

Commonwealth of Dominica**Office of the Maritime Administrator**

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, MOBILE OFFSHORE DRILLING UNITS AND RECOGNIZED ORGANIZATIONS

SUBJECT: PERIODIC SERVICING AND MAINTENANCE OF LIFEBOATS, LAUNCHING APPLIANCES AND ON-LOAD RELEASE GEAR

REFERENCE: (a) IMO Circular no. MSC.1/Circ. 1206 Periodic servicing and maintenance of lifeboats, launching appliances and on-load release gear

ATTACHMENTS: Circular no. MSC.1/Circ. 1206

PURPOSE: The purpose of this Safety Circular is to provide guidance to the Owners and Operators of Dominica vessels regarding application of MSC.1/Circ. 1206 with respect to its provisions being mandatory

APPLICABILITY: All Dominica flag vessels and Mobile Offshore Drilling Units

REQUIREMENTS:

IMO circulars are not mandatory unless they are made so by incorporating a reference thereto into the body of affected IMO statutory instrument. In the case of IMO Circular no. MSC.1/Circ. 1206 this has not been done. Indeed, the Circular will be considered at the next Maritime Safety Committee (MSC) where it is anticipated that changes will be made to the document. Pending these changes, the Administration has determined the following applicable:

1. Recognized Organizations are authorized to continue to accept facilities that have demonstrated their capabilities to competently examine, test, overhaul, and repair lifeboats, launching appliances and on-load release gear.
2. Thorough examinations, operational tests, and overhauls of on-load release mechanisms carried out in accordance with SOLAS regulation III/20.11 should, when practicable, be carried out by properly trained personnel or shore-side facilities with access to the manufacturer's technical specifications. Replacement parts should be genuine parts supplied by the original manufacturer. However, manufacturer's certification is not required.

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Inquiries concerning the subject of this Circular should be directed to the Deputy Maritime Administrator
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- 2.1 Properly trained personnel referred to above means competent persons familiar with the on-load system and includes, but is not necessarily limited to, manufacturers' representatives, or shipyard engineers or a specialist vendor, certified by a manufacturer.
3. Whenever any defects are discovered in the equipment during examination or overhaul that could affect other installations, the Office of Deputy Maritime Administrator for Commonwealth of Dominica should be notified so that the approving Administration, the manufacturer and, if appropriate, the relevant IMO Sub-committee can be informed.

BACKGROUND

The IMO MSC/Circ. 1093 on Guidelines for periodic servicing and maintenance of lifeboats, launching appliances and on-load release gear was referenced by footnote in the amendments to SOLAS regulation III/20 which entered into force on 1 July 2006. The Sub-Committee on Fire Protection, at its 50th session, developed a draft new MSC Circular to update, consolidate, and supersede this and several other MSC Circulars on Measures to prevent accidents with lifeboats. This new Circular was approved by the Committee at its 81st session as MSC.1/Circ. 1206 Measures to prevent accidents with lifeboats. The updated contents of (superseded) MSC/Circ. 1093 are contained in Annex 1 to the new Circular.

In approving the new Circular, the Committee endorsed the FP Sub-Committee's recommendation to refer matters related to the issue of whether the provisions of MSC.1/Circ.1206 should be made mandatory under the SOLAS Convention and/or the ISM Code to the FSI and STW Sub-Committees for consideration and appropriate action (MSC 81/25, para. 13.11).

FSI 14, citing concerns raised by some delegations with regard to making the circular mandatory, was unable to reach a firm decision on whether the Circular should become mandatory in its entirety, or which parts should or should not be made mandatory under SOLAS. Members are invited to submit recommendations to MSC 82 (FSI 14/19, paragraphs. 3.29-3.31).

DISCUSSION

Practical implications of mandatory application of the Circular

Dominica has observed that some Administrations, recognized organizations, and equipment manufacturers have treated the contents of the Circular relating to periodic servicing and maintenance of lifeboats, launching appliances and on-load release gear as if they became mandatory with the entry into force of amendments to SOLAS regulation III/20 on 1 July 2006.

The provisions of the Circular relating to manufacturer certification of facilities and personnel have created numerous problems for ship-owners, as such facilities and personnel are not always available within a reasonable distance or time when a ship is undergoing periodic survey.

Most components of lifeboat systems, i.e., lifeboats themselves and their launching appliances, are generally of common and conventional designs that do not necessarily require manufacturer-specific expertise and parts. Many facilities have demonstrated their capabilities to competently examine, overhaul, and repair this equipment over many years under Administration oversight, with or without explicit manufacturer certification. While it is reasonable to recommend manufacturer certification, as a means of ensuring familiarity with the equipment, certainly there is no compelling reason to require it for (e.g.) routine steel or fibre-glass work, or engine servicing and overhaul.

Thorough examination, operational tests, and overhaul of lifeboat on-load release mechanisms may need to be subjected to a higher standard than other, less critical, components of the lifeboat system. Ideally, these functions should be carried out by personnel and servicing stations certified by the manufacturer, using genuine replacement parts supplied by the manufacturer, whenever this is practicable. However, the exact procedures need to be developed. IMO will be considering whether SOLAS regulation III/20.11 should be amended to require these procedures be carried out by approved servicing stations. So doing will require additional supplemental guidance for approval of servicing stations. This needs to be developed by the IMO DE Sub-Committee prior to the entry into force of the SOLAS amendments in 2010.

Without established requirements for obtaining such approval, a requirement that servicing and maintenance be carried out by manufacturer certified personnel and facilities is virtually meaningless and cannot be applied consistently – standards may vary from manufacturer to manufacturer. For such a requirement to be effective, guidelines for certification along the lines of Res. A.761(18) for approved inflatable liferaft servicing facilities, and corresponding oversight by Administrations, are needed.

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