

SUB-COMMITTEE ON SHIP SYSTEMS AND  
EQUIPMENT  
4th session  
Agenda item 12

SSE 4/12/9  
11 January 2017  
Original: ENGLISH

**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY,  
SECURITY, AND ENVIRONMENT RELATED CONVENTIONS**

**Unified interpretation on single fall and hook system used  
for launching a lifeboat or rescue boat**

**Submitted by IACS**

**SUMMARY**

*Executive summary:* The annex to this document provides a copy of IACS unified interpretation (UI) SC281 on "Single fall and hook system used for launching a lifeboat or rescue boat – Interpretation of the LSA Code as amended by resolution MSC.320(89); and the *Revised recommendation on testing of life-saving appliances* (resolution MSC.81(70)), as amended by resolution MSC.321(89)"

*Strategic direction:* 1.1

*High-level action:* 1.1.2

*Output:* 1.1.2.3

*Action to be taken:* Paragraph 10

*Related documents:* None

**Background**

1 Paragraph 5.1.1.1 of the LSA Code states:

"Except as provided by this section, all rescue boats shall comply with the requirements of paragraphs 4.4.1 to 4.4.7.4 inclusive, excluding paragraph 4.4.6.8, and 4.4.7.6, 4.4.7.8, 4.4.7.10, 4.4.7.11 and 4.4.9 except that, for all rescue boats, an average mass of 82.5 kg shall apply to paragraph 4.4.2.2.1. ..."

2 It is evident that paragraph 4.4.7.6 of the LSA Code is an overarching requirement that needs to be applied to rescue boats.

3 However, paragraph 4.4.7.6.17 of the LSA Code also allows for exemptions whereby a single fall and hook "off-load" system may be used for launching rescue boats as follows:

"where a single fall and hook system is used for launching a lifeboat or rescue boat in combination with a suitable painter, the requirements of paragraphs 4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15 need not be applicable; in such an arrangement a single capability to release the lifeboat or rescue boat, only when it is fully waterborne, will be adequate."

4 As clarified in the *Standardized life-saving appliance evaluation and test report forms* (MSC/Circ.980/Add.2), paragraph 6.9 of part 1 of the original version of the *Revised recommendation on testing of life-saving appliances* (resolution MSC.81(70)) did not provide for testing of release mechanisms of "single fall systems not intended for on-load operation".

5 IACS notes that paragraph 6.9 of part 1 of resolution MSC.81(70) has been subsequently amended by resolution MSC.321(89), in particular regarding the conditioning and testing provisions (paragraph 6.9.4) and the testing of a further release mechanism (paragraph 6.9.5). However, it is not clear if paragraph 6.9.5.2 of this amended version of resolution MSC.81(70) applies to a single fall and hook "off-load" release mechanisms.

## Discussion

6 Based on an analysis of the above provisions, IACS has concluded that the latest versions of the LSA Code and resolution MSC.81(70) do not clearly identify the requirements for "off-load" release mechanisms fitted on rescue boat single fall launching appliances.

7 It is recognized that single fall release mechanisms intended for rescue boats must be properly tested. In this regard, IACS considers that the identification of any testing not considered to be applicable to such systems should be on the basis of the provisions in paragraph 4.4.7.6.17 of the LSA Code, as amended by resolution MSC.320(89).

8 Based on the foregoing, IACS has developed a unified interpretation based on the following principles:

- .1 paragraphs 4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15 of the LSA Code need not be applied in respect to a single "off-load" fall and hook system;
- .2 the release mechanism tests in paragraphs 6.9.1, 6.9.2, 6.9.3 and 6.9.4 of part 1 of resolution MSC.81(70), as amended, need not be applied for "off-load" only type release mechanisms;
- .3 in paragraph 6.9.5.1 of part 1 of resolution MSC.81(70), as amended, the "off-load" type release mechanism should be subject only to actuation force measurement. If a cable is used, it should be of the maximum length specified by the manufacturer and secured in the same manner it would be secured in a lifeboat or a rescue boat;
- .4 a tensile strength test is to be performed for "off-load" type release in accordance with paragraph 6.9.5.2 of part 1 of resolution MSC.81(70), as amended;
- .5 the release mechanism may be installed either in the boat or on the davit fall; and

- .6 notwithstanding paragraphs 8.1 to 8.4 above, other single fall arrangements (i.e. on-load/off-load type) need to comply with all the requirements of paragraph 4.4.7.6 of the LSA Code and be tested in accordance with paragraphs 6.9.1 to 6.9.5 of part 1 of resolution MSC.81(70), as amended.

9 Consequently, IACS has developed IACS unified interpretation (UI) SC281, a copy of which is provided in the annex. The Sub-Committee is invited to note that IACS members will uniformly implement IACS UI SC281 for approvals issued in accordance with SOLAS regulation III/34 and the LSA Code on or after 1 July 2017, unless they are provided with written instructions to apply a different interpretation by the Administration on whose behalf they are authorized to act as a recognized organization.

**Action requested of the Sub-Committee**

10 The Sub-Committee is invited to consider the analysis and discussion provided above together with the copy of IACS UI SC281, as set out in the annex, and take action as appropriate.

\*\*\*



ANNEX

SC  
**281**  
(July  
2016)

# Single fall and hook system used for launching a lifeboat or rescue boat – Interpretation of the LSA Code as amended by MSC.320(89) and MSC.81(70) as amended by MSC.321(89)

## Regulation

Paragraph 4.4.7.6.17 of the LSA Code states:

*"Where a single fall and hook system is used for launching a lifeboat or rescue boat in combination with a suitable painter, the requirements of paragraphs 4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15 need not be applicable; in such an arrangement a single capability to release the lifeboat or rescue boat, only when it is fully waterborne, will be adequate."*

MSC/Circ.980 Add.2 states the following two exemptions in the rescue boat test section:

*"Single fall systems not intended for on-load operation are exempt from this test [MSC.81(70) Part1/6.9.1-2]."*

*"This test [MSC.81(70) Part1/6.9.4] is not applicable to single fall systems not intended for on-load operation."*

## Interpretation

1. Paragraphs 4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15 of the LSA Code need not be applied when a single fall and hook system is used for launching a lifeboat or a rescue boat in combination with a suitable painter, and the hook system has a single capability to release the lifeboat or rescue boat, only when it is fully waterborne (off-load).
2. The release mechanism tests 6.9.1, 6.9.2, 6.9.3 and 6.9.4 of MSC.81(70), Part 1, as amended, need not be applied for off-load only type release mechanisms on the basis of the exemption provided in paragraph 4.4.7.6.17 of the LSA Code as amended by MSC.320(89).
3. In paragraph 6.9.5.1 of MSC.81(70), Part 1, as amended, the off-load type release mechanism shall be subject only to actuation force measurement. If a cable is used, it shall be of the maximum length specified by the manufacturer, and secured in the same manner it would be secured in a lifeboat or a rescue boat.
4. A tensile strength test is to be performed for off-load type release as per paragraph 6.9.5.2 of MSC.81(70), Part 1, as amended.
5. The release mechanism may be installed either in the boat or on the davit fall.

6. Notwithstanding paragraph 2 to 4 above, other single fall arrangements (i.e. on-load/off-load type) shall comply with all requirements of paragraph 4.4.7.6 of the LSA Code and be tested in accordance with paragraphs 6.9.1 to 6.9.5 of MSC.81(70), Part 1, as amended.

---

Note:

1. This Unified Interpretation is to be uniformly implemented by IACS Societies for approvals issued in accordance with SOLAS III/34 and the LSA Code on or after 1 July 2017.

---

End of Document
--------------------