



SUBJECT: Means of Embarkation and Disembarkation

REFERENCE:

- a) *The International Convention for the Safety of Life at Sea Chapter II-1 Regulation 3.9.*
- b) *[MSC.1 Circ. 1331](#) Guidelines for construction, installation, maintenance, and inspection/survey of means of embarkation and disembarkation.*

TO: Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organisations.

1. PURPOSE

This Circular provides information on the requirements for the inspection and testing of accommodation ladders and gangways.

2. APPLICATION

This Circular applies to all Antigua and Barbuda flagged ships.

3. BACKGROUND

Resolution MSC.256(84) adopted by the IMO in 2008 made several important changes to SOLAS including the introduction of a new Regulation 3.9 in Chapter II-1.

4. OBLIGATIONS AND RESPONSIBILITIES

1. Requirements.

1. Regulation 3.9 says:

1. *“Ships constructed on or after 1 January 2010 shall be provided with means of embarkation on and disembarkation from ships for use in port and in port related operations, such as gangways and accommodation ladders, in accordance with paragraph 2, unless the Administration deems that compliance with a particular provision is unreasonable or impractical*.*
2. *The means of embarkation and disembarkation required in paragraph 1 shall be constructed and installed based on the guidelines developed by the Organization.*
3. *For all ships the means of embarkation and disembarkation shall be inspected and maintained in suitable condition for their intended purpose, considering any restrictions related to safe loading. All wires used to support the means of embarkation and disembarkation shall be maintained as specified in regulation III/20.4”*

2. *MSC.1 Circ 1331 was issued to provide guidance on the construction, testing and maintenance of these means of embarkation.*

3. Operators are asked to note that sub-paragraph 3 of regulation 3-9 applies to “ALL SHIPS”, hence the maintenance and inspection requirements as well as the marking requirements are to be followed in ships constructed before 1 January 2010 as well as those constructed after that date.
4. Regulation III/20.4 which is referred to in .3 above states:
 1. “Maintenance of falls
 1. *Falls used in launching shall be inspected periodically* with special regard for areas passing through sheaves and renewed when necessary due to deterioration of the falls or at intervals of not more than 5 years, whichever is the earlier.”*
 2. “Periodically*” in this context is regarded by the Antigua and Barbuda Administration in this case as meaning monthly and it is recommended that any falls used in gangway systems are included in the monthly checks of lifesaving equipment required by other parts of SOLAS.
 3. Ships constructed before 1 January 2010 and which have gangways and other means of embarkation replaced should ensure that the replacements comply with MSC.1/1331 as far as is practical.
 4. SOLAS permits an administration to deem compliance impractical and to accept alternative means in cases where:
 1. A vessel has low freeboards and is provided with boarding ramps, or
 2. A vessel is engaged in voyages between designated ports where appropriate shore accommodation embarkation ladders (platforms) are provided.
 5. ADOMS will accept these relaxations on application by owners /managers in any case where they are considered applicable.

Issued by

Antigua and Barbuda
Department of Marine Services and Merchant Shipping
(ADOM) St. John’s