

Interpretation on the Treatment of Lifebuoys

Amended Guidance

Guidance for the Survey and Construction of Steel Ships Part C
Guidance for Safety Equipment

Reason for Amendment

SOLAS II-1/3-9 requires all ships be provided with a means of embarkation and disembarkation in accordance with the “*Guidelines for construction, installation, maintenance and inspection/survey of means of embarkation and disembarkation*” (MSC.1/Circ.1331). The guidelines requires a lifebuoy fitted with both a light and a lifeline as part of this means of embarkation and disembarkation. SOLAS III/7.1.3, on the other hand, state that the lifebuoys required by SOLAS III/22.1.1 (passenger ships) and SOLAS III/32.1.1 (cargo ships) which are fitted with lights are not to be provided with lifelines.

Since the above-mentioned requirements regarding lifebuoys are in conflict with respect to the provision of lifelines, it is not clear whether a lifebuoy required by SOLAS II-1/3-9 can be taken into account when determining the minimum number and distribution of lifebuoys required by SOLAS Chapter III. So, a draft unified interpretation clarifying matters was proposed at the 6th Session of the IMO Sub-committee on Ship Systems (SSE 6) held in March 2019, and agreed upon. The draft was then subsequently submitted to the IMO Maritime Safety Committee at its 101st session (MSC101) held in June 2019, and was approved as MSC.1/Circ.1618.

Accordingly, relevant requirements were amended in accordance with MSC.1/Circ.1618.

Outline of Amendment

Specified that a lifebuoy required by SOLAS II-1/3-9 is not to be taken into account when determining the minimum number and distribution of lifebuoys required by SOLAS Chapter III.

Amended Requirements

Guidance for the Survey and Construction of Steel Ships
Part C: C23.8.1
Guidance for Safety Equipment 3.1.1