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Review and new approval of lifeboat hooks

Background

On-load release hooks in lifeboats became mandatory in ships built after 1 July 1986 and have led to many accidents during lifeboat exercises. Deaths and serious injuries have resulted from these accidents and Gard has played a role in asking for improved hook designs and a solution to the problem.

In 2001 a process started at the IMO to improve the safety of lifeboats with on-load release hooks, and at the meeting of the IMO Maritime Safety Committee in May 2011 (MSC 89) new requirements were introduced.

The purpose of this Circular is to remind our Members and clients of the new requirements, and of the need to act within the deadlines given.



New requirements for release and retrieval systems

The new requirements are found in IMO Circular MSC.1/Circ.1392," *Guidelines for evaluation and replacement of lifeboat release and retrieval systems*" (available online at

http://www5.imo.org/SharePoint/blastDataHelper.asp?data_id=30629&filename=1392.pdf). In the new IMO texts the wording "on-load release" is not used, the term now being "Release and Retrieval System", comprising the hook assembly and the operating mechanism. All existing Release and Retrieval Systems have to be reviewed and tested against the new requirements not later than 1 July 2013. Systems which do not comply with the new requirements will have to be replaced or modified not later than the first scheduled dry docking after 1 July 2014, but not later than 1 July 2019. Amendments to the 1974 SOLAS Convention by a new Regulation III/1.5 will enter into force on 1 January 2013, as will amendments to the LSA Code, by a revised Chapter IV.

Evaluation process for existing lifeboats

MSC.1/Circ.1392 contains a flow chart for the evaluation process for existing lifeboat Release and Retrieval Systems, which starts with a self-assessment and a possible design modification by the manufacturer. The manufacturer has then to submit the self-assessment together with the necessary documentation to the Administration, being the flag administration(s) or a "recognised organisation", normally one of the international class societies. If the Administration's design review is positive, a performance test witnessed by the Administration must be carried out by the manufacturer. Finally, if the manufacturer obtains an approval for his hook system, there is an on-board verification of the system to be carried out for every lifeboat. This "overhaul examination" is to be carried out not later than the first scheduled dry docking after 1 July 2014, by a representative of the manufacturer. See Annex 1 to the "Measures to prevent accidents with lifeboats", MSC .1/Circ. 1206/Rev.1.

Hook systems which do not pass the evaluation and test will be reported to the IMO by the Administration and such hook systems will have to be replaced in all lifeboats.

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For a shipowner, the process will start by establishing exactly the type of hook systems in use in the lifeboats on his ships and then contacting the manufacturers of the lifeboats to check the approval situation. The hook systems may not have been produced by the manufacturer of the lifeboats and there may be different types of hooks in boats by the same manufacturer, depending on year of production, etc. "Type" is defined in MSC.1/Circ.1392 as "an identical lifeboat release and retrieval system of given safe working load, make and model (thus any change to the materials of construction, design arrangement or dimensions constitutes a change of type)". Bearing in mind the above definition of "type", some manufacturers of older hooks may over the years have produced more "types" than they may be aware.

Recommendations

It is today uncertain how quickly manufacturers will be able to obtain the new approvals of their various hook systems and the number of hooks that will have to be replaced. In order to avoid congestion, we recommend Members and clients to commence the process without delay.

If hooks have to be replaced, there will be a variety of new hooks to choose from. It would be a considerable advantage to the seamen if an owner used the same type of hook system onboard all his ships. It would greatly reduce the risks of accidents if all seamen were better trained and fully understood the working of the hook system they are to operate.

When replacing the hook system in an existing lifeboat, the original "type approval" of the lifeboat/hook assembly is breached. MSC.1/Circ. 1392 points to this in "Procedure for replacement of non-compliant lifeboat release and retrieval systems". The regulators appear to prefer that new hooks are selected in cooperation with the original manufacturer of the lifeboat, but may also accept hook systems by another maker. The retrofitting has to be approved by the Administration. It is assumed that these approvals in most instances will be undertaken by the class societies.

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