



LOSS PREVENTION LETTER

Batumi, Georgia
22.11.2019

FINES FOR THE VIOLATION OF REGULATIONS FOR THE LOWERING AND MANEUVERING OF LIFE OR RESCUE BOATS

It is natural that prior launching lifeboats into the sea in case of drills, master of the vessel requests permission from authorities. However, the procedure for obtaining permission varies from country to country and even from port to port within same country.

In case of launching a lifeboat by not properly following authorization procedure, the vessel may be detained fined. The fact will be reviewed by authorities as violation of port regulations and navigational rules.

In accordance with Code of Administrative Infringements of Georgia master of the vessel could be fined due to violation of navigational regime for the fixed amount of **50 000.00 GEL** (abt **17000.00 USD** as for the 22.11.19).

In accordance with regulations obtaining permission by VHF for the lifeboat drills from Port Dispatcher, or from Port Control is not enough. Following regulation should be taken into attention:

**Director of the Maritime Transport Agency
of the Ministry of Economy and Sustainable Development of Georgia**

Order No. 019
August 31, 2012
Batumi

Approval of "Port Rules"

Article 35. Use of shipboard life-saving and other floating objects appliances

It is prohibited to disembark from vessel (boats, rescue boats, rafts) unless:

- A) It is necessary to check / test this floating object and their waterborne mechanisms, which shall be agreed with the Port State Control and Supervision Service. In the case specified in this subparagraph, a floating object shall be lowered only to the surface of the water, in the case of a training alarm or at the request of the captain of the Port State Control, but manoeuvring and leaving away from board of vessel prohibited without the permission of the Coast Guard.
- (B) The abovementioned implementation is related to the rescue and rescue work of people at sea.
- (C) In cases provided for by the security requirements of a state contract.

In conclusion, by default vessel not aloud to lower and manoeuvring any lifesaving appliances for the drills purpose.

In order to obtain permission Master should:

1st- Obtain permission from Port State Control (Harbour Master) prior drills to lower boat till surface of water only.

2nd-Obtain permission from Coast Guard in order lower boat into the water and manoeuvring within vessel proximity.

Failing to obtain both permissions, vessel under risk of detention fine for the violation of navigational regime as stated above. Additionally, in order to avoid misunderstandings between ship crew and between several permitting authorities, it is recommended to Masters, not to obtain permission directly by VHF only, but to inquire ship agent to obtain such permission from local authorities preferable in written form. Officer on board to insure, that all requests and permissions timely recorded in deck logbook and voice records of VHF conversations available at request.



AUTHOR: GEORGE IMNAISHVILI

CONTACT WITH AUTHOR:

