



TUVALU SHIP REGISTRY

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MARINE CIRCULAR

MC-16/2011/1

5/2014

FOR: Ship Owners, Ship Managers, Ship Operators, Ship Masters, Ship Officers, Classification Societies

SUBJECT: LIFEBOAT EQUIPMENT SERVICING & MAINTENANCE REQUIREMENTS

DEFINITIONS:

The following abbreviations stand for:

- "FPD" – Fall Preventer Devices
- "FPSO" – Floating Production, Storage, and Offloading Unit
- "FSU" – Floating Storage Unit
- "IMO" – International Maritime Organization
- "LSA" – Life-Saving Appliance
- "LSA Code" – International Life-Saving Appliances Code, as amended
- "MODU" – Mobile Offshore Drilling Unit
- "MOU" – Mobile Offshore Unit
- "MSC" – Maritime Safety Committee (IMO)
- "RO" – Recognized Organization as defined by IMO Resolution A.789(19).
- "SOLAS" – International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended

The term "Administration" shall mean Tuvalu Ship Registry

PURPOSE:

The purpose of this marine circular is to address the issues and recent regulatory developments relating to lifeboats and on-load release hooks.

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) Tuvalu Marine Circular MC-5/2012/1
- (d) MSC.1/Circ.1206/Rev.1, Measures to Prevent Accidents with Lifeboats
- (e) Tuvalu Marine Circular MC-7/2011/1
- (f) Tuvalu Marine Circular MC-2/2012/1
- (g) IMO Resolution MSC.317(89), Amendments to the International Convention for the Safety of Life at Sea, 1974, as amended
- (h) IMO Resolution MSC.320(89), Amendments to the International Life-Saving Appliance (LSA) Code
- (i) IMO MSC.1/Circ.1392, Guidelines for Evaluation and Replacement of Lifeboat Release and Retrieval Systems
- (j) IMO MSC.1/Circ.1327, Guidance for the Fitting and Use of Fall Preventer Devices (FPDs)
- (k) IMO MSC.1/Circ.1445, Clarification of the term "First Scheduled Dry-Docking" as contained in SOLAS Regulation III/1.5, as amended by Resolution MSC.317(89)
- (l) IMO MSC.1/Circ.1419, Guidelines for the Standardization of Lifeboat Control Arrangements

APPLICATION:

This marine circular applies to all ships, MODUs and MOUs subject to SOLAS.

CONTENTS:

1. Approval of Equipment

The approval of lifeboat equipment shall be conducted in accordance with this Administration's policy on LSA equipment approvals set forth under Section 1 of Tuvalu Marine Circular MC-5/2012/1.

2. Servicing & Maintenance

2.1. Annex 1 of MSC.1/Circ.1206/Rev.1 should be followed for the inspection, maintenance of lifeboats, launching appliances, and on-load release gear, taking into account Section 3 of this marine circular.

2.2. Maintenance and inspection of lifeboat air cylinders shall be performed in accordance with Tuvalu Marine Circular MC-7/2011/1. Requirements for the air cylinders for totally enclosed lifeboats shall be the same, where applicable, as with Self-Contained Breathing Apparatus air bottles.

3. 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 Administration is provided in Tuvalu Marine Circular MC-2/2012/1.

4. Lifesaving Appliance Falls

4.1. In accordance with SOLAS, falls used for launching lifesaving appliances shall be inspected periodically in accordance with MSC.1/Circ.1206/Rev.1, 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. 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 IMO Resolution MSC.317(89), 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 IMO Resolution MSC.320(89), 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. The first scheduled dry-docking" means the "first scheduled out of water survey of the ship's outer bottom" in accordance to SOLAS Reg III/1.5, as amended by MSC.1/Circ.1445, and MSC.1/Circ.1419 clarifies that the on-load release mechanisms need not be compliant during an in-water survey should it occur before a dry-docking.

- 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, ROs acting on behalf of this Administration 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 (see IMO MSC.1/Circ.1392). 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 MSC.1/Circ.1206/Rev.1 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 IMO MSC.1/Circ.1392, 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 IMO Resolution MSC.320(89). This is subject to the modified system being evaluated as compliant in accordance with the guidelines under IMO MSC.1/Circ.1392.
- 5.5. It shall be noted that revisions to the LSA Code specified in IMO Resolution MSC.320(89) shall enter into force on 1 January 2013.
- 5.6. The MSC 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 IMO Resolution MSC.320(89).
- 5.7. Ship owners / operators 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 IMO Resolution MSC.320(89), subject to approval processes being in place for the new system which comply with the revised requirements.
- 5.8. Take note the guidelines set forth in MSC.1/Circ.1419 should be used when applying the relevant provisions of paragraph 4.4.7.6 of the LSA Code, as amended.

6. 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 FPD be considered as a permanent secondary safety system.

- 6.6. 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. Fall Preventer Devices

- 7.1. Notwithstanding the provision of paragraph 6 of IMO MSC.1/Circ.1392, this Administration remains of the view that 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 IMO MSC.1/Circ.1327.

8. Temporary Measures for Lifeboat(s) under Repair

- 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 Administration. 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. Lifeboat Equipment Dispensation (LSA Code Section 4.4.8.32)

- 9.1. For the purposes of LSA Code Section 4.4.8.32, MODUs and MOUs (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 10 Nautical miles (18 kilometers) of another manned platform, MODU, MOU, or from a harbour of safe refuge, are considered by this Administration 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@tvship.com.

Yours sincerely,

Deputy Registrar
Tuvalu Ship Registry