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Agenda item 3

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NEW REQUIREMENTS FOR VENTILATION OF SURVIVAL CRAFT

Comments on document SSE 12/3

Submitted by Bahamas, Panama, United Kingdom, CLIA, BIMCO,
IACS, ICS, IPTA, NI and RINA

SUMMARY

Executive summary: This document comments on document SSE 12/3, containing the report of the LSA Correspondence Group 1, to clarify the relationship between the ventilation requirements for partially enclosed lifeboats (PELBs) in the draft new paragraph 4.5.5 of the LSA Code and the related test provisions in the draft new paragraph 6.18.1 of resolution MSC.81(70).

Strategic direction, if applicable: 7

Output: 7.36

Action to be taken: Paragraph 10

Related document: SSE 12/3

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.6) and comments on document SSE 12/3 (United States), containing the report of the LSA Correspondence Group 1.

Background

2 The draft new paragraph 4.5.5 of the LSA Code (SSE 12/3, annex 1) requires PELBs installed on or after 1 January 2032 to be provided with means of ventilation. Three alternative means of complying with this draft requirement are provided, as follows:

- "1 an arrangement providing a ventilation rate of at least 5 m³/h per person for the number of persons which the lifeboat is permitted to accommodate and for a period of not less than 24 hours. The ventilation means shall be operable from inside the lifeboat and shall be arranged to ensure that the lifeboat is ventilated without stratification or formation of unventilated pockets. Where the means of ventilation is powered, the source shall not be the radio batteries

referred to in paragraph 4.4.6.11; and where dependent on the lifeboat engine, sufficient fuel shall be provided to comply with paragraph 4.4.6.8; or

- .2 providing ventilation openings having a total cross section of at least 4% of the floor area of the lifeboat positioned in opposite directions as far apart from each other and as high as possible; or
- .3 any other appropriate solutions that prevent a CO₂ concentration of more than 5,000 ppm."

3 A draft new section 6.18 has been added to the *Revised recommendation on testing of life-saving appliances* (resolution MSC.81(70)) (SSE 12/3, annex 2) to provide guidance on test procedures for demonstrating compliance with the requirements set out in paragraph 4.5.5 of the LSA Code.

Discussion

4 The co-sponsors understand that the means for demonstrating compliance with paragraph 4.5.5.1 of the LSA Code are addressed in paragraph 6.18.1.1 of resolution MSC.81(70). Further, the means of demonstrating compliance with paragraph 4.5.5.3 of the LSA Code are understood to be addressed in paragraph 6.18.1.2, which covers the case where the CO₂ concentration of 5,000 ppm is directly measured.

5 The co-sponsors consider that paragraph 6.18.1 of resolution MSC.81(70) currently does not include test or verification provisions corresponding to paragraph 4.5.5.2 of the LSA Code, i.e. the compliance option where ventilation openings are sized to at least 4% of the floor area of the lifeboat.

6 Paragraph 4.5.5.2 of the draft amendments to the LSA Code allows for the use of passive (i.e. non-powered) ventilation in PELBs. The co-sponsors consider that the relationship between paragraph 4.5.5.2 of the LSA Code and paragraph 6.18.1 of resolution MSC.81(70) is currently unclear, and that paragraph 6.18.1 may give the impression that testing in accordance with paragraph 6.14.9 of resolution MSC.81(70) or direct measurements of CO₂ concentrations are the only two options for demonstrating compliance with one of the three methods specified in paragraph 4.5.5 of the LSA Code.

7 To address this gap, the co-sponsors propose that the relationship between the requirements and the test provisions be clarified, and that appropriate guidance corresponding to paragraph 4.5.5.2 of the LSA Code be included in paragraph 6.18.1 of resolution MSC.81(70).

8 In this context, it is noted that the term "floor area" in paragraph 4.5.5.2 of the LSA Code is not expressly defined, which could lead to different interpretations in practice, particularly during testing and verification. Therefore, the co-sponsors propose that clarification of the term "floor area" be included in resolution MSC.81(70), as amended, to ensure uniform and consistent implementation of the requirement in paragraph 4.5.5.2 of the LSA Code.

Proposal

9 The co-sponsors suggest the following draft amendments to paragraph 6.18.1 of resolution MSC.81(70) to clarify its relationship with the relevant requirements in paragraph 4.5.5 of the LSA Code:*

"6.18.1 For the means of ventilation required by paragraph 4.5.5 of the LSA Code, it should be demonstrated by test that ~~either~~:

- .1 In cases where the arrangement is designed in accordance with paragraph 4.5.5.1 of the LSA Code, the means of ventilation achieves a ventilation rate of at least 5 m³/hr/person, for the number of persons which the lifeboat is permitted to accommodate, when tested in accordance with 6.14.9. ~~or~~
- .2 In cases where the arrangement is designed in accordance with paragraph 4.5.5.2 of the LSA Code, the total cross section area of all ventilation openings should be measured to ensure that it is at least 4% of the floor area of the lifeboat, and their locations should be verified to be in opposite directions, as far apart from each other and as high as possible from the deck. The floor area of the lifeboat should at least include all decks within a lifeboat and all seating arrangements, including those fitted in stages of different heights above the deck.
- .23 In cases where the arrangement is designed in accordance with paragraph 4.5.5.3 of the LSA Code, the means of ventilation provides sufficient air to keep CO₂ concentration from exceeding a time-weighted average concentration of 5,000 ppm, over a period of two hours, subject to the following criteria:
 - .1 [...]"

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the proposal in paragraph 9, and to take action, as appropriate.

* Modifications to annex 2 of SSE 12/3 are provided in grey shading.