

# Interpretation on the Treatment of Lifebuoys

## Amended Guidance

Guidance for the Survey and Construction of Steel Ships Part C  
Guidance for Safety Equipment

## Reason for Amendment

SOLAS II-1/3-9 requires all ships be provided with a means of embarkation and disembarkation in accordance with the “*Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation*” (MSC.1/Circ.1331). The guidelines requires a lifebuoy fitted with both a light and a lifeline as part of this means of embarkation and disembarkation. SOLAS III/7.1.3, on the other hand, state that the lifebuoys required by SOLAS III/22.1.1 (passenger ships) and SOLAS III/32.1.1 (cargo ships) which are fitted with lights are not to be provided with lifelines.

Since the above-mentioned requirements regarding lifebuoys are in conflict with respect to the provision of lifelines, it is not clear whether a lifebuoy required by SOLAS II-1/3-9 can be taken into account when determining the minimum number and distribution of lifebuoys required by SOLAS Chapter III. So, a draft unified interpretation clarifying matters was proposed at the 6<sup>th</sup> Session of the IMO Sub-committee on Ship Systems (SSE 6) held in March 2019, and agreed upon. The draft was then subsequently submitted to the IMO Maritime Safety Committee at its 101<sup>st</sup> session (MSC101) held in June 2019, and was approved as MSC.1/Circ.1618.

Accordingly, relevant requirements were amended in accordance with MSC.1/Circ.1618.

## Outline of Amendment

Specified that a lifebuoy required by SOLAS II-1/3-9 is not to be taken into account when determining the minimum number and distribution of lifebuoys required by SOLAS Chapter III.

## Amended Requirements

Guidance for the Survey and Construction of Steel Ships  
Part C: C23.8.1  
Guidance for Safety Equipment 3.1.1