

	<b>CIRCULAR 2012-007 rev. 1</b>		
	<b>DEPARTMENT OF MARINE SERVICES AND MERCHANT SHIPPING (ADOMS)</b>		
	<b>Lifeboat on-load Release mechanisms and Fall Preventer Devices.</b>	Ref	MSC.317(89); 320(89); 321(89). MSC.1/Circ.1327. MSC.1/Circ.1392 MSC.1/Circ.1393

**Companies having registered their ships under the flag of Antigua and Barbuda.  
Ships registered under the flag of Antigua and Barbuda.  
Authorised Recognised Organizations (ROs)**

This Circular was previously published as Circular 02-002-2012 which was re-issued in the new numbering scheme. This revision clarifies applicability to rescue boats and acceptable testing procedures.

**Introduction.**

At the 89<sup>th</sup> Session of the IMO Maritime Safety Committee meeting in 2011 important amendments were adopted to the SOLAS Convention, Chapter III/1 and to the Life Saving Appliances Code (LSA Code). These amendments affect lifeboat and rescue boat on-load release mechanisms fitted on all ships, existing and new. The changes apply to davit launched lifeboats/rescue boats only and do not affect free-fall boats or rescue boats with a single fall and no on-load release capability and they came into effect on 1<sup>st</sup> January 2013.

The intention 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.

Antigua and Barbuda Circular 02-001-06, and Information letter 001-2007 have been withdrawn

**Scope of the changes.**

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<sup>st</sup> July 2014, but not later than 1<sup>st</sup> July 2019. This means that all existing on-load release mechanisms currently in service will have to be evaluated and tested to confirm that they comply with the new standards.

The IMO has also 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 its 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 should 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 and if it is then satisfactory it can 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<sup>st</sup> July 2014 by the manufacturer or his authorised representative following the guidance in MSC.1/Circ.1206 and including a detailed assessment of the condition of the components of the system.

For Antigua and Barbuda ships all the recognised organisations are authorised to conduct the design reviews and witness the performance tests of systems on behalf of the Administration. The Administration is required to report the results of any testing and evaluation to the IMO and any RO which is engaged in the review, testing and evaluation of any release and retrieval system used in an Antigua and Barbuda ship and which is not otherwise reported to the IMO by another flag state, should make a report to ADOMS in the format set out in MSC.1/Circ.1392.

#### **Planning actions for owners.**

It is possible that a large number of existing lifeboat release and retrieval systems may not meet the new LSA Code standards. They will need to be replaced by the first dry-docking after 1<sup>st</sup> July 2014 but not later than 1<sup>st</sup> 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 existing boats. ADOMS strongly recommends to owners that they make enquiries as soon as possible with the manufacturers of their existing lifeboat release and retrieval systems to establish if they have been tested for compliance with the new standard and the results of those tests.

If the existing systems are found not to comply with the new standard, owners should make early arrangements to have them replaced with compliant systems. If it is necessary in any ship to replace the lifeboat release and retrieval systems 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.

The post-installation test of replaced on-load release mechanisms in order to verify that the replacement release and retrieval system fully complies with the LSA Code, paragraph 4.4.7.6 and subparagraphs, can be carried out in two steps:

- 1) 5-knot towing test by lowering the life-/rescue boat into the water without releasing it, no persons should be on board the life-/rescue boat during this test.
- 2) Test of the release mechanism may be performed with the vessel stopped.

ADOMS accepts alternative equivalent testing methods to achieve the 5 knot launch post-installation test subject to acceptance by the RO, such alternatives may include ;

- Creating a wash of 5 knots induced by a vessel located forward of the launching position with both vessels securely moored to quay.
- Use of tidal streams.

In all cases It must be ensured that the water is moving at the required speed to a depth deeper than the survival craft draft.

**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 systems should the system release unexpectedly.

FPDs can be either pins or strops fitted to on-load release hooks to prevent the lifeboat from falling to the water in the event of an equipment failure.

Existing release and retrieval systems that have not 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 fibre strops and similar should be arranged so that the drop and consequent shock load if the release and retrieval system opens is as small as possible. A functional test of the ability to launch the lifeboat/ rescue boat 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 utilising a factor of six times the total weight of the lifeboat/ rescue boat fully loaded with all its equipment and the 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 arrangement for fall preventer devices that utilises the 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 certificated 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 and in particular ADOMS would advise 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 authorisation 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 authorisation 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 the manufacturer's agreement to this

cannot be obtained, fall preventer devices should not be fitted. In these circumstances replacement of the release hook system should take place at the earliest opportunity.

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

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