

SUB-COMMITTEE ON SHIP SYSTEMS AND  
EQUIPMENT  
9th session  
Agenda item 3

SSE 9/3/8  
6 January 2023  
Original: ENGLISH  
Pre-session public release:

## NEW REQUIREMENTS FOR VENTILATION OF SURVIVAL CRAFT

### Lack of a compelling need for new ventilation requirements for partially enclosed lifeboats and liferafts

Submitted by Japan, Republic of Korea, United Kingdom,  
United States, ICS and CLIA

#### SUMMARY

*Executive summary:* This document comments on document SSE 9/3/1 (Secretariat) and suggests that a compelling need for revising the ventilation requirements for partially enclosed lifeboats and liferafts does not exist based on empirical data from casualties where survival craft were deployed.

*Strategic direction,  
if applicable:* 7

*Output:* 7.36

*Action to be taken:* Paragraph 5

*Related documents:* MSC 106/11/3, MSC 106/19; SSE 9/3 and SSE 9/3/1

#### Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.3) and provides comments on document SSE 9/3/1 (Secretariat).

#### Background

2 At its 106th session, the Maritime Safety Committee approved the draft amendments to the LSA Code for totally enclosed lifeboats as a matter of priority, with a view to adoption at MSC 107 and entry into force on 1 January 2026 (MSC 106/19, paragraph 11.4.1). The Committee also agreed to keep the agenda item on the agenda for SSE 9 for consideration of any compelling need for ventilation requirements for partially enclosed lifeboats and liferafts (MSC 106/19, paragraph 11.4.2).

**Discussion**

3 It is the view of the co-sponsors that compelling need for additional ventilation requirements for partially enclosed lifeboats and liferafts has not been established. By design, partially enclosed lifeboats and liferafts include hatches and flaps that can be opened to provide sufficient air quality and ventilation. The United States conducted an exhaustive review of its marine casualty data, covering a period of over 20 years, encompassing more than 120,000 separate marine casualties. This review resulted in the identification of no incidents in which inadequate ventilation within lifeboats or liferafts contributed to the injury or death of an individual. The co-sponsors conclude that the ventilation requirements for partially enclosed lifeboats or liferafts are demonstrated to be sufficient. Any additional requirements for ventilation of partially enclosed lifeboats and liferafts would be arbitrary and unnecessarily burdensome.

**Proposal**

4 In the absence of a compelling need to amend the existing ventilation requirements for partially enclosed lifeboats and liferafts, the draft amendments to the test forms in the *Revised standardized life-saving appliance evaluation and test report forms (survival craft)* (MSC.1/Circ.1630/Rev.1) should be finalized to include only those sections related to totally enclosed lifeboats, and the agenda item should be considered complete.

**Action requested of the Sub-Committee**

5 The Sub-Committee is invited to:

- .1 endorse the draft amendments to the survival craft test forms (MSC.1/Circ.1630/Rev.1), as proposed in annex 1 to document SSE 9/3 as related to totally enclosed lifeboats only, completing the full package for totally enclosed lifeboats;
  - .2 invite MSC 107 to approve the draft amendments to the survival craft test forms (MSC.1/Circ.1630/Rev.1) related to totally enclosed lifeboats, in conjunction with the adoption of the draft amendments to the LSA Code and resolution MSC 81(70); and
  - .3 consider this agenda item complete and recommend to the Committee that the output be recorded as such.
-