Marine Notice No. 54 of 2011

Notice to All Shipowners, Ship Operators, Recognised Organisations, Shipmasters, and Seafarers

Lifeboat release mechanisms – Adoption of amendments to SOLAS

The Department of Transport, Tourism and Sport would like to advise that the Maritime Safety Committee (MSC) of the International Maritime Organization (IMO), at its eighty-ninth session held from 11th to 20th May 2011, adopted, by resolution MSC.317(89), the new SOLAS regulation III/1.5 and, by resolution MSC.320(89), related amendments to chapter IV of the International Life-Saving Appliance (LSA) Code, both of which are expected to enter into force on 1st January 2013. These resolutions are attached in Appendices I and II below.

The SOLAS amendment requires lifeboat on-load release mechanisms, not complying with the new LSA Code requirements, to be replaced no later than the first scheduled dry-docking of the ship after 1st July 2014 but, in any case, not later than 1st July 2019.

The amendment is intended to establish new, stricter, safety standards for lifeboat release and retrieval systems, aimed at preventing accidents during lifeboat launching, and will require the assessment and possible replacement of a large number of lifeboat release hooks.

The Maritime Safety Committee also approved associated "*Guidelines for Evaluation and Replacement of Lifeboat Release and Retrieval Systems*" which are contained in MSC Circular MSC.1/Circ.1392, attached at Appendix III below. The Department would especially draw the attention of Masters and operators of Irish ships to paragraph 6 of the Annex of the *Guidelines* (see excerpt at Appendix III below). The Department will require fall preventer devices (FPDs) to be fitted in the circumstances outlined in the *Guidelines*. This requirement will be checked during safety equipment surveys carried out by the Marine Survey Office or by a Recognised Organisation authorised by Ireland. Additional information concerning the fitting of FPDs is contained in MSC.1/Circ.1327, attached at Appendix IV below.

Furthermore, the Department wishes to advise that in accordance with the early application of SOLAS Ch. III Reg. 1.5, referred to in MSC.1/Circ. 1393 (see Appendix V below), for new Irish ships constructed on or after 20th May 2011 it is anticipated that the on-load release and retrieval systems fitted on board such new ships will be required to comply with the provisions of the LSA Code, as amended by resolution MSC.320(89).

Further information on the above may be obtained from the Marine Survey Office, email: mso@dttas.ie.

Director General,
Maritime Safety Directorate,
Department of Transport, Tourism and Sport,
Leeson Lane, Dublin 2, Ireland.

11/11/2011

For any technical assistance in relation to this Marine Notice, please contact:
The Marine Survey Office, Leeson Lane, Dublin 2, tel: +353-(0)1-678 3400.
For general enquiries, please contact the Maritime Safety Policy Division, tel: +353-(0)1-678 3418.
Written enquiries concerning Marine Notices should be addressed to:
Maritime Safety Directorate, Department of Transport, Tourism and Sport, Leeson Lane, Dublin 2, Ireland.
email: marinenotices@dttas.ie or visit us at: www.dttas.ie

RESOLUTION MSC.317(89)
(adopted on 20 May 2011)

ADOPTION OF AMENDMENTS TO THE INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974, AS AMENDED

THE MARITIME SAFETY COMMITTEE,

RECALLING Article 28(b) of the Convention on the International Maritime Organization concerning the functions of the Committee,

RECALLING FURTHER article VIII(b) of the International Convention for the Safety of Life at Sea (SOLAS), 1974 (hereinafter referred to as "the Convention"), concerning the amendment procedure applicable to the Annex to the Convention, other than to the provisions of chapter I thereof,

HAVING CONSIDERED, at its eighty-ninth session, amendments to the Convention, proposed and circulated in accordance with article VIII(b)(i) thereof,

1. ADOPTS, in accordance with article VIII(b)(iv) of the Convention, amendments to the Convention, the text of which is set out in the Annex to the present resolution;
2. DETERMINES, in accordance with article VIII(b)(vi)(2)(bb) of the Convention, that the said amendments shall be deemed to have been accepted on 1 July 2012, unless, prior to that date, more than one third of the Contracting Governments to the Convention or Contracting Governments the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant fleet, have notified their objections to the amendments;
3. INVITES SOLAS Contracting Governments to note that, in accordance with article VIII(b)(vii)(2) of the Convention, the amendments shall enter into force on 1 January 2013 upon their acceptance in accordance with paragraph 2 above;
4. REQUESTS the Secretary-General, in conformity with article VIII(b)(v) of the Convention, to transmit certified copies of the present resolution and the text of the amendments contained in the Annex to all Contracting Governments to the Convention;
5. FURTHER REQUESTS the Secretary-General to transmit copies of this resolution and its Annex to Members of the Organization which are not Contracting Governments to the Convention.

ANNEX

AMENDMENTS TO THE INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974, AS AMENDED

CHAPTER III
LIFE-SAVING APPLIANCES AND ARRANGEMENTS

Regulation 1 – Application

The following new paragraph 5 is added after the existing paragraph 4:

"5 Notwithstanding paragraph 4.2, for all ships, not later than the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019, lifeboat on-load release mechanisms not complying with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the Code shall be replaced with equipment that complies with the Code.*

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* Refer to the Guidelines for evaluation and replacement of lifeboat release and retrieval systems (MSC.1/Circ.1392)."

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RESOLUTION MSC.320(89)
(adopted on 20 May 2011)

ADOPTION OF AMENDMENTS TO THE
INTERNATIONAL LIFE-SAVING APPLIANCE (LSA) CODE

THE MARITIME SAFETY COMMITTEE,

RECALLING Article 28(b) of the Convention on the International Maritime Organization concerning the functions of the Committee,

NOTING resolution MSC.48(66), by which it adopted the International Life-Saving Appliance Code (hereinafter referred to as "the LSA Code"), which has become mandatory under chapter III of the International Convention for the Safety of Life at Sea, 1974 (hereinafter referred to as "the Convention"),

NOTING ALSO article VIII(b) and regulation III/3.10 of the Convention concerning the procedure for amending the LSA Code,

HAVING CONSIDERED, at its eighty-ninth session, amendments to the LSA Code, proposed and circulated in accordance with article VIII(b)(i) of the Convention,

1. ADOPTS, in accordance with article VIII(b)(iv) of the Convention, amendments to the LSA Code, the text of which is set out in the Annex to the present resolution;
2. DETERMINES, in accordance with article VIII(b)(vi)(2)(bb) of the Convention, that the amendments shall be deemed to have been accepted on 1 July 2012, unless prior to that date, more than one third of the Contracting Governments to the Convention or Contracting Governments the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant fleet, have notified their objections to the amendments;
3. INVITES Contracting Governments to note that, in accordance with article VIII(b)(vii)(2) of the Convention, the amendments shall enter into force on 1 January 2013 upon their acceptance in accordance with paragraph 2 above;
4. REQUESTS the Secretary-General, in conformity with article VIII(b)(v) of the Convention, to transmit certified copies of the present resolution and the text of the amendments contained in the Annex to all Contracting Governments to the Convention;
5. FURTHER REQUESTS the Secretary-General to transmit copies of this resolution and its Annex to Members of the Organization which are not Contracting Governments to the Convention.

ANNEX

AMENDMENTS TO THE INTERNATIONAL LIFE-SAVING APPLIANCES (LSA) CODE

CHAPTER IV
SURVIVAL CRAFT

1 In paragraph 4.4.7.6, the following new subparagraphs .2 to .6 are inserted after the existing subparagraph .1:

".2 notwithstanding subparagraph .7.2 the mechanism shall only open when the release mechanism is operated with the boat fully waterborne or, if the boat is not waterborne, by multiple, deliberate and sustained action which shall include the removal or bypassing of safety interlocks designed to prevent premature or inadvertent release;

2.1 the mechanism shall not be able to open due to wear, misalignment and unintended force within the hook assembly or operating mechanism, control rods or cables as may be connected to, or form part of the hook assembly and with trim of up to 10º and a list of up to 20º either way; and

.2.2 the functional criteria of 4.4.7.6.2 and 4.4.7.6.2.1 apply for the range of loads, representing 0% to 100% of the safe working load of the lifeboat release and retrieval system for which it may be approved;

.3 unless a release mechanism is of the load over centre type, which is held fully closed by the weight of the lifeboat, the hook assembly shall be designed so that the moveable hook component is kept fully closed by the hook locking parts capable of holding its safe working load under any operational conditions until the hook locking part is deliberately caused to open by means of the operating mechanism. For designs utilizing the tail of the movable hook component and cam either directly or indirectly securing the tail of the movable hook component, the hook assembly shall continue to be closed and hold its safe working load through rotation of the cam of up to 45 degrees in either direction, or 45 degrees in one direction if restricted by design, from its locked position;

.4 to provide hook stability, the release mechanism shall be designed so that, when it is fully reset in the closed position, the weight of the lifeboat does not cause any force to be transmitted to the operating mechanism;

.5 locking devices shall be designed so that they cannot turn to open due to forces from the hook load; and

.6 if a hydrostatic interlock is provided, it shall automatically reset upon lifting the boat from the water."

2 In paragraph 4.4.7.6, the existing subparagraph .2 is replaced by the following:

".7 the mechanism shall have two release capabilities: normal (off-load) release capability and on-load release capability:

.7.1 normal (off-load) release capability shall release the lifeboat when it is waterborne or when there is no load on the hooks, and not require manual separation of the lifting ring or shackle from the jaw of the hook; and

.7.2 on-load release capability shall release the lifeboat with a load on the hooks. This release mechanism shall be provided with a hydrostatic interlock unless other means are provided to ensure that the boat is waterborne before the release mechanism can be activated. In case of failure or when the boat is not waterborne, there shall be a means to override the hydrostatic interlock or similar device to allow emergency release. This interlock override capability shall be adequately protected against accidental or premature use. Adequate protection shall include special mechanical protection not normally required for off-load release, in addition to a danger sign. The protection shall be deliberately destroyed by applying a suitable minimum force, for instance by breaking a protection glass or translucent cover. A label or thin wire seal is not considered sufficiently robust. To prevent a premature on-load release, on-load operation of the release mechanism shall require multiple, deliberate and sustained action or actions by the operator;"

3 In paragraph 4.4.7.6, the existing subparagraph .3 is renumbered as subparagraph .8 and the words "without excessive force" are replaced by the words ", and any indicators shall not indicate the release mechanism is reset".

4 In paragraph 4.4.7.6, the following new subparagraph .9 is inserted after the renumbered subparagraph 8:

".9 all components of the hook unit, release handle unit, control cables or mechanical operating links and the fixed structural connections in a lifeboat shall be of material corrosion resistant in the marine environment without the need for coatings or galvanizing. Design and manufacturing tolerances shall be such that anticipated wear throughout the service life of the mechanism shall not adversely affect its proper functioning. Mechanical operating links such as control cables shall be waterproof and shall have no exposed or unprotected areas;"

5 In paragraph 4.4.7.6, the existing subparagraphs .4 to .8 are renumbered as subparagraphs .10 to .14, respectively.

6 In paragraph 4.4.7.6, in the renumbered subparagraph .10, the word "clearly" is replaced by the word "unambiguously".

7 In paragraph 4.4.7.6, in the renumbered subparagraph .14, the words "the load bearing components of the release mechanism and" are added at the beginning and the words "of the release mechanism" are deleted.

8 In paragraph 4.4.7.6, the following new subparagraphs .15 and .16 are inserted after the renumbered subparagraph .14:

> ".15 a hydrostatic interlock shall be designed for a factor of safety of not less than 6 times maximum operating force based on the ultimate strength of the materials used;
>
> .16 the operating cables shall be designed for a factor of safety of not less than 2.5 times maximum operating force based on the ultimate strength of the materials used; and".

9 In paragraph 4.4.7.6, the existing subparagraph .9 is renumbered as subparagraph .17 and in the renumbered subparagraph .17, the references to paragraphs "4.4.7.6.2.2 and 4.4.7.6.3" are replaced by the references to paragraphs "4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15".

10 In paragraph 4.4.7.6, the referenced subparagraph .9 is replaced by .17.

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MSC.1/Circ.1392
27 May 2011

GUIDELINES FOR EVALUATION AND REPLACEMENT OF LIFEBOAT RELEASE AND RETRIEVAL SYSTEMS

1 The Maritime Safety Committee, at its eighty-ninth session (11 to 20 May 2011), approved the Guidelines for evaluation and replacement of lifeboat release and retrieval systems, set out in the annex, as per SOLAS regulation III/1.5, following the recommendations made by the Sub-Committee on Ship Design and Equipment, at its fifty-fifth session, and the *Ad Hoc* Working Group on Lifeboat Release Hooks (16 to 18 March 2011).

2 Member Governments are invited to use the annexed Guidelines when applying SOLAS regulation III/1.5, as adopted by resolution MSC.317(89), and to bring them to the attention of all parties concerned.

3 Member Governments, shipowners and manufacturers of lifeboat release and retrieval systems are also strongly urged, pending the entry into force of SOLAS regulation III/1.5, to use the annexed Guidelines to evaluate existing lifeboat release and retrieval systems at the earliest available opportunity.[*]

4 Member Governments are strongly urged to ensure that all ships fitted with on-load release systems for lifeboats, are equipped with fall preventer devices as per paragraph 6 of these Guidelines at the earliest available opportunity.

5 Member Governments are encouraged to consider the results of evaluations reported to the Organization by other Member Governments on types of existing lifeboat release and retrieval systems.

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[*] Reference is made to MSC.1/Circ.1393 on Early application of new SOLAS regulation III/1.5.

[Excerpt from Annex to MSC.1/Circ.1392]

ANNEX

GUIDELINES FOR EVALUATION AND REPLACEMENT OF LIFEBOAT RELEASE AND RETRIEVAL SYSTEMS

(…)

6 On each ship, fall preventer devices in accordance with the Guidelines for the fitting and use of fall preventer devices (FPDs) (MSC.1/Circ.1327) should be employed for each existing lifeboat release and retrieval system until the system is:

.1 found compliant with the LSA Code; or

.2 modified and found compliant with the LSA Code; or

.3 found compliant with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code and paragraphs 16 and 17 (overhaul examination) of these Guidelines; or

.4 modified and found compliant with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code and paragraphs 16 and 17 (overhaul examination) of these Guidelines; or

.5 replaced by a new lifeboat release and retrieval system.

(…)

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MSC.1/Circ.1327
11 June 2009

GUIDELINES FOR THE FITTING AND USE OF FALL PREVENTER DEVICES (FPDs)

1 The Maritime Safety Committee, at its eighty-sixth session (27 May to 5 June 2009), approved the Guidelines for the fitting and use of fall preventer devices (FPDs), set out in the annex, following the recommendations made by the Sub-Committee on Ship Design and Equipment, at its fifty-second session.

2 The use of FPDs should be considered as an interim risk mitigation measure, only to be used in connection with existing on-load release hooks, at the discretion of the master, pending the wide implementation of improved hook designs with enhanced safety features.

3 Member Governments are invited to use the annexed Guidelines when approving the use of fall preventer devices (FPDs), and to bring them to the attention of all parties concerned.

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ANNEX

GUIDELINES FOR THE FITTING AND USE OF FALL PREVENTER DEVICES (FPDs)

1 Background

1.1 In 1986, on-load release hooks for lifeboats and rescue boats were made mandatory in the SOLAS Convention, in response to Norway's worst offshore accident in March 1980, when the **Alexander Kielland** platform in the North Sea Ekofisk field capsized, killing 123 of the 212 persons on board. These then new SOLAS requirements were considered an important step forward in lifeboat design.

1.2 Some deaths in that accident were attributed to the fact that the lifeboat had no means of release when its weight was on the hook and falls. Therefore, on-load release systems were seen to offer benefits.

1.3 Since the IMO requirements for all ships to be fitted with on-load release systems came into force, there have been a number of serious accidents during drills and servicing.

1.4 Many of these accidents were attributed to either lack of maintenance, poor design or inadequate training. Failures of equipment can result in the premature opening of the on-load hook mechanism, causing the lifeboat to fall from the davits unexpectedly, even with three safety interlocks provided for in the design.

1.5 A number of current designs of on-load release hooks are designed to open under the effect of the lifeboat's own weight and often need to be held closed by the operating mechanism. This means that any defects or faults in the operating mechanism, errors by the crew or incorrect resetting of the hook after being previously operated, can result in premature release.

1.6 A “Fall Preventer Device” (FPD) can be used to minimize the risk of injury or death by providing a secondary alternate load path in the event of failure of the on-load hook or its release mechanism or of accidental release of the on-load hook. However, FPDs should not be regarded as a substitute for a safe on-load release mechanism.

2 Design and operation of FPDs

2.1 Locking pins

The following points should be considered when utilizing locking pins as FPDs:

.1 existing on-load release hooks fitted to ships should **not** be modified by drilling to provide a locking pin insertion point, unless approved by the Administration in accordance with paragraph 4, as this may significantly reduce the strength of the hook;

.2 locking pins should have clear operational instructions located near the insertion point of the locking pin and be colour coded so that it is clear where the pins are to be inserted;

.3 locking pins should be designed so that they cannot be inadvertently inserted in the wrong place;

.4 locking pins should be confirmed to be in place prior to turning out the lifeboat and during descent to the water;

.5 strict procedures, including a warning notice at the release handle, should be in place to ensure that the locking pin is removed before the release mechanism is activated. The handle of the locking pin should be coloured red or a suitable contrasting safety colour and prominently marked with a warning that it must be removed before activating the release mechanism;

.6 the removal of the pin should be achievable quickly and easily without posing any risk to the operating crew designated to carry out the task once the lifeboat has reached the water;

.7 if the removal of the pins requires opening of the lifeboat hatch it should be readily achievable by the operating crew at each device from within the craft;

.8 once the on-load release hooks have been connected to recover the lifeboat, the locking pins should be re-inserted before the boat is hoisted clear of the water. The locking pins should be designed so that they do not interfere with either the lifting or re-stowing of the lifeboat into the davits; and

.9 where provided, fall preventer locking pins should not be used for any other purpose and should be fitted to the lifeboat at all times.

2.2 Strops or slings

Wires or chains should not be used as FPDs, as they do not absorb shock loads. The following points should be considered when synthetic strops or slings are used as FPDs:

.1 where FPDs are synthetic strops or slings and no modifications are required to the lifeboat, the on-load release hook or launching equipment, a functional test should be carried out. The functional test should demonstrate, to the satisfaction of the Administration, that the equipment performs without interfering in the operation of the lifeboat or launching equipment. Strops or slings should be of resilient fibre in construction;

.2 the strops or slings should be issued with an appropriate certificate documenting a tensile strength which provides for a factor of safety of at least six, based on the total weight of the lifeboat when loaded with its full complement of persons and equipment. The strops or slings should be inspected before use and thoroughly inspected by ship's crew every six months. The material of the strop or sling should be rot-proof, corrosion-resistant, not be unduly affected by seawater, oil or fungal attack, and UV resistant. The strops or slings should be permanently marked with the date of entry into service;

.3 strict procedures, including a warning notice at the release handle, should be in place to ensure that the strops or slings are removed before the release mechanism is activated;

.4 the attachment point of the strop or sling to the on-load release hook and the davit falls block should be clearly marked and designed so that any connection device such as shackles cannot be connected to either the wrong part of the block or the wrong part of the on-load release hook;

.5 the release of the strops or slings should be achievable quickly and easily without posing any risk to the operating crew designated to carry out the task once the lifeboat has reached the water. If the release of the strops or slings requires opening of the lifeboat hatch it should be readily achievable by the operating crew at each device from within the craft. Once detached, the strops or slings should not interfere with the operation of the on-load release gear or the propeller;

.6 once the on-load release hooks have been connected to recover the lifeboat, the strops or slings should be reattached to the lifeboat before the boat is hoisted clear of the water. The strops or slings should be designed so that they do not interfere with either the lifting or re-stowing of the lifeboat into the davits;

.7 a strop or sling used as an FPD should be sized and arranged to allow the transfer of load from the hook mechanism to the strop with minimal movement (drop) of the boat in the event of a release mechanism failure. Should a fall preventer strop or sling be subject to an unintentional dynamic shock loading, then the strop or sling should be replaced and the associated attachment points inspected. In such cases, the Administration should be informed as soon as possible and the master should provide a full report of the circumstances of the incident; and

.8 where provided, fall preventer strops or slings should not be used for any other purpose and should be fitted to the lifeboat at all times.

3 Drills, testing, inspections and maintenance of lifeboats and launching appliances

3.1 The ship's master or the officer in charge of any lifeboat lowering or lifting operation should ensure that, where provided, lifeboat FPDs are properly in place before commencing any drill, testing, inspection or maintenance where persons are in the lifeboat.

3.2 The ship's operating crew should be familiar with the operation of the FPD fitted to the lifeboat on their ship. The procedure to be followed should be contained in the ISM Code documentation and the ship's training manual.

3.3 Those conducting training drills and drafting ISM Code procedures should take into account that with certain types of ship such as oil, gas or chemical tankers it may not be possible to use an FPD in an abandon ship situation where the release mechanism of the device is not inside the lifeboat. In such cases, the master should take this into account when considering application of paragraphs 2.1.9 or 2.2.8. Where a different procedure is followed during routine drills compared with an abandon ship situation, this should be clearly described in the ISM Code documentation and training manual.

4 Modification of existing approved on-load hooks already fitted to a ship to incorporate FPDs

The shipowner or original equipment manufacturer should contact the Administration for approval before any modification, such as modifying existing lifeboats and hooks for oil and chemical tankers so that FPDs can be released from within the lifeboat, is made to a hook, lifeboat or davit to accommodate the use of FPDs. Any retesting of any equipment should be agreed and witnessed by the Administration or a recognized organization appointed by them and documented in the relevant approval file.

MSC.1/Circ.1393
27 May 2011

EARLY APPLICATION OF NEW SOLAS REGULATION III/1.5

1 The Maritime Safety Committee, at its eighty-ninth session (11 to 20 May 2011), adopted, by resolution MSC.317(89), new SOLAS regulation III/1.5 and, by resolution MSC.320(89), related amendments to chapter IV of the LSA Code, which are expected to enter into force on 1 January 2013. The Committee also approved the associated Guidelines for evaluation and replacement of lifeboat release and retrieval systems (MSC.1/Circ.1392).

2 In light of the provision of the new SOLAS regulation III/1.5, the Committee agreed that:

.1 for ships constructed on or after 1 July 2014, on-load release and retrieval systems shall comply with the LSA Code, as amended by resolution MSC.320(89); and

.2 Member Governments are encouraged to ensure that ships constructed on or after 20 May 2011 but before 1 July 2014, on-load release and retrieval systems comply with the LSA Code, as amended by resolution MSC.320(89).

3 In order for parties concerned to take relevant actions with regard to paragraph 2 above, Member Governments are encouraged to initiate, at the earliest opportunity, approval processes for new on-load release and retrieval systems, which comply with the LSA Code, as amended by resolution MSC.320(89).

4 In adopting the aforementioned amendments, the Committee agreed to the recommendation by the Sub-Committee on Ship Design and Equipment, at its fifty-fifth session (21 to 25 March 2011), that parties concerned should be encouraged to take necessary action to evaluate existing lifeboat release and retrieval systems, based on the aforementioned Guidelines, at the earliest available opportunity, pending the entry into force of new SOLAS regulation III/1.5.

5 Member Governments, shipyards and shipowners are invited to take account of this circular and bring it to the attention of all parties concerned. In particular, manufacturers are urged to evaluate existing lifeboat release and retrieval systems at the earliest available opportunity, in accordance with the aforementioned Guidelines.