

Interpretation Note 12-02 “Lifeboat Release Systems”

Section 19 of the Drilling and Production Regulations requires that “*the operator shall take all reasonable precautions to ensure safety*” and section 25 of these regulations requires that “*the operator shall ensure that (a) all wells, installations, equipment and facilities are designed, constructed, tested, maintained and operated to prevent incidents and waste under the maximum load conditions that may be reasonably anticipated during any operation*”. Subsection 22(3) of the Installations Regulations requires that “*the launching devices for the totally enclosed survival craft be sufficiently strong to permit each survival craft, to be **safely** launched or lowered into the water when loaded with its full complement*”. For some years C-NLOPB guidance has advised Operators that pursuant to the legislation they must demonstrate that installations are fitted with the best practicable evacuation technology available (C-NLOPB Information Note 11-01, *Supplementary Guidance*). This concept is also reflected in the Atlantic Canada Escape Evacuation and Rescue Guide, which recognizes that operators have an obligation pursuant to the Accord legislation to provide evacuation systems that are “fit for purpose” and to reduce risk to a level that is as low as is reasonably practicable.

In response to a number of incidents in the marine and offshore petroleum industries, the International Maritime Organization (IMO) requires that lifeboat on-load release mechanisms, that do not meet the criteria set out in their Maritime Safety Committee’s MSC.1/Circ.1392 - *Guidelines for Evaluation and Replacement of Lifeboat Release and Retrieval Systems*, be replaced at the first scheduled dry docking after 1 July 2014 but in any event not later than 1 July 2019. Given the aforementioned regulatory requirements the C-NLOPB expects operators to ensure that lifeboat release systems on all installations and vessels used in authorized activities in the Newfoundland and Labrador Offshore Area are evaluated in accordance with MSC.1/Circ.1392 as soon as reasonably practicable. Where release systems do not meet the criteria set out in MSC.1/Circ.1392, they should be replaced as soon as reasonably practicable and in any event, not later than 30 September 2013.

This interpretation note applies to all installations and vessels directly engaged in petroleum related activity including seismic and construction vessels but does not apply to support craft. Evaluations must be completed by Certifying Authorities or other competent third parties acceptable to the Chief Safety Officer.