To Whomsoever it may concern (Owner’s/ Managers of vessels under Marshall Islands Flag)

Subject: On-Load Release Mechanisms for Rescue Boats


2. The LSA Code as adopted by Resolution MSC.48(66) paragraphs 4.4.7.6.2.2 and 4.4.7.6.2.9 and as amended by Resolution MSC.320(89) paragraphs 4.4.7.6.7 and 4.4.7.6.17 requires every lifeboat (except free-fall lifeboats), including lifeboats which are also rescue boats, to be fitted with hooks that have on-load release capability.

3. SOLAS and the LSA Code do not require boats used solely for purpose of rescue to be fitted with on-load release mechanisms. However, the Republic of the Marshall Islands, Maritime Administrator requires that all on-load release mechanisms to be in accordance with LSA Code 4.4.7.6 and to be evaluated in accordance with IMO MSC.1/Circ.1392, regardless of whether the release mechanism is installed on a life boat or rescue boat.

4. SOLAS Regulation III/1.5 requires existing lifeboat on-load release mechanisms to be evaluated or replaced as follows:

   “Notwithstanding paragraph 4.2, for all ships, not later than the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019, lifeboat on-load release mechanisms not complying with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the Code shall be replaced with equipment that complies with the Code”

5. Based on above, the Administrator requires that all on-load release mechanisms to be in accordance with LSA Code 4.4.7.6 and to be evaluated in accordance with IMO MSC.1/Circ.1392. Therefore, all rescue boat on-load release mechanisms not complying with LSA Code paragraphs 4.4.7.6.4 to 4.4.7.6.6 to be replaced or modified with equipment, to comply that complies with the requirements of LSA Code.
6. Where a suitable replacement or modified on-load release mechanism is not available for a rescue boat, the non-compliant on-load release mechanism may be replaced with a suitable off-load release mechanism as permitted by LSA Code paragraph 5.1.1.1.

7. Although the SOLAS timeframe for such replacement for lifeboats is the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019, however as 1 July 2014 has passed and some vessels have already completed dry-docking and are now required to evaluate their rescue boat on-load release mechanisms, the Administrator will allow a grace period on a case-by-case basis for vessels to complete the replacement on rescue boats, as necessary.

8. As the flag has not provided any information w.r.t. the implementation date for non-compliant onload release gear fitted on rescue boats, owners/managers are requested to contact administration and get concurrence w.r.t. the date by which compliance will be required.

Enclosure:
1. RMI Technical Circular No. 20 – On-load Release Mechanisms for Rescue Boats dated 24.06.2015

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1.0 Introduction

1.1 The LSA Code as adopted by Resolution MSC.48(66) paragraphs 4.4.7.6.2.2 and 4.4.7.6.2.9 requires every lifeboat, including lifeboats which are also rescue boats, to be fitted with hooks that have on-load release capability. Exempted are free-fall lifeboats. The amended LSA Code, Resolution MSC.320(89), contains the same requirements within paragraphs 4.4.7.6.7 and 4.4.7.6.17.

1.2 SOLAS and the LSA Code do not require boats used solely for rescue purposes to be fitted with on-load release mechanisms. However, the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) requires that all on-load release mechanisms shall be in accordance with LSA Code 4.4.7.6 and shall be evaluated in accordance with IMO MSC.1/Circ.1392, regardless of whether the release mechanism is installed on a life boat or rescue boat.

2.0 Instruction

2.1 SOLAS Regulation III/1.5 requires existing lifeboat on-load release mechanisms to be evaluated/replaced as follows:

   “Notwithstanding paragraph 4.2, for all ships, not later than the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019, lifeboat on-load release mechanisms not complying with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the Code shall be replaced with equipment that complies with the Code”

2.2 Based on 1.2 above, the Administrator requires that all on-load release mechanisms shall be in accordance with LSA Code 4.4.7.6 and shall be evaluated in accordance with IMO MSC.1/Circ.1392.

2.3 Therefore, all rescue boat on-load release mechanisms not complying with LSA Code paragraphs 4.4.7.6.4 to 4.4.7.6.6 shall be replaced with equipment that complies with the LSA Code or modified to comply with these requirements.
2.4 Where a suitable replacement or modified on-load release mechanism is not available for a rescue boat, the non-compliant on-load release mechanism may be replaced with a suitable off-load release mechanism as permitted by LSA Code paragraph 5.1.1.1.

2.5 Although the SOLAS timeframe for such replacement for lifeboats is the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019, as 1 July 2014 has passed and some vessels have already completed dry-docking and are now required to evaluate their rescue boat on-load release mechanisms, the Administrator will allow a grace period on a case-by-case basis for vessels to complete the replacement on rescue boats, as necessary.

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