



SUB-COMMITTEE ON SHIP DESIGN AND  
EQUIPMENT  
54th session  
Agenda item 22

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## ANY OTHER BUSINESS

### Testing of free-fall lifeboats

#### Submitted by the International Association of Classification Societies (IACS)

##### SUMMARY

*Executive summary:* This document brings to the attention of the Sub-Committee what appears to be an inconsistency in the applicable SOLAS regulations regarding the testing of free-fall lifeboats release systems

*Strategic direction:* 2

*High-level action:* 2.0.1

*Planned output:* 2.0.1.25

*Action to be taken:* Paragraph 7

*Related documents:* Resolution MSC.216(82) and MSC.1/Circ.1206/Rev.1

#### Background

1 Amendments to SOLAS chapter III as contained in annex 1 to resolution MSC.216(82) address the following requirements relating to free-fall lifeboats (FFLBs):

- .1 amendments to SOLAS regulation III/19.3.3.4 pertain to the emergency training and drills required for FFLBs; and
- .2 amendments to SOLAS regulation III/20.11.2 now require annual and every five years testing of FFLB release systems, as has been required for lifeboat on-load release gear.

2 It is also noted that guidelines for simulated launching are provided in MSC.1/Circ.1206/Rev.1.

#### Discussion

3 The amendments to SOLAS regulation III/19.3.3.4 allow, as an alternative to free-fall launching, the lowering of the FFLB by the secondary means of launching every three months, and then simulated launching every six months. There is no requirement in this regulation that would mandate free-fall launching as the only option.

4 SOLAS regulation III/20.11, as amended by resolution MSC.216(82), now requires FFLB release systems to undergo thorough exams and operational testing every year. This implies, but does not require, free-fall launching, as the test of the release system could be performed by using the mechanism used for simulated launching.

5 In addition to the annual testing required by the amended SOLAS regulation III/20.11, FFLB release systems are also required to be tested at five-year intervals, "*under a load of 1.1 times the total mass of the lifeboat when loaded with its full complement of persons and equipment whenever the release ... [system] ... is overhauled.*" This implies that the FFLB is to be free-fall launched (not simulated). However, depending on the capacity of the mechanism that would be used for simulated launching to withstand the 110% load, it might be possible to perform the 110% load test without free-fall launching of the FFLB.

#### **Clarification sought**

6 Accordingly, while the tests now required of FFLB release systems may be carried out by free-fall launching of the boat, this does not appear to be required by the regulations. IACS therefore considers it necessary to clarify whether it is the intention of the regulations to allow the various operational tests to be performed without requiring free-fall launching of the FFLB.

#### **Action requested of the Sub-Committee**

7 The Sub-Committee is invited to note that this document has also been submitted to MSC 88 for consideration under its agenda item on "Implementation of instruments and related matters". However, IACS believes that in considering that document the Committee would benefit from any input that the experts in this Sub-Committee can provide.

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