

SUB-COMMITTEE ON SHIP SYSTEMS AND
EQUIPMENT
10th session
Agenda item 14

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**COMPREHENSIVE REVIEW OF THE REQUIREMENTS FOR MAINTENANCE,
THOROUGH EXAMINATION, OPERATIONAL TESTING, OVERHAUL AND
REPAIR OF LIFEBOATS AND RESCUE BOATS, LAUNCHING APPLIANCES
AND RELEASE GEAR (RESOLUTION MSC.402(96)) TO ADDRESS
CHALLENGES WITH THEIR IMPLEMENTATION**

Industry experiences concerning LSA requirements and proposals for consideration

Submitted by CESA

SUMMARY

Executive summary: CESA would like to invite the Sub-Committee to consider practical issues and challenges currently experienced by the industry in implementing the requirements regarding LSA. These requirements are currently not uniformly implemented resulting in a less effective implementation. This document proposes various options for consideration by the Sub-Committee which would enhance the level of safety, provide a more effective implementation and reduce unnecessary burden to the industry.

Strategic direction, if applicable: 7

Output: 7.29

Action to be taken: Paragraph 24

Related documents: MSC 84/11, MSC 84/11/1; DE 52/6; SSE 9/20; SSE 10/14 and SSE 10/14/1

Introduction

1 This document provides comments on document SSE 10/14 and is submitted in accordance with the provisions of paragraph 6.12.5 of MSC-MEPC.1/Circ.5/Rev.5. Especially annex 2 to document SSE 10/14 is highlighted, which contains a list of safety issues and barriers to consistent implementation of resolution MSC.402(96).

2 CESA would like to invite the Sub-Committee to consider practical issues currently experienced by the industry in implementing the requirements regarding LSA. These practical issues may negatively affect the level of safety of, and the risks associated with, LSA equipment.

Background

3 MSC 107 agreed to the new output on "Comprehensive review of the requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear (resolution MSC.402(96)) to address challenges with their implementation" for inclusion in the biennial agenda of the Sub-Committee for 2024-2025 and the provisional agenda for SSE 10. MSC 107 also agreed that:

- .1 the amendments to be developed should apply to all ships to which SOLAS applied;
- .2 the instrument to be amended was resolution MSC.402(96); and
- .3 the amendments to be developed should enter into force on 1 January 2028, provided that they were adopted before 1 July 2026.

4 MSC 107 endorsed the instructions given to the LSA Correspondence Group established at SSE 9 under the new output, taking into account the relevant documents listed in paragraph 19.18 of document SSE 9/20 and the proposals therein regarding the comprehensive review of resolution MSC.402(96), in particular, to:

- .1 identify the safety issues and barriers to consistent implementation of the Requirements contained in resolution MSC.402(96), including the ambiguity in the use of the terms "make", "type" and "certification programme"; and
- .2 prepare relevant draft terms of reference for the Working Group on Life-Saving Appliances to be established at SSE 10 to consider the safety issues and barriers identified in .1 above.

Discussion

5 First and foremost, CESA emphasizes the importance of clearly identifying responsibilities of the various actors.

6 It is a common practice that a manufacturer certified and trained as Authorized Service Provider (ASP) is authorized by an Administration to perform services under resolution MSC.402(96). Since 2006, manufacturers have set up worldwide service networks which cover, in most cases, the industry requirements. Thus, it is debatable if an alternative training and certification scheme is required aside from the established Original Equipment Manufacturer (OEM) programmes.

7 In cases where a manufacturer is no longer in business or provides technical support, an alternative training and certification programme can be considered as useful to assure relevant skills to perform the works as currently described in paragraph 6 of resolution MSC.402(96).

8 Furthermore, CESA would like to highlight the responsibility of the Administration to authorize ASPs and OEMs in accordance with the Requirements.

Review and revision of MSC.402(96) can positively contribute to the level of safety

9 CESA believes that the review and revision of MSC.402(96) can positively contribute to the level of safety, reducing ambiguity and potential misinterpretations of standards while strengthening enforcement and coherence, and clarifying the roles and responsibilities of the stakeholders involved.

Effectiveness of audits

10 Importantly, CESA would like to emphasize the responsibility for ensuring that knowledge, training on the makes and types for which the personnel are to be certified, information and spare parts are available and maintained by all individual ASPs. CESA considers that the effectiveness of audits is of crucial importance. For an effective enforcement by the Administration, the instructions to, and auditing of, their recognized organization acting on their behalf is key. IACS, in the Unified Requirements (UR Z17, Rev.18, section 13), has provided a good basis for effective implementation that should be considered if and when amending resolution MSC.402(96).

Required knowledge by an ASP

11 CESA is of the opinion that any ASP before issuance of authorization shall demonstrate knowledge of all make and type specific details of the equipment for all makes and types, as per scope of certification and authorization. Those details are to be verified through the initial and follow up audits. Administrations and their recognized organizations acting on their behalf should ensure that the manufacturer identifies relevant makes and types of equipment designed and produced by them.

12 Those Administrations and their recognized organizations (RO) acting on their behalf have an important role, as the manufacturer may not know the actual ASP and/or owner of the ship having its equipment on board. It can be the case that an ASP may be authorized by an Administration but having no direct relationship with the manufacturer or that the manufacturer may not have seen the equipment for some time.

13 Therefore, guidelines and standardization for authorization need to be clearly defined and applied consistently worldwide.

14 It is of critical importance that the ASP has sufficient knowledge of new equipment, including changes to existing equipment.

Quality of certificates and certification processes

15 CESA members experience issues with the quality of certificates and certification processes, including certificates having the wrong names. It is noted that certificates can differ among ASP and among RO.

16 It is therefore proposed to consider, possibly as part of the revision of resolution MSC.402(96), to develop:

- .1 a model for these certificates; and
- .2 an authorization process.

Certification of people only when employed by ASP

17 Paragraph 8.2.1 of resolution MSC.402(96) states: "Initial certification shall be issued only to personnel having completed education, training and competence assessment." The intention of this sentence is clear: to certify personnel only. However, section 8.3 (Validity of certificates and renewal) does not clarify that such certification shall only be valid during the employment of that person.

18 CESA members experience ambiguity whether the intention of resolution MSC.402(96) is to allow for an ASP issuing and maintaining certification for a person not being employed by the ASP. It should be clarified that people can only maintain their certification while being employed by the ASP. It is clear that without employment with the manufacturer or authorized service provider, the certified person cannot service the make and type specific equipment appropriately.

19 Therefore, the following proposals should be considered by the Sub-Committee:

- .1 any certified person should be employed by the manufacturer or by an ASP of the make and type specific equipment on the certificate;
- .2 that certified person should work under the same quality management system of the ASP; and
- .3 that person's certificate should only be valid for the time of employment of that person by the organization that issued the certificate.

Establishment of servicing coverage worldwide

20 The establishment of servicing coverage worldwide is indeed of key importance for safety. CESA members recommend considering further enhancing this aspect of the safety framework by developing a GISIS database, similar to the GISIS Port Reception Facility Database, containing an overview on this servicing coverage.

Identifying makes and types identical for their safety critical details

21 Identification of safety critical details is of utmost importance. In practice, the entity which has design and production knowledge of the make and type specific equipment, and which may be included on the type approval certificate, would be best positioned to make that assessment. Therefore, that entity should decide which makes and types could be considered identical or non-identical for their safety critical details.

22 Moreover, the Sub-Committee may consider enhancing information exchange by including a recommendation or requirement to consult the OEM.

Reducing administrative burden

23 For potentially reducing the administrative burden of auditors and Member States, and for providing assurances on the correctness of make and type descriptions of equipment, the Sub-Committee may consider:

- .1 a GISIS database containing make and type descriptions of equipment in accordance with the relevant definitions; and
- .2 a GISIS database containing safety critical information, which requires special resources during the service.

These considerations should take into account the *Guidelines for evaluation and replacement of lifeboat release and retrieval systems* (MSC.1/Circ.1392), including appendix 3 thereto.

Action requested of the Sub-Committee

24 The Sub-Committee is invited to consider the issues raised and proposals contained in this document and take action, as appropriate.