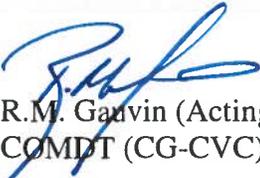




16702
CG-CVC Policy Letter
16-03
June 30, 2016

From:  R.M. Garvin (Acting)
COMDT (CG-CVC)

To: Distribution

Subj: 5-KNOT DEMONSTRATION TEST FOLLOWING REPLACEMENT OF ON-LOAD
RELEASE MECHANISMS FOR LIFEBOATS AND RESCUE BOATS

Ref: (a) CG-ENG Policy Letter No. 01-14: Lifeboat Release Mechanisms: Policy on
Implementation of New SOLAS regulation III/1.5 and IMO Circular MSC.1/Circ.1392

1. **PURPOSE.** This policy letter provides post-installation testing guidance following replacement of on-load release mechanisms (“release hooks”) for lifeboats and rescue boats on all vessels subject to SOLAS Chapter III and conducted in accordance with reference (a).
2. **BACKGROUND.** IMO MSC.1/Circ. 1392 prescribes certain post-installation testing that should occur when release hooks in lifeboats or rescue boats are replaced. One of these tests is a demonstration that the lifeboat/rescue boat can be launched from a ship proceeding ahead at a speed of not less than 5 knots in calm water and on an even keel (“5-knot test”) as prescribed by IMO Resolution MSC.81(70) Part 2/5.4.
3. **DISCUSSION.** Understanding the intent of the IMO guidance, the Coast Guard has determined that a demonstration of the “5-knot test” may be unnecessary in some circumstances and infeasible in others. The below guidance is intended to assist Officers in Charge, Marine Inspection (OCMI) in making this determination and provides for the acceptance of alternative tests and/or waiving the test in certain scenarios.
4. **ACTION.** The Cognizant OCMI may apply the following guidance in determining whether or not the 5-knot test must be performed as part of the post-installation testing following replacement of release hooks.
 - a. Not all replacements of release hooks necessitate the completion of the 5-knot test. In cases where Commandant (CG-ENG-4) has determined that no change in the geometry of the launching arrangement will occur (e.g., angles of the falls, length between hooks, etc), the 5-knot test will not be recommended. CG-ENG-4 approval letters for fitting new release hooks in existing lifeboats will contain a definitive statement regarding any change in the geometry of the launching arrangement as well as whether or not the 5-knot test is recommended.

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- b. In some instances, completing the 5-knot test as described in IMO Resolution MSC.81(70) may be infeasible due to external factors. These factors include, but are not limited to, unfavorable sea conditions, adverse weather, lack of port permissions (particularly in foreign ports), traffic schemes, and/or an unacceptable risk identified through a comprehensive risk analysis. In such cases, the OCMI may utilize their discretion to either defer the test to facilitate more favorable conditions or accept an alternative test. One such test, is a "prop wash test" which has successfully been performed using a tug to simulate a 5-knot current. In cases where an alternative test is being considered, owners and operators shall submit a detailed plan of the proposed test to the OCMI for approval.
 - c. Regardless of whether or not the 5-knot test, or an alternative, is required as described above, all remaining post-installation testing should be completed in its entirety any time release hooks are replaced.
 - d. The 5-knot test or an acceptable alternative shall be witnessed by a Coast Guard Marine Inspector. For vessels classed by a U.S. Coast Guard Authorized Classification Society (ACS), the ACS may witness the 5-knot test or OCMI accepted alternative on behalf of the Coast Guard. In any case where an alternative test procedure is to be performed, the test procedure must be approved by the OCMI.
 - e. The provisions of this policy letter are not limited to hook replacements that occur as a result of SOLAS III/1.5 and may be applied any time release hooks are replaced on lifeboats or rescue boats for a vessel subject to SOLAS Chapter III.
 - f. Nothing in this policy letter negates that the 5 knot test must be completed concurrent with an initial COI as detailed in the USCG Marine Safety Manual (MSM) II.B1.P (Inspection of Lifesaving Systems).
4. Questions concerning this policy should be directed to Commandant (CG- CVC-1), Office of Commercial Vessel Compliance, Domestic Compliance Division at CG-CVC-1@uscg.mil.
 5. Questions related to the technical provisions of release hook replacements should be directed to the CG-ENG-4 at typeapproval@uscg.mil.

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