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SUB-COMMITTEE ON SHIP DESIGN AND EQUIPMENT
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Agenda item 4

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PERFORMANCE STANDARDS FOR RECOCERY SYSTEMS FOR ALL TYPES OF SHIPS

"**Performance based**" **performance standard for recovery systems**

Submitted by ICS, BIMCO, CLIA, IMCA, INTERCARGO, INTERTANKO, IPTA, Nautical Institute and OCIMF

SUMMARY

Executive summary:	The co-sponsors advise that a "performance based" performance standard for recovery systems is unrealistic, impractical and too restrictive, taking into account that commercial ships are not designed to recover large numbers of people at sea
Strategic direction:	5.1
High-level action:	5.1.1
Planned output:	5.1.1.1
Action to be taken:	Paragraph 9
Related documents:	DE 50/27; MSC 81/25; DE 50/21/1, DE 50/21/2, DE 50/21/3; DE 51/16, DE 51/16/1; DE 52/13/1, DE 52/21; DE 53/3, DE 53/26; DE 54/7, DE 54/23 and MSC.1/Circ.1182

Introduction

1 Document DE 54/7 (Bahamas *et al.*) proposed the development of a guidance regarding recovery plans and procedures in support of the ISM Code in the form of an MSC circular, drawing attention to the need for a Safety Management System (SMS) required under the ISM Code to include plans and procedures for rescue and recovery. This approach was supported by shipping industry representatives as well as by an increasing number of Administrations in recognition that mandating the carriage of dedicated recovery equipment may actually increase the risks of a rescue at sea as well as undermine the Master's authority, particularly regarding the safety of life at sea.

2 DE 54 agreed that a performance standard based on functional requirements should be prepared, which would not require the carriage of dedicated recovery equipment, but would allow sufficient flexibility with regard to the actual equipment used for recovery operations, bearing in mind that the recovery system must be tested to demonstrate its effectiveness. In addition, the Sub-Committee agreed that, for the time being, draft SOLAS regulation III/17-1 would be maintained as drafted by MSC 81.

Discussion

3 The decision of DE 54 to develop performance standards, for recovery systems based on functional requirements reflects concern that a performance standard for recovery systems is unrealistic, impractical and too restrictive, taking into account that commercial ships are not designed to recover large numbers of people at sea. Despite this recognition, the co-sponsors consider that much care is still required to ensure that such functional requirements remain as generic requirements to allow application to the majority, if not all ship types and designs.

4 The co-sponsors consider that the essential elements of document DE 54/7 should be retained. In particular, it should be recognized that, during an emergency, there may well be significant pressure on the master and the crew to engage in rescue efforts that place individual crew members at risk of injury or even death when seeking to assist others. Developing additional mandatory IMO instruments to address the recovery of casualties, a matter that is already within the purview of the ISM Code, risks questioning the established authority of masters referenced in the Code, by establishing requirements in a new instrument that seeks to establish a regime for the recovery of casualties.

5 MSC-MEPC.7/Circ.1 sets out criteria to be addressed before IMO bodies approve or adopt amendments to mandatory or non-mandatory IMO instruments. This circular identifies significant areas where human element considerations should be addressed. The co-sponsors consider that these are fully compatible with the requirement to establish performance standards on a ship-by-ship basis within individual safety management systems previously proposed by Administrations and the shipping industry in document DE 54/7. This approach, will assure compliance with the detailed requirements of MSC-MEPC.7/Circ.1 as referred to in paragraph 8: "does the solution address safeguards to avoid organizational errors". Individual performance standards will be established for each ship though ISM Code compliance within the Safety Management System (SMS). The performance standards will be evaluated by Administrations or recognized organizations on their behalf when assessing compliance for these mandatory requirements.

6 Ship specific performance standards for the recovery of casualties will specify the anticipated environmental conditions under which ships equipment may be deployed without causing undue hazard to the officers and crew. In establishing such performance standards ship and event specific details should be addressed including:

.1 manoeuvrability of ship;

.2 freeboard of ship;

.3 access and egress;

.4 characteristics of recovery equipment;

.5 wind force, direction and spray;

.6 significant wave height (Hs);

.7 period of waves; and

.8 swell.

7 MSC.1/Circ.1182 (Guide to Recovery Techniques) advises that:

"The recovery process is often far from simple. For example, it may be complicated by:

.1 differences in size between your ship and the survival craft: survivors may have to climb or be lifted considerable distances to get into your ship;

.2 differences in relative movement between your ship and the survival craft alongside: it may be difficult to keep the survival craft alongside and for survivors to get onto ladders, etc., or in through shell openings; or

.3 physical capabilities of those to be recovered: if they are incapacitated, they may be able to do little or nothing to help themselves".

The Circular also advises that:

"The guide's principal aims are to help you as master or crew of a responding ship to:

.1 **ASSESS** and decide upon appropriate means of recovery aboard your own vessel;

.2 **TRAIN** in the use of these means of recovery, in general preparation for emergencies; and

.3 **PREPARE** yourselves and your vessel when actually responding to an emergency".

The guidance within MSC.1/Circ.1182 is based on a wealth of experience of planning and conducting rescue at sea and readily lends itself to being applied when developing individual ship specific performance standards that fully take into account the range and variety of factors that may exist.

Proposal

8 Noting that section 8 of the ISM Code requires that procedures are in place to address potential emergency situations, and that measures must be provided to ensure that the company can respond to emergency situations involving its ships, it is proposed that unless due to particular circumstances and conditions as determined by the Administration the following functional requirements should apply:

.1 On a ship by ship basis undertake an assessment of the risks anticipated and mitigation measure that are required to reduce those identified risks to a reasonable level. It would be anticipated that some of the identifiable risks can only be adjudged and mitigated on an "incident by incident" basis, such as the environmental conditions being experienced at the time. When the above assessment of the risks and mitigation measures has been completed the company should produce formal plans and procedures. These plans and procedures should:

.1 be provided for the recovery of casualties from both LSA and directly from the water. Development of such plans and procedures, which should be incorporated in the ship's safety or emergency response manuals, shall take full account of the guidance provided in MSC.1/Circ.1182.

.2 be developed for the recovery of in-water casualties identifying particular ship equipment that may be used during the recovery of in-water casualties.

.3 be developed for the recovery of in-water casualties and should include a clear statement that the ship's master will retain responsibility for the safety of the ship and its crew during the conduct of such operations, emphasizing the master's authority and confirming that the master has overriding authority and the responsibility to execute decisions necessary for safety of life at sea and protection of the marine environment.

.4 include appropriate onboard training and drills that should be conducted and recorded to ensure that ship's personnel are adequately prepared to implement shipboard plans and procedures.

.2 An Administration may require a ship to fit particular recovery equipment to support the ship specific recovery plan if through construction or operation of the ship no appropriate existing onboard equipment can be identified for use in support of plans and procedures. When particular recovery equipment is required reference to document DE 54/7/1, paragraph 5 to paragraph 13, could provide guidance regarding such equipment, without the need for such equipment to be "type approved".

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider this proposal, and decide as appropriate.