



WORK PROGRAMME

Proposal for a new output to amend paragraph 4.6.3.1 of the LSA Code to remove ambiguity in safety harnesses colour requirements for free-fall lifeboats

Submitted by the Bahamas, the Marshall Islands, Panama,
ICS, IACS and InterManager

SUMMARY

Executive summary: This document proposes a new output to amend paragraph 4.6.3.1 of the LSA Code to remove ambiguity in the requirements for colour contrasting of the safety harness with the colour of the safety harness fitted to immediately adjacent seats of free-fall lifeboats. This proposal aims to also bring clarity for the terms "seating positions" for davit-launched lifeboats and "seats" for free-fall lifeboats.

*Strategic direction, 7
if applicable:*

Output: None

Action to be taken: Paragraph 24

Related documents: SSE 8/5, SSE 8/20 ; SSE 9/3 and SSE 9/20

Introduction

1 This document is submitted in accordance with the relevant provisions 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) on the submission of proposals for new outputs, and proposes a new output to amend paragraph 4.6.3.1 of the LSA Code to remove ambiguity in the requirements for the colour contrasting of the safety harness with the colour of the safety harness which is fitted to immediately adjacent seats of free-fall lifeboats.

2 This proposal for a new output is the result of the decision of SSE 9 on the proposal in document SSE 8/5 (Bahamas et al.) to amend paragraph 4.6.3.1 of the LSA Code in the context of the output "Revision of SOLAS chapter III and the LSA Code", inviting the co-sponsors of that document to submit proposals for a relevant new output.

Background

3 Paragraph 4.6.3.1 for totally enclosed lifeboats of the LSA Code contains requirements for the colour of seat belts and safety harnesses for davit-launched lifeboats and free-fall lifeboats, respectively, which the co-sponsors believe are ambiguous.

4 Paragraph 4.6.3.1 of the LSA Code states:

"4.6.3.1 Except in free-fall lifeboats, a safety belt shall be fitted at each indicated seating position. The safety belt shall be designed to hold a person with a mass of 100 kg securely in place when the lifeboat is in a capsized position. Each set of safety belts for a seat shall be of a colour which contrasts with the belts for seats immediately adjacent. Free-fall lifeboats shall be fitted with a safety harness at each seat in contrasting colour designed to hold a person with a mass of 100 kg securely in place during a free-fall launch as well as with the lifeboat in capsized position".

5 The acceptance criteria in section 4.5.1.2 of the *Revised standardized life-saving appliance evaluation and test report forms* (MSC.1/Circ.1630/Rev.3) for free-fall lifeboats state:

"...

Each seat is fitted with a safety harness.

The adjacent safety harnesses are to be of contrasting colour

...".

6 The requirement in paragraph 4.6.3.1 of the LSA Code for davit-launched lifeboats is clear in that "Each set of safety belts for a seat shall be of a colour which contrasts with the belts for seats immediately adjacent". However, the requirement for a free-fall lifeboat merely states that "Free-fall lifeboats shall be fitted with a safety harness at each seat in contrasting colour...".

7 Section 4.5.1.2 of the annex to MSC.1/Circ.1630/Rev.3 provides additional details regarding colour contrasting for adjacent harnesses; the co-sponsors consider that it would be helpful to incorporate such details into regulation 4.6.3.1 of the LSA Code.

8 Additionally, in reviewing paragraph 4.6.3.1 of the LSA Code, the differentiation between the terms "seating positions" for davit-launched lifeboats and "seats" for free-fall lifeboats should also be clearly reflected.

IMO's objectives

9 This proposal is in line with the mission statement of IMO "to promote safe, secure, environmentally sound, efficient, and sustainable shipping through cooperation" in the *Revised Strategic Plan for the Organization for the six-year period 2024 to 2029* (resolution A.1196(34)).

10 The proposal is also in line with SD 7 in the *Revised Strategic Plan for the Organization for the six-year period 2024 to 2029*, which states: "The main role of IMO as the global regulator of safe, secure, environmentally sound and efficient shipping requires it to ensure that a universally adopted, effective, international regulatory framework is in place and implemented consistently, embracing and integrating new, emerging and advancing technologies, without causing unnecessary burden."

Need

11 The proposal addresses the identified ambiguity in the regulatory framework for life-saving, which is relevant for the safety of all persons on board when forced to abandon the parent ship. The safe abandonment of a ship using a free-fall lifeboat requires the crew member to be securely strapped into the lifeboat. This amendment can reduce the time it takes for abandonment and prevent attempts to buckle mismatched belts, allowing the lifeboat to be launched more quickly and preventing injury to people.

Analysis of the issue

12 Accelerations and impact loads resulting from the free fall of free-fall lifeboats from a ship into the water could be unsafe for persons who are inside the free-fall lifeboat. These forces can displace individuals from their seats. Persons in this situation have no possibility of fastening themselves and face difficulty remaining seated at their place. This risk is mitigated by fastening of all persons inside the free-fall lifeboat by suitable means such as safety harnesses, which also restrain the person when the free-fall lifeboat is in a capsized position and during righting.

13 In the event of an emergency, where persons on board are in a stressful situation, safe escape and evacuation become time-critical. In the case of a free-fall lifeboat, it is extremely important to correctly fasten the safety harness to minimize the probability of errors that could delay timely evacuation and abandonment. Therefore, understanding and proper use of life-saving appliances play an important role in ensuring a swift evacuation. Colour-contrasting of adjacent safety belts/safety harnesses makes it easier for a person to fasten themselves securely in less time.

14 The co-sponsors believe that ambiguities exist in the regulatory framework in paragraph 4.6.3.1 of the LSA Code on the requirements for colour contrast of safety harnesses with those fitted to immediately adjacent seats of free-fall lifeboats. Those ambiguities could lead to confusion in the event of having to abandon ship and result in improper use, endangering those persons inside the free-fall lifeboat.

Analysis of implications

15 Minimal additional costs are anticipated for the maritime industry, as the changes only affect new installations or replacements of survival craft, and the additional costs for manufacturing safety belts/harnesses in different colours are considered negligible. No concerns regarding additional costs were raised in the discussions at SSE 8 and SSE 9. The administrative burden to the Organization and to Member States is anticipated to be minimal. A completed administrative checklist in annex 6 to MSC-MEPC.1/Circ.5/Rev.6 is set out in annex 2.

16 No capacity-building implications are identified. A checklist for the identification of capacity-building implications, as set out in appendix 1 of annex 2 to the draft MSC-MEPC.1/Circ.5/Rev.6, is set out in annex 5.

Benefits

17 The proposed output aims to ensure the safety of all persons on board the ship; the proposed amendments to paragraph 4.6.3.1 of the LSA Code will address ambiguities in the current regulation which could lead to confusion in the event of having to abandon ship.

Industry standards

18 There are no industry standards for the safety harness in survival craft.

Output

19 The proposed new output reads:

"Revision of paragraph 4.6.3.1 of the LSA Code for free-fall lifeboat safety harness".

20 Parts I and II of the check/monitoring sheet, as set out in annex 2 to MSC.1/Circ.1500/Rev.3, have been completed and are provided in annex 4.

21 For illustrative purposes and to assist in the preliminary assessment by the Group of Chairs, draft amendments to paragraph 4.6.3.1 of the LSA Code are set out in annex 1. The proposed amendments are simple and precise and relate to only one paragraph. It can therefore be assumed that the amendments can be completed in a single meeting of the SSE Sub-Committee.

Human element

22 The completed checklist for considering human element issues contained in the appendix of annex 5 to MSC-MEPC.1/Circ.5/Rev.6 is set out in annex 3. No impact on the human element is anticipated.

Urgency

23 It is proposed that the output be included in the Committee's post-biennial agenda (2028-2029) with one session needed by the SSE Sub-Committee to complete the item.

Action requested of the Committee

24 The Committee is invited to consider the information, in particular the proposals in paragraphs 19 and 23 and to take action, as appropriate.

ANNEX 1

DRAFT AMENDMENTS TO PARAGRAPH 4.6.3.1 OF THE LSA CODE

"4.6.3.1**bis** For lifeboats installed on or after DD MM YYYY,

- .1 Davit-launched lifeboats ~~Except in free-fall lifeboats, a safety belt~~ shall be fitted with a safety belt at each indicated seating position. The safety belt shall be designed to hold a person with a mass of 100 kg securely in place when the lifeboat is in a capsized position. Each ~~set of safety belts~~ for a seating position shall be of a colour which contrasts with the safety belts for seating positions immediately adjacent.
- .2 Free-fall lifeboats shall be fitted with a safety harness at each seat ~~in contrasting colour~~. The safety harness shall be designed to hold a person with a mass of 100 kg securely in place during a free-fall launch as well as with the lifeboat in capsized position. Each safety harness shall be of a contrasting colour to the safety harnesses fitted on seats immediately adjacent".

ANNEX 2

CHECKLIST FOR IDENTIFYING ADMINISTRATIVE REQUIREMENTS

This checklist should be used when preparing the analysis of implications required in submissions of proposals for inclusion of outputs. For the purpose of this analysis, the term "administrative requirement" is defined in accordance with resolution A.1043(27), as an obligation arising from a mandatory IMO instrument to provide or retain information or data.

Instructions:

- (A) If the answer to any of the questions below is **YES**, the Member State proposing an output should provide supporting details on whether the requirements are likely to involve start-up and/or ongoing costs. The Member State should also give a brief description of the requirement and, if possible, provide recommendations for further work, e.g. would it be possible to combine the activity with an existing requirement?
- (B) If the proposal for the output does not contain such an activity, answer **NR** (Not required).
- (C) For any administrative requirement, full consideration should be given to electronic means of fulfilling the requirement in order to alleviate administrative burdens.

1. Notification and reporting? Reporting certain events before or after the event has taken place, e.g. notification of voyage, statistical reporting for IMO Members	NR	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
2. Record-keeping? Keeping statutory documents up to date, e.g. records of accidents, records of cargo, records of inspections, records of education	NR	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
3. Publication and documentation? Producing documents for third parties, e.g. warning signs, registration displays, publication of results of testing	NR	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
4. Permits or applications? Applying for and maintaining permission to operate, e.g. certificates, classification society costs	NR	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		
5. Other identified requirements?	NR	Yes <input type="checkbox"/> Start-up <input type="checkbox"/> Ongoing
Description of administrative requirement(s) and method of fulfilling it: (if the answer is yes)		

ANNEX 3

CHECKLIST FOR CONSIDERING HUMAN ELEMENT ISSUES BY IMO BODIES

	1 Question	2 Yes/ No	3 IMO References	4 Considerations	5 Instructions
	Workload		<i>Other relevant references may be added</i> <i>Strike out references that are not relevant</i>	<i>If answer to question is "yes" identify considerations. If answer is "no" make proper justification</i>	<i>Identify how human element considerations should be addressed in the output</i>
1	Does the "output" affect workload?				
1.1	On board, especially in the already intensive phases of the voyage and port operations to:	No	Revised guidelines for the operational implementation of the International Safety Management (ISM) Code by Companies (MSC-MEPC.7/Circ.8) Guidelines on fatigue (MSC.1/Circ.1598) Principles of minimum safe manning (resolution A.1047(27)) Guidelines for the investigation of accidents where fatigue may have been an issue (MSC/Circ.621)	NA	
1.1.1	Operations including navigation, cargo and engineering	No		NA	
1.1.2	Maintenance of the ships structure and its equipment	No		NA	
1.1.3	Onboard administration in support of the ships' management systems	No		NA	
1.1.4	Onboard administration related to regulation involving flag States, classification societies, port State	No		NA	

	1 Question	2 Yes/ No	3 IMO References	4 Considerations	5 Instructions
	and other bodies such as charterers and port authorities				
1.1.5	Increased workload or time pressure on personnel if involved in implementation of changes prior to the implementation date	No		NA	
1.2	Ashore, in a manner that would affect the ships operation to:				
1.2.1	Companies' administration	No		NA	
1.2.2	Flag State, port State and classification societies administration such that certification and other processes are compromised or delayed	No		NA	
	Decision-making		<i>Other relevant references may be added</i> <i>Strike out references that are not relevant</i>	<i>If answer to question is "yes" identify considerations. If answer is "no" make proper justification</i>	<i>Identify how human element considerations should be addressed in the output</i>
2	Does the "output" impact decision-making on board the ship?				
2.1	By confusion with existing requirements and regulations	No		The proposal seeks to clarify the relevant requirements.	
2.2	By changing responsibilities as laid out in the ISM Code	No		NA	
2.3	By creating complexity in its implementation and/or in the safety management systems	No		NA	
2.4	By requiring increased mental effort, such as the need to find, transform and analyse data or result in the	No		NA	

	1 Question	2 Yes/ No	3 IMO References	4 Considerations	5 Instructions
	need to make judgements based on incomplete information				
2.5	By limiting the time available to establish situational awareness, decide, communicate (possibly across time zones) or check	No		NA	
2.6	By increasing reliance on judgement and administrative controls to manage major risks such as oil spills and collisions	No		NA	
Living and working environment			<i>Other relevant references may be added</i> <i>Strike out references that are not relevant</i>	<i>If answer to question is "yes" identify considerations. If answer is "no" make proper justification</i>	<i>Identify how human element considerations should be addressed in the output</i>
3	Does the "output" affect the living and working environment?		Guidelines on the basic elements of a shipboard occupational health and safety programme (MSC-MEPC.2/Circ.3) Guidelines on fatigue (MSC.1/Circ.1598)		
3.1	By interfering with existing arrangements for abandonment, fire fighting and other emergency plans or procedures	No		NA	
3.2	By introducing new materials that could create an explosion, fire, environmental or occupational health risk	No		NA	
3.3	By introducing new high energy sources such as high-voltage, high pressure fluids	No		NA	

	1 Question	2 Yes/ No	3 IMO References	4 Considerations	5 Instructions
3.4	By affecting access or egress and causing lack of ventilation in working spaces	No		NA	
Operation and maintenance			<i>Other relevant references may be added</i> <i>Strike out references that are not relevant</i>	<i>If answer to question is "yes" identify considerations. If answer is "no" make proper justification</i>	<i>Identify how human element considerations should be addressed in the output</i>
4	Does the "output" affect the operation and maintenance of the ship, its structure or systems and equipment?		Revised guidelines for the operational implementation of the International Safety Management (ISM) Code by Companies (MSC-MEPC.7/Circ.8) Guidelines for bridge equipment and systems, their arrangement and integration (BES) (SN.1/Circ.288) Principles of minimum safe manning (resolution A.1047(27)) Issues to be considered when introducing new technology on board ships (MSC/Circ.1091) Guideline on software quality assurance and human-centred design for e-navigation (MSC.1/Circ.1512) Guidelines for the standardization of user interface design for navigation equipment (MSC.1/Circ.1609)		

	1 Question	2 Yes/ No	3 IMO References	4 Considerations	5 Instructions
4.1	By introducing equipment that the user may find difficult to operate or maintain or may be unreliable	No		NA	
4.2	By introducing new and/or novel technology, or technology that changes the role of the person	No		NA	
4.3	By introducing requirements for new competencies and roles	No		NA	
4.4	By overloading existing infrastructure such as power generation and ventilation systems	No		NA	
4.5	By poor integration with existing systems and controls	No		NA	
4.6	By introducing new and unfamiliar operations/procedures	No		NA	
4.7	By introducing new and unfamiliar operating interfaces?	No		NA	
4.8	By introducing risks to the ship during any modifications required prior to the implementation date of the output	No		NA	
Measures to address the human element			<i>Other relevant references may be added</i> <i>Strike out references that are not relevant</i>	<i>If answer to question is "yes" identify considerations. If answer is "no" make proper justification</i>	<i>Identify how human element considerations should be addressed in the output</i>
5	Does the "output" require changes to:		Shipboard technical operating and maintenance manuals (MSC.1/Circ.1253) Revised guidelines for the operational implementation of the International Safety Management (ISM) Code by		

	1 Question	2 Yes/ No	3 IMO References	4 Considerations	5 Instructions
			Companies (MSC-MEPC.7/Circ.8)		
5.1	Training	No		NA	
5.2	Practical skill development and competences	No		NA	
5.3	Operating, management and/or maintenance procedures	No		NA	
5.4	Information/manuals for operation and maintenance	No		NA	
5.5	Spares outfit	No		NA	
5.6	Occupational safety requirements including guarding and PPE	No		NA	
5.7	Shore support	No		NA	

ANNEX 4

**CHECK/MONITORING SHEET FOR THE PROCESSING OF AMENDMENTS TO THE
CONVENTION AND RELATED MANDATORY INSTRUMENTS
(PROPOSAL/DEVELOPMENT)**

Part I – Submitter of proposal (refer to paragraph 3.2.1.1)¹

1	<i>Submitted by (document number and submitter)</i> MSC 111/19 – the Bahamas, the Marshall Islands, Panama, ICS, IACS and InterManager
2	<i>Meeting session</i> MSC 111
3	<i>Date (date of submission)</i> 29 January 2026

Part II – Details of proposed amendment(s) or new mandatory instrument (refer to paragraphs 3.2.1.1 and 3.2.1.2)^{*}

1	<i>Strategic direction</i> 7 SD 7
2	<i>Title of the output</i> Revision of paragraph 4.6.3.1 of the LSA Code for free-fall lifeboat safety harness
3	<i>Recommended type of amendments (MSC.1/Circ.1481) (delete as appropriate)</i> • Four-year cycle of entry into force
4	<i>Instruments intended for amendment (SOLAS, LSA Code, etc.) or developed (new code, new version of a code, etc.)</i> The LSA Code
5	<i>Intended application (scope, size, type, tonnage/length restriction, service (International/non-international), activity, etc.)</i> All ships to which SOLAS applies
6	<i>Application to new/existing ships</i> Lifeboats newly installed on board new and existing ships
7	<i>Proposed coordinating sub-committee</i> Sub-Committee on Ship Systems and Equipment (SSE)

¹ Parts I and II should be completed by the submitter of a proposed new amendment, to the fullest extent possible.

8	<i>Anticipated supporting sub-committees</i>
	None
9	<i>Timescale for completion</i>
	One session
10	<i>Expected date(s) for entry into force and implementation/application</i>
	1 January 2032
11	<i>Any relevant decision taken or instruction given by the Committee</i>
	None

ANNEX 5

CHECKLIST FOR THE IDENTIFICATION OF CAPACITY-BUILDING IMPLICATIONS

(Appendix 1 of Annex 2 of draft MSC-MEPC.1/Circ.5/Rev.6)

1 For Administrations

Is new legislation required? *No*

Is there a requirement for new equipment and/or systems? *No*

- o Does equipment manufacturing capacity exist internationally? *N/A*
- o Do equipment repair/servicing facilities exist internationally? *N/A*
- o Is there capacity to develop new systems? *N/A*

Will the implementation require additional financial resources? *No*

Is there a need for additional human resources or new skills? *No*

Will there be a need to upgrade current infrastructure? *No*

Is there enough lead time towards implementation? *Yes*

Will a rapid implementation procedure be adopted? *No*

Is there a substantial modification of existing standards? *No*

Will a guide to implementation be needed? *No*

2 For the industry

Would the industry require new and/or enhancement of existing systems? *No*

- o Does capacity exist internationally to develop new systems? *N/A*

Is there a need for additional training of seafarers? *No*

- o Do related and validated training courses exist? *N/A*
- o Are sufficient simulation training courses available internationally? *N/A*

Will there be a requirement for new equipment? *No*

- o Does manufacturing capacity exist internationally? *N/A*

Is there repair/servicing and/or retrofitting and does maintenance capacity exist internationally? *N/A*
