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## CIRCULAR Alert on detainable deficiencies

Following a recent Port State Control (PSC) inspection, a serious deficiency has been imposed that resulted in the detention of the vessel. Dromon wishes to draw attention to this detainable deficiency to avoid re-occurrence.

Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors

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### INFLATABLE LIFERAFTS

Throughout the PSC Inspection, it was noted that *the inflatable liferafts were insufficient: no liferafts served by launching appliances on board.*

#### What SOLAS, Chapter III, Regulation 31.1 requires?

##### 1.1 Cargo ships shall carry:

1. one or more totally enclosed lifeboats complying with the requirements of section 4.6 of the LSA Code of such aggregate capacity on each side of the ship as will accommodate the total number of persons on board; and
2. **in addition, one or more inflatable or rigid liferafts, complying with the requirements of section 4.2 or 4.3 of the LSA Code**, of a mass of less than 185 kg and stowed in a position providing for easy side-to-side transfer at a single open deck level, and of such aggregate capacity as will accommodate the total number of persons on board. If the liferaft or liferafts are not of a mass of less than 185 kg and stowed in a position providing for **easy side-to-side transfer at a single open deck level**, the total capacity available on each side shall be sufficient to accommodate the total number of persons on board.

##### 1.2 In lieu of meeting the requirements of paragraph 1.1, cargo ships may carry:

1. one or more free-fall lifeboats, complying with the requirements of section 4.7 of the LSA Code, capable of being free-fall launched over the stern of the ship of such aggregate capacity as will accommodate the total number of persons on board; and
2. in addition, one or more inflatable or rigid liferafts **complying with the requirements of section 4.2 or 4.3 of the LSA Code, on each side of the ship, of such aggregate capacity as will accommodate the total number of persons on board. The liferafts on at least one side of the ship shall be served by launching appliances.**

##### 1.3 In lieu of meeting the requirements of paragraph 1.1 or 1.2, cargo ships of less than 85 m in length other than oil tankers, chemical tankers and gas carriers, may comply with the following:

1. they shall carry on each side of the ship, one or more inflatable or rigid liferafts complying with the requirements of section 4.2 or 4.3 of the LSA Code and of such aggregate capacity as will accommodate the total number of persons on board;
2. unless the liferafts required by paragraph 1.3.1 are of a mass of less than 185 kg and stowed in a position providing for easy side-to-side transfer at a single open deck level, additional liferafts shall be provided so that the total capacity available on each side will accommodate 150% of the total number of persons on board;
3. if the rescue boat required by paragraph 2 is also a totally enclosed lifeboat complying with the requirements of section 4.6 of the LSA Code, it may be included in the aggregate capacity required by paragraph 1.3.1, provided that the total capacity available on either side of the ship is at least 150% of the total number of persons on board; and
4. in the event of any one survival craft being lost or rendered unserviceable, there shall be sufficient survival craft available for use on each side, including any which are of a mass of less than 185 kg and stowed in a position providing for easy side-to-side transfer at a single open deck level, to accommodate the total number of persons on board.

Additional requirements for Bulk Carriers, Oil and Chemical Tankers apply as per Regulation 31.

### The requirements as per the LSA Code

The inflatable liferafts shall comply with the requirements of section 4.1 and, in addition, shall comply with the requirements of section 4.2 of the LSA Code.

For the davit-launched inflatable liferafts, additional requirements apply: **“Rigid containers for liferafts to be launched by a launching appliance shall be so secured that the container or parts of it are prevented from falling into the sea during and after inflation and launching of the contained liferaft”.**

### The conclusion

For the cases that a vessel has freefall lifeboats, it needs additionally to carry davit-launched inflatable liferafts as per the LSA Code specific requirements. **A door containing the hook should exist enabling the davit-launched inflatable liferaft to be lifted,** as per the image and video below.



\*Video Source: Viking Life-Saving Equipment

### Act now

Surveyors must take note on the above detainable deficiency and give special attention during forthcoming class and statutory surveys, irrespective of scope.

Shipowners / Managers / Operators are kindly requested to pay special attention into this deficiency, note the regulation's requirements and to inform Masters on taking corrective actions, if necessary.