MINISTRY OF COMMUNICATIONS AND WORKS DEPARTMENT OF MERCHANT SHIPPING LEMESOS

18 October 2005

Circular No 31 / 2005

TEN 5.13.09 TEN 4.28.03.5 TEN 16.17.18

To all Owners, Managers and Representatives of ships under the Cyprus Flag.

To all recognised Classification Societies and Inspectors of Cyprus Ships

Subject: Emergency Training and Drills – Launching of Lifeboats

The Maritime Safety Committee (MSC) of the International Maritime Organization on 20 May 2004 adopted, by Resolution MSC.152 (78) amendments to the International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended. These amendments shall be deemed to have been accepted on 1 January 2006 if no objection is raised by Contracting Governments to SOLAS 1974, as amended, in accordance with article VIII (b)(vi)(2)(bb) and enter into force on 1July 2006.

- 1. With reference to the above amendments, paragraph 3.3.3 of regulation 19/Ch III/SOLAS 1974, as amended, has been modified to allow the lifeboats to be launched without its assigned operating crew aboard.
- 2. MSC on 15 December 2004 issued the attached circular MSC/Circ. 1127, advising the Contracting Governments to the 1974 SOLAS Convention to implement the said amendment prior its scheduled date of entry into force.
- 3. The Government of the Republic of Cyprus, in accordance with MSC/Circ. 1127, consents to the immediate application of the said amendment.
- 4. The free-fall launching of free-fall lifeboats is an unnecessary risk and a psychological burden for the crew. Other means exist to achieve the same level of emergency training and to ensure that free-fall lifeboat's release mechanism operates satisfactorily and the free-fall lifeboat will be successfully launched in a real situation.

- 5. As from 1 October 2005, the abandon ship drills on ships equipped with a free-fall lifeboat, which together with its launching appliance are designed to accommodate simulated launching, may be carried out as follows:
 - A simulated launching, in accordance with the attached Guidelines approved by MSC on 15 December 2004 (MSC/Circ.1137) shall be carried as a part of the provisions of paragraph 3.3.1 of regulation 19/Ch III/SOLAS 1974, as amended.
 - ii. Every three months, a lifeboat arranged for free-fall launching shall be lowered into the water and manoeuvred by its assigned operating crew.
- 6. The free-fall launching required by paragraph 3.3.4 of regulation 19/Ch III/SOLAS 1974, as amended, may be dispensed with if ship's drills are carried out in accordance with 5 (i) and 5 (ii).
- 7. MSC/Circ.1136 approved by MSC on 15 December 2004 is hereby brought to your attention as a general guidance on safety during abandon ship drills using lifeboats.
- 8. This Circular must be placed on board ships flying the Cyprus Flag.

S. S. Serghiou Director Department Of Merchant Shipping

> CC: Permanent Secretary, Ministry of Communications and Works Maritime Offices of the Department of Merchant Shipping abroad Permanent Secretary, Ministry of Foreign Affairs Diplomatic and Consular Missions of the Republic Honorary Consular Officers of the Republic Cyprus Shipping Council Cyprus Union of Shipowners PEO Trade Union **SEK Trade Union** Cyprus Bar Association International Maritime Organization Paris M.O.U. Tokyo M.O.U. Mediterranean M.O.U. Black Sea M.O.U. U.S. Coast Guard

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MSC/Circ.1127 15 December 2004

EARLY IMPLEMENTATION OF AMENDMENT TO SOLAS REGULATION III/19.3.3.3 ADOPTED BY RESOLUTION MSC.152(78)

- The Maritime Safety Committee, at its seventy-eighth session (12 to 21 May 2004), noting the urgent need to give effect to measures to prevent accidents with lifeboats and, in particular, to reduce personal injuries resulting from such accidents, adopted an amendment to SOLAS regulation III/19.3.3.3 in relation to the operating crew being aboard lifeboats at the time of launching during abandon ship drills. The amendment is not scheduled to enter into force until 1 July 2006.
- Recognizing the effect of this amendment in improving the occupational health and safety of seafarers and, thus, the importance of avoiding delays in relation to this matter, the Committee, at its seventy-ninth session (1 to 10 December 2004), urged Contracting Governments to the 1974 SOLAS Convention to implement the amendment prior to its scheduled date of entry into force. The Committee further urged Contracting Governments to provide appropriate documentation for ships flying their flag to which such early implementation has been granted and port States to accept such early implementation.
- 3 The Committee also urged Contracting Governments, ship masters and shipowners to take care that ship's crew are not exposed to new or additional risks in accessing or exiting lifeboats once they are deployed/recovered unmanned, and that a safe means of access is provided.

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Ref. T4/3.01 MSC/Circ.1136 15 December 2004

GUIDANCE ON SAFETY DURING ABANDON SHIP DRILLS USING LIFEBOATS

- The Maritime Safety Committee, at its seventy-ninth session (1 to 10 December 2004), recalled that, at its seventy-fifth session (15 to 24 May 2002), it considered the issue of the unacceptably high number of accidents with lifeboats that have been occurring over recent years in which crew were being injured, sometimes fatally, while participating in lifeboat drills and/or inspections.
- 2 The Committee further observed that most accidents fell under the following categories:
 - .1 failure of on-load release mechanism;
 - .2 inadvertent operation of on-load release mechanism;
 - .3 inadequate maintenance of lifeboats, davits and launching equipment;
 - .4 communication failure;
 - .5 lack of familiarity with lifeboats, davits, equipment and associated controls;
 - .6 unsafe practices during lifeboat drills and inspections; and
 - .7 design faults other than on-load release.
- The Committee recalled that, at its seventy-fifth session, it had approved MSC/Circ.1049 on Accidents with lifeboats, to draw the attention of manufacturers, shipowners, crews and classification societies to the personal injury and loss of life that may follow inadequate attention to the design, construction, maintenance and operation of lifeboats, davits and associated equipment, and urged all concerned to take necessary action to prevent further accidents with lifeboats. The Committee further recalled that, at its seventy-seventh session, it had endorsed the intention of the Sub-Committee on Ship Design and Equipment, in co-operation with the Sub-Committee on Standards of Training and Watchkeeping, to develop further IMO guidance.
- 4 Accordingly, the Committee approved the Guidance on safety during abandon ship drills using lifeboats, as set out in the annex.
- 5 The Committee noted that the Guidance developed for lifeboats has relevance, in general, for emergency drills with other life-saving systems and should be taken into account when such drills are conducted.
- 6 Member Governments are invited to bring the Guidance to the attention of their maritime Administrations, relevant industry organizations, manufacturers, shipowners, crews and classification societies.

Member Governments are further invited, while enforcing the provisions of SOLAS regulation IX/4.3, to ensure that the provisions of the annex are addressed through the Safety Management System of the company, as appropriate.

ANNEX

GUIDANCE ON SAFETY DURING ABANDON SHIP DRILLS USING LIFEBOATS

1 GENERAL

1.1 Introduction

- 1.1.1 It is essential that seafarers are familiar with the life-saving systems on board their ships and that they have confidence that the systems provided for their safety will work and will be effective in an emergency. Frequent periodic shipboard drills are necessary to achieve this.
- 1.1.2 Crew training is an important component of drills. As a supplement to initial shore side training, on board training will familiarize crew members with the ship systems and the associated procedures for use, operation and drills. On these occasions, the objective is to develop appropriate crew competencies, enabling effective and safe utilization of the equipment required by the 1974 SOLAS Convention. The time limits set out in SOLAS for ship abandonment should be considered as a secondary objective when conducting drills.

1.2 Drill frequency

Experience has shown that holding frequent drills furthers the goals of making the crew familiar with the life-saving systems on board their ships and increasing their confidence that the systems will work and will be effective in an emergency. Drills give the crew opportunity to gain experience in the use of the safety equipment and in co-operation. The ability to cope with an emergency and handle the situation, if the ship needs to be abandoned, needs to be well rehearsed. However, frequent crew changes sometimes make it difficult to assure that all on board have had the opportunity to participate in drills if only the minimum required drills are conducted. Therefore, consideration needs to be given to scheduling drills as necessary to ensure all on board have an early opportunity to become familiar with the systems on board.

1.3 Drills must be safe

- 1.3.1 Abandon ship drills should be planned, organized and performed so that the recognized risks are minimized and in accordance with relevant shipboard requirements of occupational safety and health.
- 1.3.2 Drills provide an opportunity to verify that the life-saving system is working and that all associated equipment is in place and in good working order, ready for use.
- 1.3.3 Before conducting drills, it should be checked that the lifeboat and its safety equipment have been maintained in accordance with the manufacturer's instructions, as well as noting all the precautionary measures necessary. Abnormal conditions of wear and tear or corrosion should be reported to the responsible officer immediately.

1.4 Emphasis on learning

Drills should be conducted with an emphasis on learning and be viewed as a learning experience, not just a task to meet a regulatory requirement to conduct drills. Whether they are emergency drills required by SOLAS or additional special drills conducted to enhance the competence of the crew members, they should be carried out at safe speed. During drills, care should be taken to ensure that everybody familiarizes themselves with their duties and with the equipment. If necessary, pauses should be made during the drills to explain especially difficult elements.

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The experience of the crew is an important factor in determining how fast a drill or certain drill elements should be carried out.

1.5 Planning and organizing drills

- 1.5.1 The 1974 SOLAS Convention requires that drills shall, as far as practicable, be conducted as if there was an actual emergency.* This means that the entire drill should, as far as possible, be carried out. The point is that, at the same time, it should be ensured that the drill can be carried out in such a way that it is safe in every respect. Consequently, elements of the drill that may involve unnecessary risks need special attention or may be excluded from the drill.
- 1.5.2 In preparing for a drill, those responsible should review the manufacturers' instruction manual to assure that a planned drill is conducted properly. Those responsible for the drill should assure that the crew is familiar with the guidance provided in the life-saving system instruction manual.
- 1.5.3 Lessons learned in the course of a drill should be documented and made a part of follow-up shipboard training discussions and planning the next drill session.
- 1.5.4 The lowering of a boat with its full complement of persons is an example of an element of a drill that may, depending on the circumstances, involve an unnecessary risk. Such drills should only be carried out if special precautions are observed.

2 ABANDON SHIP DRILLS

2.1 Introduction

It is important that the crew who operate safety equipment on board are familiar with the functioning and operation of such equipment. The 1974 SOLAS Convention requires that sufficiently detailed manufacturers' training manuals and instructions be carried on board, which should be easily understood by the crew. Such manufacturers' manuals and instructions should be accessible for everyone on board and observed and followed closely during drills.

2.2 Guidance to the shipowner

- 2.2.1 The shipowner should ensure that new safety equipment on board the company's ships has been approved and installed in accordance with the provisions of the 1974 SOLAS Convention and the International Life-saving Appliances (LSA) Code.
- 2.2.2 Procedures for holding safe drills should be included in the Safety Management System (SMS) of the shipping companies. Detailed procedures for elements of drills that involve a special risk should be evident from workplace assessments adjusted to the relevant life-saving appliance.
- 2.2.3 Personnel carrying out maintenance and repair work on lifeboats should be qualified accordingly.**

^{*} Refer to SOLAS regulation III/19.3.1.

^{**} Refer to the Guidelines for periodic servicing and maintenance of lifeboats, launching appliances and on-load release gear (MSC/Circ.1093).

2.3 Lifeboats lowered by means of falls

- 2.3.1 In MSC/Circ.1049, on Accidents with lifeboats, the Maritime Safety Committee identified the following causes of accidents, to which special attention should be paid on board:
 - .1 failure of on-load release mechanism;
 - .2 inadvertent operation of on-load release mechanism;
 - .3 inadequate maintenance of lifeboats, davits and launching equipment;
 - .4 communication failure;
 - .5 lack of familiarity with lifeboats, davits, equipment and associated controls;
 - .6 unsafe practices during lifeboat drills and inspections; and
 - .7 design faults other than on-load release.
- 2.3.2 During drills, those responsible should be alert for conditions and situations stemming from the above items and should bring them to the attention of the responsible person for appropriate action. Feedback and improvement recommendations to the shipowner, the Administration and the system manufacturer are important elements of the marine safety system.
- 2.3.3 Before placing persons onboard a lifeboat, it is recommended that the boat first be lowered and recovered without persons on board to ascertain that the arrangement functions correctly. The boat should then be lowered into the water with only the number of persons on board necessary to operate the boat.
- 2.3.4 To prevent lashings or gripes from getting entangled, proper release should be checked before swinging out the davit.

2.4 Free-fall lifeboats

- 2.4.1 The monthly drills with free-fall lifeboats should be carried out according to the manufacturer's instructions, so that the persons who are to enter the boat in an emergency are trained to embark the boat, to take their seats in a correct way and to use the safety belts; and also are instructed on how to act during launching into the sea.
- 2.4.2 When the lifeboat is free-fall launched as part of a drill, this should be carried out with the minimum personnel required to manoeuvre the boat in the water and to recover it. The recovery operation should be carried out with special attention, bearing in mind the high risk level of this operation. Where permitted by SOLAS, simulated launching should be carried out in accordance with the manufacturer's instructions, taking due note of MSC/Circ.1137 on Guidelines for simulated launching of free-fall lifeboats.

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MSC/Circ.1137 15 December 2004

GUIDELINES FOR SIMULATED LAUNCHING OF FREE-FALL LIFEBOATS

- The Maritime Safety Committee, at its seventy-ninth session (1 to 10 December 2004), recognizing the need to provide a basic outline of essential steps to safely carry out simulated launching of free-fall lifeboats, required by SOLAS regulation III/19.3.3.4, and having considered proposals by the forty-seventh session of the Sub-Committee on Design and Equipment, approved the Guidelines for simulated launching of free-fall lifeboats, as set out in the annex.
- 2 Member Governments are invited to bring the annexed Guidelines to the attention of all parties concerned, for their application as appropriate.

ANNEX

GUIDELINES FOR SIMULATED LAUNCHING OF FREE-FALL LIFEBOATS

1 Definition

Simulated launching is a means of training the crew in the free-fall release procedure of free-fall lifeboats and in verifying the satisfactory function of the free-fall release system without allowing the lifeboat to fall into the sea.

2 Purpose and scope

The purpose of these Guidelines is to provide a basic outline of essential steps to safely carry out simulated launching. These Guidelines are general; the lifeboat manufacturer's instruction manual should always be consulted before conducting simulated launching. Simulated launching should only be carried out with lifeboats and launching appliances designed to accommodate it, and for which the manufacturer has provided instructions. Simulated launching should be carried out under the supervision of a responsible person who should be an officer experienced in such procedures.

3 Typical simulated launching sequence

- 3.1 Check equipment and documentation to ensure that all components of the lifeboat and launching appliance are in good operational condition.
- 3.2 Ensure that the restraining device(s) provided by the manufacturer for simulated launching are installed and secure and that the free-fall release mechanism is fully and correctly engaged.
- 3.3 Establish and maintain good communication between the assigned operating crew and the responsible person.
- 3.4 Disengage lashings, gripes, etc. installed to secure the lifeboat for sea or for maintenance, except those required for simulated free-fall.
- 3.5 Participating crew board the lifeboat and fasten their seatbelts under the supervision of the responsible person.
- 3.6 All crew, except the assigned operating crew, disembark the lifeboat. The assigned operating crew fully prepares the lifeboat for free-fall launch and secures themselves in their seats for the release operation.
- 3.7 The assigned operating crew activates the release mechanism when instructed by the responsible person. Ensure that the release mechanism operates satisfactorily and the lifeboat travels down the ramp to the distance specified in the manufacturer's instructions.

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3.8 Recover the lifeboat to its stowed position, using the means provided by the manufacturer and ensure that the free-fall release mechanism is fully and correctly engaged.

- 3.9 Repeat procedures from 3.7 above, using the back-up release mechanism when applicable.
- 3.10 The assigned operating crew disembarks the lifeboat.
- 3.11 Ensure that the lifeboat is returned to its normal stowed condition. Remove any restraining and/or recovery devices used only for the simulated launch procedure.