

SUB-COMMITTEE ON SHIP SYSTEMS AND
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Agenda item 12

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY AND
ENVIRONMENT-RELATED CONVENTIONS**

**Unified interpretation on lifebuoy arrangements for means of
embarkation/disembarkation
(SOLAS regulation II-1/3-9 and MSC.1/Circ.1331; and SOLAS regulation III/7.1)**

Submitted by IACS

SUMMARY

Executive summary: The annex to this document proposes a draft unified interpretation on "Lifebuoy arrangements for means of embarkation/disembarkation" (SOLAS regulation II-1/3-9.2 and MSC.1/Circ.1331; and SOLAS regulation III/7.1)

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 7

Related documents: None

Background

1 SOLAS regulation II-1/3-9.2 on the means of embarkation on and disembarkation from ships states the following:

"9.2 The means of embarkation and disembarkation required in paragraph 1 shall be constructed and installed based on the guidelines developed by the Organization.*

* Refer to Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation (MSC.1/Circular.1331)."

2 Paragraph 3.3 of annex to MSC.1/Circ.1331 on *Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation* states the following:

"A lifebuoy equipped with a self-igniting light and a buoyant lifeline should be available for immediate use in the vicinity of the embarkation and disembarkation arrangement when in use."

3 SOLAS regulations III/7.1.2 and 1.3 states the following:

"1.2 At least one lifebuoy on each side of the ship shall be fitted with a buoyant lifeline complying with the requirements of paragraph 2.1.4 of the Code ..."

"1.3 ... lifebuoys with lights and those with lights and smoke signals shall be equally distributed on both sides of the ship and shall not be the lifebuoys provided with lifelines in compliance with the requirements of paragraph 1.2."

Discussion

4 IACS is aware of the fact that some confusion exists in the industry regarding the provisions of SOLAS and MSC.1/Circ.1331 on the number of lifebuoys fitted with a buoyant lifeline that are to be carried on board a ship.

5 The draft UI in the annex to this document is intended to clarify that a lifebuoy fitted with both a light and a lifeline as per MSC.1/Circular.1331 for compliance with SOLAS regulation II-1/3-9 should not be taken into account when considering the minimum number and distribution of lifebuoys, as required by SOLAS regulation III/22.1.1 (lifebuoys for passenger ships) or III/32.1.1 (lifebuoys for cargo ships), as applicable.

6 IACS suggests that the unified interpretation, if agreed and finalized, should only be applied to ships contracted for construction on or after 1 January 2020.

Action requested of the Sub-Committee

7 The Sub-Committee is invited to consider the discussion provided above together with the draft IACS UI, as set out in the annex and take action, as appropriate.

ANNEX

DRAFT UNIFIED INTERPRETATION ON LIFEBUOY ARRANGEMENTS FOR MEANS OF EMBARKATION/DISEMBARKATION

SOLAS regulation III/7.1.3 (lifebuoys) states:

"...lifebuoys with lights and those with lights and smoke signals shall be equally distributed on both sides of the ship and shall not be the lifebuoys provided with lifelines in compliance with the requirements of paragraph 1.2."

SOLAS regulation II-1/3-9.2 (means of embarkation on and disembarkation from ships) states:

"9.2 The means of embarkation and disembarkation required in paragraph 1 shall be constructed and installed based on the guidelines developed by the Organization.*

* Refer to Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation (MSC.1/Circular.1331)."

Paragraph 3.3 of annex to MSC.1/Circ.1331 on *Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation* states:

"A lifebuoy equipped with a self-igniting light and a buoyant lifeline should be available for immediate use in the vicinity of the embarkation and disembarkation arrangement when in use."

Interpretation

A lifebuoy, fitted with both a light and a lifeline as per MSC.1/Circular.1331 for compliance with SOLAS regulation II-1/3-9.2, should not be taken into account when considering the minimum number and distribution of lifebuoys as required by SOLAS regulations III/22.1.1 or III/32.1.1, as applicable.
