriate, by the Administration and in accordance with SOLAS Reg II-2 requirements for alternative fire-fighting systems and relevant guidance1. Maintenance and inspection of these systems shall be carried out in accordance with manufacturer's instructions and/or Classification Society requirements.

Yours sincerely,

Deputy Registrar
Tuvalu Ship Registry