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COMMISSION STAFF WORKING DOCUMENT

For the Council Shipping Working party

**IMO – Union submission to be submitted to the 100th session of the Committee on
Maritime Safety (MSC 100) of the IMO in London from 3 – 7 December 2018
concerning clarification of the requirement for a capability to release a hook under load
in respect of liferaft launching appliances**

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IMO – Union submission to be submitted to the 100th session of the Committee on Maritime Safety (MSC 100) of the IMO in London from 3 – 7 December 2018 concerning clarification of the requirement for a capability to release a hook under load in respect of liferaft launching appliances

PURPOSE

The document in Annex contains a draft Union submission to the 100th session of the Committee on Maritime Safety (MSC 100) of the IMO concerning clarification of the requirement for a capability to release a hook under load in respect of liferaft launching appliances. It is hereby submitted to the appropriate technical body of the Council with a view to achieving agreement on transmission of the document to the IMO prior to the required deadline of 28 September 2018¹.

Liferaft release hooks are included in Commission Implementing Regulation (EU) 2018/773 of 15 May 2018 on design, construction and performance requirements and testing standards for marine equipment and repealing Implementing Regulation (EU) 2017/306². Reference is made in that Implementing Regulation to the LSA Code and to resolution MSC/Circular 81(70) in relation to life saving appliances. This equipment therefore falls in the scope of Directive 2014/90/EU of the European Parliament and of the Council of 23 July 2014 on marine equipment and repealing Council Directive 96/98/EC³ and therefore the said draft Union submission falls under EU exclusive competence.

¹ The submission of proposals or information papers to the IMO, on issues falling under external exclusive EU competence, are acts of external representation. Such submissions are to be made by an EU actor who can represent the Union externally under the Treaty, which for non-CFSP (Common Foreign and Security Policy) issues is the Commission or the EU Delegation in accordance with Article 17(1) TEU and Article 221 TFEU. IMO internal rules make such an arrangement absolutely possible as regards existing agenda and work programme items. This way of proceeding is in line with the General Arrangements for EU statements in multilateral organisations endorsed by COREPER on 24 October 2011.

² OJ L 133, 30.5.2018, p. 1.

³ OJ L 257, 28.8.2014, p. 146.

SHIP SYSTEMS AND EQUIPMENT

CLARIFICATION ON THE REQUIREMENT FOR A CAPABILITY TO RELEASE A HOOK UNDER LOAD IN RESPECT OF LIFERAFT LAUNCHING APPLIANCES

Submitted by the European Commission on behalf of the European Union

SUMMARY

Executive summary: This document seeks clarification on the sentence “The release hook shall include a capability to release the hook under load” which is contained in paragraph 6.1.5 of the LSA Code, to facilitate global and unified implementation of the LSA Code.

Strategic Direction, if applicable: 6 – Ensure regulatory effectiveness

Output: 6.1

Action to be taken: Paragraph 3.1

Related documents: LSA Code, IMO Res.MSC.81(70) (as amended).

1. Introduction

1.1. The use of on-load release hooks for lifeboats and rescue boats was made mandatory in 1986, addressing the fact that lifeboats not equipped with these mechanisms had no means of release when the weight of the lifeboat was on the hooks and fall wires.

1.2. The LSA Code, which became mandatory in 1998, included a requirement for the on-load release capability for davit launched liferaft release hooks and this text has not been amended since.

1.3. IMO Res.MSC.48(66) (LSA Code) 6.1.5 (Liferaft Launching Appliances) states:

Every liferaft launching appliance shall comply with the requirements of paragraphs 6.1.1 and 6.1.2, except with regard to embarkation in the stowed position, recovery of the loaded liferaft and that manual operation

*is permitted for turning out the appliance. The launching appliance shall include an automatic release hook arranged so as to prevent premature release during lowering and shall release the liferaft when waterborne. **The release hook shall include a capability to release the hook under load.** The on-load release control shall:*

.1 be clearly differentiated from the control which activates the automatic release function;

.2 require at least two separate actions to operate;

.3 with a load of 150 kg on the hook, require a force of at least 600 and not more than 700 N to release the load, or provide equivalent adequate protection against inadvertent release of the hook; and

.4 be designed such that the crew members on deck can clearly observe when the release mechanism is properly and completely set.

An 'automatic release hook', when used as part of a liferaft launching appliance, is therefore required to have a capability to release the liferaft when under load. Whilst the requirements to prevent the inadvertent operation of the release control are clearly identified as above, the maximum and minimum loads at which the hook must be able to release the raft whilst 'on-load' are not defined.

- 1.4. Furthermore, the Revised Recommendation on Testing of Life Saving Appliances MSC.81(70), Part 2, 6.2.3 (Operational test) states:

*Each release hook should be submitted to an **operational test with a mass equivalent to the safe working load being applied.** The release arrangements shall be demonstrated and checked with the liferaft loaded and to ensure that the automatic release hook will not release while the load is being applied.*

This operational test does not specifically include or exclude an on-load test of the launching arrangement.

- 1.5. Finally, the Revised Recommendation on Testing of Life Saving Appliances MSC.81(70), Part 2, 6.2.7 (Towing strain test) states:

*A **moderate towing strain** should be put on the liferaft when water-borne to check that the release arrangements are satisfactory under this condition.*

The force of the 'moderate towing strain' is not defined.

2. Discussion

- 2.1. Whilst the definitions and testing standards for the automatic function of a davit launched liferaft release hook are not under scrutiny, the on-load release functionality of the hook has not been sufficiently or clearly defined within the LSA Code.
- 2.2. No type of loaded survival craft would be expected to be fully released from the stowage height (with the exception of free-fall life boats). The functionality of the on-load

release is designed to be used only when, after attempting to launch the craft, an axial load remains on the launching hook due to the effects of wind or waves, and/or if the automatic release has failed to operate.

- 2.3. The on-load release mechanism for life boat hooks is required to be tested at 1.1 times the maximum expected loading at installation (LSA Code 4.4.7.6.2.2). For launching in poor weather conditions, a significant load on the appliance can be expected, and there is no reason to omit this requirement for other types of survival craft (such as a life raft).
- 2.4. It is important to differentiate between the requirements for the on-load release 'control', and the ability of the hook to function in an on-load release manner. Hooks are readily available where the test weight requirements for the on-load release 'control' appear also to be the upper limit at which the hook will function for on-load release. Documentation available from some hook manufacturers explicitly states that the on-load release will only function up to a maximum of 150kg loading.
- 2.5. Although not specifically a launching device, LSA Code 4.1.6.1 outlines the requirement for a liferaft painter system to ensure an inflated liferaft is "not dragged under by the sinking ship". Any 'tether' between the liferaft and the ship should always be able to be released in this scenario, whether under load or not.
- 2.6. The revised recommendations of MSC.81(70) additionally outline an 'operational test under load' of 1.1 times the total mass of the equipped and boarded liferaft whenever the hook is overhauled. The full scope of the operational test is not defined.
- 2.7. The maximum and minimum loads for which the on-load release mechanism for a davit launched liferaft launching appliance must correctly function should be clarified with a view to global and uniform application of the LSA Code.

3. Action Requested of the Committee

- 3.1. The Committee is invited to consider the comments above and take action as appropriate.