

SUB-COMMITTEE ON SHIP DESIGN AND
EQUIPMENT
55th session
Agenda item 7

DE 55/7/2
13 January 2011
Original: ENGLISH

MAKING THE PROVISIONS OF MSC.1/CIRC.1206/REV.1 MANDATORY

Proposed mandatory use of fall preventer devices in lifeboat fitted with on-load release mechanisms as referred to in SOLAS regulation III/1.5

Submitted by BIMCO, CLIA, ICS, IFSMA, ITF, IPTA, Nautical Institute and OCIMF

SUMMARY

Executive summary: In this document the industry co-sponsors propose mandatory use of fall preventer devices (FPDs) to prevent life threatening accidents in davit launched lifeboats fitted with on-load release hooks

Strategic direction: 5.1

High-level action: 5.1.2

Planned output: 5.1.2.1

Action to be taken: Paragraph 12

Related documents: ISWG LRH/2 and ISWG LRH/4

1 Document ISWG LRH/4 reported to the Intersessional Working Group on Lifeboat Release Hooks on a survey across the BIMCO membership during a limited period in July and August of 2010. The reports received included the extent to which fall preventer devices (FPDs) were currently in use and the occurrence of accidents with lifeboats. In the submission it was reported that a number of, but not all members were using FPDs. Some had experienced accidents and were now using FPDs as a result but the variance seemed to verify that the real value of this risk control measure was not universally understood.

2 The co-sponsors are concerned that seafarers' lives continue to remain at risk until a satisfactory system is in place to prove the safety of on-load release hooks and their associated mechanisms. It is the opinion of the co-sponsors that the use of FPDs should be made mandatory with immediate effect.

Discussion

3 The co-sponsors, representing a strong competence in operational aspects of ships' lifeboats, are concerned at the continued exposure of seafarers to unacceptable risk whilst fulfilling their obligations under SOLAS for exercising lifeboats. Until a permanent and robust solution to the on-load release hook problem has entered into force, there is an urgent need for interim solutions.

4 Despite the guidelines given in MSC.1/Circ.1327 on FPDs the survey conducted by BIMCO clearly showed that FPDs were not universally used on all ships.

5 The co-sponsors consider that good risk management should be applied to lifeboat operations as much as to other shipboard activities. It is known that lifeboat accidents associated with failures in on-load release gear can, and do, result in fatality or maiming and risk assessment therefore calls for additional safeguards to be used.

6 Additional safeguards can be implemented by removing the hazard to seafarers of premature detachment of the boat in one of two ways:

- .1 prohibiting crew from entering lifeboats without safeguards in place; or
- .2 introducing measures to prevent the lifeboat falling in the event of failure of the primary connection.

7 The method in subparagraph 6.1 should be self-explanatory although this method is often used to launch boats that are subsequently boarded by rope ladder. This method of boarding, quite apart from being particularly slow, is not without risks of its own. The method in subparagraph 6.2 can be achieved by the installation of either an alternative load path (strops or slings) or a lock that prevents the mechanism from operating (most probably pins). Both measures are described in MSC.1/Circ.1327 as FPDs.

8 The method in subparagraph 6.1 has been practised for some time by many masters but it has the disadvantage of de-skilling the crew through reduced familiarity with the equipment. This seems to be contradictory to the intentions of the International Safety Management (ISM) Code in relation to training. The method in subparagraph 6.2 is being practised by some but not all masters. Furthermore there have been reports of use of FPDs being opposed by Port State Control Officers who seem concerned that the measure will in some way interfere with the proper operation of the on-load release gear.

9 The co-sponsors would suggest that the unacceptable risk of fatality or injury, if FPDs are not used, is significantly higher than the risk to seafarers due to inadvertently leaving the FPD in place.

Proposal

10 The co-sponsors consider that the use of FPDs should be made mandatory in order to prevent premature detachment causing an unprotected fall of a lifeboat. Risk of premature detachment should be deemed to exist unless proven otherwise by design review and/or approval of lifeboats that use on-load release hooks as their means of attachment to the falls when they are not secured in their davits or afloat in the water.

11 Safeguards in the form of FPDs, should be implemented immediately and as an interim measure pending additional proposed amendments to the "Guidelines for evaluation and replacement of lifeboat on load release mechanisms", to chapter IV of the LSA Code. The measures should remain in place at all times when the hazards associated with launching and recovering boats remain with significant risk. Only when the on-load release hook and its associated mechanisms have been proven safe to the latest standards should the use of FPDs be terminated.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider this proposal, and decide as appropriate.