

SUB-COMMITTEE ON SHIP SYSTEMS AND  
EQUIPMENT  
6th session  
Agenda item 12

SSE 6/12/2  
20 December 2018  
Original: ENGLISH

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

**Clarification on the application of the requirement to launch free-fall lifeboats with the  
ship making headway at speeds up to 5 knots in calm water**

**Submitted by IACS**

**SUMMARY**

*Executive summary:* This document discusses the implementation of SOLAS regulation III/33.2 and paragraph 5.4 of part 2 of resolution MSC.81(70), as amended, and seeks clarification from the Sub-Committee on the matter of the application of the requirement to launch free-fall lifeboats with the ship making headway at speeds up to 5 knots in calm water

*Strategic direction, if applicable:* 6

*Output:* 6.1

*Action to be taken:* Paragraph 8

*Related documents:* None

**Introduction**

1 SOLAS regulation III/33.2 states the following:

"On cargo ships of 20,000 gross tonnage and upwards, lifeboats shall be capable of being launched, where necessary utilizing painters, with the ship making headway at speeds up to 5 knots in calm water".

2 Paragraph 4.4.1.3.2 of the LSA Code on general requirements for lifeboats states the following:

"4.4.1.3 All lifeboats shall be of sufficient strength to:

...

.2 be capable of being launched and towed when the ship is making headway at a speed of 5 knots in calm water."

3 Paragraph 5.4 of part 2 of resolution MSC.81(70) on the *Revised Recommendation on Testing of Life-Saving Appliances*, as amended, states the following:

"5.4 Launch test

It should be demonstrated that the fully equipped lifeboat on cargo ships of 20,000 gross tons or more and rescue boat can be launched from a ship proceeding ahead at a speed of not less than 5 knots in calm water and on an even keel. There should be no damage to the lifeboat or the rescue boat or their equipment as a result of this test."

### **Discussion**

4 As specified above, neither SOLAS regulation III/33.2, nor section 4.4.1.3.2 of the LSA Code, nor paragraph 5.4 of part 2 of resolution MSC.81(70), as amended, clearly specifies the non-application of these requirements to free-fall lifeboats.

5 The expression used in the regulation, the Code and the Revised Recommendation only refers to "lifeboats", which can be read literally as "all lifeboats, including free-fall lifeboats".

6 IACS considers that as the launching of a free-fall lifeboat from the stern of the ship while making headway at speeds of not less than 5 knots in calm water does not carry additional risk or hazard, then the requirements referred to in paragraphs 1 to 3 above should be interpreted as being only applicable to davit-launched lifeboats and not applicable to free-fall lifeboats. Additionally, IACS does not consider that these requirements apply to the secondary means of launching of free-fall lifeboats.

7 If the Sub-Committee concurs with IACS's view as provided in paragraph 6 above and if it considers that this issue can be addressed by a unified interpretation, IACS offers to draft such an interpretation with a view to submitting it to the Sub-Committee's next session for consideration.

### **Action requested of the Sub-Committee**

8 The Sub-Committee is invited to consider the foregoing, in particular, the proposals in paragraphs 6 and 7 above and to take action, as appropriate.