

# Palau International Ship Registry



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## MARINE NOTICE 139.2

**To: SHIPOWNERS, MANAGERS, MASTERS, DEPUTY REGISTRARS,  
FLAG STATE INSPECTORS, AND RECOGNIZED ORGANIZATIONS**

**Subject: LIFEBOAT EQUIPMENT REQUIREMENTS, MAINTENANCE, AND  
SERVICING**

### 1. Reference

- 1.1 International Convention for the Safety of Life at Sea, 1974, SOLAS as amended
- 1.2 International Life-saving Appliance, LSA Code, as amended
- 1.3 Resolution MSC.1/Circ. 1206/Rev.1, *Measures to Prevent Accidents with Lifeboats*, dated June 11, 2009
- 1.4 Resolution MSC.317(89), *Amendments to the International Convention for the Safety of Life at Sea, 1974, as amended*, adopted on 20 May 2011
- 1.5 Resolution MSC.320(89), *Amendments to the International Life-Saving Appliance (LSA) Code*, adopted on 20 May 2011
- 1.6 MSC.1/Circ.1392, *Guidelines for Evaluation and Replacement of Lifeboat Release and Retrieval Systems*, dated 27 May 2011
- 1.7 MSC.1/Circ.1327, *Guidance for the Fitting and Use of Fall Preventer Devices (FPDs)*, dated 11 June 2009
- 1.8 MSC.1/Circ.1419, *Guidelines for the Standardization of Lifeboat Control Arrangements*, dated 13 June 2012
- 1.9 Palau Maritime Regulations Chapter 5
- 1.10 Resolution MSC.402(96) *Requirements for Maintenance, through Examination, Operational Testing, Overhaul and Repair of Lifeboats, Launching appliances and Release Gear.*

### 2. Purpose

- 2.1 This Marine Notice establishes and clarifies the Republic of Palau policy regarding Lifeboat equipment, its maintenance and servicing in relation to the updated Guidelines published by the IMO.

### 3. Applicability

- 3.1 This Marine Notice applies to vessels registered with the Palau Flag including Mobile Offshore Units (MOUs).



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## 4 General Requirements

4.1 Maintenance and Servicing shall be conducted in accordance with Reference 1.2 above. The same should be followed for the inspections, maintenance of lifeboats, launching appliances, and on-load release gear.

4.2 Requirements for the air cylinders for totally enclosed lifeboats shall be the same, where applicable, as with Self-Contained Breathing Apparatus air bottles.

## 5. Manufacturer and Authorized Service Providers.

5.1 According to Resolution 402(96) the original equipment manufacturer or any entity which has taken legal and legitimate responsibilities for equipment when the original equipment manufacturer no longer exists or supports the equipment can proceed with the servicing and maintenance of lifeboats, launching appliances and on-load release gear; in cases where manufacturer certified facilities are not available, a non-manufacturer certified facility or properly trained personnel selected by the Company may be utilized to perform those relevant servicing and maintenance functions, provided the Recognized Organization is satisfied with the ability of the facility or personnel to carry out these functions.

5.2 From January 1<sup>st</sup> 2020, the Palau Ship Registry Administrator will provide approval to Authorized Service Providers according to the new requirements of Resolution 402(96). Service Providers seeking for Palau Flag Approval shall contact the Palau Ship Registry Administrator or visit the website [www.palaureg.com](http://www.palaureg.com) in order to get the application and start the process of approval.

## 6. Requirements Lifesaving Appliance Falls

6.1 Falls used for launching lifesavings appliances shall be inspected periodically, in accordance with reference 1.3 above, with special regard for areas passing through sheaves, and renewed when necessary due to deterioration of the falls or at intervals of not more than five (5) years, whichever is the earlier. The intermediate turning of the falls end for end is no longer required.



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6.2 All terminations of primary load-bearing wire rope must be formed by wedge sockets, class approved resin or white metal sockets, swaged or spelter fittings or other suitable alternative method approved by class. This includes falls for lifeboats, rescue boats and davit launched life rafts as well as hanging off pendants and recovery strops. Wire-rope grips, such as bulldog grips, are not acceptable for any primary load-bearing terminations. Where wire rope grips are found to have been used on primary load-bearing terminations, arrangements are to be made for their replacement.

## 7. Requirements for On-Load Release Hook Evaluation and Replacement (2011 SOLAS/LSA Code Amendments)

7.1 In accordance with the new requirements of SOLAS Regulation III/1 set forth under reference 1.4 above, all ships fitted with lifeboat on-load release mechanisms that are found not in compliance with paragraphs 4.4.7.6.4 to 4.4.7.6.6 of the LSA Code, as revised by reference 1.5 above, shall be replaced with equipment that complies with the Code not later than the first scheduled dry-docking after 1 July 2014, but not later than 1 July 2019. In the context of SOLAS regulation III/1.5 as amended by reference 1.5, the wording “first scheduled dry-docking” means the “first scheduled out of water survey of the ship's outer bottom.” This explanation is provided in reference 1.7 above and is to clarify that the on-load release mechanisms need not be compliant during an in-water survey, should this occur before a dry-docking.

7.2 To determine if existing ships are fitted with non-compliant on-load release mechanisms, manufacturers of lifeboat release and retrieval systems are to conduct a self-assessment of their types of existing systems at the earliest opportunity, but no later than 1 July 2013. Upon receipt of the results of the manufacturer self-assessment, Recognized Organizations acting on behalf of the Palau Ship Registry Administrator are to carry out a design review and witness a performance test of these existing systems in accordance with the IMO Guidelines for evaluation and replacement of lifeboat release and retrieval systems – reference 1.6 above. Results of the system evaluations are to be reported to the IMO as they are received.

7.3 For lifeboat release and retrieval systems found to be compliant as a result of the system evaluation, an ‘overhaul examination’ according to Annex 1 of reference 1.3 above shall be carried out by the system manufacturer or one of their representatives no later than the first scheduled dry-docking



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after 1 July 2014, during which a verification is performed to ensure that the system is the same type as evaluated.

7.4 As an alternative to replacement, in accordance with reference 1.6 above, non-compliant on-load release mechanisms may be modified or re-designed by the manufacturer to comply with the revised requirements of the LSA Code referred to in reference 1.5 above. This is subject to the modified system being evaluated as compliant in accordance with the guidelines under reference 1.6 above.

7.5 It shall be noted that revisions to the LSA Code specified in reference 1.5 have entered into force as of 1 January 2013.

7.6 Furthermore, ship owners are strongly encouraged to ensure that on-load release and retrieval systems installed on ships constructed on or after 1 January 2012 but before 1 July 2014 comply with the revised requirements of the LSA Code referred to in reference 1.5 above, subject to approval processes being in place for the new system which comply with the revised requirements.

7.7 When applying the relevant provisions of paragraph 4.4.7.6 of the LSA Code, as amended, the guidelines for the standardization of lifeboat control arrangements, set forth in reference 1.8 above should be used.

## 8. Secondary Safety System

8.1 When selecting new or replacement lifeboat on-load release hooks, it is recommended that ship owners/operators select designs incorporating a permanent secondary safety system.

8.2 Alternatively, where a new or replacement lifeboat on-load release hook incorporating a permanent secondary safety system cannot be obtained, ship owners/operators may select fail safe and innovative hook designs with particular characteristics that ensure the system cannot be released unintentionally or by the force of gravity.

8.3 A secondary safety system is deemed to be an additional device or design element, independent of the release mechanism which, prevents the on-load release hook from inadvertently opening during launching or recovery of the lifeboat, cannot open until the device is removed or unlocked, and



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can only be physically employed when the on-load release hook has been correctly reset.

8.4 A typical example of a secondary safety system would be a locking pin inserted into the onload release hook that can only be inserted when the on-load release hook is correctly reset. Further, a typical example of a fail-safe hook design would be a load-over-top hook design in which the weight of the boat holds the on-load release hook positively closed.

8.5 Ship's masters shall ensure that when a lifeboat on-load release hook with a secondary safety system is fitted, the secondary safety system shall be used during all drills (both launch and recovery) and specifically at all times when the lifeboat has crew or other personnel aboard. After the drill has been concluded, the secondary safety system shall be removed or disengaged.

## 9. Fall Preventer Devices

9.1 Notwithstanding the provision of paragraph 6 in reference 1.6 above, the Palau Ship Registry Administrator remains of the view that Fall Preventer Devices (FPDs) shall not be considered a substitute for an unstable or improperly designed lifeboat on-load release hook. The principal concern being the potential for misuse or misapplication of the FPD, which could contribute to further accidents during drills or loss of life in the event the device cannot be disengaged in an actual emergency. With this in mind, if the ship owner/operator decides to provide FPDs for use, they shall be designed, installed, inspected, and utilized in accordance with reference 1.7 above.

## 10. Lifeboat Damage

10.1 When any lifeboat is damaged and declared unseaworthy or is found in need of repair and no replacement boat is readily available, it may be substituted, as a temporary measure, with life raft(s) capacity for all the persons on board, but only with specific approval of the Palau Ship Registry Administrator. The minimum survival craft capacity prescribed by SOLAS Chapter III must be maintained.

10.2 Where the defective boat is a motorboat and there is no other motor lifeboat on board, the total survival craft capacity provided is to include a



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powered rescue boat meeting the requirements of Regulation III/31.2 of SOLAS.

10.3 These temporary measures will be limited to the minimum period of time required for replacement and, in general, will not exceed three (3) months.

## 11. Lifeboat Equipment Dispensation (LSA Code Section 4.4.8.32)

11.1 Lifeboat equipment dispensations for all other vessels will be handled on a case by case basis. Requests for such dispensations should be forwarded to [technical@palaureg.com](mailto:technical@palaureg.com)

## 12 Contact

12.1 Any further information requests and inquiries concerning the subject for this Marine Notice should be directed to Palau International Ship Registry as the office of the Palau Ship Registry Administrator at [technical@palaureg.com](mailto:technical@palaureg.com)

**This Marine Notice supersedes  
Marine Notice 139.1**

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