

## GUIDANCE NOTE 09/2023 (Rev 01)

### EMBARKATION LADDERS AND OTHER MEANS OF EMBARKATION ENABLING DESCENT TO THE WATER

**To:** Ship Owners, Ship Managers, Recognized Organizations and Masters

#### 1. BACKGROUND

- 1.1 Some vessels fitted with lifeboats and/or davit launched liferafts, have been removing their IMO LSA Code type approved 'Embarkation Ladders' and replacing these with other type approved devices enabling descent.
- 1.2 These devices are often referred to in sales literature as 'controlled decent devices' or 'emergency ladders', with the type approval certificate referencing SOLAS.
- 1.3 The purpose of this guidance notice is to clarify the applicable requirements.

#### 2. REGULATORY REQUIREMENTS

- 2.1 SOLAS Chapter III Regulation 11.7 states "*the Administration may permit such ladders to be replaced by approved devices to afford access to the survival craft when waterborne, provided that there shall be at least one embarkation ladder on each side of the ship. Other means of embarkation enabling descent to the water in a controlled manner may be permitted for the liferafts required by regulation 31.1.4.*".
- 2.2 Regulation 31.1.4 pertains to those liferafts stowed forward on cargo ships of more than 100m in length.
- 2.2 The UK MCA "MGN 519 (M) Life-saving appliances: Controlled means of descent" provides more details on the type approval of descent devices.
- 2.3 A copy of MGN 519 (M) is available [HERE](https://www.gov.uk/government/publications/mgn-519-life-saving-appliances-controlled-means-of-descent)<sup>1</sup>.

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**3. ACTION REQUIRED**

- 3.1 ISM Managers should review the arrangements on the vessels under their management and ensure that if type approved descent devices have been provided that there is still at least one type approved 'Embarkation Ladder' on either side of the vessel.
- 3.2 The use of a descent device should be formally agreed with the Cayman Islands Shipping Registry, and be indicated on the vessel's approved Safety Plan.
- 3.3 The inspection and test requirements of any approved descent device, as detailed in the manufacture's instruction or type approval certificate, should be incorporated in the vessels planned maintenance system.
- 3.4 Many "controlled decent devices" have a limited service life and are supplied with an "expiry date". All such devices should be replaced onboard before this date, even if never used.