



## Dienststelle Schiffssicherheit BG Verkehr

FLAG STATE CIRCULAR Nr: 01/2012

**Subject:** Lifeboats - Equipment with Fall Preventer Devices (FPD) -  
**FLAG STATE SAFETY NOTICE by Germany**

**Reference:** Orderly application and monitoring of FPDs on board of ships,  
flying the German Flag

**Date:** 14<sup>th</sup> of August 2012

**Keywords:**

**Danger for the crew** by using FPDs, certified by Recognized Organisations for universal use (as FPD set) and not in compliance with an individual approval by the Administration for the existing release and retrieval system on board.

Existing on-load release hooks fitted to ships flying the German Flag are not be modified by drilling to provide a locking pin insertion point.

**Legal provisions / references:**

**MSC.1/Circ.1327, MSC.1/Circ.1392 and IACS UI SC 254**

The German Ship Safety Administration requests all surveyors of recognized organisations, recognized by BG Verkehr, Ship Safety Division, to strictly follow this safety notice when evaluating FPDs on board.

The ship owner or the original equipment manufacturer is requested by MSC.1/Circ.1327 to contact the Administration for approval of modifications. The use of FPDs should be considered as an interim risk mitigation measure, only to be used in connection with existing on-load release hooks, at the discretion of the master, until the procedures according to MSC.1/Circ.1392 will be completed.

As known, the industry provides ships with additional sets of FPDs which were not approved individually for the existing on-load release and retrieval system and for the existing attachment points of the hook attachment and foundation plates.

The attachment of FPDs as strops or slings at the fixing points for the maintenance hanging off pendants can result in a **danger for the crew**.

FPDs on ships flying the German Flag have to be approved by the Administration BG Verkehr, Ship Safety Division.

The modification of an existing on-load release mechanism by drilling to provide a locking pin insertion point is **strictly prohibited** for ships flying the German Flag.

A safety factor of 6 is requested by IACS UI SC 254 for strops and slings. This value is not acceptable and not according to MSC.1/Circ.1327, which requests a safety factor of minimum 6. In fact, the values which will be achieved for dynamic release

can be much higher and are expected to be higher than 6.

**Action:**

Therefore, an approval by the Administration individually for each FPD and the attachment points to the release mechanism **is requested as mandatory**.

FPDs without approval by the Administration found on board of ships flying the German Flag are to be removed from board - supervised by the surveyor, due to **danger** for the crew using FPDs not individually approved by the Administration.

In cases where the original equipment manufacturer concludes that an FPD cannot be installed properly, FPDs are not considered as interim risk mitigation measure for ships flying the German Flag, irrespective of the request by regulations of recognized organisations.

If approved FPDs are used on board of ships flying the German Flag, the strop or sling has to be as short as possible in length to reduce the dynamic forces.

It is very important that FPDs - when approved for installation - will not be tested or simulated in practice by any weight or force during drills, exercises, port state control inspections or flag state inspections.

Therefore functional tests of FPDs by the crew shall be avoided. Functional tests according MSC.1/Circ. 1327, 2.2.1, to be carried out only in the water without load on the FPDs under attendance of a surveyor of the classification organization, to demonstrate that the equipment performs without interfering in the operation of the lifeboat or launching equipment.

In case of any dynamic shock loading, the strop or sling has to be replaced and the associated attachment points inspected. In such cases, the Administration should be informed as soon as possible and the master should provide a full report of the circumstances of the incident.

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