

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

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS

SUBJECT: LIFEBOAT ON-LOAD RELEASE MECHANISMS AND USE OF FALL PREVENTER DEVICES

REFERENCE: MSC. 1/CIRC. 1206, MSC. 1/CIRC. 1392, MSC. 1/CIRC. 1327

APPLICABILITY: This Policy Letter applies to all Flag State Inspectors and ships registered with the Dominica Maritime Registry

PURPOSE:

The purpose of this Circular is to bring to the attention of all concerned to the important amendments to the SOLAS Convention, Chapter III and to the Life Saving Appliances Code (LSA Code). These amendments affect lifeboat on-load release mechanisms fitted on all ships, existing and new. The changes apply to davit launched lifeboats only and do not affect free-fall boats or rescue boats with a single fall and no on-load capability and come into force on 1 January, 2013.

BACKGROUND:

At the IMO Maritime Safety Committee meeting (89th Session) in 2011 important amendments were adopted to the SOLAS Convention, Chapter III and to the Life Saving Appliances Code (LSA Code). The intent of the changes is to improve the safety of lifeboats in response to the large number of accidents in which seafarers have been killed or injured while launching or recovering lifeboats.

REQUIREMENTS:**General**

The new regulation SOLAS III/1.5 requires that all lifeboat on-load release mechanisms that do not comply with the new standards in the amended LSA Code must be replaced not later than the first scheduled dry-docking after 1 July, 2014 but not later than July 2019. This means that all existing on-load release mechanisms currently in service must be evaluated to confirm that they comply with the new standards.

The IMO has provided guidance in MSC.1/Circ. 1392 for the evaluation and replacement of lifeboat release and retrieval systems. The process requires that:

- Documentation and information for each type of lifeboat release and retrieval system is to be submitted to the administration or to an RO acting on their behalf for a design review. If the design review shows that the system is not compliant with the new standard, all systems of that type should be replaced by the due dates.
- If the design review is satisfactory, then a performance test shall be conducted by the manufacturer in accordance with the test criteria in the LSA Code and witnessed by the administration or by an RO acting on its behalf. If the performance test is not satisfactory, the systems should be replaced by the due dates. The IMO Guidelines allow that a lifeboat release and retrieval system that is not satisfactory at the performance test may be modified and re-tested. If it is then satisfactory, it may be evaluated in accordance with the guidelines and the details of the modified system can be reported.
- If the performance test is satisfactory, each lifeboat release and retrieval system in service of that type should be subjected to a one-time follow-up overhaul examination not later than the first dry-docking after 1 July 2014 by the manufacturer or his authorized representative following the guidance in MSC.1/Circ. 1206 and including a detailed assessment of the conditions of the components of the system.

Planning Actions for Owners

It is possible that a large number of existing lifeboat release and retrieval systems may not meet the new standards. They will need to be replaced by the first dry-docking after 1 July, 2014 but not later than 1 July 2019. It is possible therefore that there may be a large demand for replacement systems as the dates approach and that there may be delays in obtaining replacement systems that comply with the standards and are suitable for fitting in the existing boats. Owners are strongly advised that they make enquiries as soon as possible with the manufacturers of their existing lifeboat release and retrieval systems to determine whether or not their systems have been tested and found to be compliant.

If the existing systems are found to not comply with the new standard, owners should make early arrangements to have them replaced with compliant systems. If it is found necessary to replace the lifeboat release and retrieval systems on any ship with systems that comply with the new standard, the owner should first submit the necessary information as set out in paragraphs 18, 19 and 20 of MSC.1/Circ. 1392 to their Classification Society for review and approval.

Fall Preventer Devices

Immediate temporary measures until systems are shown to be compliant.

Fall Preventer Devices (FPDs) are arrangements that provide an additional measure of protection for existing lifeboat release and retrieval systems should the system release unexpectedly.

Existing release and retrieval systems that have to been found to be in compliance with the new standards may pose a risk to the seafarers using them. Owners should therefore make immediate arrangements to fit fall protection devices, wherever possible, to all davit launched release and recovery systems that have not yet been shown to be in compliance with the new standard. MSC.1/Circ 1327 provides extensive guidance on the possible options that can be used and their arrangements. In particular, owners should note that arrangements using wires or chains should not be used and that systems using fiber strops and similar should be arranged so that the drop and consequent shock load if the release system opens is as small as possible. A functional test of the ability to launch the lifeboat should be carried out as soon as the fall prevention devices are fitted.

Strops, slings and other components used as part of a fall preventer device should all be certified for a safe working load utilizing a factor of six times the total weight of the lifeboat fully loaded with all its equipment and full complement of persons.

Shipowners should note that the existing attachment points on many systems for use by hanging off pennants may not have sufficient strength for the attachment of fall preventer devices and may not be able to withstand the shock load of a boat if the release system opens unexpectedly. Any arrangements for fall preventer devices that utilizes existing hanging off pennant arrangements should first check that their strength is adequate for this purpose.

There is no requirement for Fall Preventer Devices to be certified by Class or by flag once fitted. However strops, wires, shackles, and other components should be properly certified by their manufacturers for SWL in common with any other such equipment

Actions where Fall Preventer Devices are not practicable.

There will be some release and retrieval systems in service in which it is not immediately

practicable, without modification, to fit a fall protection device. Owners are advised that:

1. No hook, support structure for a hook, or other part of the system should be drilled for the installation of a pin without the express authorization and approval of the manufacturer.
2. No attachment point or other lifting point should be welded or otherwise attached to any part of an existing system without the express authorization and approval of the manufacturer.

Where it is impossible to arrange a fall preventer device without drilling parts of the existing system for a pin or attaching eyes or other fittings and manufacturer's agreement to this cannot be obtained, fall preventer devices should not be fitted.

In such cases, the owner and master should establish other procedures to minimize the risks to seafarers. These could include arrangements to ensure that crew members are not to be on board lifeboats during practice launching. In any such case the procedures should be clearly documented in the ship's ISM procedures and well understood by all seafarers on board.

Any questions can be directed to:

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