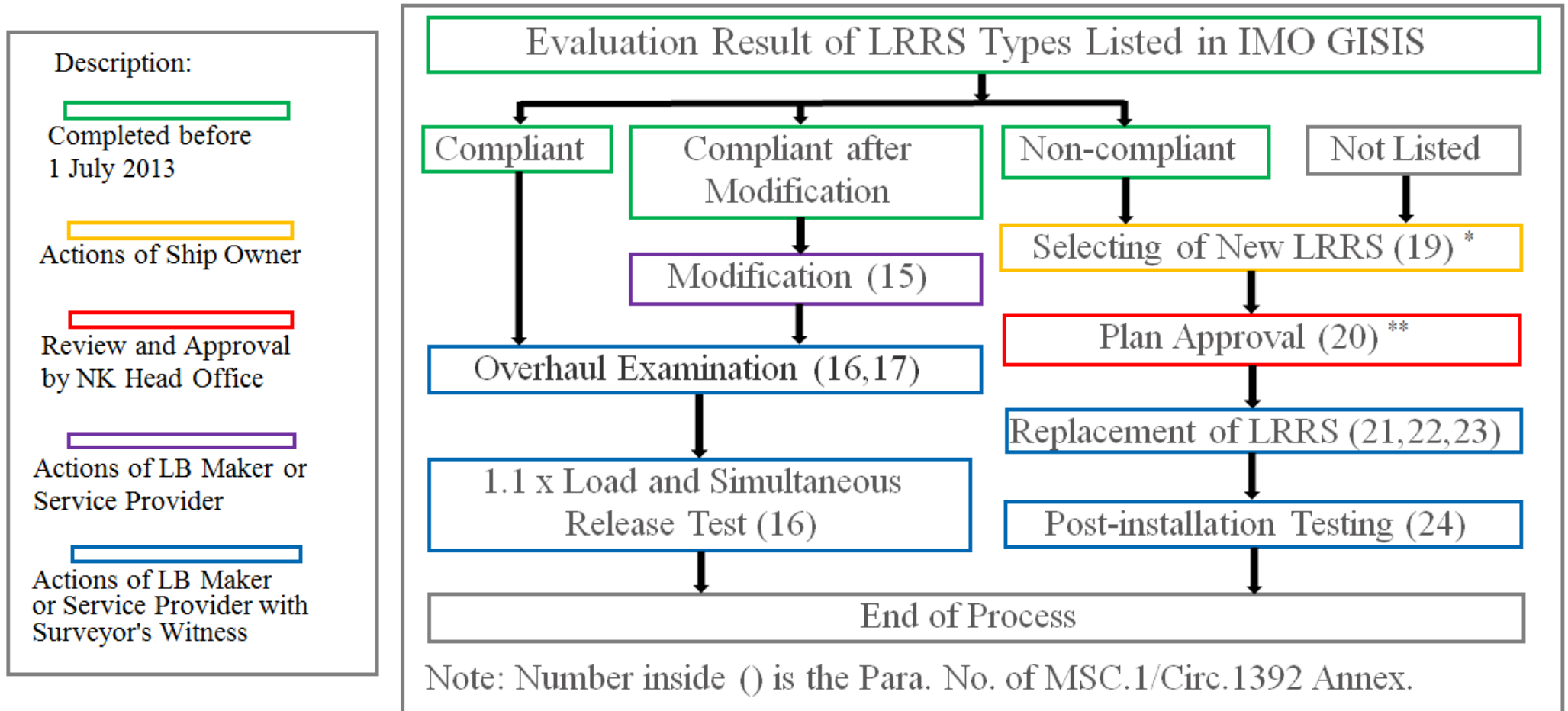


Brief Process Flow Chart of Actions on LRRS of Existing Lifeboat



* LRRS is to be replaced with the type accepted by the original lifeboat manufacturer as a rule. In case the agreement from the original lifeboat manufacturer is not available, exemption from Flag State Administration is necessary.

** Notwithstanding the prescription in Para.20, we suggest submission of drawings by the manufacturer due to time constraints.

Table 1. Application of New SOLAS Regulation III/1.5

Flag	Information/Notice on Application of New SOLAS Regulation III/1.5
Bahamas	For ships delivered after 1 January 2013, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Brazil	The use of the on-load release and retrieval systems for the lifeboats meeting the MSC.320(89) should be applied to all ships.
Chile	For ships constructed on or after 1 January 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Comoros	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Cyprus	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Denmark	The LSA Code as amended by Resolution MSC.320(89) is to be applied to new equipment that is approved and "Wheel-marked" in accordance with the Marine Equipment Directive from 1 January 2013.
Dominica	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Greece	MSC.1/Circ.1393 27-05-2011 early application of new SOLAS regulation III/1.5 was approved. / Hellenic Republic, Ministry of Maritime Affairs, Islands & Fisheries, Merchant Ships' Inspections General Directorate, Regulations and organizations Division: "Application of the provisional the new regulation III/5 SOLAS 74 as applied", Ref.No. 4339.10/75/12
Honduras	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Hong Kong	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89). The term "FIRST SCHEDULED DRY-DOCKING" as contained in SOLAS III/1.5 is "first scheduled out of water survey of the ship's outer bottom". / HONG KONG MERCHANT SHIPPING INFORMATION NOTE No. 38/2012
Ireland	For ships constructed on or after 20 May 2011, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89). / Notice to Mariners No.54 of 2011
Isle of Man	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Lebanon	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89)
Liberia	Ships built after 1 July 2014 shall comply with the LSA Code, as amended by resolution MSC.320(89). / Marine Notice SAF-005
Malta	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Marshall Islands	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89). / Marine Notice No. 2-011-37 / TEC-0888
Netherlands	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Norway	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Panama	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Portugal	For new ships constructed on or after 1 January 2013 and existing ships fitted with lifeboats placed on-board on or after 1 January 2013, LRRSs shall comply with

	the LSA Code, as amended by resolution MSC.320(89). / DGRM Circular No. 35
Singapore	For ships constructed on or after 20 May 2011 but before 1 July 2014, it is acceptable to MPA that they are encouraged to comply with the amended LSA Code. / Shipping Circular to Shipowners No.14 of 2011
St. Kitts & Nevis	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
St. Vincent and the Grenadines	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Switzerland	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Tuvalu	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
U.A.E.	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
U.K.	New vessels, or existing vessels with lifeboats placed on-board on or after 01 January 2013, should have lifeboats installed with LRRS compliant with IMO Res.MSC.320(89). New vessels, or existing vessels with lifeboats placed on-board before 1st January 2013, are advised to have lifeboats installed with LRRS compliant with IMO RESOLUTION MSC.320(89). Those LRRS that are not compliant with MSC.320(89) will be subject to the evaluation and possible replacement as per MSC.1/Circ.1392 and MARINE GUIDANCE NOTICE MGN 541 (M+F).
Vanuatu	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).
Vietnam	For ships constructed on or after 1 July 2014, LRRSs shall comply with the LSA Code, as amended by resolution MSC.320(89).

Table 2. Application of MSC.1/Circ.1392

Flag	Instructions on Application of MSC.1/Circ.1392
Antigua and Barbuda	<p>(Scope of the Application)</p> <p>At the 89th Session of the IMO Maritime Safety Committee meeting in 2011 important amendments were adopted to the SOLAS Convention, Chapter III/1 and to the Life Saving Appliances Code (LSA Code). These amendments affect lifeboat and rescue boat on-load release mechanisms fitted on all ships, existing and new. The changes apply to davit launched lifeboats/rescue boats only and do not affect free-fall boats or rescue boats with a single fall and no on-load release capability and they came into effect on 1st January 2013. Ref. No. CIRCULAR 2012-007</p> <p>(5 knots Installation Test)</p> <p>The post-installation test of replaced on-load release mechanisms in order to verify that the replacement release and retrieval system fully complies with the LSA Code, paragraph 4.4.7.6 and subparagraphs, can be carried out in two steps:</p> <ol style="list-style-type: none"> 1) 5-knot towing test by lowering the life-/rescue boat into the water without releasing it, no persons should be on board the life-/rescue boat during this test. 2) Test of the release mechanism may be performed with the vessel stopped. ADOMS accepts alternative equivalent testing methods to achieve the 5 knot launch post-installation test subject to acceptance by the RO, such alternatives may include: <ul style="list-style-type: none"> • Creating a wash of 5 knots induced by a vessel located forward of the launching position with both vessels securely moored to quay. • Use of tidal streams. <p>In all cases It must be ensured that the water is moving at the required speed to a depth deeper than the survival craft draft.</p>
Bahamas	<p>(Acceptance of LRRS)</p> <p>LRRS type evaluated by the Recognized Organization and registered to IMO GISIS is acceptable. / TEC-982</p> <p>A copy of evaluation report by the Recognized Organization of the LRRS type registered to IMO GISIS is acceptable as Flag State's Confirmation Letter (Document 2). The copy is supplied by the lifeboat maker or the service provider.</p> <p>(Replacement of on-load release gear for lifeboat or rescue boat)</p> <p>The BMA considers that any on-load release mechanism which is required to comply with LSA Code 4.4.7.6, whether installed on a lifeboat or rescue boat, shall be re-evaluated and dealt with in accordance with the Guidelines laid out in the Annex to MSC.1/Circ.1392 not later than the first scheduled dry docking after 1st July 2014, but not later than 1st July 2019. Lifeboat or Rescue boat 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.</p>

(Use of Corrosion Resistant Materials in the Marine Environment)

The BMA interprets paragraph 21 of the Annex to MSC.1/Circ.1392 to mean that the hook fixed structural connections of the release mechanism and supporting structure which are not made of materials corrosion resistant in the marine environment and which are installed on the outside of the lifeboat should be replaced. In cases where it is wished not to replace such fixed structural connections or supporting structure fitted on the outside of the lifeboat a suitable application seeking the BMA's concurrence shall be submitted in accordance with BMA Information Bulletin No.8.

(Use of LRRS not Manufactured by the Original Lifeboat Manufacturer)

The BMA will give consideration to accepting the installation of new LRRS which are not manufactured by the original lifeboat manufacturer provided the following is undertaken:

- a) It is demonstrated that the original lifeboat manufacturer is no longer in existence; or,
- b) At least three attempts have been made by the owner to obtain the agreement of the original lifeboat manufacturer to the installation of the proposed LRRS:
 - If the original lifeboat manufacturer rejects the proposed replacement LRRS for technical reasons, those technical reasons are to be assessed by NK. Where NK assesses the stated technical reasons as not being valid, an application in accordance with BMA Information Bulletin No.8 is to be made to the BMA seeking concurrence with NK's findings and seeking agreement for NK to conduct the review and approval of the LRRS installation in accordance with the procedures in the annex to MSC.1/Circ.1392;
 - If no response is received from the original lifeboat manufacturer, or the lifeboat manufacturer objects for commercial reasons, the review and approval of the LRRS installation may be carried out by NK in accordance with the procedures in the annex to MSC.1/Circ.1392.

(5 knots Installation Test)

The BMA will give consideration to equivalent means of conducting the 5 knots installation test in a more controlled environment with the ship stationary whilst alongside or at anchor. Equivalent means may include the use of the wash from a vessel positioned forward of the launching position to create a 5 knots current or the use of a 5 knots current from a river or tidal flow. In case where the Company applies equivalent means of conducting the 5 knots installation test, application via NK to the BMA for an agreement prior to conducting the 5 knots installation test is necessary. The Company is to ensure that suitable safety provisions are in place and that a thorough risk assessment is conducted prior to conducting the 5 knots installation test, or agreed equivalent test. The BMA does not apply a "sister ship" approach when dealing with the 5 knots installation test or agreed equivalent test required after the replacement of hooks.

Denmark

(5 knots Installation Test)

The Danish Maritime Authority (DMA) can accept that post-installation test of replaced or modified on-load release mechanisms are carried out in two steps:
(1) 5-knot towing test by lowering the life-/rescue boat into the water without releasing it, no persons need to be on board the life-/rescue boat during this test.
(2) Test of the release mechanism may be performed with the vessel stopped.

The above is acceptable provided that it can be verified by safer means that the re-placement release and retrieval system fully complies with the LSA Code, paragraph 4.4.7.6 and

	<p>subparagraphs.</p> <p>DMA accepts alternative equivalent testing methods to achieve 5 knots, which may include i.e.:</p> <p>(1) Creating a wash of 5 knots induced by a vessel located forward of the launching position or with both vessels securely moored to quay.</p> <p>(2) Use of tidal streams.</p> <p>It must be ensured that the water is moving at the required speed to a depth deeper than the survival craft draft.</p> <p>On cargo ships alternative means for achieving 5 knots are to be approved by NK.</p> <p>Ref. No.: DMA Circular no. 019</p>
Greece	<p>(Acceptance of LRRS)</p> <p>LRRS type evaluated and registered to IMO GISIS is acceptable. A copy of evaluation report by the Recognized Organization of the LRRS type registered to IMO GISIS is acceptable as Flag State's Confirmation Letter (Document 2). The copy is supplied by the lifeboat maker or the service provider. / Hellenic Republic, Ministry of Maritime Affairs, Islands & Fisheries, Merchant Ships' Inspections General Directorate, Regulations and organizations Division: "Application of the provisional the new regulation III/5 SOLAS 74 as applied", Ref.No. 4339.10/75/12</p> <p>(5 knots Installation Test)</p> <p>5 knots installation test could be dispensed by simulating real conditions and forces as per lifeboat maker suggestion. Test procedure is to be approved by NK. In case where tests present damage to the lifeboat after the simulation test, then the test should be carried out again in real condition. Irrespective of the way of this test, it is not compulsory to perform release when lifeboat is waterborne, unless this is requested by the lifeboat maker or NK Surveyor.</p>
Isle of Man	<p>Replacement of Lifeboat Release and Retrieval Systems (LRRS), not meeting SOLAS III/1.5, in accordance with MSC.1/1392 Paragraphs 18-26 including:</p> <ol style="list-style-type: none"> i. Review and approval of replacement Lifeboat RRS (MSC.1/Circ.1392 Paragraph 20) ii. Discretion to decide if the hook fixed structural connections need not be replaced (MSC.1/Circ.1392 Paragraph 21) iii. Witnessing the installation (MSC.1/Circ.1392 Paragraph 23) iv. Witnessing the post installation testing (MSC.1/Circ.1392 Paragraph 25) – For compliance with MSC.1/Circ.1392. The Ship Registry accepts simulation of the 5 knot test by means of lowering into an approximate 5 knot tidal stream or lowering into the wake of a tug. This test is designed to assess the whole launching system for the boat and shall be carried out on each davit on the ship. v. Issuing the Statement of Acceptance as per MSC.1/Circ.1392 Appendix 4 (MSC.1/Circ 1392 Paragraph 26) <p>It is the Ship Registry's interpretation of the LSA Code that this is also applicable to rescue boats and as such if a hook on a rescue boat is of a similar type to that on a lifeboat the same procedures should be followed as for lifeboats, including replacement.</p>

Japan	<p>(Acceptance of LRRS)</p> <p>Results of evaluation by Japanese Ministry of Land, Infrastructure, Transport and Tourism (JG) can be seen at the following URL: http://www.mlit.go.jp/en/maritime/maritime_fr8_000001.html .</p> <p>As a rule, LRRS types without the evaluation by JG are not acceptable for Japanese flagged ships regardless the results on IMO GISIS.</p> <p>JG may, however, accept those LRRS types on case by case basis subject to additional tests / documents.</p>
Liberia	<p>(5 knots Installation Test)</p> <p>The Liberia Maritime Authority will consider an equivalent test in which another boat is simulating the 5 knots on the fully equipped lifeboat. This second boat should be providing enough thrust in an astern direction so as to simulate a strain similar in force and direction as would be imparted on the LRRS if the ship were making 5 knots ahead when the fully equipped lifeboat is launched. This equivalent test must be conducted in the presence of an attending surveyor. If the attending surveyor is satisfied that the test is designed and conducted so as to accurately and sufficiently simulate and demonstrate that the lifeboat can be safely launched from the launching position of the vessel while traveling at an ahead speed of 5 knots then the Liberia Maritime Authority will accept the test as meeting the requirements of MSC.1/Circ. 1392, paragraph 24.3.</p> <p>The Liberia Maritime Authority will also consider a reduced post-installation test as required by paragraph 24 of MSC.1/Circ.1392 and agrees to waive the 5 knots installation test only, required under paragraph 24.3 and resolution MSC.81(70), part 2, paragraph 5.4, for sister ships after taking into account the following:</p> <ol style="list-style-type: none"> 1. The complete post-installation test required under paragraph 24 of MSC.1/Circ.1392 was successfully completed for the first ship in the series; 2. The remaining sister ships in the series are built to the same ship and lines plans, with identical geometric arrangement of the life boats and launching arrangements and replacement LRRS; 3. The replacement of the LRRS on sister ships are carried out by the Manufacturer of the LRRS or the Manufacturer Certified Service Provider for that make and model of the LRRS and authorized by their Administration; and 4. The Acceptance Documents upon completion of installation and testing shall be submitted to the Administration.
Malta	<p>(Scope of the Application)</p> <p>Application of MSC.1/Circ.1392 as being valid for any on-load release gear, regardless of whether this is installed on a survival craft or rescue boat.</p>
Marshall Islands	<p>(Scope of the Application)</p> <p>SOLAS and the LSA Code do not require boats used solely for rescue purposes to be fitted with on-load release mechanisms. However, many dedicated rescue boats are fitted with these devices and the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) believes that all on-load release mechanisms should meet the same standards regardless of whether installed on a life boat or rescue boat. Accordingly, 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.</p>

	<p>Based on 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.</p> <p>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.</p> <p>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.</p> <p>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. / Technical Circular 20</p> <p>(Acceptance of LRRS)</p> <p>LRRS type evaluated by the Recognized Organization and registered to IMO GISIS is acceptable. / Marine Notice No. 2-011-37</p> <p>A copy of evaluation report by the Recognized Organization of the LRRS type registered to IMO GISIS is acceptable as Flag State's Confirmation Letter (Document 2). The copy is supplied by the lifeboat maker or the service provider.</p>
Portugal	<p>(Selecting of New LRRS)</p> <p>Companies should, where possible, select replacement equipment acceptable to the lifeboat manufacturer. However, in cases where the lifeboat manufacturer is unable to offer a suitable replacement lifeboat release and retrieval system, the Company may select an alternative one, provided it is approved, and if possible with the agreement of the lifeboat manufacturer. In such cases the company has the right to select alternative LRRS which may not be those as supplied or approved by the Lifeboat OEM but compatibility of such hooks must be assured by the RO.</p> <p>(5 knots Installation Test)</p> <p>Portuguese Maritime Administration allows the following test to be performed, as an equivalent to the 5 knots installation test: a tugboat shall be tied up alongside the ship at the quay, whereby the tug engines create a "5-knot wash". In this "5-knot wash" the installation/launching test is performed.</p>
U.K.	<p>(Scope of the Application)</p> <p>MSC.1/Circ.1392 and MARINE GUIDANCE NOTICE MGN 541 (M+F) are applicable to davit launched lifeboats fitted with on-load release hooks, and any similar on-load release</p>

	<p>systems if fitted to rescue boats.</p> <p>(Use of LRRS not Manufactured by the Original Lifeboat Manufacturer)</p> <p>Companies should, where possible, select replacement equipment acceptable to the lifeboat manufacturer. However, in cases where the lifeboat manufacturer is unable to offer a suitable replacement LRRS, the Company may select an alternative LRRS provided it is approved. It's the company's right to select alternative LRRS which may not be those as supplied or approved by the Lifeboat OEM but compatibility of such hooks must be assured by NK.</p> <p>(5 knots Installation Test)</p> <p>A simulated launch test e.g. where a vessel creates approximately 5knot wash ahead of the launched craft, may be accepted as equivalent to launching requirement of MSC.81(70) part 2, paragraph 5.4. All proposed equivalent arrangements adequately demonstrating the launch retirement must be presented to MCA Marine Technology Branch, on case by case basis, before acceptance can be granted. Examples of assessment of this provision through calculation have been demonstrated but the MCA position is that this test must be physically conducted as far as is practicable because it is designed to assess the whole launching system for the boat.</p>
	<p>(Documentation to be Retained Onboard)</p> <p>After the first scheduled dry-docking after 1 July 2014, vessels should have one of the following sets of documents onboard.</p> <p>.1 Vessels for which existing LRRS are found compliant with the evaluation in MSC.1/Circ.1392:</p> <p>(1) 'Factual Statement' from the Manufacturer to confirm that the system onboard is of the same type as the system that passed the MSC.1/Circ.1392 evaluation</p> <p>(2) Copy of the document listing the accepted LRRS having passed MSC.1/Circ.1392 evaluations (to be published after 1st July 2013)</p> <p>(3) MED Certificate and DoC for the LRRS</p> <p>.2 Vessels which have had non-compliant LRRS replaced with new ones:</p> <p>(1) RO issued 'Statement of Acceptance' as per Corrigendum 1 to MSC.1/Circ.1392.</p> <p>(2) A copy of the engineering drawing(s) approved by the RO</p> <p>(3) MED Certificate and DoC for the LRRS</p> <p>.3 Vessels with lifeboats installed onboard with LRRS compliant with IMO RESOLUTION MSC.320(89): MED Certificates and DoC for the lifeboat and LRRS</p>
U.S.A.	<p>FAQs – SOLAS III/1.5 and MSC.1/Circ. 1392</p> <p>(1) What are the first steps I should take regarding compliance with SOLAS Regulation III/1.5?</p> <p>We recommend that you immediately determine the model name(s) and approval number(s) of the release mechanisms installed on your lifeboats and rescue boats.</p> <p>Coast Guard approval numbers of release mechanisms should be marked on the release mechanism and will be in the form: 160.133/xxx/x or 160.033/xxx/x. The approval series "160.033" is now an obsolete approval series, but such mechanisms may remain in use. If your release mechanism was approved only under approval series "160.033" contact</p>

Commandant (CG-ENG-4) at typeapproval@uscg.mil for guidance.

If you cannot locate the model name or approval number for your release mechanism, the Coast Guard's Maritime Information Exchange ("CGMIX") website contains a list of all current and previously approved release mechanisms, searchable by approval series (i.e., 160.033, or 160.133), approval number, manufacturer name, or by keyword at the following website: <http://cgmix.uscg.mil/equipment/equipmentsearch.aspx>. If you need further assistance to determine this information, you may wish to contact the original boat manufacturer or a service provider for that make of boat.

Next, we recommend that you visit IMO's GISIS module on "Evaluation of hooks," or consult with the hook manufacturer or service provider, to find out if your model of hook has completed the self-assessment and/or performance test. IMO's GISIS module is available to the public at <http://gisis.imo.org/Public/Default.aspx>. Each release mechanism that has been evaluated by the Coast Guard will be listed as "compliant," "compliant with modification," or "non-compliant," with "United States" as the Reporting Authority.

If the hook is not listed, you may contact the Coast Guard at typeapproval@uscg.mil to inquire about the status of your mechanism. If you choose to contact the manufacturer or a lifeboat service provider directly regarding the status of your release mechanisms with respect to SOLAS Regulation III/1.5, we recommend that you request a copy of the relevant correspondence from Commandant (CG-ENG-4) concerning the selfassessment and performance testing of the release mechanism. A copy of that letter should be retained on board your vessel with the approval certificates for the lifeboat and release mechanism.

(2) What if my release mechanism is not listed in GISIS, or the manufacturer is no longer in business?

You may contact the Coast Guard at typeapproval@uscg.mil with the model and approval number of your release mechanisms. The Coast Guard will either provide you with the status of the evaluation of your equipment or, for mechanisms whose manufacturer is no longer in business, assist you in determining your options for compliance with SOLAS Regulation III/1.5.

(3) What is the next step if my hook is "compliant"?

No later than the first scheduled dry-docking after July 1, 2014, but in any case no later than July 1, 2019, all U.S. ships subject to SOLAS with installed davit-launched lifeboats, must have the overhaul examination outlined in Annex 1 to IMO Resolution MSC.1/Circ.1206/Rev.1 "Measures to prevent accidents with lifeboats" performed by the manufacturer or by a suitably qualified service provider in order to remain in compliance with SOLAS. You may download a copy of MSC.1/Circ.1206/Rev.1 from the IMO website at <http://docs.imo.org> or request it from us. Upon satisfactory completion of the overhaul examination, the manufacturer or service provider should issue a factual statement to confirm this, for retention on board.

(4) What is the next step if my hook is "compliant with modifications"?

Contact Commandant (CG-ENG-4) at typeapproval@uscg.mil for specific guidance on the process for modifying existing USCG approved release mechanisms.

(5) What is the next step if my hook is "non-compliant"?

In order to maintain a valid SOLAS Safety Equipment Certificate, non-compliant release mechanisms must be replaced no later than the first scheduled dry-docking after July 1, 2014, but in any case no later than July 1, 2019, with a USCG approved release mechanism approved under approval series 160.133 as complying with IMO Resolutions MSC.320(89) and MSC.321(89). You should contact the issuing authority of your Safety Equipment Certificate, either USCG or Class Society authorized under the Alternate Compliance Program, before undergoing a retrofit of approved release mechanisms in your lifeboats. See also answers to questions (6) and (7) below. You may find all current USCG approved release mechanisms by conducting a search under approval series 160.133 at our CGMIX website:
<https://cgmix.uscg.mil/Equipment/EquipmentSearch.aspx>.

IMO provided clarification on the term “first scheduled dry-docking” in IMO Circular MSC.1/Circ.1445, as follows: “In the context of SOLAS regulation III/1.5, the wording “first scheduled dry-docking” was introduced to mean the “first scheduled out of water survey of the ship's outer bottom.” This explanation is to clarify that the onload release mechanisms need not be compliant during an in-water survey, should this occur before a dry-docking.”

Every Coast Guard approved lifeboat is approved with a specific Coast Guard approved release mechanism. Therefore, when a different Coast Guard approved release mechanism than that approved with the original boat is proposed for installation on a Coast Guard approved lifeboat or rescue boat, it constitutes a modification to the approved lifeboat, and the change must be submitted to the Coast Guard in advance for review and approval. See Question (6) below for specifics of what to submit to Commandant (CG-ENG-4) for retrofitting release mechanisms.

(6) How do I get Coast Guard approval of retrofitting Original Equipment Manufacturer (OEM) or non-OEM release mechanisms into existing approved lifeboats?

Owners of Coast Guard approved lifeboats should select a current Coast Guard approved release mechanism under approval series 160.133 as listed on our CGMIX website (see answers to questions 1 and 5 above) and select a suitable facility to undertake the retrofit work. We recognize that, in most cases, the facility undertaking the retrofit will have some association with the OEM of the lifeboat and/or the release mechanism. However, owners of Coast Guard approved lifeboats are not obligated to select replacement release mechanisms acceptable to, or manufactured by, the original lifeboat manufacturer.

Contact Commandant (CG-ENG-4) at typeapproval@uscg.mil for specific guidance on submitting requests for retrofitting release mechanisms into existing USCG approved lifeboats.

(7) My ship is enrolled in the Alternate Compliance Program (ACP). What is the role of the Authorized Classification Society with respect to compliance with SOLAS III/1.5?

Classification Societies accepted into the ACP are authorized to issue SOLAS Safety Equipment Certificates to U.S. ships subject to SOLAS on behalf of the Coast Guard. However, the authority to issue approval certificates for safety equipment, such as SOLAS lifeboats and release mechanisms, is not currently delegated under the ACP.

Any potential modifications to a Coast Guard approved lifeboat on board a ship enrolled in the ACP must first be approved by Commandant (CG-ENG-4).

(8) If my ship has lifeboats that were issued approval from another Administration (e.g., reflagged to the U.S. under the Maritime Security Program), do I need Coast Guard approval

of retrofits of OEM or non-OEM release mechanisms into existing approved lifeboats?

Yes, ships with lifeboats, or even rescue boats when applicable, not approved by the Coast Guard should follow the guidance provided in the response to Question (6) above.

(9) Does SOLAS Regulation III/1.5 apply to all ships subject to SOLAS regardless of build date?

Yes. However, some lifeboats installed prior to July 1, 1986 may not require action to comply with SOLAS III/1.5. SOLAS III/1.5 applies to ships subject to SOLAS that have lifeboats with hooks designed and approved for on-load release. Certain older hook designs that pre-date the SOLAS requirements for on-load release are not considered to be on-load hooks subject to SOLAS III/1.5. When in doubt, contact Commandant (CG-ENG-4) at typeapproval@uscg.mil, or the original manufacturer of the lifeboat.

(10) Does the Coast Guard recognize the compliance status of release mechanisms posted to GISIS by foreign authorities in cases where they have approvals from both the Coast Guard and foreign authorities (e.g., the European “wheelmark”)?

No, the Coast Guard must evaluate and accept all documents and tests performed on Coast Guard approved release mechanisms in order for the ship to comply with SOLAS III/1.5, regardless of whether a similar release mechanism has been approved and evaluated by another Administrations. There are cases where a particular model as approved in the U.S. is not identical to the same model approved by other authorities.