

Merchant Marine Circular

Panama Maritime Authority
General Directorate of Merchant Marine
Control and Compliance Department

MERCHANT MARINE CIRCULAR MMC-250

- To:** Ship-owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates and Recognized Organizations (ROs).
- Subject:** Lifeboat on-load release and retrieval systems
- Reference:**
- a) Resolution MSC.317 (89) of 20 May 2011, in force on 1 January 2013 adopted through Resolution No. 106-OMI-107-DGMM.
 - b) Resolution MSC. 320 (89) Amendments to the International Life-Saving Appliance Code (LSA Code) adopted through Resolution No. 106-OMI-106-DGMM of 29 November 2012.
 - c) Guidelines for evaluation and replacement of lifeboat release and retrieval systems (MSC.1/Circ.1392 and its Corr.1, as amended by MSC.1/Circ.1584 of 20 June 2017.
 - d) Circular MSC.1/1393 of 27 May 2011 - Early Application of new SOLAS regulation III/1.5.

1. Purpose

- 1.1** The purpose of this Merchant Marine Circular is to inform all parties concerned with Panamanian flag ships about MSC.1/Circ. 1392, MSC.1/Circ.1392/Corr.1 and MSC.1/Circ.1584 which amend the existing text of appendix 4 as well as the amendments to Regulation III/1.5 of SOLAS and to LSA Code Chapter IV/4.4.7.6, regarding lifeboat on-load release mechanisms.

2. Scope/Applicability

- 2.1** All ships constructed on or after 1 July 2014.



Merchant Marine Circular

3. Background

3.1 Amendments to Regulation III/1.5 of SOLAS and to LSA Code Chapter IV/4.4.7.6, will enter into force on 1 January 2013. These amendments require that for all ships constructed on or after 1 July 2014, the lifeboat on-load release mechanism, meets the new LSA Code requirements.

4. Requirement

4.1 Ships constructed before 1 July 2014 (Existing Ships), fitted with lifeboat on-load release mechanism, shall meet the requirements of LSA Code 4.4.7.6.4 to 4.4.7.6.6 as amended by Resolution MSC.320 (89) after the first scheduled dry-docking after 1 July 2014 but not later than 1 July 2019.

4.2 This Administration would like to point out that, **all types** of existing lifeboat on-load release and retrieval systems **design** shall be reviewed, and the performance test witnessed by an Administration or by a Recognized Organization before 1 July 2013 in accordance with MSC.1Circ.1392. Failing to do so, shall result into the release and retrieval system to be considered as non-compliant and required to be replaced by a new lifeboat release and retrieval system, within the dates above mentioned (after the first scheduled dry-docking after 1 July 2014 but no later than 1 July 2019).

4.3 This Administration would like to clarify that:

1. Existing ships fitted with off-load only release systems do not need to go through the evaluation process or replacement.
2. This Administration will accept the results of evaluations carried out by other Administrations on types of existing lifeboat release and retrieval systems (as per information released on GISIS data base).
3. The Manufacturer, see definition in MSC.1/Circ.1392, needs to submit to an Administration, for evaluation, the types of existing on-load release and retrieval systems for which he is responsible, before 1 July 2013.
4. If the lifeboat on-load release and retrieval system is deemed non-compliant after evaluation, the Manufacturer has the option to modify and re-submit for evaluation. If the modification is approved, all ships continuing to use that type of lifeboat on-load release and retrieval system shall be modified in accordance with the specifications approved.
5. Ship owners/operators should confirm with their manufacturers, that the type of lifeboat on-load release and retrieval system has been submitted for evaluation and be aware if it has been found compliant, noncompliant or capable of being modified.



Merchant Marine Circular

6. Fall Preventer Devices (FPD's) should be employed as an interim risk mitigation measure for each existing lifeboat release and retrieval system until the system meets any of the requirements stated in the MSC.1/Circ.1392 as amended, Paragraph 6.1 to 6.5; and at the master's discretion.
5. The one-time follow up overhaul examination shall be carried out, on board in accordance with MSC.1/Circ.1392, MSC.1/Circ.1392/Corr.1, MSC.1/Circ.1584, by the Manufacturer or by one of their representatives.
- 5.1 The Owners/Operators shall ensure that the extent of wear, corrosion, erosion and any material degradation is verified, addressed, and a factual statement is issued by the Manufacturer to confirm this. This statement shall be retained on board.
6. Taking into account MSC.1/Circ.1393 on early implementation of the new SOLAS regulation III/1.5, this Administration highly recommends all parties concerned to take the appropriate actions, at the earliest opportunity.

October, 2023 – reference to MSC.1/Circ. 1392 as amended.

July, 2014 – correction on point 2.1

June, 2014 – amendment of date "1 January 2013" by "1 July 2014" in point 2.1

May, 2014 – adding "constructed on or after 1 July 2014" in point 2.

July, 2012.

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