



# The Bahamas Maritime Authority

## BMA INFORMATION BULLETIN No. 87

### SAFETY OF LIFEBOAT ONLOAD RELEASE GEAR

#### 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. 87 and is to be read in conjunction with BMA Information Bulletin No. 72 and IMO Circulars MSC/Circ.1206 Rev.1 and MSC/Circ.1277*

#### 1. Introduction

This Bulletin gives guidance on the approach of The Bahamas to the amended SOLAS Regulation III/20 and the associated IMO circulars. It is issued to support BMA Information Bulletin no. 72.

#### 2. Background

2.1 The issue of lifeboat safety remains a significant concern and the Maritime Safety Committee of the International Maritime Organisation has, following discussions in MSC, issued IMO Circular MSC/Circ.1277 *Interim Recommendation on Conditions for Authorisation of Service Providers for Lifeboats, Launching Appliances and On-Load Release Gear* and MSC/Circ.1206 Rev.1 *Measures to Prevent Accidents with Lifeboats*

2.2 This Bulletin is intended to clarify the policy adopted by the BMA in response to these two important circulars, in the light of on-going discussion at IMO.

#### 3. SOLAS Regulations III/20.3 & III/20.11

##### 3.1 SOLAS Regulation III/20.3

This Regulation refers to maintenance, testing and inspections of all life-saving equipment and requires that these activities are carried out based upon the guidelines contained in MSC.Circ.1206 Rev.1. It must be noted that specific requirements regarding annual thorough examination and testing of launching

appliances and on-load release gear are contained within SOLAS Regulation III/20.11.

### 3.2 SOLAS Regulation III/20.11

- 3.2.1 This Regulation refers specifically to periodic service and also annual thorough examination and operational test of launching appliances and on-load release gear.
- 3.2.2 The regulation requires that the thorough examination and operational test required by SOLAS III/20.11.1.2, 2.2 and 3.2 is to be carried out during the annual surveys required by SOLAS I/7 or I/8, as applicable.
- 3.2.3 The maintenance required by SOLAS III/20.11.1.1, .2.1, and .3.1 is not required to be carried out in conjunction with annual, periodic or renewal survey, but it must be verified at the time of survey. The BMA advises that the required maintenance may be harmonised with the survey window in order that the principles set out in MSC.Circ.955 can be applied. This will provide a practical framework for implementation when applying a 12 month maintenance period.

## 4. Status of MSC/Circ.1206 Rev.1

- 4.1 SOLAS Regulation III/20.3.1 states that “...*maintenance, testing and inspections shall be carried out based on the guidelines...*” (IMO Circular MSC/Circ.1206 Rev.1). Companies should follow the existing guidance in the context of their obligations under ISM Code.

## 5. Requirement for Personnel Performing Inspection, Servicing and Repair

- 5.1 In accordance with MSC/Circ.1206 Rev.1 Annex 1 paragraph 15, the service provider who performed the work will issue a statement of fitness for purpose of the lifeboat arrangements on completion of repairs, thorough servicing and annual servicing.
- 5.2 It is noted that there are many vessels fitted with lifeboats, launching appliances and on-load release gear where either the manufacturer is no longer available to carry out this function or lack the capacity to meet the needs for the world-wide fleet.
- 5.3 It is the intention of SOLAS Regulation III/20 as supported by IMO Circular MSC/Circ.1206 Rev.1 that the manufacturer, or its authorised agent, will perform the service, maintenance, repair, inspection and examination activities covered by SOLAS Regulation III/20.11 and the Company is expected to engage the manufacturer or authorized representative of the manufacturer wherever practicable.

- 5.3.1 For the purposes of this regulation the BMA considers that “properly trained personnel familiar with the system” may be representatives of the manufacturer, or:
- i. representatives of an organisation authorised or certified by the manufacturer, or;
  - ii. representatives of an organisation authorised under the provisions of paragraph 9 of Annex 1 of IMO Circular MSC./Circ.1206 Rev.1 and MSC/Circ.1277 by an Administration or Bahamas Recognised Organisation.
  - iii. Other competent persons who may be selected by the Company, taking into account training provided by the manufacturer, manufacturers representatives or an organisation authorised under the provisions of MSC/Circ.1277

## **6. Authorisation of Competent Persons**

- 6.1 The BMA recognises the authorisation of service providers by SOLAS contracting Administrations.
- 6.2 In line with the responsibilities specified in Annex 1 paragraph 6 of MSC/Circ.1206 Rev.1 the Company is responsible for assessing and selecting a suitable competent person, and appropriate procedures relating to this activity must be established within the Safety Management System.
- 6.3 The Company should ensure that documentary evidence is available to third parties, to confirm that the competent person carrying out the service, maintenance, repair, and inspection and examination activities covered by SOLAS Regulation III/20.11 is appropriately certified.
- 6.4 The Recognised Organisation shall, as part of its survey activities and as far as practicable, verify that the person performing inspection and testing activities related to SOLAS Regulation III/20.11 has been certified.

## **7. Records**

Records of all activities relating to the referenced regulations must be retained on board for inspection by Bahamas Approved Nautical Inspectors, Recognised Organisation Surveyors/Auditors and Port State Control Officers.