



SUB-COMMITTEE ON SHIP DESIGN AND
EQUIPMENT
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Agenda item 6

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MEASURES TO PREVENT ACCIDENTS WITH LIFEBOATS

Guidance on abandon ship drills relating to SOLAS regulation III/19.3.3.3

Submitted by **Dominica, Malta, New Zealand, the Philippines, South Africa, Sweden, BIMCO, ICS, IFSMA, INTERCARGO, INTERTANKO, ITF and OCIMF**

SUMMARY

<i>Executive summary:</i>	The co-sponsors of this document have concerns with regard to Authorities who interpret SOLAS to require ships' crew to be on board lifeboats during launching. It is the interpretation of the co-sponsors, that the master has full discretion for deciding the conditions in which such drills are undertaken. Further, SOLAS explicitly does not require ships' crew to be on board lifeboats during launches when carrying out abandon ship drills. The co-sponsors propose that guidance be issued to clarify the situation in the form of an IMO circular.
<i>Strategic direction:</i>	5.1
<i>High-level action:</i>	5.1.2
<i>Planned output:</i>	5.1.2.1
<i>Action to be taken:</i>	Paragraph 7
<i>Related documents:</i>	DE 46/32; MSC 78/26; resolution MSC.152(78); and ISM Code, paragraph 5.2

Background

1 It has come to the attention of the co-sponsors of this document that some port State control Authorities require crew to be on board lifeboats during launching when carrying out abandon ship drills. The co-sponsors of this document are of the view that this is in clear contradiction of the intent of SOLAS regulation III/19.3.3.3, as the requirement to have crew on board was removed. The co-sponsors are of the view that SOLAS regulation III/19.3.3.3, as currently written, requires each lifeboat to be manoeuvred in the water by its assigned operating crew, but it does not require the lifeboat to be launched with the assigned operating crew in the lifeboat.

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2 At the forty-sixth session of the Sub-Committee on Ship Design and Equipment (DE 46), draft amendments to SOLAS regulation III/19.3.3.3 were agreed. These were subsequently adopted at MSC 78 by means of resolution MSC.152(78) and entered into force on 1 July 2006.

3 Resolution MSC.152(78) amended the text of SOLAS regulation III/19.3.3.3 from:

“Except as provided in paragraphs 3.3.4 and 3.3.5, each lifeboat shall be launched with its assigned operating crew aboard and manoeuvred in the water at least once every three months during an abandon ship drill”.

to:

“Except as provided in paragraphs 3.3.4 and 3.3.5, each lifeboat shall be launched, and manoeuvred in the water by its assigned operating crew, at least once every three months during an abandon ship drill”.

As can be seen, the requirement to launch the lifeboat with crew on board was removed.

4 In addition, the co-sponsors would draw the Sub-Committee’s attention to paragraph 9.31 in the report of DE 46 (DE 46/32), which reads as follows:

“The Sub-Committee agreed to the draft amendments to regulation III/19.3.3.3, as set out in annex 10, for submission to MSC 77 for approval with a view to adoption by MSC 78. As agreed, the text of the draft amendments would leave to the master full discretion for deciding the conditions in which such training and drills should be conducted, bearing in mind that the existing text of regulation III/19.3.1 would still contain the requirement for drills to be conducted, as far as practicable, as if there were an actual emergency.”

5 It is recognized that many accidents have occurred during drills with lifeboats, sometimes with fatalities as a result. Although drills and launches are supposed to familiarize crews with the equipment in case of an emergency, such operations are to be considered hazardous and should be carried out in as safe a manner as is practical. The co-sponsors believe that the master of any ship is in the best position to decide if allowing crew to be on board during such training and drills is safe, and any decision in this regard should be left to the master’s discretion, as per paragraph 5.2 of the ISM Code.

Proposal

6 The co-sponsors propose that an MSC circular should be issued in order to emphasize the intent of SOLAS regulation III/19.3.3.3. This circular would clarify the requirement for each lifeboat to be manoeuvred in the water by its assigned operating crew, and that the lifeboat is not required to be launched with the assigned operating crew aboard. We also propose including text to clarify that having crews on board during lifeboat launches would be left to the master’s full discretion. To assist in this process, a draft MSC circular is attached in the annex to this document.

Action requested by the Sub-Committee

7 The Sub-Committee is invited to:

- .1 consider the proposal in paragraph 7 together with the attached annex and take action as appropriate; and
- .2 request the Secretariat to inform the FSI Sub-Committee as appropriate.

ANNEX

DRAFT MSC CIRCULAR

CLARIFICATION OF SOLAS REGULATION III/19

1 The Maritime Safety Committee, at its [eighty-sixth session (27 May to 5 June 2009)], having considered a recommendation made by the Sub-Committee on Ship Design and Equipment, at its fifty-second session, agreed that there was a need to clarify the application of SOLAS regulation III/19.3.3.3.

2 SOLAS regulation III/19.3.3.3 requires each lifeboat to be launched, and manoeuvred in the water by its assigned operating crew, at least once every three months during an abandon ship drill. This regulation requires each lifeboat to be manoeuvred in the water by its assigned operating crew, but it does not require the lifeboat to be launched with the assigned operating crew on board.

3 Taking into account all safety aspects, it is at the discretion of the master whether crew should be on board lifeboats during their launching. Such authority rests within paragraph 5.2 of the ISM Code.

4 Member Governments are invited to use the above when applying the provisions of SOLAS regulation III/19, and bring it to the attention of all parties concerned and in particular to port State control officers.
