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**AMENDMENTS TO PARAGRAPH 4.4.7.6.17 OF THE LSA CODE CONCERNING SINGLE
FALL AND HOOK SYSTEMS WITH ON-LOAD RELEASE CAPABILITY**

Proposal for amendments to paragraph 4.4.7.6.17 of the LSA Code

**Submitted by Marshall Islands, New Zealand, ICS, BIMCO, IACS, IFSMA,
INTERCARGO, IMarEST, InterManager, IPTA, RINA, IBIA and the Nautical Institute**

SUMMARY

Executive summary: The document provides further justification aimed at addressing the concerns expressed during discussions at SSE 6 and proposes amendments to paragraph 4.4.7.6.17 of the LSA Code in order to ensure adequate safety standards for lifeboats and rescue boats fitted with single fall and hook systems with on-load release capability

Strategic direction, if applicable: 6

Output: 6.14

Action to be taken: Paragraph 16

Related documents: MSC 99/20/8, MSC 99/20/8/Add.1, MSC 99/22; SSE 6/13 and SSE 6/18

Background

1 The sixth session of the Sub-Committee on Ship Systems and Equipment (SSE 6) considered document SSE 6/13 (Marshall Islands et al.), recalling the discussion that had taken place at the ninety-ninth session of the Maritime Safety Committee (MSC 99) regarding the amendments to paragraph 4.4.7.6.17 of the LSA Code to ensure adequate safety standards for lifeboats and rescue boats fitted with single fall and hook systems with on-load release capability.

2 In considering the document, the Sub-Committee, while acknowledging that several delegations supported the substance of the proposal for further consideration by the Working Group on Life-Saving Appliances, also noted concerns in relation to the applicability of these exemptions (SSE 6/18, paragraph 13.4).

3 Consequently, the Sub-Committee agreed that further consideration of this matter was necessary and, therefore, invited the co-sponsors of document SSE 6/13 to submit a revised proposal to the next session (SSE 6/18, paragraph 13.5).

Discussion

4 Paragraph 4.4.7.6.7 of the LSA Code states:

".7 the mechanism shall have two release capabilities: normal (off-load) release capability and on-load release capability:

.7.1 normal (off-load) release capability shall release the lifeboat when it is waterborne or when there is no load on the hooks, and not require manual separation of the lifting ring or shackle from the jaw of the hook; and

.7.2 on-load release capability shall release the lifeboat with a load on the hooks. This release mechanism shall be provided with a hydrostatic interlock unless other means are provided to ensure that the boat is waterborne before the release mechanism can be activated. In case of failure or when the boat is not waterborne, there shall be a means to override the hydrostatic interlock or similar device to allow emergency release. This interlock override capability shall be adequately protected against accidental or premature use. Adequate protection shall include special mechanical protection not normally required for off-load release, in addition to a danger sign. The protection shall be deliberately destroyed by applying a suitable minimum force, for instance by breaking a protection glass or translucent cover. A label or thin wire seal is not considered sufficiently robust. To prevent a premature on-load release, on-load operation of the release mechanism shall require multiple, deliberate and sustained action or actions by the operator;"

5 Paragraph 4.4.7.6.8 of the LSA Code states:

".8 to prevent an accidental release during recovery of the boat, unless the hook is completely reset, either the hook shall not be able to support any load, or the handle or safety pins shall not be able to be returned to the reset (closed) position and any indicators shall not indicate the release mechanism is reset. Additional danger signs shall be posted at each hook station to alert crew members to the proper method of resetting;"

6 Paragraph 4.4.7.6.17 of the LSA Code states:

".17 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."

7 Paragraph 4.4.7.6.17 of the LSA Code, therefore, allows for the exemption from the requirement for single fall systems to have two release capabilities, whilst not specifying which type (off-load or on-load) of single release capability should be employed. Despite the fact that

this lack of clarity exists regarding the specification of hook type, manufacturers have applied this exemption to install single fall systems used for launching a lifeboat or rescue boat, with on-load release hooks that do not meet the safety requirements stated in paragraphs 4.4.7.6.8 and 4.4.7.6.15 of the Code.

8 Document MSC 99/20/8 (Marshall Islands et al.) highlighted the fact that lifeboats and rescue boats with single fall and hook systems face similar potential risks of accidental release during recovery operations as those with twin fall and hook systems. These systems are used and tested in a similar way as twin fall lifeboats and, therefore, should have similar safety standards. As a result, it was proposed that paragraph 4.4.7.6 of the LSA Code should be amended to reflect this. The document provided two different options to achieve this outcome. The majority of those who spoke on this issue at MSC 99 supported option 2 that proposed the amendment of paragraph 4.4.7.6.17 to specify that exemptions to requirements in paragraphs 4.4.7.6.7, 4.4.7.6.8 and 4.4.7.6.15 of the LSA Code do not apply to single fall and hook systems with on-load release capability.

9 Based on the invitation of SSE 6, as stated in paragraph 3 above, the co-sponsors embarked on detailed consideration of the concerns raised in relation to the applicability of these exemptions. In this context, the co-sponsors try to elaborate their attempt to address these concerns in the following paragraphs.

Responses to the concerns raised at SSE 6

Use of the phrase "fully waterborne"

10 The first objection was in relation to the terminology used, specifically with the phrase "fully waterborne". The co-sponsors highlight that the terminology in question is part of the existing text of paragraph 4.4.7.6 of the LSA Code and should, therefore, not be considered as part of the proposed new text.

Use of automatic release hooks fitted on rescue boats

11 The second and final objection to the proposed text relates to the effect the amendments will have on the use of automatic release hooks fitted on rescue boats. Specifically, it was opined that the proposed amendment, if approved, would prevent the use of automatic release mechanisms for launch of rescue boats, as approved according to paragraph 6.1.5 of the LSA Code.

12 Paragraph 6.1.5 of the LSA Code contains provisions specifically applicable to liferaft launching appliances. The paragraph specifies that these appliances "shall include an automatic release hook arranged so as to prevent premature release during lowering and shall release the liferaft when waterborne" and provides the requirements for these automatic release hooks which are to be fitted on liferaft launching appliances.

13 The co-sponsors believe that the risks associated with launching a liferaft, which happens maybe once in the lifetime of a ship, cannot be compared to that with lifeboats and rescue boats, which are tried and tested on a regular basis by the ship's crew. The co-sponsors view, with concern, the continued use on rescue boats of hooks that are designed specifically for use on liferafts, as they are not designed to withstand the frequent use, testing and maintenance that rescue boats are subject to, thereby, seriously jeopardizing the safety of seafarers who operate and maintain them. Liferaft release mechanisms that do not meet all the safety provisions provided in paragraph 4.4.7.6 of the LSA Code must never be deemed acceptable for use on single fall systems on rescue boats and lifeboats.

14 Consequently, the co-sponsors believe that the objections in relation to the applicability of these exemptions that were raised at SSE 6 cannot be addressed without reducing the safety levels intended by the proposal contained in document SSE 6/13.

Proposal

15 Based on the discussion presented in paragraphs 4 to 9 and the responses to the concerns provided in paragraphs 10 to 14 above, the co-sponsors are convinced that the proposal to amend paragraph 4.4.7.6.17, as provided in document SSE 6/13, remains the best way to ensure the safety of crew operating rescue boats fitted with single fall hook systems. The co-sponsors, therefore, invite the Sub-Committee to reconsider the following amendment to paragraph 4.4.7.6.17 of the LSA Code, as proposed at SSE 6 (additions shown through underlining):

".17 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. These exemptions do not apply to single fall and hook systems with on-load release capability."

Action requested of the Sub-Committee

16 The Sub-Committee is invited to note the discussion and responses to concerns raised at SSE 6 in paragraphs 4 to 14, consider the proposal in paragraph 15 above and take action, as appropriate.
