



Barbados Maritime Ship Registry

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Notice to: Shipowners, Operators, Officers, Flag State Inspectors and Recognised Organisations.

1. References

- a) [Barbados Merchant Shipping Act, 2024](#)
- b) SOLAS, International Convention for the Safety of Life at Sea
- c) [Resolution MSC.402\(96\)](#) Requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear
- d) [Resolution MSC.404\(96\)](#) Amendments to SOLAS Ch's II-2 and III
- e) [Bulletin 041](#) – Barbadian Authorisation of Service Provider
- f) [Resolution A.761\(18\)](#) Recommendation on Conditions for the Approval of Servicing Stations for Inflatable Liferrafts
- g) [Bulletin 008](#) – Permits Exemptions and Equivalences
- h) International Life-Saving Appliance Code (LSA Code)
- i) [MSC.1/Circ.1490/Rev.1](#) Revised unified interpretation of SOLAS regulation III/31.1.4 (MSC.1/Circ.1490)
- j) [MSC.1/Circ.1328](#) – Guidelines for the Approval of Inflatable Liferrafts subject to extended service intervals not exceeding 30 months

2. Purpose

- 2.1 This Bulletin is to establish a uniform, safe and documented standard for maintenance, inspections and servicing of Life Saving Appliances (LSA) in compliance with SOLAS III/Reg. 20 and Reg. 36 and with IMO Resolution MSC.402(96) and Resolution MSC.404(96), which both took effect on the 1st of January 2020.

3. Application

- 3.1 This Bulletin applies to all LSA installed on board all Barbadian vessels.

4. Competent Person

- 4.1 A "competent person" is one possessing the knowledge and experience necessary to enable them to satisfactorily perform the duties required by SOLAS III/Reg.20 and Reg. 36. Such knowledge and experience can be obtained in a variety of ways. For example, a "competent person" might obtain the necessary knowledge through training provided by the manufacturer of equipment or by "inhouse" or "on the job" training provided within the organisation or on the vessel.
- 4.2 SOLAS does not define who can be considered a "competent person". It is for the Company to decide who is a "competent person" for a particular duty. A member of the vessel's crew might, if they have the appropriate knowledge and experience, be considered a "competent person" for the purpose of carrying out routine inspections, whereas a "competent person" able to carry out tests of lifting equipment may need to be provided by a company specialising in such testing. It should also not be assumed that possession of a Certificate of Competency means that the person holding that Certificate is automatically a "competent person" for the purposes of this bulletin. Much will depend on the work to be undertaken, the qualifications required to undertake it and the individual's knowledge of the particular equipment.
- 4.3 The Company are responsible for assessing and selecting a suitable "competent person". Appropriate procedures relating to this activity must be established within the Company's Safety Management System (SMS). Documentary evidence of personnel competence must be available on board for verification by Barbados Appointed Nautical Inspectors (ANIs) and Recognised Organisations (ROs).

5. Servicing of inflatable lifesaving appliances

- 5.1 SOLAS III/Reg. 20.8 requires inflatable liferafts, inflatable life jackets, marine evacuation systems, and inflated rescue boats to be serviced at approved servicing facilities.
- 5.2 Before endorsing or issuing the Cargo Ship Safety Equipment Certificate, the RO surveyors must be satisfied that the servicing has been completed satisfactorily. The surveyor's attendance during servicing is not mandatory because they are taken ashore.
- 5.3 The servicing interval and procedures for inflatable rescue boats must be according to the manufacturer's requirements. The facility performing the servicing must be an approved service provider by a Barbados RO, as detailed in Resolution A.761(18).
- 5.4 Where inflatable liferafts, inflatable lifejackets, inflated rescue boats and hydrostatic release units (other than disposable hydrostatic release units) are serviced outside the relevant annual or periodical survey window and cannot be serviced within the 12-month period, the Company shall apply to the BMSR, via the Recognised Organisation, for an extension. "Under SOLAS III/20.8.3 and IMO MSC.1/Circ.1328, new and novel inflatable liferafts are allowed an extended service interval of up to 30 months."
- 5.5 In considering any extension, due regard shall be given to dated components which may expire during this extension period (e.g. food, water, seasickness tablets, etc.). Otherwise, extensions shall be in line with the specified SOLAS allowances.
- 5.6 It may be necessary to temporarily carry on board more persons than currently authorised. When physically possible, the installed lifeboats must be recertified to provide the necessary capacity. If the existing lifeboats are already certified to their maximum capacity, the BMSR may allow with a permit, as per Bulletin 008, substituting inflatable liferaft capacity to increase the required lifeboat complement for legitimate, verifiable reasons. The permit will be limited to the minimum time required for the additional persons to be on board and, in general, will not exceed two months.

6. Inspections and Maintenance

- 6.1 Weekly and monthly inspections, routine maintenance of life-saving appliances, including lifeboat equipment as specified in the equipment maintenance manual can be conducted by a competent person, in accordance with the maintenance manual(s), and such activities do not require BMSR authorisation.
- 6.2 Monthly inspections of LSA, including lifeboat equipment, shall be carried out using a checklist as required by SOLAS III/Reg. 36.1 and a report of the inspection shall be entered in the official log-book.
- 6.3 SOLAS III/Reg. 20.11 requires annual and five-year thorough examinations, any overhaul and overload operational tests to be carried out for:
- .1 Lifeboats (including free-fall lifeboats), rescue boats and fast rescue boats; and
 - .2 Launching appliances (including primary and secondary means of launching appliance for freefall lifeboats), and release gear for all lifeboats type, rescue boats, fast rescue boats and davit launched liferafts.
- 6.4 The annual and five-year thorough examination, any overhaul or overload operational tests of equipment listed in Sec. 6.3 above shall be conducted ONLY by a service provider with a Barbados Approved Service Provider (BASP) authorisation document issued by the BMSR as per Bulletin 041.
- 6.5 Instructions, maintenance and record keeping shall be implemented through the vessel's instructions for on-board maintenance of life saving appliances or a planned maintenance system which meets the requirements of SOLAS III.
- 6.6 Records must clearly state that the annual periodical inspection has been carried out and the results of the examination. If end-for-end turning of wires has been carried out this should also be recorded. The renewal of falls at the required intervals (according to the maintenance procedure adopted) must be included. These records must be verified by the surveyor attending for the Safety Equipment Survey.

- 6.7 There are no provisions in SOLAS III to postpone the 5 yearly service and load test. The Company shall make arrangements for the 5-yearly service to be carried out, including the dynamic load test, prior to the expiry of the 5-year term.
- 6.8 In exceptional cases where it is not possible to conduct the 5-yearly service within the required period, the BMSR may consider short postponements of up to 3 months to allow the service to be completed. In such cases, the BMSR will issue a permit as per Bulletin 008.

7. Maintenance of LSA falls

- 7.1 As required by SOLAS III/Reg. 20.4, falls used for launching lifesavings appliances must be inspected periodically with special regard for areas passing through sheaves. Deteriorating falls must be renewed as necessary or at intervals of not more than five (5) years, whichever is the earlier. The intermediate turning of the falls end for end is no longer required.
- 7.2 Wire rope grips, such as bulldog grips, are not acceptable for any primary load-bearing terminations. Where wire rope grips are found to have been used on primary load-bearing terminations, arrangements must be made for their replacement.
- 7.3 If the Company chooses to end-for-end fall wires, special attention must be paid to the method of joining and terminating wires. The BMSR recognises that there are a number of alternative methods that can be used to form these terminations and that the suitability of each type of connection for the intended service is varied. The Company shall ensure the correct method of joining and terminating the wires, taking into consideration any design or manufacturers' requirements.
- 7.4 The periodic inspection shall be carried out by a competent person within the window before, or at the time of, the Safety Equipment survey.

8. Lifeboats

- 8.1 Vessels must be fitted with lifeboats on-load release mechanisms compliant with Sec. 4.4.7.6.4 to 4.4.7.6.6 of LSA Code as required by SOLAS III/Reg. 1.5.
- 8.2 The vessel's Master must ensure that when a lifeboat on-load release hook with a secondary safety system is fitted, this is used during all drills (both launch and recovery) and when the lifeboat has crew or other personnel aboard. After the drill finishes, the secondary safety system must be removed or disengaged.
- 8.3 When any lifeboat is damaged, declared unseaworthy, or needs repair and if no replacement boat is readily available, liferaft(s) capacity for all the persons on board may be substituted as a temporary measure. This substitution may only take place with a permit as per Bulletin 008, which, in general, will not exceed three (3) months. The minimum survival craft capacity prescribed by SOLAS III must be maintained.

9. Rescue Boats

- 9.1 SOLAS and the LSA Code do not require boats used solely for rescue to be fitted with on-load release mechanisms; however, many are fitted with these devices. The BMSR recommends that all on-load release mechanisms should meet the same standards, regardless of whether installed on a lifeboat or rescue boat. Accordingly, the rescue boat on-load release mechanisms should also comply with Sec. 4.4.7.6 of the LSA Code.

10. Liferafts

- 10.1 Liferafts provided under SOLAS III/Reg. 31.1.4 may be stowed in protected positions, provided they are always readily available. Care must be given to their accessibility when deck cargoes are carried.

- 10.2 For Barbadian vessels, IMO MSC.1/Circ.1490/Rev.1 must be applied to liferafts as required by SOLAS III/Reg. 31.1.4. This unified interpretation covers:
- .1 Stowage arrangements;
 - .2 Embarkation and embarkation ladders;
 - .3 Illumination; and
 - .4 Lifejackets and immersion suits.
- 10.3 “Extended service interval” means a service interval more than 12 months. Therefore, the provisions of SOLAS III/20.8.1.1 do not apply. Liferafts designed for an extended service period of up to 30 months and approved by the Administration of the country of manufacture are acceptable to the BMSR, provided that the approval is verified by a BMSR Recognised Organisation as being in accordance with MSC.1/Circ.1328.
- 10.4 Paragraph 4.1.1 of MSC.1/Circ.1328 permits extended servicing intervals for the first 10 years after which servicing intervals are to be at the intervals required by SOLAS III/20.8.1.1 (i.e. every 12 months). The 10-year limitation may be extended by the Administration if strong justification is provided.
- 10.5 Where the liferaft manufacturer can demonstrate to the BMSR, that the liferaft fabric and pressure seals are within acceptable limits, liferaft may continue to be in service for up to 15 years’ subject to continued compliance with MSC.1/Circ.1328. The liferaft manufacturer is to provide relevant documentation to the BMSR for review.
- 10.6 Where it is proposed to use extended service interval liferafts beyond 15 years’, the BMSR will consider applications from the liferaft manufacturer on a case-by-case basis. The liferaft manufacturer shall provide relevant documentation to the BMSR for review.
- 10.7 If onboard verification indicates that the hermetic seal of the liferafts have been compromised for any reason, the liferafts must be serviced and repacked.
- 10.8 BMSR will not grant any further extension for the service interval except in cases of force majeure.

Revision No	Description Of Revision
1.0	First Issue
1.1	Sec. 5.4 renamed as 5.6 Amended Sec: 1.a/3.1/4.1/5/5.1/8.3 Added: 1.j/5.4/5.5/10.3/10.4/10.5/10.6/10.8

