



Antigua and Barbuda  
Maritime Administration

SOLAS Circular  
No. 2012 - 007  
Rev 3  
24 August 2021

**SUBJECT: Lifeboat on-load Release Mechanisms and Fall Preventer Devices.**

**REFERENCE:**

- a) [IMO Resolution MSC.317\(89\)](#) *Adoption of amendments to the International Convention for the Safety of Life at SEA, 1974, as amended.*
- b) [IMO Resolution MSC 320\(89\)](#) *Adoption of amendments to the International Life-Saving Appliance (LSA) Code*
- c) [IMO Resolution MSC 321\(89\)](#). *Adoption of amendments to the revised recommendation on testing of Life-Saving Appliances (Resolution MSC.81(70)), as amended.*
- d) *MSC.1/Circ.1327 Guidelines for the fitting and use of fall preventer devices (FPDS)*
- e) *MSC.1/Circ.1392 Guidelines for the evaluation and replacement of lifeboat release and retrieval systems*
- f) *MSC.1/Circ.1584 Amendments to the Guidelines for evaluation and replacement of lifeboat release and retrieval systems (MSC.1/Circ.1392)*
- g) *MSC.1/Circ.1393 Early application of new SOLAS Regulation III/1.5*

**TO:** Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organizations.

**1. PURPOSE**

This Circular provides information on the interpretation, expectations, and requirements of the Administration in respect of Lifeboat on-load Release mechanisms and Fall Preventer Devices.

**2. APPLICATION**

This Circular applies to all Antigua and Barbuda flagged ships.

**3. BACKGROUND**

At the 89<sup>th</sup> Session of the IMO Maritime Safety Committee meeting in 2011 important amendments were adopted to the SOLAS Convention, Chapter III/1 and to the Life Saving Appliances Code (LSA Code). The Committee also adopted MSC Resolutions 320(89) and 321(89) which contain amendments to the Life Saving Appliances (LSA) Code requirements and for the testing and approval of LRRS. These amendments affect lifeboat on-load release mechanisms fitted on all ships, existing and new. The changes apply to davit launched lifeboats only and do not affect free-fall boats or rescue boats with a single fall and no on-load release capability and they come into effect on 1 January 2013.

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The intention of the changes is to improve the safety of lifeboats in response to the large number of accidents in which seafarers have been killed or injured while launching or recovering lifeboats.

#### **4. OBLIGATIONS AND GUIDANCE/RESPONSIBILITIES**

##### **1. Scope of the changes.**

1. Regulation SOLAS III/1.5 requires that all lifeboat onload release mechanisms that do not comply with the new standards in the amended LSA Code must be replaced not later than the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019. This means that all existing onload release mechanisms currently in service will have to be evaluated and tested to confirm that they comply with the new standards.
2. The IMO has also provided guidance in MSC.1/Circ.1392 and the amending circular MSC.1/Circ. 1584 for the evaluation and replacement of lifeboat release and retrieval systems. The process requires that:
  1. Documentation and information for each type of lifeboat release and retrieval system is to be submitted to the administration or to an RO acting on its behalf for a design review. If the design review shows that the system is not compliant with the new standard, all systems of that type should be replaced by the due dates.
  2. If the design review is satisfactory, then a performance test should be conducted by the manufacturer in accordance with the test criteria in the LSA Code and witnessed by the Administration or by an RO acting on its behalf. If the performance test is not satisfactory the systems should be replaced by the due dates. The IMO Guidelines allow that a lifeboat release and retrieval system that is not satisfactory at the performance test may be modified and re-tested and if it is then satisfactory it can be evaluated in accordance with the guidelines and the details of the modified system can be reported.
  3. If the performance test is satisfactory each lifeboat release and retrieval system in service of that type should be subjected to a one-time follow-up overhaul examination not later than the first dry-docking after 1 July 2014 by the manufacturer or his authorised representative following the guidance in Resolution MSC.402(96) and including a detailed assessment of the condition of the components of the system.
3. For Antigua and Barbuda ships, all the Recognised Organisations are authorised to conduct the design reviews and witness the performance tests of systems on behalf of the Administration. The Administration is required to report the results of any testing and evaluation to the IMO and any RO which is engaged in the review, testing and evaluation of any release and retrieval system used on an Antigua and Barbuda ship and which is not otherwise reported to the IMO by another flag State, should make a report to ADOMS in the format set out in MSC.1/Circ.1392.

2. Planning actions for owners.

1. It is possible that many existing lifeboat release and retrieval systems may not meet the new LSA Code standards. They will need to be replaced by the first dry-docking after 1 July 2014 but not later than 1 July 2019. It is possible therefore that there may be a large demand for replacement systems as the dates approach and that there may be delays in obtaining replacement systems that comply with the standards and are suitable for fitting in existing boats. ADOMS strongly recommends to owners that they make enquiries as soon as possible with the manufacturers of their existing lifeboat release and retrieval systems to establish if they have been tested for compliance with the new standard and the results of those tests.

2. If the existing systems are found not to comply with the new standard, owners should make early arrangements to have them replaced with compliant systems. If it is necessary in any ship to replace the lifeboat release and retrieval systems with systems that comply with the new standard, the owner should first submit the necessary information as set out in paragraphs 18,19 and 20 of MSC.1/Circ. 1392 as amended to their Recognised organization for review and approvals.

3. Fall Preventer Devices: Immediate temporary measures until systems are shown to be compliant.

1. Fall Preventer Devices (FPDs) are arrangements that provide an additional measure of protection for existing systems should the system release unexpectedly.

2. Existing release and retrieval systems that have not been found to follow the new standards may pose a risk to the seafarers using them. Owners should therefore make immediate arrangements to fit fall protection devices, wherever possible, to all davit launched release and recovery systems that have not yet been shown to follow the new standard. MSC.1/Circ.1327 provides extensive guidance on the possible options that can be used and their arrangements. Owners should note that arrangements using wires or chains should not be used and that systems using fibre strops and similar should be arranged so that the drop and consequent shock load, if the release and retrieval system opens, is as small as possible. A functional test of the ability to launch the lifeboat should be carried out as soon as the fall prevention devices are fitted.

3. Strops, slings and other components used as part of a fall preventer device should all be certified for a safe working load utilising a factor of six times the total weight of the lifeboat fully loaded with all its equipment and the full complement of persons.

4. Shipowners should note that the existing attachment points on many systems for use by hanging off pennants may not have sufficient strength for the attachment of fall preventer devices and may not be able to withstand the shock load of a boat if the release system opens unexpectedly. Any arrangement for fall preventer devices

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that utilises the existing hanging off pennant arrangements should first check that their strength is adequate for this purpose.

5. There is no requirement for Fall Preventer Devices to be certificated by ROs or by flag once fitted. However, strops, wires, shackles, and other components should be properly certified by their manufacturers for Safe Working Load in common with any other such equipment.

4. Actions where Fall Preventer Devices are not practicable.

1. There will be some release and retrieval systems in service in which it is not immediately practicable, without modification, to fit a fall protection device and ADOMS would advise that:

1. No hook, support structure for a hook, or other part of the system should be drilled for the installation of a pin without the express authorisation and approval of the manufacturer.
2. No attachment point or other lifting point should be welded or otherwise attached to any part of an existing system without the express authorisation and approval of the manufacturer.

2. Where it is impossible to arrange a fall preventer device without drilling parts of the existing system for a pin or attaching eyes or other fittings and the manufacturer's agreement to this cannot be obtained, fall preventer devices should not be fitted.

3. In such cases the owner and master should establish other procedures to minimise the risks to seafarers. These could include arrangements to ensure that crew members are not to be on board lifeboats during practice launching. In any such case the procedures should be clearly documented in the ships ISM procedures and well understood by all seafarers on board

**Issued by**

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