



REPUBLIC OF
THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Notice

No. 7-041-7

Dec/2016

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS

SUBJECT: Alternative Methods for Lifeboat Drills on Mobile Offshore Units (MOU)s

- References:**
- (a) **2009 MODU Code**, *Code for the Construction and Equipment of Mobile Offshore Drilling Units 2009*, as amended
 - (b) **IMO Resolution [A.1079\(28\)](#)**, *Recommendations for the Training and Certification of Personnel on Mobile Offshore Units (MOUs)*, adopted 04 December 2013
 - (c) **IMO Circulars [MSC.1/Circ.1486](#) and [MSC.1/Circ.1486/Corr.1](#)**, *Guidelines on Alternative Methods for Lifeboat Drills on MODUs*, issued 12 January 2015 and amended 10 June 2016
 - (d) **IMO Circular [MSC.1/Circ.1206/Rev.1](#)**, *Measures to Prevent Accidents with Lifeboats*, issued 11 June 2009
 - (e) **IMO Circular [MSC.1/Circ.1277](#)**, *Interim Recommendation On Conditions For Authorization Of Service Providers For Lifeboats, Launching Appliances And On-Load Release Gear*, issued 23 May 2008
 - (f) **RMI Maritime Regulations ([MI-108](#))**
 - (g) **RMI Mobile Offshore Unit Standards ([MI-293](#))**

PURPOSE:

This Notice provides the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) requirements for accepting alternative methods of conducting lifeboat drills on Mobile Offshore Units (MOUs). In doing so, it also establishes criteria for the application of International Maritime Organization (IMO) Circular MSC.1/Circ.1486 and its provisions.

BACKGROUND:

In 2014, §14.13.4 of the 2009 Code for the Construction and Equipment of Mobile Offshore Drilling Units (MODU Code) was amended to allow for an alternative means of meeting the requirement for lifeboats to be launched and maneuvered with assigned operating crew on onboard at least once every three (3) months.

The reason for this was that launching, maneuvering, and retrieval of lifeboats are part of the critical

assessment of a MOU's survival craft capability and readiness. However, conducting such exercises in remote offshore locations, and other areas where there are similar unfavorable environmental conditions, may involve circumstances that lead to hazardous situations and, potentially, the inability to carry out these drills safely and fully.

Lifeboat drills are intended to test and verify that the emergency life-saving system and its associated equipment are in place, in good working order, and ready for use. The drills are also necessary to train and evaluate the crew in the use of the equipment and demonstrate that they have the capability and readiness to manage an emergency in which lifeboats are employed.

In recognition of the need for MOUs to achieve these objectives regularly and safely even when launch and maneuver of the boat would be hazardous, the 2009 MODU Code was amended by the addition of §14.13.4.3 to allow for alternatives. It specifically provides:

alternatively, the provisions regarding launching and maneuvering may be considered as having been met for those units that have, (a) implemented the Guidelines developed by the Organization and they are included in the unit's operating procedures or, (b) by other equivalent means acceptable to the Administrator.

APPLICABILITY:

This Notice applies to any RMI-flagged vessel holding an IIMO MODU Code Safety Certificate or National MODU/MOU Document of Compliance.

REQUIREMENTS:

1.0 General

1.1 In accordance with §7.41.6 of the RMI Maritime Regulations ([MI-108](#)), Masters of MOUs are required to conduct drills such that:

h. Each lifeboat shall be launched and maneuvered in the water by its assigned crew, at least once in every three (3) months, during an abandon ship drill, and the crew shall be exercised in the use of oars and other means of propulsion where fitted.

1.2 Recognizing the difficulty and hazards inherent with the launching of lifeboats from offshore units and in keeping with §3.6.2 of the RMI MOU Standards ([MI-293](#)), the Administrator allows for alternative approaches to meeting the lifeboat launching and maneuvering requirements as provided in §14.13.4.3 of the 2009 MODU Code, provided certain conditions as articulated in this Notice are met.

1.3 §2.0 through §4.0 of this Notice apply to MOU owners or operators seeking to implement IMO Circular [MSC.1/Circ.1486](#) into the MOUs operating procedures in accordance with §14.13.4.3(a) of the 2009 MODU Code.

2.0 Program Development, Review, and Acceptance

- 2.1 The Administrator has authorized its Recognized Organizations (ROs) to review and accept alternative methods for lifeboat launching and maneuvering drills in its implementation of §14.13.4.3 of the 2009 MODU Code. See RMI [Technical Circular 22](#).
- 2.2 Operators requesting the Administrator's acceptance of an alternative method must develop a program taking into consideration the elements provided in §3.0 and §4.0 below. This program, with any necessary supporting documentation, must be submitted to a RO for review and acceptance.
- 2.3 Upon acceptance of the plan, the RO shall place a notation on the MODU Safety Certificate indicating that the MOU has satisfied the requirements of §14.13.4.3 of the 2009 MODU Code in that it has in place an acceptable alternative to the requirements of §14.13.4.2.

3.0 Capability and Readiness

- 3.1 The alternative approach must demonstrate a level of capability and readiness at least equivalent to that achieved through the traditional three-monthly launching and maneuvering exercise.
- 3.2 Such demonstration must address the readiness of the lifeboat equipment and systems, the capability of the lifeboat crew, and the effectiveness of evacuation procedures. As a minimum, drills, and exercises are to demonstrate:
 - .1 preparing and making ready the lifeboat for launching;
 - .2 lowering the lifeboat;
 - .3 releasing the lifeboat;
 - .4 propelling and steering the lifeboat; and
 - .5 functioning of all lifeboat systems including deluge, air, etc.
- 3.3 All elements of an alternative arrangement are to be implemented through a formal, robust, and documented program established and maintained by the operator.

4.0 Program Elements

- 4.1 The following sections outline the Administrator's expectations for the plan elements when an operator seeks to establish an acceptable alternative arrangement.

For ease of cross-reference, the paragraph numbers of the Annex to IMO Circular [MSC.1/Circ.1486](#) are included parenthetically in boldface for each of the Administrator's requirements in §4.2 and §4.3 below.

4.2 Equipment (11.1)

- 4.2.1 *A comprehensive maintenance and inspection plan meeting the criteria found in IMO Circular [MSC.1/Circ.1206/Rev.1](#) should be in place. (11.1.1)*

Criterion: The above referenced plan is to address the specific procedures for maintenance and servicing included in the Appendix to Annex 1 of IMO Circular MSC.1/CIRC.1206/Rev.1.

- 4.2.2 *Weekly and monthly inspections should be conducted in accordance with §10.18.7 and §10.18.8 of the 2009 MODU Code. (11.1.2)*

Criterion: All tests and inspections are to be conducted under the supervision of a person designated by the Person In Charge (PIC) and documented in a manner to allow for subsequent review. A person so designated is to have sufficient knowledge of the survival craft systems.

- 4.2.3 *In addition, on a monthly basis, each lifeboat should be lowered to just above but not entering the water, and returned to the original stowage position; the condition of the hull, hook release and retrieval systems (lubrication, integrity, and storage), and the operational condition of davit systems should be checked. (11.1.3)*

Criterion: This exercise should be witnessed by the designated person (see 11.1.2). Post deployment integrity checks are to be carried out by competent personnel under the supervision of the designated person. Results of the exercise and subsequent checks must be documented.

- 4.2.4 *Insofar as possible, those on board responsible for lifeboat-launching should be involved in the annual servicing and function test of release gear carried out in accordance with IMO Circular MSC.1/Circ.1206/Rev.1. (11.1.4)*

Criterion: The Administrator recognizes that there may be limitations to crew involvement in third party servicing of such equipment. Therefore any involvement may be limited to witnessing of these activities and is to be documented. Note that all service providers are to be authorized by the Administrator and qualified in accordance with the provisions of IMO Circular [MSC.1/Circ.1277](#); and that all servicing must be in accordance with International Convention for the Safety of Life at Sea (SOLAS) Regulations III/20 and III/36.

4.3 Personnel (11.2)

- 4.3.1 *A competence assurance program should be in place and cover all aspects of instruction and exercising of the crew as pertains to lifeboats and should be in accordance with the Recommendations for the training and certification of personnel on MOUs (IMO Assembly Resolution [A.1079\(28\)](#)). (11.2.1)*

Criterion: the documentation of the competence assurance program must address all aspects of the following paragraphs of this section.

- 4.3.2 *In addition to the specified mandatory training (e.g. as shown in table A-VI/2-1 of the Seafarers' Training, Certificate and Watchkeeping Code (STCW Code), the lifeboat coxswain should receive intermediate training (at least once every 2.5 years) at a facility satisfactory to the Administrator. This training should include practical demonstration of all the elements that are described in paragraph 10 above of these guidelines and are part of the three-monthly launch/maneuver exercise. This training should be carried out utilizing a lifeboat system the same as, or substantially similar to, that which is fitted on board the unit; (11.2.2)*

Criterion: Facilities considered satisfactory to the Administration for the specified mandatory training, are considered satisfactory for the intermediate training.

In-house or company sponsored training which conforms to the criteria applied to STCW training facilities may also be accepted as meeting the provision for intermediate training.

The Administrator recognizes that simulators may provide an effective means of achievement of some of the training objectives and, where used, their contribution toward that end should be sufficiently described. Documented relevant experience with survival systems may establish a level of proficiency sufficient to satisfy some of the requirements for intermediate training. The program should include a formal documented process to ensure that such experience is verified and evaluated in accordance with the unit's safety management system.

Such experience may include direct involvement with survival craft maintenance, training of others, or involvement in and responsibility for actual deployment.

- 4.3.3 *Regarding drills and exercises, reference is made to Appendix 1 of the Annex to IMO Assembly Resolution [A.1079\(28\)](#). (11.2.3)*

Criterion: Such drills and exercises are to consider all elements of launching and maneuvering of the survival craft; all key personnel with the required frequency; be documented; and identify outcomes and opportunities for improvement.

- 4.3.4 *Simulators can form a useful and important part of an overall competence assurance program. Where such simulators are to be used, they should be wholly appropriate to the lifeboat system encountered on board the unit. Simulators should not be seen as a complete replacement for practical hands-on training and drills. (11.2.4)*

Criterion: Use of the simulator is to be fully documented along with goals and objectives and elements of the training requirement that are achieved by successful completion of a simulator program. The extent to which the simulator duplicates the actual survival craft that the person will be required to operate is to be taken into account in assessing its contribution to competence assurance.

- 4.3.5 *Records of training in proficiency in lifeboats, including that carried out at a facility satisfactory to the Administrator (IMO Assembly Resolution [A.1079\(28\)](#)), should be readily accessible. (11.2.5)*

Criterion: Records of completion and outcome of training, drills, and exercises as described above are to be kept in accordance with the unit's safety management system.

5.0 Other Equivalent Means

- 5.1 §14.13.4.3(b) of the 2009 MODU Code allows the requirement for launching and maneuvering to be met by "other equivalent means" provided they are acceptable to the Administration.
- 5.2 The Administrator will accept such "other equivalent means" on a case-by case basis upon thorough evaluation by, and subsequent recommendation from, the RO.

6.0 MODU Safety Certificate

- 6.1 Upon acceptance of alternative means of compliance under either MODU Code 2009 §14.13.4.3(a) or §14.13.4.3(b), the RO shall place a notation on the MODU Safety Certificate in accordance with RMI [Technical Circular 22](#).