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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 applicability of SOLAS
regulation III/20.11 and resolution MSC.402(96) to inflated rescue boats**

Submitted by IACS

SUMMARY

Executive summary: This document provides comments on document SSE 10/14 relating to the applicability of SOLAS regulation III/20.11 and resolution MSC.402(96) to inflated rescue boats, with a view towards universal and uniform implementation.

Strategic direction, if applicable: 7

Output: 7.1

Action to be taken: Paragraph 9

Related documents: MSC 105/19/8 and SSE 10/14

Introduction

1 In document MSC 105/19/8, IACS sought the view of the Maritime Safety Committee as to whether SOLAS regulation III/20.11 and resolution MSC.402(96) were applicable to inflated rescue boats. Also, IACS expressed its intent to submit to a future session of the SSE Sub-Committee a document containing a draft unified interpretation or to work with interested Member State(s) to propose a new output to a future session of MSC, with a view to amending relevant IMO instruments, depending on the preference of the Committee. In this regard, MSC 106 instructed SSE 9 to consider the issue as an urgent matter (MSC 106/19, paragraph 18.18).

2 Consequently, SSE 9 instructed the LSA Correspondence Group to consider the matter. The LSA Correspondence Group reached a unanimous agreement, as contained in paragraph 11 of document SSE 10/14, that the requirements of SOLAS regulation III/20.11 and resolution MSC.402(96) apply to inflated rescue boats.

Discussion

3 In respect of the repair and maintenance of inflated rescue boats, SOLAS regulation III/20.8.4 states:

"8.4 All repairs and maintenance of inflated rescue boats shall be carried out in accordance with the manufacturer's instructions. Emergency repairs may be carried out on board the ship; however, permanent repairs shall be effected at an approved servicing station."

4 At the same time, SOLAS regulation III/20.11.5, as amended by resolution MSC.404(96), regulates the maintenance and repair of rescue boats in accordance with resolution MSC.402(96) without making reference to the *Recommendation on conditions for the approval of servicing stations for inflatable liferafts* (resolution A.761(18)), as follows:

"11.5 The thorough examination, operational testing and overhaul required by paragraphs 11.1 to 11.4 and the maintenance and repair of equipment specified in paragraphs 11.1 to 11.4 shall be carried out in accordance with the Requirements for maintenance, thorough examination, operational testing, overhaul and repair, and the instructions for onboard maintenance as required by regulation 36."

5 Therefore, the conclusion of the LSA Correspondence Group referred to in paragraph 2 above may imply that there is an unavoidable overlap on the repair and maintenance of inflated rescue boats between SOLAS regulations III/20.8.4 and III/20.11. In this regard, IACS finds that such an overlap might have arisen due to an inadvertent oversight when SOLAS regulation III/20.11 was amended through resolution MSC.404(96).

6 In the meantime, in order to capture the understanding as agreed by the LSA Correspondence Group, IACS believes that an interpretation of SOLAS regulations III/20.8.4 and III/20.11 and resolution MSC.402(96) should be developed as an interim measure.

Proposal

7 Considering the discussion in paragraphs 3 to 5 above, IACS suggests that the overlap between SOLAS regulations III/20.8.4 and III/20.11 should be dealt with as one of the safety barriers and/or issues which are being considered under agenda item 14 on "Comprehensive review of the Requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear (resolution MSC.402(96)) to address challenges with their implementation", with a view to amending relevant IMO instruments to remove such a duplication, which would require expansion of the scope of the output to also include such instruments.

8 Further, with reference to paragraph 6 above, IACS proposes a unified interpretation of SOLAS regulations III/20.8.4 and III/20.11, and resolution MSC.402(96), as follows:

"SOLAS regulation III/20.11 and resolution MSC.402(96) should be applicable to inflated rescue boats."

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider the above, the proposals in paragraphs 7 and 8 above and take action, as appropriate.