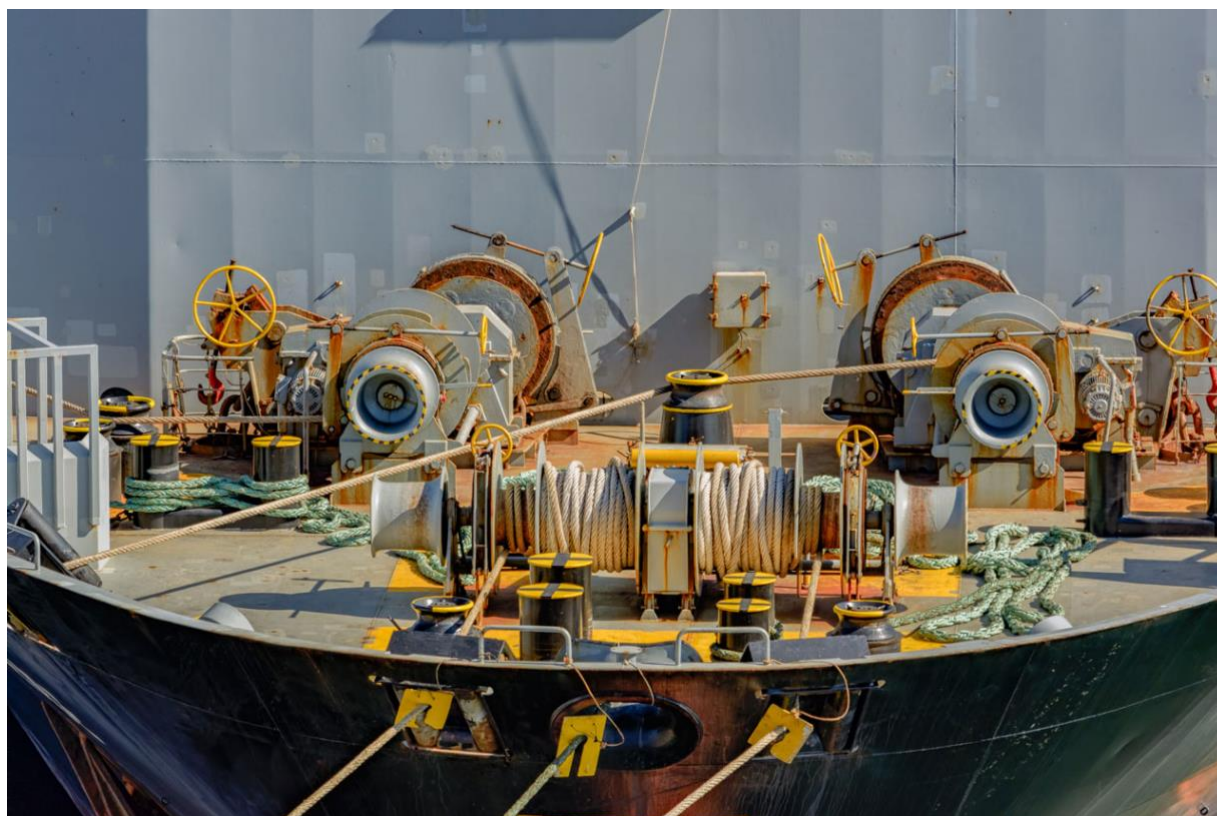


LATEST AMENDMENTS TO SOLAS CHAPTER II-1/3-8 TOWING & MOORING EQUIPMENT AND NEW RECOMMENDATIONS: ARE YOU FULLY COMPLIANT?

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INTRODUCTION

Amendments to SOLAS mandating the upgrading of all commercial vessel Towing and Mooring Equipment design and operation entered into force on 1 Jan 2024. These amendments and their associated Guidelines apply only to new vessels ordered on or after this date. However, there are also new IMO Guidelines on Mooring Equipment Inspection and Maintenance which apply retrospectively to **all** existing vessels built after 2007. This Risk Bulletin seeks to explain the SOLAS amendments, the related Guidelines and their impact on Members.

BACKGROUND

The IMO's Maritime Safety Committee (MSC) agreed amendments to SOLAS Chap II-1/3-8 Towing and Mooring Equipment in 2015. The goal being to further improve the safety of ships and their crews during mooring, unmooring and associated towing processes. The amendments were formally adopted in 2020 and, as of 1 Jan 2024, are now fully in force.

Members are referred to Risk Bulletin No. 70, Mooring Line, Towing Hawser and Fishing Gear 'Snap Back Hazards. It included a reference to SOLAS Chap II-1/3-8 Towing and Mooring Equipment and the amendments made by [IMO Res MSC.474\(102\)](#).

RB 70 also listed and briefly described the supporting IMO Circulars/Guidelines. For reader convenience, these descriptions, and the date order in which these Circulars were issued by the IMO are repeated below.

- [MSC.1/Circ. 1175](#) (issued 24 May 2005), Guidance on Shipboard Towing and Mooring Equipment. In its original and unrevised form, it remains in force and is applicable to all SOLAS regulated vessels built after 2007 but before 1 Jan 2024.
- [MSC.1/Circ. 1175/Rev 1](#) (Issued 9 Dec 2020) Revised Guidance on Shipboard Towing and Mooring Equipment. This revision applies mandatorily to vessels over 3,000 GT built after 1 Jan 2024. For vessels under 3000 GT, shipowners are encouraged to follow the Guidelines as closely as reasonably practical or with their flag state standards.
- [MSC.1/Circ.1619](#) (Issued 11 Dec 2020), Guidelines on the Design of Mooring Arrangements and Selection of Mooring Equipment and Fittings, applies mandatorily only to vessels over 3,000 GT ordered or built after 1 Jan 2024. For vessels under 3000 GT, shipowners are encouraged to follow the Guidelines as closely as reasonably practical or with their flag state standards.
- [MSC.1/Circ.1620](#) (Issued 24 Dec 2020), Guidelines for Inspection and Maintenance of Mooring Equipment, including Mooring Lines, applies retrospectively to **all** existing vessels by way of the provision of IMO "guidance and recommendations".

APPLICATION

The [IMO Res MSC.474\(102\)](#) amendments to SOLAS Chap II-1/3-8 Towing and Mooring Equipment, together with the recommendations and guidance provided by [MSC.1/Circ. 1175/Rev. 1](#) and [MSC.1/Circ.1619](#), apply to SOLAS regulated vessels over 3,000 GT and ordered or built after 1 Jan 2024. As such, it is likely that these amendments and their associated guidance will not impact Members immediately. However, they will need to be understood and applied to Members' new vessel builds and acquisitions.

With regard to vessels built between 2007 and 1 Jan 2024, the IMO make it clear that [MSC.1/Circ. 1175](#) Guidance on Shipboard Towing and Mooring Equipment (issued 2005) remains in effect. For vessels built before 2007, the national regulatory requirements of flag state administrations must be adhered to.

Importantly, [MSC.1/Circ.1620](#), Guidelines for Inspection and Maintenance of Mooring Equipment, including Mooring Lines, apply to **all** SOLAS regulated vessels. Members should therefore ensure that these recommendations are fully understood and implemented on board their SOLAS regulated ships as described in the 'Inspection and Maintenance Implementation Requirements' section below.

NOTE: With reference to SOLAS and associated IMO Resolutions and Circulars, Members will be aware they are normally applicable only to vessels of 500 GT or over-engaged in international trade. Members operating in domestic trade are respectfully reminded that similar NCVS regulations and associated guidance may apply to their vessels. Members should confer directly with their flag state administration and/or Class RO to confirm the application of either SOLAS Chap II-1/3-8 Towing and Mooring Equipment regulations and guidance or similar NCVS regulations and guidance requirements.

INSPECTION AND MAINTENANCE IMPLEMENTATION REQUIREMENTS FOR ALL SHIPS

[MSC.1/Circ.1620](#), Guidelines for Inspection and Maintenance of Mooring Equipment consists of seven detailed pages of important recommendations and guidance. Their stated application is to **"all ships"**. Full implementation is required after 1 January 2024 and before the first annual survey for renewal of the flag state Cargo or Passenger Ship Safety Construction Certificates.

In summary, the key Circ.1620 safe mooring recommendations for Members operating vessels built after 2007 are as below.

- Procedures for mooring operations and the inspection and maintenance of mooring equipment, including mooring lines, should be prepared and available on board, as incorporated into the vessel's ISM Code Safety Management System (SMS) manual.
- Procedures and records to ensure the identification, periodic inspection, maintenance and renewal control of mooring lines, tails, and associated attachments should be available on board as incorporated into the ISM Code Planned Maintenance System (PMS).
- Manufacturer criteria for condition assessment and replacement of mooring lines and associated attachments should be available.
- The replacement of in-service mooring lines assessed as no longer safe for use should be based on a clearly defined inspection and rotation plan for removal and replacement prior to failure and resulting harm.
- Drawings and specifications of the original mooring system design, equipment, arrangement, and specifications should be available on board to assist accurate condition assessment and safe use.
- Any defect observed to mooring lines or associated equipment during mooring operations, or at any other time, to be reported immediately to the Master and recorded as an SMS non-conformity for priority action, recorded rectification and SMS close-out.

CONCLUSION AND TAKEAWAY

Despite numerous equipment and awareness improvements in past decades, mooring, unmooring and associated towing operations continue to constitute a high risk operation for both ship crews and shore linesmen. As such, mooring/unmooring accidents still occur and – as explained in Risk Bulletin 70 – they can be deadly.

On-going awareness and vigilance by Members and their ship crews with the active support of their DPAs and ship managers provide the key to zero mooring/unmooring accidents. Members are therefore encouraged to ensure that their international trade vessels are fully compliant with the most recent and applicable amendments to SOLAS towing and mooring equipment regulation and associated Guidelines. For domestic trade vessels, compliance with all applicable flag state NCVS regulation is essential.

With reference to international trade vessels built after 2007 but before 1 Jan 2004, Members should ensure that – by reference to SOLAS Chap II Towing and Mooring Equipment, [MSC.1/Circ.1175](#) and [MSC.1/Circ.1620](#) – their ship masters, DPAs and ship managers conduct a full review of both existing ISM Code SMS mooring/unmooring plans and PMS procedures. Non-conformities should be identified and rectified, and specific reference should be made in the SMS and PMS to the relevant regulation and recommendations. Members operating domestic trade vessels should do the same by reference to applicable flag state NCVS regulation.

Finally, and despite the fact that the latest amendments to SOLAS and the associated Guidelines [MSC.1/Circ.1175/Rev 1](#) and [MSC.1/Circ.1619](#) may not yet be applicable to all Member vessels, Members are encouraged to review the improvements to mooring safety they provide. Members of both international and domestic trade vessels may then wish to consider the voluntary upgrading of their existing ISM Code or NCVS SMS mooring/unmooring plans and PMS procedures to the IMO's currently highest mooring/unmooring safety standard.