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EQUIPMENT  
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Agenda item 12

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

**Comments on document SSE 10/14 relating to the proposed interpretations  
of paragraphs 6.1.1.3 and 6.1.2.2 of the LSA Code**

**Submitted by IACS**

**SUMMARY**

*Executive summary:* This document provides comments on document SSE 10/14 relating to the proposed interpretations of paragraphs 6.1.1.3 and 6.1.2.2 of the LSA Code, with a view towards universal and uniform implementation.

*Strategic direction,  
if applicable:* 7

*Output:* 7.1

*Action to be taken:* Paragraph 23

*Related documents:* SSE 8/15/2; SSE 9/14/3, SSE 9/14/7 and SSE 10/14

**Introduction**

1 Document SSE 8/15/2 (IACS) sought clarification of paragraph 6.1.2.2 of the LSA Code as to whether a dedicated rescue boat and its launching appliance on a cargo ship, which is launched by stored mechanical power as per paragraph 6.1.1.3 of the LSA Code, should be provided with an arrangement to be slewed out to the ship's side, and even hoisted up, if necessary, from its stowed position on the ship's deck or from a position within the rescue boat (SSE 8/15/2, paragraph 5).

2 Also, document SSE 9/14/3 (IACS) sought clarification on the implementation of paragraphs 6.1.1.3 and 6.1.2.6 of the LSA Code in respect to the manual hoisting-up of a dedicated rescue boat on a cargo ship from its stowed position for subsequent slewing out to ship's side.

3 Having considered the documents, SSE 9 agreed in principle with the proposal to establish unified interpretations on the requirement for manual hoisting of a dedicated rescue boat in the LSA Code; and consequently instructed the LSA Correspondence Group to

consider the issues, with a view to finalization of relevant unified interpretations and reporting back to SSE 10 (SSE 9/20, paragraph 14.13).

## Discussion

### ***Proposed interpretation of paragraph 6.1.1.3 of the LSA Code***

4 As a result of the LSA Correspondence Group's consideration, the following interpretation of paragraph 6.1.1.3 of the LSA Code was proposed, as contained in paragraph 1 of annex 1 to document SSE 10/14:

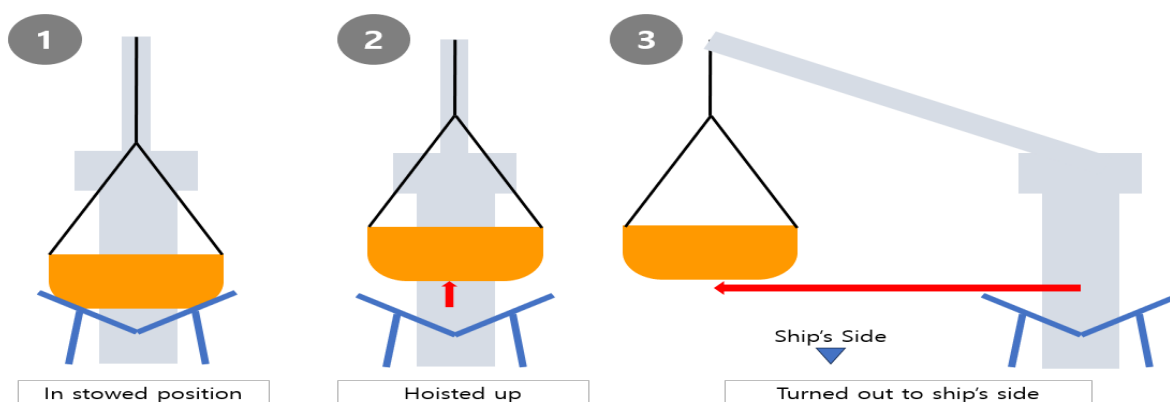
"For cargo ships, manual hoisting of a dedicated rescue boat from the stowed position, having a mass not more than 700 kg in fully equipped condition, with engine, but without the crew, may be acceptable for subsequent slewing out by stored mechanical power provided that:

- .1 manual hoisting from the stowed position and turning out to the embarkation position is possible by one person;
- .2 the force on the crank handle does not exceed 160 N at the maximum crank radius of 350 mm; and
- .3 means having sufficient strength such as bowsing line are provided for bringing the rescue boat against the ship's side and holding it alongside so that persons can be safely embarked."

5 The above proposed interpretation incorporates a few comments which were presented in the Correspondence Group aiming to add conditions on the proposal originally offered in document SSE 9/14/3. It is noted that the conditions are almost the same as those appearing in paragraphs 6.1.1.3.1 to 6.1.1.3.3 of the LSA Code, as amended by resolution MSC.459(101).

6 As such, while IACS sought to establish a general interpretation for dedicated rescue boats of all sizes, the proposed interpretation is limited to the manual type launching appliance for a dedicated rescue boat of not more than 700 kg on a cargo ship, as newly established in the above-mentioned provisions of the LSA Code.

7 The illustration below provides the three steps on how a dedicated rescue boat is launched.



8 Based on the above illustration and the allowable launching appliance as per the LSA Code or the equivalency accepted by some flag State Administrations, IACS assesses the issue at hand as shown in the below table.

Launching appliance on cargo ships	Step 2 by	Step 3 by
<b>(Case 1)</b> - for dedicated rescue boats of more than 700 kg; - with stored mechanical power; and - regardless of installation date;	<b>In question</b>	Stored mechanical power
<b>(Case 2)</b> - for dedicated rescue boats of not more than 700 kg; - with stored mechanical power; - not in compliance with paragraphs 6.1.1.3.1 to 6.1.1.3.3 of the LSA Code; and - regardless of installation date	<b>In question</b>	Stored mechanical power
<b>(Case 3)</b> - for dedicated rescue boats of small sizes; - without stored mechanical power; - an equivalency accepted by the flag Administration; and - installed before 1 January 2024	Manual	Manual
<b>(Case 4)</b> - for dedicated rescue boats of not more than 700 kg; - without stored mechanical power; - in compliance with paragraphs 6.1.1.3.1 to 6.1.1.3.3 of the LSA Code; and - installed on or after 1 January 2024	Manual	Manual

9 The above cases 1 and 2 are the main concern of IACS; and the question remains whether the manual hoisting up of step 2 is acceptable, as they were not fully addressed by the Correspondence Group. In contrast, cases 3 and/or 4, on which the interpretation (proposed in paragraph 1 of annex 1 to document SSE 10/14) focused during the consideration in the Correspondence Group, seem to be rather evident either from the LSA Code or the equivalency accepted by the flag Administration without a need to establish an interpretation.

10 Given that the manual hoisting from the stowed position is already permitted for the manual type launching appliance as shown in paragraph 6.1.1.3.1 of the LSA Code, IACS is of the view that the interpretation proposed in paragraph 1 of annex 1 to document SSE 10/14 may not be necessary and cannot provide sufficient clarification as to whether, for cargo ships, dedicated rescue boats other than those launched by manual type davits may be hoisted up from their stowed positions by a manually actuated mechanism and subsequently turned out to ship's side by stored mechanical power.

11 In this regard, as already pointed out in paragraphs 3 and 5 of document SSE 9/14/3, IACS reiterates the practical difficulties in finding the stored mechanical power available on the market which may cover both the hoisting up and the subsequent slewing out to ship's side and reemphasizes the concern related to previous PSC contentions.

12 Unless the manual hoisting up is acceptable in cases 1 and/or 2 above, a tilting cradle which may not necessitate the hoisting up, as shown below, de facto becomes the only available solution for the launching appliance of dedicated rescue boats to comply with paragraph 6.1.1.3 of the LSA Code.



13 However, a tilting cradle is neither defined nor explicitly required under SOLAS chapter III and the LSA Code. Thus, IACS is concerned that the conclusion of the LSA Correspondence Group may not alleviate the level of uncertainty in implementing paragraph 6.1.1.3 of the LSA Code and, therefore, may cause retroactive action towards cradle arrangements already installed on board.

14 Given that the distance of the manual hoisting-up from the stowed position may be very short, as illustrated in paragraph 7 above, IACS is of the view that the hand gear already required for the recovery of a rescue boat, as per paragraph 6.1.2.6 of the LSA Code, may be accepted as an alternative method to lift the boat from its stowed position. Such an arrangement is not expected to substantially delay the launching process of a dedicated rescue boat.

#### ***Proposed interpretation of paragraph 6.1.2.2 of the LSA Code***

15 Further, the LSA Correspondence Group agreed the following interpretation of paragraph 6.1.2.2 of the LSA Code for small rescue boats, as shown in paragraph 2 of annex 1 to document SSE 10/14, based on document SSE 9/14/7 (China):

"For cargo ships not fitted with stored mechanical power in compliance with paragraph 6.1.1.3 of the LSA Code, as amended through resolution MSC.459(101), the manual hoisting from the stowed position and turning out to the embarkation position of the rescue boat does not need to be actuated from a position within the rescue boat."

16 However, based on an alternative proposal, the LSA Correspondence Group included in paragraph 3 of annex 1 to document SSE 10/14 the following additional interpretation of paragraph 6.1.2.2 of the LSA Code:

"Launching mechanism is the means to control the launch of the lifeboat or rescue boat after the point of embarkation when all persons assigned have boarded."

17 In this regard, IACS is of the view that the interpretation mentioned in paragraph 15 above seems to address only small rescue boats in compliance with the revised paragraph 6.1.1.3 of the LSA Code, i.e. a launching appliance without stored mechanical power but with manual hoisting/turning-out functions. Hence, the proposal may not bring clarity for existing ships and all sizes of rescue boats.

18 However, IACS finds that the interpretation in paragraph 16 above may alternatively address the question raised by IACS through document SSE 8/15/2, recognizing that for cargo ships, unlike passenger ships, a dedicated rescue boat may not be necessarily boarded by all assigned persons from its stowed position but at ship's side.

19 Therefore, IACS is of the view that the Working Group on Life-Saving Appliances, if established, should further discuss the proposed interpretation of paragraph 6.1.2.2 based on paragraph 3 of annex 1 to document SSE 10/14 instead of endorsing the interpretation mentioned in paragraph 2 of that annex, which may not address all cases.

### **Proposal**

20 In light of paragraphs 4 to 14 above, IACS proposes that the following draft interpretation of paragraph 6.1.1.3 of the LSA Code be considered in the LSA Working Group, if established, instead of endorsing the interpretation proposed in paragraph 17.1 of document SSE 10/14 and paragraph 1 of its annex 1:

"For cargo ships, manual hoisting up of a dedicated rescue boat may be acceptable for subsequent slewing out by stored mechanical power."

21 If the interpretation proposed in paragraph 20 above is not acceptable, IACS seeks the view of the Sub-Committee whether stored mechanical power should provide for the hoisting of a dedicated rescue boat from its stowed position for subsequent slewing out, except when the hoisting up is not needed by the use of, for example, a tilting cradle.

22 In light of paragraphs 15 to 19 above, IACS supports that the interpretation of paragraph 6.1.2.2 of the LSA Code proposed in paragraph 17.2 of document SSE 10/14 and paragraph 3 of its annex 1, be further discussed in the LSA Working Group, if established, instead of endorsing the interpretation proposed in paragraph 17.1 of document SSE 10/14 and paragraph 2 of its annex 1.

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

23 The Sub-Committee is invited to consider the above, the proposals in paragraphs 20 to 22 above and take action, as appropriate.

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