



Instruction to RO's

Nr 20. New SOLAS regulation III/1.5, revision to LSA Code and Guidelines for evaluation and replacement of Lifeboat Release and Retrieval Systems

Date Entry Into Force: 01 September 2017

Introduction

In accordance with art. 40 of the Ships decree 2004, a ship for which a passenger ship safety certificate or a cargo ship safety certificate is required shall satisfy a.o. the requirements of chapter III of the SOLAS Convention applicable to that ship.

MSC at its 89th session adopted a new paragraph 5 of SOLAS regulation III/1 to require lifeboat on-load release mechanisms not complying with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the new International Life-Saving Appliances (LSA) Code (as amended by IMO resolution MSC.320(89)) to be replaced no later than the first scheduled dry-docking of the ship after 1 July 2014 but, in any case, not later than 1 July 2019. See IMO resolution MSC.317(89).

The SOLAS amendment, which is expected to enter into force on 1 January 2013, is intended to establish new and stricter safety standards for lifeboat release and retrieval systems (LRRS), aimed at preventing accidents during lifeboat launching, and will require the assessment and possible replacement of a large number of lifeboat release hooks.

The Committee also adopted Guidelines for evaluation of and replacement of LRRS's (see MSC.1/Circ.1392) and related amendments to the LSA Code (see IMO resolution MSC.320(89)) and associated amendments to the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70), amended by resolution MSC.321(89)).

Member governments were encouraged to initiate, at the earliest opportunity, approval processes for new LRRS's that comply with the amendments to the LSA Code.

It should be noted that MAC considers MSC.1/Circ.1392 as a policy rule, with the provision that paragraph 6 of the Annex (use of FPD's) is optional i.e. up to the discretion of the ship owner and master, in accordance with the instruction of the manufacturer. Approval processes for new LRRS's will remain within the framework of the Marine Equipment Directive 96/98/EC, as amended.

Furthermore, in accordance with paragraph 5 of MSC.1/Circ.1392, MAC will accept and acknowledge the results of evaluations reported to IMO by other Administrations. IMO will provide a module in GISIS (Global Integrated Shipping Information System) for the reporting and publication of evaluation results. MAC intends to publish a list with all existing makes and types of LRRS's on board Curaçao vessels as soon as possible, and has to report the evaluation results thereof to IMO not later than 1 July 2013.

Application of the new requirements

This instruction aims to provide clarification as to the practical application of the new requirements on Curaçao flag vessels, and contains the following provisions:



Evaluation

1. Upon a positive result of a self-assessment of the LRRS, the manufacturer¹ (if it concerns a Curaçao manufacturer) shall submit the necessary information (including the details of the self-assessment) to a RO of his choice who shall perform a design review in accordance with par.10 of the Annex to MSC.1/Circ.1392;
2. Upon a positive result of the design review, the manufacturer shall conduct a performance test, witnessed by the RO, in accordance with par.12 of the Annex to MSC.1/Circ.1392;
3. Upon a positive result of the performance test the RO shall notify the manufacturer of compliance of the type. At the same time the RO shall inform MAC of compliance of the type, and subsequently MAC will report compliance of the type to IMO;
4. Not later than the first scheduled dry-docking after 1 July 2014, every LRRS of a type found to be compliant shall be subject to an overhaul examination in accordance with Annex 1 to MSC.1/Circ.1206/Rev.1 by the manufacturer or by one of their representatives. A factual statement by the manufacturer or one of their representatives shall be retained on board to confirm that the overhaul examination has been satisfactorily completed.
5. When the LRRS does not satisfactorily pass the overhaul examination, it shall be replaced with a LRRS that complies with the revised LSA Code (resolution MSC.320(89)).

Modification of the design

1. Upon a negative result of steps 1. or 2. of the evaluation above, the RO shall inform the manufacturer of non-compliance of the type. At the same time the RO shall inform MAC of non-compliance of the type, and subsequently MAC will report non-compliance of the type to IMO;
2. The manufacturer may decide to redesign the LRRS, in which case the modified design shall be re-submitted for evaluation in accordance with the steps above;
3. In case the manufacturer decides not to redesign the LRRS, the RO shall be informed and determine non-compliance. At the same time the RO shall inform MAC of non-compliance of the type, and subsequently MAC will report non-compliance of the type to IMO;
4. All LRRS's of a non-compliant type shall be replaced with LRRS's that comply with the revised LSA Code (resolution MSC.320(89)).

Replacement

This section applies to all cases where, in accordance with the provisions of MSC.1/Circ.1392, a non-compliant LRRS has to be replaced with a LRRS that fully complies with the revised LSA Code (resolution MSC.320(89)).

1. For compatibility reasons the company² should, where possible, select a replacement LRRS acceptable to the *lifeboat* manufacturer. However, when the lifeboat manufacturer is unable to offer a suitable replacement LRRS, the company may select one, with the agreement of the lifeboat manufacturer, if possible. Furthermore the replacement LRRS shall be approved in accordance with the Marine Equipment Directive 96/98/EC, as amended. When the agreement of the lifeboat manufacturer cannot be obtained, the arguments of both lifeboat manufacturer and company should be gathered and MAC should be consulted.
2. Prior to the installation of the replacement LRRS, the company shall submit to the RO, for review and approval, as a minimum the following information:

¹ The definition of paragraph 9.9 of the Annex to MSC.1/Circ.1392 applies. Evaluation results of systems from manufacturers abroad by other Administrations will be accepted by MAC.

² The definition of paragraph 9.13 of the Annex to MSC.1/Circ.1392 applies



1. Details of the proposed replacement LRRS including type approval certification;
 2. The engineering analysis of the replacement LRRS, including:
 - i. Drawings of the original LRRS arrangement;
 - ii. Detailed drawings showing clearly the proposed changes (see par.20.2.1 of the Annex to MSC.1/Circ.1392), and;
 - iii. Calculation of forces subject to the provisions of par.20.2.3 of the Annex to MSC.1/Circ.1392;
 3. Evaluation of other factors affected by the replacement LRRS in accordance with par.20.3 of the Annex to MSC.1/Circ.1392;
 4. Amended operating and training manuals; and
 5. Identification of the person(s) responsible for design appraisal, installation work and post-installation testing and evidence of their competence.
3. The installation of the replacement LRRS and the post-installation testing, both carried out by the manufacturer or by one of their representatives, shall be witnessed by the RO. The RO shall also verify that the installation complies with the documentation submitted by the company.
 4. Following satisfactory completion of post-installation testing, the RO shall issue to the company a Statement of Acceptance, using the template set out in appendix 4 of the Annex to MSC.1/Circ.1392, for retention on board.