MARINE NOTICE 84



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Marine Evacuation Systems

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations and surveyors

This Marine Notice supersedes BMA Information Bulletin No.174

1. **Purpose**

- 1.1. The purpose of this Marine Notice is to provide clarification on the requirements of Regulation 20.8 of Chapter III of the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS Chapter III), in respect of Marine Evacuation Systems (MES¹).
- 1.2. This Notice also provides Bahamas Maritime Authority (BMA) reporting criteria for MES deployments.

2. **Application**

2.1. This Notice applies to all ships registered in the Bahamas that are fitted with MES.

3. **Background**

- Regulation 3.14 of SOLAS Chapter III defines an MES as "an appliance for the rapid 3.1. transfer of persons from the embarkation deck of a ship to a floating survival craft". MES are widely used on ships, especially on passenger ships and high-speed craft.
- 3.2. The BMA has received several anecdotal reports of unsuccessful MES deployments over recent years.
- 3.3. The United Kingdom also raised the issue of unsuccessful MES deployments at the 97th session of the International Maritime Organization (IMO) Maritime Safety Committee and requested other Administrations to share their experience, with a view to future collaboration and information sharing.

MN 84 v 1.0

¹ Similar requirements are included in the Code of Safety for Dynamically Supported Craft, A.373(X), as amended, the International Code of Safety for High Speed Craft 1994 (1994 HSC Code), MSC.36(63), as amended and the International Code of Safety for High Speed Craft 2000 (2000HSC Code), MSC.97(73), as amended.



3.4. In order to improve the oversight and reporting of MES deployments and to gather evidence of unsuccessful MES deployments, the BMA has introduced more stringent monitoring of MES deployments.

4. Service Intervals and Extensions

- 4.1. Regulation 20 of SOLAS Chapter III requires that MES be serviced at intervals not exceeding 12 months.
- 4.2. The BMA may extend the service period by up to 5 months if a ship is trading to ports where there are no approved service stations or where the service is proved to be impracticable, in accordance with Regulation 20.8.1.1 of SOLAS Chapter III.
- 4.3. The BMA may allow an extension to the servicing interval in line with the relevant annual or periodical survey window, i.e., 12 months +/- 3 months, up to a maximum of 18 months from the last date of servicing, in accordance with IMO Circular MSC/Circ.955. In such instances where the latest servicing and previous servicing were not completed within a 12- month period but were done within the relevant annual or periodical survey windows, the Company² does not need to apply to the BMA for an extension.
- 4.4. In circumstances where MES are serviced outside the relevant annual or periodical survey window and cannot be serviced within the 12-month period, the Company shall apply to the BMA for an extension, as per Marine Notice 8.
- 4.5. The Recognised Organisation is to review the application and seek authorisation from the BMA for the extension.
- 4.6. When reviewing applications for extension to service intervals, Recognised Organisations must verify that the justification for the extension is reasonable in the circumstances.
- 4.7. In considering any extension, due regard shall be given to dated components which may expire during this extension period (e.g., food, water, seasickness tablets, etc.). Otherwise, extensions shall be in line with the specified SOLAS allowances.
- 4.8. The period of the extension shall be limited to that considered necessary to carry out the required servicing and/or survey completion, but in no case shall the extension be for more than 5 months, except for the cases described in paragraph 4.3.

² The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships to which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Merchant Shipping Act



4.9. Any services or changes/modifications to an MES shall be recorded. This may be in a separate MES log or in the deck log book and/or planned maintenance system.

5. Training

- 5.1. All crew members involved in MES deployment shall receive adequate training, in accordance with manufacturer's instructions.
- 5.2. The BMA encourages Companies to use rotational MES deployment tests, as required by Regulation 20.8.2 of SOLAS Chapter III, 1994 HSC Code³ 8.9.7.2 or 2000 HSC Code⁴ 8.9.8 (as applicable), as opportunities for training and familiarisation of as many crew members as possible.

6. MES deployment tests

- 6.1. Paragraph 6.2.2.2 of the LSA Code⁵ requires that, when more than one MES is fitted, at least 50% of MES shall be deployed after installation. Subject to those deployments being satisfactory, the remaining systems are to be deployed within 12 months of installation.
- 6.2. In addition, Regulation 20 of Chapter III of SOLAS, Chapter 8 of the DSC Code⁶, Chapter 8 of the 1994 HSC Code and Chapter 8 of the 2000 HSC Code require, in addition to annual servicing, that each MES shall be deployed on a rotational basis at least once every six years.
- 6.3. The Company is to invite an authorised representative to attend all MES deployment tests. Authorised representatives for MES deployment tests are:
 - i. a Recognised Organisation (Class) surveyor; or
 - ii. a Bahamas Approved Nautical Inspector; or
 - iii. a member of BMA technical staff
- 6.4. In order to let the ship's crew experience a realistic training scenario and to ensure that the MES deploys correctly, it is important, unless a safety risk has been identified, that nobody intervenes whilst the crew are conducting the MES deployment procedures.
- 6.5. Deployment tests shall be recorded in the Official Log Book.

³ MSC.36(63) International Code of Safety for High Speed Craft, 1994, as amended

⁴ MSC.97(73) International Code of Safety for High Speed Craft, 2000, as amended

⁵ MSC.48(66) International Life-Saving Appliance Code, as amended

⁶ <u>A.373(X) Code of Safety for Dynamically Supported Craft</u>, as amended



- 6.6. During the deployment test, the authorised representative is to:
 - i. observe the test and record the details in the MES Deployment Reporting Form, which can be downloaded here;
 - ii. evaluate the crew competency and familiarisation with the MES and its deployment;
 - iii. record the number of persons that are evacuated via the MES and the time taken for the test from system activation/deployment to complete evacuation of those persons taking part in the deployment test;
 - iv. note any modifications, workarounds or intervention from the crew or third parties (such as manufacturer or service company representatives) required to ensure deployment;
 - v. take notes and photographs of the deployment, any failures and anything of concern.
- 6.7. The deployment test shall be recorded as "successful", "successful by secondary means", "partially successful" or "unsuccessful", as indicated below. These terms are aligned with United Kingdom Maritime & Coastguard Agency MGN558(M)⁷ for consistency.
- 6.7.1. A **successful deployment** is when the system functions entirely as expected and would have resulted in a successful evacuation within the time frame specified in SOLAS or the HSC Code, as applicable.
- 6.7.2. **Successful by secondary means** is when the MES fails to deploy using the primary means of activation but deploys correctly by secondary means of activation in accordance with manufacturer's instructions.
- 6.7.3. A *partially successful deployment* outcome will be determined by all of the following factors:
 - i. The deployment and evacuation could have taken place within the permitted time frame, taking into account the need for slower times for safe exercises, however aspects of the system did not function as expected by manufacturer's guidelines.
 - ii. Any intervention or additional work required for the deployment to take place could have been carried out safely and competently by a member of the crew; and
 - iii. Any fault found is sufficiently minor to not warrant a cause for concern from evacuees.
- 6.7.4. An *unsuccessful deployment outcome* will be determined by any of the following factors:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/571005/MGN_558_HC.rev.2.pdf

⁷ MGN 558(M) can be downloaded at:



- During pre-deployment checks, unplanned actions were required by the equipment manufacturer or its representative, without which deployment would not have occurred; or
- ii. Deviations from the manufacturer's launching instructions were required to facilitate a launch; or
- iii. Full MES capacity would not have been able to embark the rafts from the ship in the permitted time frame, taking into account the need for slower times for safe exercises.
- iv. Unexpected deflation of the raft or link raft.
- 6.8. When a deployment failure is identified, the BMA recommends, where practicable, to deploy another MES, within the agreed time frame. The BMA may provide additional instructions, based on the report and root cause analysis for the failure. The root cause analysis plus the planned or implemented corrective and preventative actions shall be included in the report for unsuccessful deployments. Potential systemic failures identified for an MES type (e.g., because of wrong installation, defective component, etc.) shall be reported by the manufacturer together with the list of all ships where that MES is installed, the planned corrective actions and the proposed timeframe for implementing the corrective actions on those ships.
- 6.9. The completed MES Deployment Reporting Form and any accompanying notes or photographs shall be sent by the authorised representative to the BMA Inspections & Surveys department via email (tech@bahamasmaritime.com). The email subject line should use the format: "MES deployment <Ship Name> <Ship IMO No.> ".

7. USE of MES deployment data

- 7.1. The BMA will collate and evaluate all data received from MES deployment tests.
- 7.2. Companies are invited to provide historical data on MES deployments, if available, from 01 January 2012 to date. Such information should be sent to the BMA Inspections & Surveys department via email (tech@bahamasmaritime.com).
- 7.3. Details of the manufacturer and type of MES deployed and the outcome of the deployment (including details of any faults) may be shared with other flag States to assess any systemic problems with MES, in order to review IMO Regulations if necessary. This data will not identify individual Companies, ships or systems, but will include the manufacturer and model of the MES.

8. Queries

8.1. Any queries on this Notice may be submitted to <u>tech@bahamasmaritime.com</u> or any BMA office.



Revision History

Version	Description of Revision
1.0	First Issue
	- CONCRESS A