



The Bahamas Maritime Authority

BMA INFORMATION BULLETIN No. 72

ENHANCING LIFEBOAT SAFETY DURING ABANDON SHIP DRILLS

Guidance and Instructions for Ship-owners, Managers, Masters, Bahamas Recognised Organisations and Bahamas Approved Nautical Inspectors

Note: This Bulletin supersedes the previous BMA Information Bulletin No. 72 and replaces BMA Instruction to Classification Societies No. 21. The Bulletin should be read in conjunction with BMA Information Bulletin No. 87 and IMO Circulars MSC/Circ.1207 and MSC/Circ.1206

1. Introduction

This Bulletin is intended to give additional guidance on enhancing safety during launching of lifeboats at abandon ship drills and the relationship between ISM and lifeboat safety.

2. General

- 2.1. The issue of lifeboat safety remains high on the agenda at the International Maritime Organisation (IMO) and a significant amount of information has been issued to assist Companies in enhancing safety when conducting abandon ship drills with lifeboats.
- 2.2. These documents should already have been incorporated into Safety Management Systems (SMS) and the contents must be fully implemented wherever practicable.

3. Important Factors for Enhanced Safety

- 3.1. It is not the intention of this bulletin to repeat the contents of IMO documents but important points are:
- maintenance and inspections must be carried out by a competent person¹ to procedures that reflect the manufacturers' instructions;
 - maintenance and inspections must be recorded to provide objective evidence that these have been carried out according to manufacturer's instructions;
 - the quality of crew training and familiarisation are directly affected by the frequency and quality of the drills carried out;
 - planning is essential to ensure drills are performed safely;
 - drills should be realistic but must not be hurried when familiarization or other training is taking place;
 - a crew debrief after each drill is essential to emphasise lessons learned or to give additional training where necessary
- 3.2. In view of the need to safely verify satisfactory operation of lifeboat launching equipment which is not in frequent use, it is recommended that during abandon ship drills the lifeboats are initially lowered and recovered without any crew on board.
- 3.3. The guidelines for simulated launching of free fall lifeboats contained in IMO Circular MSC/Circ.1206 should be brought to the attention of ship's crew, where applicable and used, where allowed for in SOLAS, to ensure crew familiarisation with limited risk. However, manufacturer's instructions take precedence over the generic procedure contained in that circular.
- 3.4. Companies are also reminded that The Bahamas has given effect to the early implementation of the SOLAS amendments, as set out in IMO Circular MSC/Circ.1207, for Bahamas vessels and any other vessels which may call at ports in the Bahamas.
- 3.5. Careful observation of the lifeboat during every recovery operation should be made, in particular when near the davit heads as the boat may swing on a short pendulum during the later stages of recovery. This may happen when the speed of the winch is slowed or the boat is run out in order to ensure proper return to the davits or run out to the embarkation position after an empty deployment, such as referred to in paragraph 3.2 above.

¹ See BMA Information Bulletin No. 89 for further details regarding the definition of "competent person"

4. Causes of Accidents

4.1. Lifeboat accidents have been attributed to seven categories of failure:

- failure of on-load release gear (OLR)
- inadvertent operation of on load release mechanism
- inadequate maintenance of lifeboats, davits and launching equipment
- communication failure
- lack of familiarity with lifeboats, davits, equipment and associated controls
- unsafe practices during lifeboat drills and inspections
- design faults other than on load release

4.2. The report of an investigation into a fatal accident on a Bahamas ship revealed that all of the above were factors. It recognised the diversity in OLR types on different vessels and recommended comprehensive crew training at the earliest opportunity after joining, even for persons who may not ordinarily be required to operate the on-load release gear.

4.3. Inadvertent operation, or incomplete engagement of the locking mechanism prior to hoisting, is of particular concern as a clear result of the dangers of crew unfamiliarity with OLR. Consequently it is recommended that, where possible, a working model of the OLR is carried on board for training purposes. In one case where a working model was unavailable a generic training video was supplied which also covered the specific equipment on board that ship.

4.4. In addition to the above factors the effects of crew fatigue should be considered. Drills must be carefully planned to take into account the voyage requirements, loading and unloading operations, weather conditions etc. in order to identify the most suitable opportunity for an alert crew to carry out the drill.

5. Accident Reporting

Accidents involving lifeboats continue to occur and the BMA requires full details of any accident in order to identify and recommend improvements to equipment, onboard management or industry practices. Companies are urged to report all accidents and near misses, whether resulting in personal injury or not, so that valid information can be gathered to identify new or on going problems with survival craft and their launching appliances.

6. Abandon Ship Drill and Launching Requirements

- 6.1. Abandon ship drills, launching and manoeuvring of lifeboats, including rescue boat and free fall boats, shall be carried out in accordance with the SOLAS requirements.
- 6.2. For free-fall lifeboats from high-launch heights the provisions of IMO Circular MSC/Circ.1207 apply.

7. Conducting Drills at the Required Times

- 7.1. The BMA has received applications for exemption from the requirement to carry out lifeboat launching during abandon ship drills. However, exemption for the maximum period allowable under SOLAS may result in the drill not being carried out at the next available opportunity.
- 7.2. Noting the value of drills for crew familiarization and training, exemptions from this requirement will not normally be granted. However, in noting the potential hazards associated with conducting drills in unsuitable conditions the BMA accepts that the Master may use his professional judgement to either:
 - modify the drill to suit the circumstances of weather, location and vessel operational requirements, or
 - postpone the drill until the earliest opportunity when circumstances are suitable for the drill to be carried out.
- 7.3. Full details of planned drills, whether carried out or not, must be entered into the Official Log Book with reasons for the modification or postponement (if applicable). Such written evidence is accepted by the BMA as valid reason for not carrying out abandon ship drills at the required intervals.
- 7.4. Every effort should be made to carry out the required drills at the earliest reasonable opportunity, although the BMA recognises that the ship should not be unduly delayed or deviate from its intended voyage in order to do so.

8. Davit Winch Brake Remote Release Gear – Equivalent Arrangement

- 8.1. A number of accidents have involved difficulties with lifeboat davit brake remote release arrangements e.g. snagging of wires resulting in non-operation. As a consequence some Companies have lost confidence in the reliability of these systems and have proposed replacing the remote release with alternative manual arrangements.
- 8.2. The BMA has accepted such applications provided that an officer responsible for overseeing the lowering of a lifeboat is in:

- constant two way UHF radio communication with the responsible person in the lifeboat;
- direct line of sight of the lifeboat;
- direct contact with the person operating the local davit winch brake release, if applicable.

9. Lifeboat Safety and ISM Audits

9.1. The ISM Code requires that Companies maintain ships to relevant rules and regulations. The BMA requires that all Companies incorporate all IMO guidance relating to lifeboat safety into their Safety Management System, and maintain proper documentation and records relating to the performance of safe maintenance and inspection.

9.2. At ISM audits Bahamas Recognised Organisations are required to verify that the following are available on board:

- manufacturer's instructions and recommendations
- the Company's procedures for maintenance and inspection
- records of lifeboat drills
- records of inspection and maintenance of equipment, including details of the competent persons undertaking the activity

Failure to maintain any of these documents is considered to be an ISM non-conformity and must be specially reported to the BMA.