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SHIP DESIGN AND EQUIPMENT

Comments on the report of DE 53 regarding life-saving appliances

Submitted by the International Chamber of Shipping (ICS), BIMCO, Cruise Line International Association (CLIA), The International Federation of Shipmasters' Associations (IFSMA), International Marine Contractors Association (IMCA), INTERCARGO, INTERFERRY, INTERTANKO, International Parcel Tankers Association (IPTA), International Shipping Federation (ISF), International Transport Workers' Federation (ITF), The Nautical Institute (NI), Oil Companies International Marine Forum (OCIMF) and Society of International Gas Tanker and Terminal Operators (SIGTTO)

SUMMARY

Executive summary: Industry associations comment on draft Guidelines developed by the DE Sub-Committee regarding the assessment of lifeboat hook release mechanisms. The co-sponsors express concern that by limiting the design review assessment to the issue of wear rates, some other factors that may have contributed to release mechanism failures have not been sufficiently considered.

Strategic direction: 5.1

High-level action: 5.1.2

Planned output: 5.1.2.1

Action to be taken: Paragraph 13

Related documents: Resolution MSC.81(70); DE 52/6/5 ; DE 53/3, DE 53/3/Add.1 ; DE 53/WP.1 and DE 53/WP.7

Introduction

1 This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the Organization and method of work of the MSC and the MEPC and their subsidiary bodies and comments on the report of DE 53.

2 DE 53 developed draft Guidelines for evaluation and replacement of lifeboat on-load release mechanisms, for poor and unstable characteristics, taking into account the report of the correspondence group (DE 53/3 and Add.1) and documents DE 53/3/4 and DE 53/3/5/Rev.1.

3 The Sub-Committee agreed that the draft Guidelines should specify a design review recognizing the significance of the following issues:

- .1 it is of primary importance that design reviews should take into account anticipated wear of critical parts over the service life of the release mechanism, and that illustrated examples of several types of hook systems, which may not meet the relevant requirements if they fall out of tolerance due to wear, be included for guidance;
- .2 that, if the design review reveals that a release mechanism does not comply with paragraphs 4.4.7.6.3 to 4.4.7.6.5 of the LSA Code, as amended by MSC....(87), or a design review cannot be carried out because design documentation is not available, all installed release mechanisms of that type should be replaced; and
- .3 procedures for replacement of non-compliant release mechanisms.

4 The Sub-Committee agreed that the Bahamas proposal (DE 53/3, paragraph 19) for a hook stability test should be included in the Guidelines as an additional option for Administrations to consider.

Discussion

5 During development of the Guidelines, concern was expressed that the design review relies heavily on an assumption that the anticipated wear rate of critical parts over the service life of release mechanisms was the critical determining factor. Furthermore this single parameter would be used to assess compliance with the amended LSA Code as required by SOLAS regulation III/1.5.

6 However the co-sponsors observe that investigation reports regarding failures of current generation release mechanisms have either not been conducted or are not available in the public domain. In the discussion during DE 53, concern was expressed that additional factors other than excessive wear rates could be significant factors in the failure of release mechanisms. It is, therefore, suggested that it may be inappropriate to base the "design review" assessment of current hooks exclusively on anticipated wear rates.

7 The Guidelines also provide for an Administration to conduct a hook stability test in support of the design review assessment. However, without definitive information regarding the root cause of the release mechanism's failure, it is suggested that even such additional tests may not provide definitive guidance regarding operational functionality.

8 The co-sponsors are very concerned that the assessment required for existing release mechanisms may not be based on sufficiently robust and valid technical criteria. Without appropriate validation there is a risk that anticipated lifeboat safety improvements may not be realized and that seafarers' confidence in these LSA may be further eroded.

Proposal

9 The co-sponsors propose that the draft Guidelines for "evaluation and replacement of lifeboat on-load release mechanisms" should be considered to be an interim solution.

10 The co-sponsors also propose that the interim Guidelines should be subject to further consideration to identify criteria associated with the root cause of previous hook

failures in addition to those associated with critical component's wear in excess of design tolerances.

11 The Committee may wish to consider that draft Guidelines should continue to include recommendations for hook stability tests taking into account specific factors in addition to the wear rate of such mechanisms.

12 The co-sponsors consider that draft Guidelines should incorporate assessment criteria for release mechanisms that fully address design failures that may be known to LSA manufacturers and to other bodies and organizations who have participated in the technical assessment of release mechanisms that have failed in service.

Action requested of the Committee

13 The Committee is requested to consider the information provided and to decide as appropriate.
