

Subject

Special requirements for Life-saving appliances and Equipment onboard Marshall Islands flagged vessels

ClassNK

Technical Information

No. TEC-0888
Date 20 January 2012

To whom it may concern

The Marshall Islands Government has noticed ClassNK of the special requirements for Life-saving appliances and Equipment onboard Marshall Islands flagged vessels (Marine Notice No. 2-011-37).

For your attention, sections of Marshall Islands Marine Notice 2-011-5 Rev.9/09 (Technical Information No. TEC-0796 dated 18 December 2009) related to lifeboat servicing, lifeboat damage, falls and equipment dispensations, lifeboat equipment dispensation have been relocated to this Notice accordingly.

The requirement of the "On-Load Release Hook Evaluation and Replacement" in accordance with MSC.1/Circ.1392, "Secondary Safety System" and "Fall Preventer Devices" are specified additionally in this notice.

For any questions about the above, please contact:

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Attachment:

1. Marine Notice No. 2-011-37

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**REPUBLIC OF
THE MARSHALL ISLANDS**

**OFFICE OF THE
MARITIME ADMINISTRATOR**

Marine Notice

No. 2-011-37

11/11

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

SUBJECT: Life Boat Equipment Requirements, Maintenance, and Servicing.

- References:**
- (a) **International Convention for the Safety of Life at Sea, 1974 (SOLAS), as amended**
 - (b) **International Life-Saving Appliance (LSA) Code, as amended**
 - (c) **Marshall Islands Marine Notice 2-011-5, Life Saving Appliances and Equipment**
 - (d) **Measures to Prevent Accidents with Lifeboats (MSC.1/Circ.1206/Rev.1)**
 - (e) **Marshall Islands Marine Notice 2-011-14, Maintenance and Inspection of Fire-Protection Systems and Appliances**
 - (f) **Marshall Islands Technical Circular #1**
 - (g) **Amendments to the International Convention for the Safety of Life at Sea, 1974, as amended – Resolution MSC.317(89)**
 - (h) **Amendments to the International Life-Saving Appliance (LSA) Code – Resolution MSC.320(89)**
 - (i) **Guidelines for Evaluation and Replacement of Lifeboat Release and Retrieval Systems – MSC.1/Circ.1392**
 - (j) **Early Application of New SOLAS Regulation III/1.5 – MSC.1/Circ.1393**
 - (k) **Guidance for the Fitting and Use of Fall Preventer Devices (FPDs) – MSC.1/Circ.1327**

PURPOSE:

Due to the extent of issues and recent regulatory developments relating to lifeboats and on-load release hooks, this Notice has been developed to specifically address these issues and requests presented to the Republic of the Marshall Islands Maritime Administrator (the “Administrator”) for interpretation and clarification of policy. Sections of Marshall Islands Marine Notice 2-011-5 (reference (c) above) related to lifeboat servicing, lifeboat damage, falls and equipment dispensations have been relocated to this Notice accordingly.

APPLICABILITY:

This Notice applies to all ships, MODUs and mobile offshore units (MOUs) subject to reference (a) above.

REQUIREMENTS:

1.0 Approval of Equipment

1.1 The approval of lifeboat equipment shall be conducted in accordance with the Administrator's policy on Life-Saving Appliance equipment approvals set forth under section 1.0 of Marshall Islands Marine Notice 2-011-5 – reference (c) above.

2.0 Maintenance and Servicing

2.1 Annex 1 of reference (d) above should be followed for the inspection, maintenance of lifeboats, launching appliances, and on-load release gear, taking into account section 3.0 of this Notice.

2.2 Maintenance and inspection of lifeboat air cylinders shall be performed in accordance with reference (e) above. Requirements for the air cylinders for totally enclosed lifeboats shall be the same, where applicable, as with Self-Contained Breathing Apparatus air bottles.

3.0 Manufacturer Certified Service Providers

3.1 With regard to the servicing and maintenance of lifeboats, launching appliances and on-load release gear, in cases where manufacturer certified facilities are not available, a non-manufacturer certified facility or properly trained personnel selected by the Company may be utilized to perform those relevant servicing and maintenance functions, provided the RO is satisfied with the ability of the facility or personnel to carry out these functions.

3.2 More specific guidance to ROs carrying out this function on behalf of the Administrator is provided in Marshall Islands Technical Circular #1 – reference (f) above.

4.0 Lifesaving Appliance Falls

4.1 In accordance with reference (a) above, falls used for launching lifesavings appliances shall be inspected periodically, in accordance with reference (d) above, 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 five (5) years, whichever is the earlier. The intermediate turning of the falls end for end is no longer required.

4.2 All terminations of primary load-bearing wire rope must be formed by wedge sockets, class approved resin or white metal sockets, swaged or spelter fittings or other suitable alternative method approved by class. This includes falls for lifeboats, rescue boats and davit launched life rafts as well as hanging off pendants and recovery strops. Wire-rope grips, such as

bulldog grips, are not acceptable for any primary load-bearing terminations. Where wire-rope grips are found to have been used on primary load-bearing terminations, arrangements are to be made for their replacement.

5.0 On-Load Release Hook Evaluation and Replacement (2011 SOLAS/LSA Code Amendments)

- 5.1 In accordance with the new requirements of SOLAS Regulation III/1 set forth under reference (g) above, all ships fitted with lifeboat on-load release mechanisms that are found not in compliance with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code, as revised by reference (h) above, shall be replaced with equipment that complies with the Code not later than the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019.
- 5.2 To determine if existing ships are fitted with non-compliant on-load release mechanisms, manufacturers of lifeboat release and retrieval systems are to conduct a self-assessment of their types of existing systems at the earliest opportunity, but no later than 1 July 2013. Upon receipt of the results of the manufacturer self-assessment, Marshall Islands Recognized Organizations (ROs) acting on behalf of the Administrator are to carry out a design review and witness a performance test of these existing systems in accordance with the IMO Guidelines for evaluation and replacement of lifeboat release and retrieval systems – reference (i) above. Results of the system evaluations are to be reported to the IMO as they are received.
- 5.3 For lifeboat release and retrieval systems found to be compliant as a result of the system evaluation, an ‘overhaul examination’ according to Annex 1 of reference (d) above shall be carried out by the system manufacturer or one of their representatives no later than the first scheduled dry-docking after 1 July 2014, during which a verification is performed to ensure that the system is the same type as evaluated.
- 5.4 As an alternative to replacement, in accordance with reference (i) above, non-compliant on-load release mechanisms may be modified or re-designed by the manufacturer to comply with the revised requirements of the LSA Code referred to in reference (h) above. This is subject to the modified system being evaluated as compliant in accordance with the guidelines under reference (i) above.
- 5.5 It shall be noted that revisions to the LSA Code specified in reference (h) shall enter into force on 1 January 2013. However, provisions for early application are cited in IMO circular MSC.1/Circ.1393 – reference (j) above.
- 5.6 In accordance with paragraph 2.1 of this circular, the IMO Maritime Safety Committee has agreed that on-load release and retrieval systems installed on ships constructed on or after 1 July 2014 shall comply with the revised requirements of the LSA Code referred to in reference (h) above.
- 5.7 Furthermore, Marshall Islands ship owners are strongly encouraged to ensure that on-load release and retrieval systems installed on ships constructed on or after 1 January 2012 but before 1 July 2014 comply with the revised requirements of the LSA Code referred to in

reference (h) above, subject to approval processes being in place for the new system which comply with the revised requirements.

6.0 Secondary Safety System

- 6.1 When selecting new or replacement lifeboat on-load release hooks, it is recommended that ship owners/operators select designs incorporating a permanent secondary safety system.
- 6.2 Alternatively, where a new or replacement lifeboat on-load release hook incorporating a permanent secondary safety system cannot be obtained, ship owners/operators may select fail safe and innovative hook designs with particular characteristics that ensure the system cannot be released unintentionally or by the force of gravity.
- 6.3 A secondary safety system is deemed to be an additional device or design element, independent of the release mechanism which, prevents the on-load release hook from inadvertently opening during launching or recovery of the lifeboat, cannot open until the device is removed or unlocked, and can only be physically employed when the on-load release hook has been correctly reset.
- 6.4 A typical example of a secondary safety system would be a locking pin inserted into the on-load release hook that can only be inserted when the on-load release hook is correctly reset. Further, a typical example of a fail-safe hook design would be a load-over-top hook design in which the weight of the boat holds the on-load release hook positively closed.
- 6.5 Under no circumstances shall a fall preventer device, referred to under section 7.0 of this Notice, be considered as a permanent secondary safety system.
- 6.6 Ship's masters shall ensure that when a lifeboat on-load release hook with a secondary safety system is fitted, the secondary safety system shall be used during all drills (both launch and recovery) and specifically at all times when the lifeboat has crew or other personnel aboard. After the drill has been concluded, the secondary safety system shall be removed or disengaged.

7.0 Fall Preventer Devices

- 7.1 Notwithstanding the provision of paragraph 6 in reference (i) above, the Administrator remains of the view that Fall Preventer Devices (FPDs) shall not be considered a substitute for an unstable or improperly designed lifeboat on-load release hook. The principal concern being the potential for misuse or misapplication of the FPD, which could contribute to further accidents during drills or loss of life in the event the device cannot be disengaged in an actual emergency. With this in mind, if the ship owner/operator decides to provide FPDs for use, they shall be designed, installed, inspected, and utilized in accordance with reference (k) above.

8.0 Lifeboat Damage

- 8.1 When any lifeboat is damaged and declared unseaworthy or is found in need of repair and no replacement boat is readily available, it may be substituted, as a temporary measure, with life raft(s) capacity for all the persons on board, but only with specific approval of the Administrator. The minimum survival craft capacity prescribed by SOLAS Chapter III must be maintained.
- 8.2 Where the defective boat is a motorboat and there is no other motor lifeboat on board, the total survival craft capacity provided is to include a powered rescue boat meeting the requirements of Regulation III/31.2 of SOLAS.
- 8.3 These temporary measures will be limited to the minimum period of time required for replacement and, in general, will not exceed three (3) months.

9.0 Lifeboat Equipment Dispensation (LSA Code Section 4.4.8.32)

- 9.1 For the purposes of LSA Code Section 4.4.8.32, Mobile Offshore Drilling Units and Mobile Offshore Units (i.e., FPSO, FSU, or other permanent moored factory or storage vessels) while on station and being served by a standby vessel, or when on station and located within 25 kilometers (16 miles) of another manned platform, MODU, MOU, or from a harbor of safe refuge, are considered by this Administrator to be engaged on a voyage that will permit the food rations (LSA Code Section 4.4.8.12) and fishing tackle (LSA code Section 4.4.8.26) to be dispensed with. Lifeboat equipment dispensations for all other vessels will be handled on a case by case basis. Requests for such dispensations should be forwarded to technical@register-iri.com.