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AND EQUIPMENT
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Agenda item 15

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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY
AND ENVIRONMENT-RELATED CONVENTIONS**

**Unified interpretation on liferaft, lifeboat and rescue boat equipment in the LSA Code,
and the 1994 and 2000 HSC Codes**

**Submitted by Marshall Islands, New Zealand, Panama,
IACS, ICS, INTERMANAGER and INTERTANKO**

SUMMARY

Executive summary: This document provides a proposed unified interpretation (UI) of paragraphs 4.1.5.1.13, 4.4.8.16 and 5.1.2.2.7 of the International Life-Saving Appliance (LSA) Code; paragraph 3.8.10 of annex 10 of the 1994 HSC Code; and paragraph 3.8.10 of annex 11 of the 2000 HSC Code, in order to reflect current technology and clarify the use of light emitting diode (LED) torches

*Strategic direction,
if applicable:* 6

Output: 6.1

Action to be taken: Paragraph 13

Related document: LSA Code

Background

1 SOLAS regulation III/13.1.4 requires that survival craft shall be "fully equipped as required by this chapter and the Code".

2 Paragraph 4.1.5.1.13 of the LSA Code specifically requires:

"The normal equipment of every liferaft shall consist of:

.13 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container."

3 Paragraph 4.4.8.16 of the LSA Code specifically requires:

"Except where otherwise stated, the normal equipment of every lifeboat shall consist of:

.16 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container;"

4 Paragraph 5.1.2.2.7 of the LSA Code specifically requires:

"The normal equipment of every rescue boat shall consist of:

.7 one waterproof electric torch suitable for Morse signalling, together with one spare set of batteries and one spare bulb in a waterproof container;"

5 Paragraph 3.8.10 of annex 10 of the 1994 HSC Code specifically requires:

"The equipment of every open reversible liferaft shall consist of:

.10 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container;"

6 Paragraph 11.3.8.10 of annex 11 of the 2000 HSC Code specifically requires;

"The equipment of every open reversible liferaft shall consist of:

.10 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container;"

Discussion

7 The requirement to carry a spare bulb has been in place since the adoption of the LSA Code on 4 June 1996 and has not been subject to any amendment.

8 Technology advances since 1996 has seen the development of LED torches, which provide the advantage of lower power usage, the ability to have variable light intensity and to have the light beam produced by more than one LED, so that in the event of the failure of a single LED, the torch will still function.

9 Online investigations have discovered that there are many LED marine capable torches on the market, with only one being SOLAS approved and provided with a spare LED.

10 The requirement to carry a spare bulb could be interpreted as meaning that only filament torches may be used: something that is illustrated by the lack of availability of SOLAS approved LED torches.

11 It should be noted that if an exemption is granted under SOLAS regulation III/2 to not carry a spare bulb, then the ship would be limited to voyages of not more than 20 miles from the nearest land.

Proposal

12 In order to modernize and clarify the interpretation of paragraphs 4.1.5.1.13, 4.4.8.16 and 5.1.2.2.7 of the LSA Code; paragraph 3.8.10 of annex 10 of the 1994 HSC Code; and paragraph 3.8.10 of annex 11 of the 2000 HSC Code, a draft unified interpretation has been developed as set out in the annex.

Action requested of the Sub-Committee

13 The Sub-Committee is invited to consider the discussion provided above, together with the draft unified interpretation set out in the annex, and take action, as appropriate.

ANNEX

DRAFT UNIFIED INTERPRETATION OF PARAGRAPHS 4.1.5.1.13, 4.4.8.16 and 5.1.2.2.7 OF THE LSA CODE; PARAGRAPH 3.8.10 OF ANNEX 10 OF THE 1994 HSC CODE; AND PARAGRAPH 3.8.10 OF ANNEX 11 OF THE 2000 HSC CODE

Requirements for liferafts, lifeboats, and rescue boats:

- 1 Paragraph 4.1.5.1.13 of the LSA Code specifically requires:
"The normal equipment of every liferaft shall consist of:
.13 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container."
- 2 Paragraph 4.4.8.16 of the LSA Code specifically requires:
"Except where otherwise stated, the normal equipment of every lifeboat shall consist of:
.16 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container;"
- 3 Paragraph 5.1.2.2.7 of the LSA Code specifically requires:
"The normal equipment of every rescue boat shall consist of:
.7 one waterproof electric torch suitable for Morse signalling, together with one spare set of batteries and one spare bulb in a waterproof container;"
- 4 Paragraph 3.8.10 of annex 10 of the 1994 HSC Code specifically requires:
"The equipment of every open reversible liferaft shall consist of:
.10 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container;"
- 5 Paragraph 11.3.8.10 of annex 11 of the 2000 HSC Code specifically requires;
"The equipment of every open reversible liferaft shall consist of:
.10 one waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container;"

Interpretation

- 6 One spare bulb shall be provided for torches utilizing either a filament bulb or single LED to provide the light source. Where the light source is provided by more than one LED, a spare LED bulb is not required, provided the failure of any one LED does not prevent the other LED's from fully functioning and the light intensity is not significantly diminished.

7 Provision of a second ready for use waterproof electric torch suitable for Morse signalling, can be accepted as an alternative to providing one spare set of batteries and one spare bulb in a waterproof container.
