



Examination and test of launching appliances and on-load release gear.

Date: 2006-10-06

This issue supersedes the previous one of 2006-09-18.

1. Introduction

Reference is made to SOLAS Ch. III Reg. 20 as amended by IMO Res MSC 152 (78). The amendments to SOLAS Ch. III Reg. 20 entered into force 2006-07-01.

The issue of lifeboat safety remains a significant concern and the Maritime Safety Committee of the International Maritime Organisation has, following discussions in MSC 81 of June 2006, issued circular 1206 – *Measures to Prevent Accidents with Lifeboats*. IACS is currently working to develop a Unified Interpretation and will, when adopted in IACS, forward this to IMO for their consideration.

This DNV circular is intended to clarify the policy adopted by DNV with regard to this important circular and will be used until ongoing discussions in IMO may mandate changes to SOLAS.

2. Applicability

Whereas MSC/Circ.1206 in principle is not mandatory, DNV strongly recommends its use and will apply the circular unless the Flag explicitly advises otherwise. Specific Flag state requirements are copied later in this instruction.

MSC/Circ 1206 Annex 1 item 3 states that the guidelines may be applied for the periodic servicing and maintenance of life rafts, rescue boats and fast rescue boats and their launching appliances and release gear. DNV will apply MSC/Circ 1206 to life rafts, rescue boats and fast rescue boats and their launching appliances and release gear unless the Flag explicitly advises otherwise.

3. Intervals

The new text of Ch. III Reg. 20.3 introduces important changes with respect to the intervals for “thorough examination”. For launching appliances and on-load release gears the interval is now one year, opposed to the previous mix of 5, 2 ½ and 1 year. The requirements are to be complied with by existing ships at first safety equipment survey after 2006-07-01.

4. Qualifications

Ch. III Reg. 20.3 has been amended, and all maintenance shall be carried out in accordance with IMO guidelines in MSC/Circ. 1206 issued 26 May 2006 (superseding MSC/Circ. 1093).

MSC/Circ. 1206 annex 1 item 12 states all inspections, servicing and repair (other than weekly and monthly inspections, and routine maintenance as defined by the manufacturer) *“should be conducted by the manufacturer’s representative or a person appropriately trained and certified by the manufacturer for the work to be done.”*

MSC/Circ.1206 Annex 1 paragraph 10 further states: *“Where these Guidelines require certification of servicing personnel, such certification should be issued by the manufacturer in accordance with an established system for training and authorization.”*

5. Arrangement of Surveys

5.1 Manufacturer exists

5.1.1 Survey

In the majority of cases the manufacturer exists or the manufacturer has sold his brand to an existing company. The guidelines require that the manufacturer’s representative, or the person authorised by the manufacturer, issues a statement of fitness for purpose of the lifeboat arrangements on completion of repairs, thorough servicing and annual servicing. The company (Shipowner) is responsible to call in such a person for inspection.

We would like to underline that the time window (+/- 3 months from annual survey) may be fully used in case of difficulties finding a competent person/ service supplier to undertake the surveys.

5.1.2 Conditions/CA

If the company (Shipowner) is not able to find a competent person to do the survey simultaneously with the annual/periodic/renewal survey, a CA shall be issued with due date 3 months. If survey otherwise is acceptable, the survey shall be credited.

Alternatively, the survey shall not be credited and an MS shall be issued explaining that the remaining items shall be dealt with within the survey window. This applies only if the survey is carried out before the end of the time window.

If the manager does not manage to have the problem solved within the due date of the CA, the CA may be postponed, however only if the managers submit in writing documentation to the effect that the annual examination has been ordered and survey date has been fixed. Generally, the postponement should be limited to 3 months.

Owners with vessels where CAs will cause major trading problems are encouraged to be proactive well in advance of the time window to arrange for service by competent persons or apply via MTPNO863 to the Flag for acceptance of companies other than the manufacturer or the manufacturer’s representative if necessary.

5.2 Manufacturer does not exist or is not available

5.2.1 Survey

It is the intention in SOLAS Ch. III Reg. 20 that the manufacturer should carry out the survey, wherever possible, and that the company is expected to engage the manufacturer.

We would like to underline that the time window (+/- 3 months from annual survey) may be fully used in case of difficulties finding a competent person/ service supplier to undertake the surveys.

However, in the absence of the manufacturer etc., or where service from the manufacturer, cannot reasonably be undertaken, these inspections may be carried out by some other competent person – i.e. one who has the documented training, knowledge, skills and experience necessary to safely complete the task. This competence can be documented as follows:

5.2.1.1 Approval by the Flag state

The Flag state for the ship in question has generally approved the service supplier in question or approved the service supplier for a specific job for a specific ship. If in doubt in such cases, DNV may convey necessary information to the vessel's flag for final acceptance. Such information should consist of:

- Ship(s) in question
- Make, model, and manufacturer of the lifeboat, the lifeboat davits, and the on load releasing gear in question
- Year of manufacture of the lifeboat, the lifeboat davits, and the on load releasing gear
- A confirmation that the manufacturers' service and maintenance manual are available on board for the lifeboat, launching appliances and on-load release gears
- A confirmation that all testing, repairs, and maintenance to the lifeboat, the lifeboat launching appliances and on load releasing gear will be/has been carried out in accordance with the manufacturer's instructions and manuals, the instructions required by SOLAS Reg. III/36, and to the satisfaction of the attending class society surveyor
- A confirmation by that shipboard inspection and maintenance records are readily available onboard
- The non-manufacturer certified third party facility's procedures for the thorough examination, servicing, and testing of the lifeboat, the launching appliances, and on-load releasing gear
- The proposed date of commencement of the survey
- The name of the service company
- A short description of the company and its experience
- A quality system certificate for the service company and any certification currently held by the facility for servicing and examination of lifeboats and their associated launching gear that may have been issued by other lifeboat manufacturers, class societies, or government Administrations
- Preferably a link to the company's web-site
- The short description of the local DNV surveyors' experience with the service company, if any
- The DNV surveyor's opinion if the service company is competent or not

5.2.1.2 Approval by the local flag/administration

A local company may be approved by the local flag for given types of lifeboats, winches, rescue boats and hooks. It is assumed that this arrangement in most cases will be accepted by the ships' flag administrations.

If in doubt in such cases, DNV may convey necessary information to the vessel's flag for final acceptance.

5.2.2 Conditions/CA

If the manufacturer does not exist and the company (Shipowner) is not able to find a competent person, a CA with due date 3 months shall be issued. If survey otherwise is acceptable, the survey shall be credited.

Alternatively, the survey shall not be credited and an MS shall be issued explaining that the remaining items shall be dealt with within the survey window. This applies only if the survey is carried out before the end of the time window.

If the company (Shipowner) do not manage to have the problem solved within due date of the CA, the CA may be postponed by up to 3 months (depending on the case; in consultation with the flag). MTP shall be contacted.

The company's (Ship owner's) options are:

- Change equipment
- Have the examination carried out in a port where local service company has been accepted by local flag
- Have the examination carried out by a company that has been approved by another classification society. In this case, MTP will convey this to Flag and it will be up to Flag whether they will accept it or not

Owners with vessels where CAs will cause major trading problems are encouraged to be proactive well in advance of the time window to arrange for service by competent persons or apply via MTPNO863 to the Flag for acceptance of companies other than the manufacturer or the manufacturer's representative if necessary.

5.3 Neither approval by the Flag state nor approval by the local flag/administration is available

5.3.1 Survey

In such cases, our interpretation of MSC/ Circ 1206 is that the company (Shipowner) is responsible to ensure that the competent person carrying out the inspections covered by SOLAS Ch. III Reg. 20.3 and they should present to the DNV surveyor suitable evidence of competence. If the surveyor is in doubt, MTP shall be consulted.

We point out that DNV under no circumstances shall issue any general certificate or survey report indicating that the service company is regarded competent to carry out surveys according to SOLAS Ch. III, Reg. 20. Only survey reports referring to a specific ship shall be issued.

5.3.2 Conditions/CA

If the company (Shipowner) is not able to present to the DNV surveyor suitable evidence of competence for the service company carrying out the survey, a CA with due date 3 months shall be issued. If survey otherwise is acceptable, the survey shall be credited.

Alternatively, the survey shall not be credited and an MS shall be issued explaining that the remaining items shall be dealt with within the survey window. This applies only if the survey is carried out before the end of the time window.

If the company (Shipowner) does not manage to have the problem solved within due date of the CA, the CA may be postponed by up to 3 months (depending on the case; in consultation with the flag). MTP shall be contacted.

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- Have the examination carried out in a port where local service company has been accepted by local flag/administration
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Owners with vessels where CAs will cause major trading problems are encouraged to be proactive well in advance of the time window to arrange for service by competent persons or apply via MTPNO863 to the Flag for acceptance of companies other than the manufacturer or the manufacturer's representative if necessary.

6. Hydraulic Winch Brakes

It has been claimed by several manufacturers that opening up of hydraulic winch brakes may decrease rather than increase the reliability of the system. DNV should for such systems accept, in lieu of opening up the winch brake, manufacturer's alternative proposed tests, and a declaration that explicitly says that opening up is not recommended.

7. Documentation

For the examinations and tests that are not witnessed by DNV, our surveyor should check the documentation mentioned in items 13, 14 and 15 in Annex to MSC 1206. The documentation of service and test personnel's qualifications as mentioned above should also be checked.

8. Instructions

It should be noted that all overload testing should be witnessed by the DNV surveyor.

In order to ease the understanding of the referred changes please find attached a table describing application, test intervals and DNV's involvement. The table will replace the current table 1 – 1 in IS II – 3.2.3.

9. Referenced documents

SOLAS Ch. III Reg 20 as amended by IMO Res MSC 152 (78) (can be found in IMO Vega) MSC/Circ. 1206 (contact MTPNO863 for copies, will be published on Intranet)

10. Further work and other Class Societies

For information, MTPNO863 participates in an ongoing discussion in the IACS Statutory panel regarding this topic. This panel has submitted input to MSC 82 which will take place in December 2006. In parallel to the outcome of this meeting, DNV has volunteered to draft an IACS internal guideline regarding this subject.

Please note that the official members from the major class societies in this panel have already clearly expressed their concern regarding certification of service suppliers by the class societies. This contradicts the fact that some surveyors from other class societies have issued certificates to service suppliers.

11. Schematic overview of DNV Interpretation

Reg.	Description of requirement	Interval	Application			
			Conv. Lifeboat	Free-fall lifeboat	Rescue boat	Liferaft
20.11.1	Launching appliances (davit and winch):					
20.11.1.1	Maintained in accordance with instructions for on-board maintenance. <i>Conducted by ships personnel.</i>	Manufacturers recommendation	Yes	Yes	Yes	Yes
20.11.1.2	Thorough examination <i>Conducted by manufacturers representative or person trained & certified by the manufacturer.</i>	Annually	Yes	Yes	Yes	Yes
20.11.1.3	Dynamic test of winch brake with load of empty boat. <i>Conducted by manufacturers representative or person trained & certified by the manufacturer.</i>	Annually	Yes	Yes ¹	Yes	Yes
20.11.1.3	Dynamic test of winch brake with 1.1 x weight of fully equipped and manned boat. <i>Conducted by manufacturers representative or person trained & certified by the manufacturer – and witnessed by DNV surveyor.</i>	5 yearly	Yes	Yes ¹	Yes	Yes
20.11.2	Lifeboat on-load release gear:					
20.11.2.1	Maintained in accordance with instructions for on-board maintenance. <i>Conducted by ships personnel.</i>	Manufacturers recommendation	Yes ²	N/A	Yes ²	No
20.11.2.2	Thorough examination and operational test. <i>Conducted by manufacturers representative or person trained & certified by the manufacturer.</i>	Annually	Yes ²	N/A	Yes ²	No
20.11.2.3	Operational test under 1.1 x total mass of lifeboat fully equipped and loaded. <i>Conducted by manufacturers representative or person trained & certified by the manufacturer – and witnessed by DNV surveyor.</i>	5 yearly	Yes ²	N/A	Yes ²	No

¹ Dynamic test of free-fall lifeboat secondary means of launching is required only if design permits. If design does not permit, meaning that launching is done under power, a controlled lowering to the water with 1.1 x weight of fully equipped and manned boat should be conducted.

² Only if fitted with on-load release gear.

12. Flag States that in writing has expressed their view regarding requirements/interpretations of SOLAS Ch. III, Reg. 20/MSC Circ. 1206

Flag	Explicit interpretations different than DNV (and thereby these prevail)	Document number
Bahamas	<p>Bahamas has explicitly said that they do not authorise companies to do the survey: <i>"It should be noted that the BMA does not anticipate authorising organisations to perform the activities of the manufacturer under Annex 1 paragraph 9. In line with the responsibilities specified in Annex 1 paragraph 6 the <u>Company</u> is responsible for assessing and selecting a suitable competent person and appropriate procedures relating to this activity must be established within the <u>Safety Management System</u>."</i></p> <p>Further, Bahamas has explicitly said that Reg. 20.11 applies only to lifeboats and not to rescue boats/life rafts.</p>	<p>Bulletin B87-06</p> <p>Email from Flag</p>
Greece	SOLAS Ch. III, Reg. 20.11.1.3 only applies to lifesaving appliances complying with SOLAS 1983 amendments and forward.	Email from Flag
Isle of Man	Isle of man explicitly say that they shall be contacted if authorised personnel is available, meaning DNV can not accept documentation in accordance with above instruction 5.2.3: <i>"If no such person (manufacturers representative/trained or authorised by manufacturer) is in existence or is unavailable, the owners should contact the Isle of Man Marine Administration, in good time, to discuss suitable alternatives."</i>	<p>MSN 009 Rev Aug 2006</p> <p>Note: Industry Circular IND 004 is withdrawn</p>
Liberia	If manufacturer exist, issue a Short Term CEC up to three months (apply to Flag) until the ship reach a port where service supplier is available.	Email from Flag
Malta	In line with DNV interpretation, as described in referred email.	Email from Flag
Marshall Islands	Points back to DNV and accept <i>Class approved Service suppliers</i> according to MI Technical Circular #1. No approval shall be given by DNV surveyor, only acceptance of the service supplier for a specific job.	Email from Flag

Panama	<p>Points back to DNV and accept Class approved Service suppliers. No approval shall be given by DNV surveyor, only acceptance of the service supplier for a specific job.</p> <p><i>"Please be informed that this Administration has no objection for Class Society to recommend a Service facility to carry out the required maintenance. The procedures followed by the service facility must be to the satisfaction of the Class in accordance to the equipment being serviced"</i></p>	<p>Email from Flag. Circular expected by end Oct 2006.</p>
UK	<p>MCA will accept Independent Lifeboat Servicing and Testing Organisation (ILSTO) certified service companies according to guidelines given in MSN 1803 (M).</p>	<p>MSN 1803 (M)</p>
USCG	<p>Certification of service supplier only necessary for the on-load release gear.</p>	<p>Email from Flag. Drafting of circular ongoing</p>