The Bahamas Maritime Authority

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INFORMATION BULLETIN No. 72

Enhancing lifeboat safety during abandon ship drills

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

1. Purpose

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

2. Application

2.1. This Bulletin applies to all Bahamas flag ships fitted with lifeboats.

3. General

3.1. The issue of lifeboat safety has been the focus of considerable efforts over the last few years at the International Maritime Organization (IMO). A large amount of information has been issued to assist Companies[1] in enhancing safety when conducting abandon ship drills with lifeboats.

3.2. In addition, amendments have been made to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS) to improve lifeboat safety (e.g. new Regulation 1.5 of Chapter III of SOLAS, which entered into force on 01 January 2013[2] and amendments to Regulation 20 of Chapter III, which enter into force on 01 January 2020[3,4]).

[1] The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships to which the ISM Code is not applicable, the Company is the "Managing Owner" in accordance with Section 52 of the Merchant Shipping Act
[2] Adopted by MSC.317(89)
[3] Adopted by MSC.404(96)
[4] Please refer to BMA Information Bulletin No.184

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3.3. The guidance documents issued by IMO should be incorporated into the Company's safety management system (SMS) and the contents fully implemented wherever practicable.

4. Important factors for enhanced safety

4.1. It is not the intention of this Bulletin to repeat the contents of IMO documents, but important points are:

i. maintenance and inspections must be carried out by a competent person to procedures that reflect the manufacturers' instructions;
ii. maintenance and inspections must be recorded to provide objective evidence that these have been carried out according to manufacturer's instructions;
iii. the quality of crew training and familiarisation are directly affected by the frequency and quality of the drills carried out;
iv. planning is essential to ensure drills are performed safely;
v. drills should be realistic but must not be hurried when familiarisation or other training is taking place;
vi. a crew debrief after each drill is essential to emphasise lessons learned or to give additional training where necessary.

4.2. In view of the need to safely verify satisfactory operation of lifeboat launching equipment that is not in frequent use, it is recommended that, where possible, lifeboats are initially lowered and recovered without any crew on board during drills.

4.3. The guidelines for simulated launching of free fall lifeboats contained in the appendix to IMO Circular MSC.1/Circ.1578[5] should be brought to the attention of ship's crew, where applicable, to ensure crew familiarisation with limited risk. However, manufacturer's instructions take precedence over the generic procedure contained in that circular.

4.4. 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 4.2 above.

[5] MSC.1-Circ.1578.pdf

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5. Causes of accidents

5.1. Lifeboat accidents have been attributed to multiple categories of failure, including:

i. failure of on-load release gear (OLR);
ii. inadvertent operation of OLR mechanism;
iii. inadequate maintenance of lifeboats, davits and launching equipment;
iv. incorrect supply and fitting of equipment, not in accordance with manufacturer requirements;
v. inadequate inspections including failure to identify defective equipment;
vi. communication failure;
vii. lack of familiarity with lifeboats, davits, equipment and associated controls;
viii. inadequate training impacting safe operation of equipment;
ix. unsafe practices during lifeboat drills and inspections;
x. design faults other than OLR.

5.2. The report of an investigation into a fatal accident on a Bahamas ship revealed that all of the above were contributory 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 OLR gear.

5.3. 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.

5.4. 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.

6. Accident reporting

6.1. Accidents involving lifeboats continue to occur and the Bahamas Maritime Authority (BMA) requires full details of any accident in order to identify and recommend improvements to equipment, onboard management or industry practices.

6.2. Companies are required to report all accidents and near misses[6], whether resulting in personal injury or not, so that valid information can be gathered to identify new or ongoing problems with survival craft and their launching appliances.

7. Abandon ship drills and launching requirements

7.1. Abandon ship drills, launching and manoeuvring of lifeboats, including rescue boat and free fall lifeboats, shall be carried out in accordance with Regulation 19.3.4 of Chapter III of SOLAS.

7.2. Please refer to paragraph 8 for situations where drills cannot be conducted as required by SOLAS.

8. Conducting drills at the required times

8.1. The BMA occasionally receives applications directly from the owner's representative for exemption from the requirement to carry out lifeboat launching during abandon ship drills.

8.2. Noting the value of drills for crew familiarisation 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 or her professional judgement to either:

i. modify the drill to suit the circumstances of weather, location and vessel operational requirements; or
ii. postpone the drill until the earliest opportunity when circumstances are suitable for the drill to be carried out.

8.3. Full details of planned drills, whether carried out or not, must be entered into the Official Log Book, with reasons for the modification or

[6] In accordance with BMA Information Bulletin No. 4 and MSC-MPEC.7/Circ.7

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postponement (as applicable). Such written evidence is accepted by the BMA as valid reason for not carrying out abandon ship drills at the required intervals and, provided that 8.3 and 8.4 are satisfied, there is no need to contact the BMA for an exemption.

8.4. 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.

8.5. For vessels certified to the MODU Code, subject to formal BMA application as per paragraph 9.3, an alternative method can be considered acceptable provided that it meets the intent outlined in the IMO guidelines established under circular MSC.1/Circ.1486, as amended[7].

9. Davit winch brake remote release gear – equivalent arrangement

9.1. A number of accidents have involved difficulties with lifeboat davit brake remote release arrangements, e.g. snagging of wires resulting in non-operation.

9.2. The BMA may consider applications for exemptions from the remote release gear requirement, provided that an officer responsible for overseeing the lowering of a lifeboat is in:

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

9.3. All applications for exemption shall be submitted via the Recognised Organisation that classes the ship, as outlined in BMA Information Bulletin No.8.

10. Lifeboat Safety and ISM Audits

10.1. 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,

[7] MSC.1-Circ.1486.pdf

and maintain proper documentation and records relating to the performance of safe maintenance and inspection.

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

i. manufacturer's instructions and recommendations;
ii. the Company's procedures for maintenance and inspection;
iii. records of lifeboat drills; and
iv. records of inspection and maintenance of equipment, including details of the competent persons undertaking the activity[8].

10.3. Failure to maintain any of these documents is considered to be a Major ISM non-conformity and must be specially reported to the BMA by the Recognised Organisation carrying out the ISM audit.

11. Revision History

Rev.2 (19 December 2019) – General update

Rev.1 (12 April 2007) – General update

Rev.0 (17 February 2005) - First issue

[8] See also BMA Information Bulletin No. 184