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MEASURES TO PREVENT ACCIDENTS WITH LIFEBOATS

Comments on evaluations of occupant seats, seating space and the adequacy of current design criteria for free-fall lifeboats

Submitted by the International Chamber of Shipping (ICS)

SUMMARY

Executive summary:	This document comments upon DE 48/INF.2 and DE 48/INF.5 and concludes that they present sufficient new evidence to justify extending the exemption within MSC/Circ.1115 regarding free-fall lifeboat launches above 20 metres launch height to all free-fall lifeboat launches.
Action to be taken:	Paragraphs 8 to 10
Related documents:	MSC/Circ.1115, MSC 78/8/2

1 This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC/Circ.1099 – MEPC/Circ.405), and provides comments on documents DE 48/INF.2 (Sweden) and DE 48/INF.5 (Canada, Sweden and the United States).

Introduction

2 At MSC 78, ICS reasoned for the exemption within MSC/Circ.1115 (Preventing of accidents in high free-fall launching of lifeboats) to be extended to include all free-fall launched lifeboats regardless of launch height. The successful counter argument considered that at heights of less than 20 metres there was no evidence that ship's lifeboat crews had suffered injury.

3 DE 48/INF.2 (Sweden) indicates that injury to ship's lifeboat crews has been sustained during the launching of free-fall lifeboats and DE 48/INF.5 (Canada, Sweden and the United States) indicates that the incidence of injury associated with free-fall launches is associated with the interior layout of the lifeboat including the design of seats and the seating support offered to persons of different statures.

4 ICS recognizes that MSC 78 acted to apply measures to prevent accidents with lifeboats when it issued MSC/Circ.1115. ICS suggests that new information within DE 48/INF.2 and DE 48/INF.5 confirms that injuries have occurred to ship's personnel launching free-fall lifeboats from below 20 metres and that the risk of injury is associated with the design of the lifeboat

rather than the specific launch height. Consequently it is now appropriate to extend the exemption applied to free-fall lifeboats launched from a height above 20 metres to all free-fall launched lifeboats.

Free-fall launch risk

5 The annex to DE 48/INF.2 notes that between 1985 and 1992, at the NUTEC training facility in Bergen training launches at heights of both 28 metres and 12.5 metres took place. During this period sixteen injuries to personnel were sustained. It is not recorded if all the injuries were associated with a particular launch height and it is assumed that the injuries followed launches from both heights. It is noted that a higher number of injuries occur during on-board ship drills than during shore-based training. The Swedish submission concludes that, "During the launch of the free-fall lifeboat, there is a potential for the occupants to be injured."

6 DE 48/INF.5, paragraph 2, recommends that further study is required into lifeboat seat design and also into the amount of energy absorbed by seats during water entry to ensure that the established injury potential criteria in the LSA Code are consistently met in practice. Also noted is the variation in back support offered by differing designs of seats related to persons of differing stature. The submission does not specifically link launch height to the potential for personnel injury.

7 In light of both DE 48/INF.2 and DE 48/INF.5, ICS considers that sufficient new evidence has been made available to the Sub-Committee to confirm that:

.1 Injury to ship's free-fall lifeboat crews during launch remains a risk irrespective of the launch height.

.2 Research suggests that the interior structure and design of free-fall lifeboats is the determining factor leading to injury during launch and raises concern that many crews potentially remain at risk of injury despite the partial exemption granted in MSC/Circ.1115.

ICS considers that all freefall lifeboats drills, irrespective of launch height, should be conducted as specified within MSC/Circ.1115.

Proposal

8 ICS urges the Sub-Committee to agree that the mandating of work related activity that carries with it an unacceptable risk of injury cannot be supported and to consider removing the references to '20 metres' and 'simulated free fall launch' in the MSC/Circ.1115 that already exempts the crews of free-fall lifeboats with a launch height of more than 20 metres from conducting live launching drills.

9 ICS further urges the Sub-Committee to consider that any change to MSC/Circ.1115 that may be adopted should be promulgated with urgency.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to consider the comments made in this document and to take action as appropriate.

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