



INFORMATION BULLETIN No. 87

Safety of Survival Craft On-load Release Gear and Launching Appliances

Guidance and Instructions for Bahamas Recognised Organisations, Bahamas Approved Nautical Inspectors, Ship Owners, Managers and Masters

1. Purpose

- 1.1. The issue of survival craft safety remains a significant concern and the IMO Maritime Safety Committee (MSC) has, following discussion, issued IMO Circulars MSC.1/Circ.1206 Rev.1 "*Measures to Prevent Accidents with Lifeboats*" and MSC.1/Circ.1277 "*Interim Recommendation on Conditions for Authorisation of Service Providers for Lifeboats, Launching Appliances and On-Load Release Gear*".
- 1.2. This Bulletin is intended to clarify the policy of The Bahamas Maritime Authority (BMA) on the application of SOLAS Regulations III/20.3 and III/20.11 and the associated IMO circulars, in light of on-going discussion at IMO.
- 1.3. This Bulletin is to be read in conjunction with BMA Information Bulletin No. 72 and IMO Circulars MSC.1/Circ.1206 Rev.1 and MSC.1/Circ.1277.

2. Application

- 2.1. This Bulletin applies to the following:
 - All ships' lifeboats and rescue boats fitted with on-load release gear as referred to in SOLAS III/20.11.2;
 - All ships' davit launched liferaft automatic release hooks as referred to in SOLAS III/20.11.3;
 - All ships fitted with survival craft launching appliances as referred to in SOLAS III/20.11.1.

3. SOLAS Regulations III/20.3 & III/20.11

3.1. SOLAS Regulation III/20.3

3.1.1. This Regulation refers to maintenance, testing and inspections of all life-saving equipment and requires that these activities are carried out based upon the guidelines contained in MSC.1/Circ.1206 Rev.1.

3.1.2. It must be noted that specific requirements regarding annual thorough examination and testing of launching appliances and on-load release gear are contained within SOLAS Regulation III/20.11.

3.2. SOLAS Regulation III/20.11

3.2.1. Periodic servicing - this Regulation requires

- i. annual thorough examination and operational test of launching appliances and on-load release gear, and,
- ii. at least every five years, overhaul of on-load release gear (for lifeboats and rescue boats) and automatic release hooks (for davit-launched liferafts) and load testing.

3.2.2. The maintenance required by SOLAS III/20.11.1.1, 20.11.2.1, and 20.11.3.1 is not required to be carried out in conjunction with annual, periodic or renewal survey, but it must be verified at the time of survey.

4. Status of MSC.1/Circ.1206 Rev.1

4.1. SOLAS Regulation III/20.3.1 states that "...maintenance, testing and inspections shall be carried out based on the guidelines..." (IMO Circular MSC/Circ.1206 Rev.1). Companies¹ should take into account the existing guidance in the context of their obligations under ISM Code.

¹ The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Bahamas Merchant Shipping Act.

5. Requirements for personnel performing inspection, servicing and repair

- 5.1. The BMA does not authorise or approve service providers unless they are based in The Bahamas.
- 5.2. In line with the responsibilities specified in Annex 1 paragraph 6 of MSC/Circ.1206 Rev.1 the Company is responsible for assessing and selecting a suitable competent person, and appropriate procedures relating to this activity must be established within the Safety Management System.
- 5.3. The Company should ensure that documentary evidence is available to third parties to confirm that the competent person carrying out the service, maintenance, repair, and inspection and examination activities covered by SOLAS Regulation III/20.11 is properly trained and familiar with these duties.
- 5.4. For the purposes of SOLAS Regulation III/20.11, the BMA considers that “properly trained personnel familiar with the system” may be:
 - i. representatives of the manufacturer; or
 - ii. a person trained by the manufacturer; or
 - iii. representatives of an organisation authorised or certified by the manufacturer; or
 - iv. representatives of an organisation authorised under the provisions of MSC.1/Circ.1277 by a SOLAS contracting party or a Bahamas Recognised Organisation acting on behalf of a SOLAS contracting party; or
 - v. Other persons with proven experience in conducting this type of work. The selection of persons in this category is the responsibility of the Company and the criteria and procedures for selection should be documented in the safety management system and take into account the following:
 - Existing Flag State or Recognised Organisation approvals;
 - Existing manufacturer approvals;
 - Suitable training programmes for operators/technicians/inspectors;
 - Review of servicing records/history for similar equipment;
 - Access to spare parts and servicing instructions;
 - Any quality management system certification, such as ISO 9000 series or equivalent.

6. Records

- 6.1. Records of all activities relating to the referenced regulations must be retained on board for inspection by Bahamas Approved Nautical Inspectors, Recognised Organisation Surveyors/Auditors and Port State Control Officers.

7. Revision History

Rev.4 (16 August 2012) – Complete revision

Rev.5 (24 April 2014) – Reference to MSC/Circ.955 in Paragraph 3.2.2 removed.