



**AMENDMENTS TO SOLAS CHAPTER III AND CHAPTER IV OF THE LSA CODE
TO REQUIRE THE CARRIAGE OF SELF-RIGHTING OR CANOPIED
REVERSIBLE LIFERAFTS FOR NEW SHIPS**

Comments on document SSE 12/3

Submitted by IACS

SUMMARY

Executive summary: This document comments on document SSE 12/3, with a view to ensuring the correct and unambiguous referencing of new requirements of the LSA Code for automatically self-righting or canopied reversible liferafts within SOLAS chapter III. Proposals are also made to maintain the intended application scope and avoid unintended retroactive requirements for existing ships.

*Strategic direction, 7
if applicable:*

Output: 7.30

Action to be taken: Paragraph 16

Related documents: SSE 11/20 and SSE 12/3

Background

1 SSE 11 agreed that the requirement for automatically self-righting or canopied reversible liferafts would apply to new cargo and passenger ships, except for liferafts with a capacity of six persons or fewer (SSE 11/20, paragraph 6.6). The Sub-Committee also noted the discussion of the LSA Working Group 1, indicating that the future amendments should exclude liferafts with a capacity of up to 12 persons from the application scope, and should apply irrespective of whether liferafts are davit-launched or not (SSE 11/20, paragraph 6.8).

2 Based on the application scope agreed or noted by SSE 11, the LSA Correspondence Group 1 further developed draft amendments to SOLAS chapter III and chapter IV of the LSA Code.

3 Through this document, IACS reiterates, as briefly reflected in paragraphs 13, 16, 17 and 18 of document SSE 12/3, that clear and precise cross-referencing between SOLAS chapter III and the new amendments of the LSA Code requirements is essential to avoid ambiguity or misinterpretation of application.

Discussion

Correct referencing of the new amendments of LSA Code requirements within SOLAS chapter III

4 It is noted that in annex 4 of document SSE 12/3, the draft requirements for automatically self-righting or canopied reversible liferafts are introduced as new subsection 4.2.10 under section 4.2 of the LSA Code, which governs inflatable liferafts.

5 It is further noted that in annex 3 of document SSE 12/3, the draft amendments to SOLAS chapter III reference the new requirements of the LSA Code to mandate or exempt the carriage of automatically self-righting or canopied reversible liferafts, as summarized below:

SOLAS chapter III	Referencing of the LSA Code requirements	Descriptions
New paragraph 1.6	"... need not comply with the requirements of section 4.2.10 of the Code, as amended by resolution [MSC.XXX(XX)]."	Exemption of existing ships
New paragraph 21.1.6	"... complying with the requirements of section 4.2 of the Code ..."	Carriage on new passenger ships
Revised paragraph 26.2.4		Carriage on new ro-ro passenger ships
New paragraph 31.1.9		Carriage on new cargo ships

6 Existing requirements of SOLAS chapter III currently reference sections 4.2 or 4.3 of the LSA Code to define liferaft requirements for both passenger ships and cargo ships, as summarized below:

SOLAS chapter III	Referencing of the LSA Code requirements	Descriptions
Paragraphs 21.1.1.1, 21.1.1.2, 21.1.2.1, 21.1.2.2 and 21.1.4.1	"... shall comply with the requirements of section 4.2 or 4.3 of the Code ...", or	Passenger ships
Paragraphs 31.1.1.2, 31.1.2.2 and 31.1.3.1	"... complying with the requirements of section 4.2 or 4.3 of the Code ..."	Cargo ships

7 If the new amendments of the LSA Code remain numbered as section 4.2.10, any global reference to section 4.2 of the LSA Code in SOLAS chapter III would unintentionally include section 4.2.10, resulting in mandatory application to all ships, regardless of their construction dates or/and liferaft capacity. IACS considers that this would create regulatory ambiguity and may lead to unintended mandatory retrofit obligations.

8 To clearly differentiate between ordinary inflatable liferafts and automatically self-righting or canopied reversible liferafts, IACS proposes the renumbering of subsection 4.2.10 as a new stand-alone section 4.2-1, enabling clear regulatory distinction, as illustrated below:

SOLAS chapter III	Referencing of the LSA Code requirements	Application
Paragraphs 21.1.1.1, 21.1.1.2, 21.1.2.1, 21.1.2.2, 21.1.4.1, 31.1.1.2, 31.1.2.2 and 31.1.3.1	<p>"... shall comply with the requirements of section 4.2 or 4.3 of the Code ...", or</p> <p>"... complying with the requirements of section 4.2 or 4.3 of the Code ..."</p>	All liferafts on all ships
New paragraphs 21.1.6 and 31.1.9, and revised paragraph 26.2.4	"... complying with the requirements of sections 4.2 and 4.2-1 of the Code ..."	Automatically self-righting or canopied reversible liferafts installed on new ships

9 In this case, the reference to the new requirements of the LSA Code in the draft new paragraph 1.6 under SOLAS chapter III will also need to be updated to section 4.2-1.

Concerns regarding replacement of SOLAS regulation III/26.2.4

10 SOLAS regulation III/1.1 applies its chapter III to ships constructed on or after 1 July 1998, unless otherwise expressly provided.

11 Existing SOLAS regulation III/26.2.4 requires every liferaft on ro-ro passenger ships to be either automatically self-righting or canopied reversible in accordance with the recommendations in MSC.1/Circ.809. However, it is found in annex 3 of document SSE 12/3 that this requirement will be simply replaced by the following new text addressing new ro-ro passenger ships only, without retaining the existing footnote to MSC.1/Circ.809.

"2.4 Every liferaft on ro-ro passenger ships [on or after the date of entry into force] shall either be automatically self-righting or be a canopied reversible liferaft complying with the requirements of section 4.2 of the Code which is stable in a seaway and is capable of operating safely whichever way up it is floating. Alternatively, the ship shall carry automatically self-righting liferafts or canopied reversible liferafts, in addition to its normal complement of liferafts, of such aggregate capacity as will accommodate at least 50% of the persons not accommodated in lifeboats. This additional liferaft capacity shall be determined based on the difference between the total number of persons on board and the number of persons accommodated in lifeboats. Every such liferaft shall be approved by the Administration having regard to the recommendations adopted by the Organization."

12 Instead, in annex 3 of document SSE 12/3, a new paragraph 26.1.1 was proposed for inclusion, as excerpted below, to address the carriage requirements for automatically self-righting or canopied reversible liferafts on existing ro-ro passenger ships.

"1 This regulation applies to all ro-ro passenger ships. Ro-ro passenger ships constructed:

.1 on or after 1 July 1998 and before [a date to be decided] shall comply with the requirements of paragraphs ~~2.3, 2.4, 3.1, 3.2, 3.3, 4 and 5~~;

..."

13 It should be noted that substantive discrepancies exist between MSC.1/Circ.809 and the draft new subsection 4.2.10 of the LSA Code, and that equipment certificates already issued for automatically self-righting or canopied reversible liferafts cannot yet reference subsection 4.2.10 of the LSA Code. IACS considers that, if the existing SOLAS regulation III/26.2.4 were to be deleted and existing ro-ro passenger ships were to be required to comply with the new draft SOLAS regulation III/26.2.4, existing liferafts would ultimately need to be replaced with units certified to the new subsection 4.2.10 of the LSA Code. IACS considers that this outcome would be at odds with the decisions taken at SSE 11 on the agreed application scope for automatically self-righting or canopied reversible liferafts.

14 Therefore, IACS proposes that existing SOLAS regulation III/26.2.4 be retained unchanged, and a new SOLAS regulation III/26.2.4.1 be added to address new ships, as shown below (shaded text):

"2.4 Every liferaft on ro-ro passenger ships shall either be automatically self-righting or be a canopied reversible liferaft which is stable in a seaway and is capable of operating safely whichever way up it is floating. Alternatively, the ship shall carry automatically self-righting liferafts or canopied reversible liferafts, in addition to its normal complement of liferafts, of such aggregate capacity as will accommodate at least 50% of the persons not accommodated in lifeboats. This additional liferaft capacity shall be determined on the basis of the difference between the total number of persons on board and the number of persons accommodated in lifeboats. Every such liferaft shall be approved by the Administration having regard to the recommendations adopted by the Organization.*

2.4.1 Every liferaft installed on ro-ro passenger ships constructed on or after DDMMYYYY shall comply with sections 4.2 and 4.2-1 of the Code."

* Refer to MSC.1/Circ.809, *Recommendation for canopied reversible liferafts, automatically self-righting liferafts and fast rescue boats, including testing, on ro-ro passenger ships.*

15 In addition, IACS suggests that the draft revised paragraph 1 of SOLAS regulation III/26.1 be modified to give flexibility to existing ro-ro passenger ships, as follows (shaded text is in addition to and in modification of the changes in annex 3 of document SSE 12/3):

"1 This regulation applies to all ro-ro passenger ships. Ro-ro passenger ships constructed:

.1 on or after 1 July 1998 and before [a date to be decided] shall comply with the requirements of either paragraphs 2.4 or 2.4.1;

..."

Action requested of the Sub-Committee

16 The Sub-Committee is invited to consider the foregoing, the proposals in paragraphs 8, 9, 14 and 15, and to take action, as appropriate.