

Subject

Air pressure test of immersion suit and anti-exposure suit seams and closures, and special requirements of Administrations for the test

ClassNK

Technical Information

No. TEC-0756
Date 9 December 2008

To whom it may concern

The Maritime Safety Committee of IMO at its seventy-eighth session (May 2004), approved the MSC/Circ.1114 “Guidelines for periodic testing of immersion suit and anti-exposure suit seams and closures”. The Guidelines are attached for your easy reference.

These Guidelines recommend that the immersion suit and anti-exposure suit be subjected to the air pressure test such at intervals not exceeding three years, or more frequently for suits over ten years of age at a suitable shore-based facility equipped to make any necessary repairs in accordance with the manufacturer's recommendations. However, the air pressure test may be carried out on board ship if suitable equipment is available. Unless otherwise instructed by the Administrations, the interval of the first test is counted from the date of manufacture of the each suit.

The implementation of these Guidelines is subject to the decision of the each Flag Administration. At the present, the following Administrations have ~~noticed their~~ instructions to implement MSC/Circ.1114 by the attached circulars. ClassNK will confirm the implementation of these tests at the periodical SE surveys of these flagged ships to be held on or after 15 January 2009.

Belize	Merchant Shipping Notice MSN-0018
Cayman Islands	Shipping Notice CISON 04/05 (Para.2.3)
Cyprus	Circular No. 12 /2006
Greece	Ref. No. 4338.1/03/06
Liberia	Marine Notice SAF-001 (Para.5.4)
Malta	Administration Requirements 1.19.1
Marshall Islands	Marine Notice No. 2-011-5 (Para.3.7)
Panama	Merchant Marine Circular No.165
St. Kitts & Nevis	Circular Letter No. SV06/2007 (Para.6)
Vietnam	Technical Information 021KT/05TB.E

ClassNK will inform you of the instructions for the test concerned from the other Administrations once we received.

(To be continued)

NOTES:

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Attachment:

1. MSC/Circ.1114 “Guidelines for periodic testing of immersion suit and anti-exposure suit seams and closures”
2. Merchant Shipping Notice MSN-0018
3. Shipping Notice CISM 04/05 (Para.2.3)
4. Circular No. 12 /2006
5. Ref. No. 4338.1/03/06
6. Marine Notice SAF-001 (Para.5.4)
7. Administration Requirements 1.19.1
8. Marine Notice No. 2-011-5 (Para.3.7)
9. Merchant Marine Circular No.165
10. Circular Letter No. SV06/2007 (Para.6)
11. Technical Information 021KT/05TB.E



IMO

E

Ref. T4/3.01

MSC/Circ.1114
25 May 2004

GUIDELINES FOR PERIODIC TESTING OF IMMERSION SUIT AND ANTI-EXPOSURE SUIT SEAMS AND CLOSURES

1 The Maritime Safety Committee, at its seventy-eighth session (12 to 21 May 2004), recognizing that shipboard inspections of immersion suits and anti-exposure suits carried out in accordance with SOLAS regulation III/20.7 and MSC/Circ.1047 may not be adequate to detect deterioration of seams and closures of the suits due to adhesive ageing, and having considered the recommendation made by the Sub-Committee on Ship Design and Equipment at its forty-sixth session, approved the Guidelines for periodic testing of immersion suit and anti-exposure suit seams and closures, as set out in the annex.

2 Member Governments are invited to bring the annexed Guidelines to the attention of all parties concerned.

ANNEX

GUIDELINES FOR PERIODIC TESTING OF IMMERSION SUIT AND ANTI-EXPOSURE SUIT SEAMS AND CLOSURES

- 1 Research performed by several Member Governments has demonstrated that the seams and closures of immersion suits and anti-exposure suits experience deterioration over time. The rate and severity of deterioration may vary widely, depending upon the specific components and procedures employed in the manufacture of the suit and the conditions under which the suit is stored. However, even under ideal conditions, the materials and adhesives used have a finite service life and will inevitably experience a reduction in strength and/or loss of watertightness with age.
- 2 The Guidelines for monthly shipboard inspection of immersion suits and anti-exposure suits (MSC/Circ.1047) are very helpful in identifying obvious problems with a suit, but do not adequately address deterioration of seams and closures (zippers, etc.) which may not be readily apparent by visual inspection. Such deterioration can be detected by pressurization of the suit with air, and testing of the seams and closures for leaks with a soapy water solution.
- 3 To ensure the maintenance of adequate strength and watertightness of seams and closures of immersion suits and anti-exposure suits with age, it is recommended that each suit be subjected to an air pressure test such as the following, at intervals not exceeding three years, or more frequently for suits over ten years of age:
 - .1 A suitable head piece, fitted with a means to inject air into the suit, should be inserted into the face orifice of the suit and secured so as to minimize leakage around the face seal. A low-pressure monitoring device, either integral to the fitting for air injection or as a separate device, should also be inserted. If the suit is fitted with detachable gloves and/or boots, the wrists and/or cuffs should be sealed by inserting a short length of suitable diameter plastic pipe and securing the gloves and/or boots with suitable wire ties or hose clamps. The zipper should be fully zipped, and any face flap closed. The suit should then be inflated to a pressure of 0.7 to 1.4 kPa (0.1 to 0.2 psi). If an auxiliary inflatable means of buoyancy is provided, it should be inflated through the oral valve to a pressure of 0.7 kPa (0.1 psi) or until firm to the touch.
 - .2 Each seam and closure of the suit - and each seam, oral tube and attachment points and joint or valve of any auxiliary inflatable means of buoyancy - should then be covered with a soapy water solution containing enough soap to produce bubbles (if leakage is noted at a foot valve to the extent that air pressure cannot be maintained, the valves should be sealed for the test).
 - .3 If leaks are revealed by the propagation of bubbles at seams or closures, the leaking areas should be marked and, after cleaning the suit thoroughly with fresh water and drying it, repaired in accordance with the suit manufacturer's recommendations.

4 It is recommended that the air pressure test be performed at a suitable shore-based facility equipped to make any necessary repairs in accordance with the manufacturer's recommendations. In view of the wide variety of materials and adhesives used in immersion suits and anti-exposure suits, it is strongly recommended that any repairs to a suit be carried out by a facility which has access to the original manufacturer's recommended servicing instructions, parts and adhesives, and suitably trained personnel. The air pressure test may be carried out on board ship if suitable equipment is available.

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IMMARBE

International Merchant Marine Registry of Belize

Merchant Shipping Notice **MSN-0018**

CARRIAGE, INSPECTION AND TESTING OF IMERSION SUITS ONBOARD BELIZE FLAG VESSELS

TO ALL SHIPOWNERS AND OPERATORS, DEPUTY REGISTRARS, RESIDENT AGENTS,
CLASSIFICATION SOCIETIES AND RECOGNIZED ORGANIZATIONS.

MSN Superseded:
ISSUE DATE:

N/A
June 30, 2006

Revision No.(mm/dd/yy):

This Merchant Shipping Notice is intended to remind all Belize flagged vessels of the amendments made to SOLAS 74 Chapter III Regulation 32.3 by Resolution MSC.152(78), deemed to have been accepted on 1 January 2006 and that will enter into force on 1 July 2006.

1. BACKGROUND

- 1.1. During the 78th meeting of the Maritime Safety Committee of IMO, amendments to SOLAS regulation III/32.3 were adopted. Under these amendments all cargo ships, regardless of their date of construction, will be required to provide immersion suits for every person onboard not later than the first Safety Equipment survey after July 01, 2006.
- 1.2. The revised SOLAS Reg. III/32.3, requires one immersion suit to be provided for each person on board a cargo ship with additional suits to be provided at work and at watch-keeping stations which are remotely located from the immersion suits storage locations.
- 1.3. IMMARBE has received a number of requests for clarification on the revised regulation and the comments herein are intended to provide guidance to meet the minimum requirements. However, Owners and Managers are reminded of their obligations to provide all crewmembers with a safe working environment and place additional immersion suits on board where necessary.

2. DEFINITIONS

- 2.1. For the purpose of this Merchant Shipping Notice;
 - 2.1.1. *Remotely located stations* are the watch or work stations within the navigation bridge, the machinery space and any other work and watch station(s) where the horizontal distance from the nearest storage of immersion suits is greater than 100 meters in length.

2.1.2. *Warm Climates* are the sea areas where the approximate variation of seawater temperature ranges above 20° C. The geographical sectors where these variations take place have been accepted as being between 30° North and 30° South of the Equator.

3. NUMBER OF SUITS REQUIRED

- 3.1. One immersion suit is required for each person on board at the time. The suits must be of an approved type in accordance with the LSA Code and be provided in sizes appropriate for the crew onboard.
- 3.2. Immersion suits may be stored in either one or more muster and embarkation stations or otherwise distributed throughout the crew cabins in readily accessible and clearly marked locations.
- 3.3. It should be noted that changes in the arrangement, storage and location of immersion suits will entail amendments in safety procedures and/or instructions that might need to be endorsed by the Recognized Organization issuing the ISM Certification.
- 3.4. In addition to the number of suits required for each person on board, a number of suits shall be placed in remotely located stations. A minimum of two (2) for the navigation bridge; two (2) for the machinery space and two (2) for any other location meeting the criteria of 2.1.1., will be considered satisfactory by this Administration.

4. INSPECTION AND TESTING

- 4.1. The monthly shipboard inspection of immersion suits as required by SOLAS 74, Chapter III/Reg. 20.7 shall take into account the procedure recommended in the Annex to circular MSC/Circ.1047.
- 4.2. The periodic testing of immersion suits shall be based on the guidelines contained in the Annex to circular MSC/Circ. 1114. Particular emphasis should be placed in performing the air pressure test at intervals not exceeding three (3) years.
- 4.3. Records of monthly inspections and periodic testing of immersion suits should be maintained onboard at all times.

5. EXEMPTIONS

- 5.1. A ship other than bulk carrier as defined in SOLAS 74, Chapter IX/Reg. 1, which is constantly engaged in voyages in warm climates, shall apply for an exemption to be issued by this Administration.
- 5.2. A vessel that has been trading in warm climates and which has been previously issued with an exemption to carry immersion suits where the geographical sectors fall outside the 30° North

and 30° South as prescribed in MSC/Circ. 1046, shall apply to IMMARBÉ for the re-issuance of the exemption.

Libardo Brú
Technical Manager
IMMARBÉ

For any questions about the above, please contact:

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Shipping Notice CISN 04/05

The Carriage, Inspection and Testing of Immersions Suits onboard Cayman Islands Ships.

To: OWNERS, MANAGERS, MASTERS, SURVEYORS AND CLASSIFICATION SOCIETIES

1. Background

- 1.1. During the 78th meeting of the Maritime Safety Committee of IMO, amendments to SOLAS regulation III/32.3 were adopted. Under these amendments all cargo¹ ships, regardless of their date of construction, will be required to provide immersion suits for every person onboard not later than the first Safety Equipment survey after 01 July 2006.
- 1.2. Administrations may exempt ships (other than bulk carriers) from this requirement if they are satisfied that the voyage pattern of the ship makes the carriage of immersion suits unnecessary. Applications for such exemptions will be considered by the Cayman Islands Shipping Registry (CISR) on an individual "case by case" basis only.
- 1.3. In addition to the requirements of SOLAS and the Life Saving Appliance (LSA) Code, IMO has published a number of circulars relating to the inspection and testing of immersion suits. MSC Circular MSC/Circ.1047 gives "Guidelines for monthly inspection of immersion suits and anti-exposure suits by ships' crews.". MSC Circular MSC/Circ.1114 gives "Guidelines for the periodic testing of immersion suits and anti-exposure suit seams and closures".

2. MSC Circular MSC/Circ.1047.

- 2.1. This circular details the monthly onboard checks which should be conducted and recorded to meet the requirements of SOLAS III/36.1
- 2.2. The checks include:
 - 2.2.1. Closures and the general condition of the storage bag to check ease of removal of the suit from the storage bag, to confirm donning instructions are legible and confirmation that the suit is the type and size identified on the bag.
 - 2.2.2. Visual inspection of the suit confirming that it is dry inside and out and free of rips, tears or punctures. Any rips, tears or punctures are to be repaired by a repair station authorized by the suit manufacturer. Until repaired, the suit is to be removed from service.

¹ SOLAS Chapter I, Part A Regulation 2(f): "A cargo ship is any ship which is not a passenger ship".

- 2.2.3. Confirmation that all zippers are free and operating correctly. All zippers should be lubricated in accordance with manufactures recommendations. If a zipper is not functional, the suit must be removed from service and discarded or returned to the manufacturer or a suitable repair station.
- 2.2.4. Any inflatable head support and/or buoyancy ring is to be checked for damage and to ensure it remains properly attached. At least quarterly, the head support/buoyancy ring is to be inflated and tested for leaks. Any leaks are to be repaired by a repair station authorized by the suit manufacturer.
- 2.2.5. Records of the above checks are to be kept in accordance with SOLAS III/20.7 and SOLAS III/36.7.

2.3. MSC Circular MSC/Circ.1114.

- 2.3.1. This circular details the testing requirements for immersion suit and anti-exposure suit seams and closures. Paragraph 3 of the annex to this circular detail the air pressure testing requirements. On Cayman Islands ships, these tests are to be carried out every three years for suits up to ten years of age and annually for suits over ten years of age.
- 2.3.2. These air pressure tests and any subsequent repairs should be undertaken by a test / repair station authorized by the suit manufacturer.
- 2.3.3. Records of the last air pressure test of the immersion suits are to be retained onboard.

3. Required actions.

- 3.1. Persons with responsibilities relating to compliance matters on Cayman Islands ships are requested to ensure that such ships are in full compliance with both the current and future requirements for the carriage of immersion suits.
- 3.2. Such persons are also urged to ensure that sufficient extra immersion suits are carried so that if immersion suits are found to be unsuitable for continued service at any of the required inspections and tests, the ship continues to comply with the requirements.



**MINISTRY OF COMMUNICATIONS AND WORKS
DEPARTMENT OF MERCHANT SHIPPING
LEMESOS**

01 July 2006

Circular No. 12 /2006

TEN 5.13.09
TEN 4.28.03.5
TEN 16.17.18

To all Owners, Managers
and Representatives
of ships under the Cyprus Flag.

To all recognised Classification Societies
and Inspectors of Cyprus Ships

Subject: Immersion Suits
Interpretation needed for the implementation of new provisions

Further to my Circular No. 25/2005 dated 4 October 2005, on the above subject, please note the following:

The Maritime Safety Committee (MSC) of the International Maritime Organization adopted on 20 May 2004, with Resolution MSC.152(78) amendments to the International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended. These amendments entered into force on 01 July 2006.

1. With reference to the above amendments, according to paragraph 3 of regulation 32/Ch III/SOLAS 1974, as amended, an immersion suit must be provided for every person on board cargo ships.
2. A ship shall continue to carry the number of lifejackets required by regulation 7.2/Ch III/SOLAS 1974, as amended, even if the immersion suits onboard are classified as lifejackets.
3. A ship other than a bulk carrier, as defined in regulation 1/Ch IX/ SOLAS 1974, as amended, which is constantly engaged on voyages in warm climates, may be exempted from the said requirement. The Department of Merchant Shipping, having considered the Guidelines for Assessment of Thermal Protection (MSC/Circ. 1046), designates the following as warm climate sea areas for the scope of exempting ships from this regulation:
 - (i) The sector of the globe between latitude 30 degrees North and 30 degrees South.
 - (ii) The part of the Mediterranean Sea south of latitude of 35 degrees.
 - (iii) The Mediterranean Sea during the summer period (between 01/04 – 31/10)

(iv) The coasts of Africa (within 20 nautical miles from the shore) not included in (i) and (ii) above.

4. A Workstation is any place of the ship where the crew is occupied performing its normal duties (except watch keeping duties). Remotely located workstations are those located more than 100 metres, measured horizontally, from the place where the immersion suits are stowed. If a ship has such remote workstations, or places where additional liferafts (fwd or aft) are required in accordance with paragraph 1.4 of regulation 31/Ch III/SOLAS 1974, as amended, then, at least two (2) additional immersion suits must be placed at each of those stations.
5. A Watch station is any place of the ship where the crew performs its normal watch keeping duties. Remotely located watch stations are those located more than 50 metres, measured horizontally, from the place where the immersion suits are stowed. If a ship has such remotely located watch stations, then at least two (2) additional immersion suits must be placed at each of those watch stations.
6. Quantity and Storage of Immersion Suits

The immersion suits shall be so placed as to be readily accessible and their position shall be clearly indicated. The vessel's Fire Control & Life Saving Appliances Plan must be updated accordingly. The following two options may be considered for the storage of immersion suits:

Option (i) Storage: Immersion Suits to be stored on deck in a box or a centralised accessible store room within or outside of the accommodation (on the way to, or in the vicinity of the assembly stations or survival craft stations).

Quantity: If this solution is implemented, the quantity of the immersion suits to be placed onboard, is equal to the number of persons for which life-saving appliances are provided, as stated on the record of equipment of the Cargo Ship Safety Equipment Certificate, plus (if applicable) the immersion suits required by virtue of paragraphs 4 and 5.

or

Option (ii) Storage: Immersion Suits to be placed in Crew Cabins.

Quantity: If this solution is implemented, the quantity of the immersion suits to be placed onboard, is equal to the number of persons for which life-saving appliances are provided, as stated on the record of equipment of the Cargo Ship Safety Equipment Certificate; additionally, there should be at least two (2) readily available immersion suits located in the Navigation Bridge and at least two (2) located in the Engine Control Room, plus (if applicable) the immersion suits required by virtue of paragraphs 4 and 5.

7. Inspection and Testing of Immersion Suits

The monthly inspection of immersion suits required by regulation 20.7 /Ch III/ SOLAS 1974, as amended, must be carried out in accordance with the attached Guidelines approved by MSC on 28 May 2002 (MSC/Circ.1047).

A periodic testing of the immersion suits, in accordance with the attached Guidelines approved by MSC on 25 May 2004 (MSC/Circ.1114), must be carried at intervals not exceeding three years. Immersion suits which are already over three years of age must be tested by the next safety equipment survey.

The shore-based stations which have been accepted to provide services to Cyprus ships in respect of immersion suits must fulfil the criteria of my Circular No. 12/2001 dated 15 June 2001 on "IMO Resolution A. 761 (18) as amended. Liferaft servicing stations approved and certified by SOLAS Contracting Governments or Recognized Organizations (ROs)".

8. This circular supersedes my circular No. 25/2005 issued on 04 October 2005.

9. This Circular must be placed on board ships flying the Cyprus Flag.

S. S. Serghiou

Director

Department of Merchant Shipping

cc: Permanent Secretary, Ministry of Communications and Works
Permanent Secretary, Ministry of Foreign Affairs
Maritime Offices of the Department of Merchant Shipping abroad
Diplomatic and Consular Missions of the Republic
Honorary Consular Officers of the Republic
Cyprus Shipping Council
Cyprus Union of Shipowners
PEO Trade Union
SEK Trade Union
Cyprus Bar Association

Hellenic Republic
Ministry of Mercantile Marine
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Piraeus 24-05-2005

Ref. No. : 4338.1/03/06

To: As attached Table

Subject: PROVISION OF IMMERSION SUITS

Ref.: SOLAS Reg. III/32 (MSC 152(78))

1. You have already been informed that on 01.07.2006 all persons onboard are to be provided with immersion suits, as per SOLAS Reg. III/32.
2. Our Department, having considered all requirements related to this subject has decided the following:
 - a) All immersion suits are to be stowed on or next to ship's lifeboats and rescue boats. In case crew accommodation spaces are located close to embarkation stations, immersion suits may be stowed inside each crew member cabin or inside lockers of accommodation.
 - b) According to common working practice we define:
 1. Remote working station.
The place that is located more than 100m horizontally away from immersion suits stowage place.
 2. Remote watch station.
The place of watch (Engine room/wheelhouse) that is located more than 50m horizontally away from immersion suits storage place.
 - c) For the above 1 & 2 cases, at least 2 additional immersion suits are to be provided near their entrance.
 - d) In case the Approved Organization deems necessary for the work or watch stations that more than 10 minutes are required for a person to leave and go to wear his immersion suits (Reg. III/31.1.5), additional immersion suits (2 pcs at least) are also to be provided despite are remote or not.
 - e) For the forward liferaft (if provided), two additional immersion suits are required.
 - f) The ships trading in the following areas, are exempted from this requirement:
 - i) Within Mediterranean and/or Caribbean Sea and from 1st April to 30th October
 - ii) Within Persian Gulf, Red Sea and the zone between lat 20°N and 20°S

../..

3. The lifejackets required as per paragraph 2.3.1.2 of LSA Code and Reg. III/7.2 and III/32.2 of SOLAS, should remain onboard, regardless if the immersion suits are provided with facilities equivalent to lifejackets.
4. All regular inspections and tests for immersion suits are to be carried out in accordance with IMO MSC/1047/28-5-2002 and 1114/25-5-2004 and SOLAS III/36.
5. Please be advised accordingly.

The Manager
Capt. P.A. Papadopoulos

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REPUBLIC OF LIBERIA

Marine Notice

BUREAU OF MARITIME AFFAIRS

SAF-001
Rev. 04/05

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF
MERCHANT SHIPS, AGENTS AND RECOGNIZED ORGANIZATIONS**

SUBJECT: Lifesaving Equipment.

Reference: (a) Maritime Regulation 2.35
(b) SOLAS Consolidated Edition 2004, Chapter III
(c) International Life-Saving Appliance (LSA) Code
(d) MSC Resolution 152(78)
(e) MSC Circular 1114

Supersedes: Marine Notice SAF-001 issued 11/02.

PURPOSE:

This Notice addresses a number of recent issues and requests involving Lifesaving Appliances and Survival Craft aboard Liberian Flag vessels which have been presented to the Office of the Deputy Commissioner for interpretation and clarification of its policy.

APPLICABILITY:

This Notice applies to Owners, Masters, Ship Officers and Classification Societies and it addresses several SOLAS requirements which have been established by the Office of the Deputy Commissioner.

REQUIREMENTS:

1.0 Certification

- 1.1 All lifesaving appliances and Survival Craft are to be reviewed for compliance with the appropriate SOLAS regulation and acceptability by the Classification Society of the vessel at the time of installation and their condition verified at all subsequent safety equipment surveys. Any substandard or unapproved appliances or equipment are to be replaced. All survival craft are to be equipped as prescribed in the International Life-Saving Appliance (LSA) Code.
- 1.2 Safety equipment and other materials or equipment approved by a major maritime authority, such as the USCG, U.K. DOT, and the Ministries of Transport or Maritime Directorates of Japan, France, Italy, Germany, Norway, Korea, China, Russian Federation, Canada, Australia, or by an IACS member on behalf of a national maritime authority are acceptable

for vessels registered with the Republic of Liberia. The Administration will also accept equipment that has been approved under the EU Marine Equipment Directive.

- 1.3 Manufacturers of lifesaving appliances are responsible for ensuring that testing is performed in accordance with the LSA Code and for providing documentation that this has satisfactorily been accomplished
- 1.4 Existing equipment, which was manufactured and tested in accordance with previous SOLAS Convention requirements, may continue to be used as long as it remains in serviceable condition.

2.0 Servicing

- 2.1 Inflatable life rafts, inflatable life jackets, marine evacuation systems, and inflated rescue boats be serviced at approved servicing facilities. Servicing facilities that are approved by a State which is Party to the SOLAS Convention, and acceptable to the vessel classification society or servicing facilities that have been approved by a Liberian Recognized Organization on behalf of a Party to the SOLAS Convention; are acceptable to the Administration, provided, the approvals are in compliance with Reference (c). Vessel Owners and Agents should consult closely with their Classification Society when selecting a service station to ensure that it meets the requirements of IMO Resolutions.
- 2.2 Inflatable life rafts, life jackets, and marine evacuation systems are to be serviced annually immediately prior to, or at the time of, the periodic or renewal safety equipment surveys carried out by the Classification Society.
- 2.3 Inflatable rescue boats are to be serviced in accordance with the manufacturers' instructions. The rescue boat must be serviced at an approved facility acceptable to the vessel's classification society.
- 2.4 The Classification Society surveyors must be satisfied that the servicing has been completed satisfactorily prior to endorsing or issuing the Safety Equipment Certificate. Attendance of the surveyor during the servicing of the liferaft is not mandatory.
- 2.5 If suitable service stations are not available at the port of survey, extension of the applicable statutory certificate may be authorized by the Office of the Deputy Commissioner upon reasonable request to allow up to 17 months from the last date of service for the required service to be completed.
- 2.6 The Office of the Deputy Commissioner recognizes that annual servicing of the large numbers of liferafts required for passenger ships under their unique voyage conditions may impose unnecessary difficulties. The Office of the Deputy Commissioner therefore approves the servicing of liferafts in smaller more manageable groups throughout the certification year. Each liferaft, however, must be serviced by its servicing due date so that no unit will be beyond the 12 month servicing interval at the time of renewal of the Passenger Ship Safety Certificate.

3.0 Liferafts

- 3.1 Liferafts provided in compliance with SOLAS Regulation III/31.1.2, Regulation III/31.1.2.2, or Regulation III/31.1.3.2 are to be transportable and launchable by one person. They may be stowed in protected positions provided they are readily available at all times. Particular care should be given to their accessibility when deck cargoes are carried. Where appropriate, portable guard rails or bulwarks should be provided to facilitate launching.
- 3.2 On occasion, it may be necessary to temporarily carry persons on board in excess of the number currently authorized by the Safety Equipment Certificate. When physically possible, the installed lifeboats should be recertified to provide the necessary capacity. If the existing lifeboats are already certified to their maximum capacity, the Office of the Deputy Commissioner may allow, for legitimate verifiable reasons, the substitution of inflatable liferaft capacity appropriately installed in accordance with regulatory requirements to augment the required lifeboat complement as a temporary measure of equivalency.
- 3.3 Temporary measures (as provided for in 3.2 above) will be limited to the minimum period of time required for the additional persons to be on board, and in general will not exceed three (3) months. This accommodation will only be allowed with the specific approval of the Office of the Deputy Commissioner, provided:
- the additional persons are limited to a reasonable number,
 - the minimum survival craft capacity prescribed by SOLAS Chapter III is maintained,
 - the necessary additional personal life-saving appliances are provided and
 - the vessel does reasonably adhere to the appropriate provisions of the ILO Convention.

4.0 Lifeboat Damage

- 4.1 When any lifeboat is damaged and declared unseaworthy or is found in need of repair and no replacement boat is readily available, liferaft(s) with capacity for all the persons on board may be substituted, as a temporary measure, but only with specific approval of the Office of the Deputy Commissioner, provided the minimum survival craft capacity prescribed by SOLAS Chapter III is maintained.
- 4.2 Where the defective boat is a motorboat and there is no other motor lifeboat on board, the total survival craft capacity provided is to include a powered rescue boat meeting the requirements of Regulation III/31.2 of SOLAS.
- 4.3 These temporary measures will be limited to the minimum period of time required for replacement and, in general, will not exceed three (3) months.

5.0 Immersion Suits and Thermal Protective Aids

- 5.1 For purposes of SOLAS Regulations III/7.3, 22.4.1.2, III/32.3.2.3 and III/32.3.3.3, Liberia defines warm climates as being that between 32° North and 32° South latitudes. For vessels, other than bulk carriers operating exclusively within this trading zone, immersion suits and thermal protective aids will not be required. The thermal protective aids required by LSA Code Sections 4.1.5.1.24, 4.4.8.31, and 5.1.2.2.13, however, are an integral part of survival craft and rescue boat equipment which must be provided regardless of vessel route.

- 5.2 Liberia defines cold climates as the areas of operation above 50° N and 50° S latitudes. For the prolonged operation of vessels with open lifeboats in cold climates, the Office of the Deputy Commissioner requires that immersion suits constructed in accordance with LSA Code Section 2.3 be provided for all persons on board.
- 5.3 Existing cargo ships no later than the first safety equipment survey on or after 1 July 2006 and any new cargo ships constructed after 1 July 2006 shall carry immersion suits for every person onboard each cargo ship subject to these regulations. In addition, any ship subject to this regulation will also provide additional immersion suits so that individuals who will be working some distance from where their immersion suits are stored will have access to an immersion suit. This would be similar to the protection afforded by the requirement for an additional liferaft fitted forward and/or aft as required by SOLAS Regulation III/31.1.4, and the additional lifejackets required by SOLAS Regulation III/7.2.2.
- 5.3.1 As an example each such ship, in addition to the immersion suit for every person carried on board, shall be required to carry at least one additional immersion suit of adequate size near the additional liferaft(s) when fitted forward or aft, so that the immersion suits may be available to the crew working out on deck away from the accommodation block.
- 5.3.2 A number of additional immersion suits may also be required at other locations if the vessels class society surveyor determines that there are watch or work stations, which are so remote from the place where a crewman's immersion suit is stored, that in an emergency it is unreasonable to expect a crewman could acquire the assigned immersion suit.
- 5.4 Testing and repairing immersion suits:
- Select members of the crew shall be appointed and trained to conduct the monthly visual inspection of the immersion suits.
 - Immersion suits shall be sent ashore for testing of seams and closures in accordance with the guidance found in MSC Circular 1114 dated 25 May 2004 as follows:
 - Immersion suits less than 10 years old once every three years, and
 - Immersion suits over 10 years old every other year.
- All repairs shall be completed by an authorized repair facility.
- 5.5 Immersion suits and thermal protective aids are to be assigned by the Master. It is recommended that they should be kept in staterooms along with life jackets.
- 5.6 The three (3) immersion suits per lifeboat required by SOLAS, Regulation III/32.3.2 for cargo ships and Regulation III/22.4.1 for passenger vessels are intended for use by the designated and/or certified persons in charge of the lifeboat. They may be kept in the staterooms of the assigned personnel.
- 5.7 For cargo vessels less than 85 meters in length operating above 32° North and 32° South latitudes where only liferafts are carried in accordance with SOLAS, Regulation III/31.1.3, all persons are to be provided with immersion suits.
- 5.8 All persons in the crew of a rescue boat are to be provided with immersion suits, if different from the persons in charge of the lifeboat noted in 5.6 above.

6.0 EPIRB Maintenance Requirements

6.1 MSC Resolution 152(78) modified SOLAS Regulation IV/15. 9 to read as follows:

“9. Satellite EPIRBS shall be:

.1 annually tested for all aspects of operational efficiency, with a special emphasis on checking the emission on operational frequencies, coding and registration, at intervals as specified below:

- .1 on passenger ships, within three months before the expiry date of the Passenger Ship Safety Certificate; and
- .2 on cargo ships, within three months before the expiry date, or three months before or after the anniversary date of the Cargo Ship Safety Radio Certificate.

.2 subject to maintenance at intervals not exceeding five years, to be performed at an approved shore-based maintenance facility.”

7.0 Lifeboat Air Support Systems

7.1 Periodic Inspections

In accordance with the manufacturer’s instructions and guidelines the air support system shall be subject to periodic inspection carried out by the vessel's crew on a monthly basis as required by SOLAS 2004 Edition, as amended, Regulation 20.7.

7.2 Annual Examinations

All life boat air support systems and bottles shall be examined at least annually by the attending class society surveyor as part of the annual statutory survey for the Safety Equipment Certificate (SEC) or MODU Code certificate.

7.3 Recharging

If the air pressure in the bottles should fall below ten percent (10%) of the normal full level air pressure, then the air bottles should be recharged in accordance with the manufacturer’s instructions and guidelines. The air bottle can only be recharged on board from an air compressor that has been certified for providing air that is fit for human consumption. If applicable, the on board air supply air recharging systems should be checked for air quality as part of the annual statutory survey for the SEC or MODU Code certificate. If the ship is not equipped with such an air compressor then the bottle must be sent ashore to an authorized service facility for recharging or exchange.

7.4 Hydrostatic testing

Hydrostatic testing of lifeboat air support bottles shall be carried out once every five years or in accordance with the recommendations of the bottle manufacturer whichever is due the

earliest. The air support bottles shall also be hydrostatically tested prior to refilling a bottle that has been discharged. The hydrostatic test date must be permanently marked on the bottles or, if the bottles are made of a material that cannot be stamped with the date, a tag indicating the hydrostatic test date should be securely attached to the bottles. Intervals for hydrostatically testing cylinders of the ultra lightweight type may vary and will depend upon the requirements of the cylinder manufacturer and the vessel's classification society. Servicing of the cylinders must be performed to the satisfaction of the classification society surveyor.

7.5 Gauges

The accuracy of the primary pressure gauge and secondary air pressure gauge shall be verified at least once every five years or in accordance with the recommendations of the bottle manufacturers whichever comes first. Verification of the gauges must be performed to the satisfaction of the classification society surveyor.





Immersion Suits			
Date Issued	8 November 2005	Section	1
Revision No.	-	Item	1.19
Date Revised	-	Page	1 of 1

Reference is made to SOLAS 74 Chapter III Regulation 32.3 as amended by Resolution MSC.152(78), which if deemed to have been accepted on 1 January 2006, will enter into force on 1 July 2006.

In accordance with the provisions of Regulation 32.3.2 cargo ships, other than bulk carriers (as defined in SOLAS 74 Chapter IX Regulation 1), may be exempted from the requirement of Regulation 32.3.2 when such ships are constantly engaged on voyages within "warm climates". Following consideration of the guidance provided in MSC/Circ 1046 – Guidelines for the Assessment of Thermal Protection, this Administration has defined the following sea areas for the scope of application of the exemption provision:

- the sea area between the parallels of latitude 30° North and 30° South;
- the sea area of the Mediterranean Sea south of latitude 35° North;
- the sea area within 20 nautical miles from the coasts of Africa not included in the sea areas above.

On ships that are required to provide every person onboard with an immersion suit complying with the requirements of the Life-Saving Appliances Code Section 2.3 there shall also be available:

- at least two additional immersion suits of the same type located in the navigating bridge
- at least two additional immersion suits of the same type located in the engine room
- at least two additional immersion suits of the same type located at workstations where the crew performs its normal duties (except watch-keeping duties), if the horizontal distance from the workstations to the stowage position of the immersion suits is more than 100 metres.

Immersion Suits may be either stored at clearly identifiable locations close to the lifeboat stations or alternatively be distributed to each individual member of the crew.

The monthly shipboard inspection of immersion suits as required by SOLAS 74 Chapter III Regulation 20.7 shall take into account the guidelines approved by the Maritime safety Committee as contained in MSC/Circ.1047

The periodic testing of immersion suits shall be based on the guidelines approved by the Maritime Safety Committee, contained in MSC/Circ.1114 Periodic testing is to be carried out at intervals not exceeding three years at a shore servicing facility approved by the manufacturer and recognized organization.

Lifejackets required by SOLAS 74 Chapter III Regulation 7.2 shall be retained onboard regardless of the type of immersion suits provided.



**REPUBLIC OF
THE MARSHALL ISLANDS**

**OFFICE OF THE
MARITIME ADMINISTRATOR**

Marine Notice

No. 2-011-5

Rev. 8/06

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF
MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

SUBJECT: Lifesaving Equipment.

Reference:

- (a) SOLAS Consolidated Edition 2004, Chapter III
- (b) International Life-Saving Appliance (LSA) Code, Resolution MSC.48(66)
- (c) Revised Recommendation on Testing of Life-Saving Appliances, Resolution MSC.81(70)
- (d) European Union Council Directive 96/98/EC on Marine Equipment (MED)
- (e) Recommendations on Conditions for the Approval of Servicing Stations for Inflatable Life Rafts, Resolution A.761(18)
- (f) Adoption of Amendments to the Recommendation on Conditions for the Approval of Servicing Stations for Inflatable Life Rafts (Resolution A.761(18)), Resolution MSC.55(66)
- (g) Measures to Prevent Accidents with Lifeboats (MSC Circular 1206)
- (h) Guidelines for Periodic Testing of Immersion Suit and Anti-exposure Suit Seams and Closures (MSC Circular.1114)
- (i) Marshall Islands Technical Circular #1
- (j) Marshall Islands Technical Circular #4
- (k) Marine Notice 2-011-14, Maintenance and Inspection of Fire-Protection Systems and Appliances

PURPOSE:

This Notice addresses a number of recent issues and requests involving Lifesaving Appliances aboard Marshall Islands Flag vessels that have been presented to the Administration for interpretation and clarification of its policy. This Notice supersedes Rev. 1/06. It supplements the requirements and provisions of reference (a) and must be considered within that context.

APPLICABILITY:

This Notice applies to all ships, MODUs and mobile offshore units (MOUs) subject to reference (a).

REQUIREMENTS:

1.0 Approval of Equipment

- 1.1 All newly installed lifesaving equipment must comply with references (a) through (c). The Administration will accept equipment approvals granted by another State that is a Party to the SOLAS Convention, or a Marshall Islands Recognized Organization (RO) on behalf of the Marshall Islands or other Party to the SOLAS Convention; provided, the approvals are fully in accordance with Convention requirements. The Administration will also accept equipment that has been approved under reference (d), the EU Marine Equipment Directive (MED).
- 1.2 Existing equipment, which was manufactured and tested in accordance with previous SOLAS Convention requirements, may continue to be used as long as it remains in serviceable condition.

2.0 Approval of Service Providers

- 2.1 The Administration recognizes servicing facilities that are approved by a State which is Party to the SOLAS Convention or by a Marshall Islands RO on behalf of a Party to the SOLAS Convention; provided the approvals are in compliance with reference (e), as amended by reference (f). This has become necessary because certain suppliers have not developed networks of service stations to support their products, something that owners should be taking into consideration in the selection of such closely regulated items such as these.
- 2.2 The Administration does not, however, maintain a list of every possible service station so recognized by so many authorities all over the world. Nor is the Administration being advised by anyone as to who they are. That's one of the reasons why the Administration relies upon the local knowledge of the extensive network of class society offices. The Classification Society station offices should know of the availability of such service stations in their area that would be considered suitable for this servicing. Whomever they recommend will be acceptable to the Administration.
- 2.3 If manufacturer certified facilities are not available for servicing and maintenance of lifeboats, launching appliances and on-load release gear, the RO, when satisfied with an organization's ability to carry out these functions, may authorize such organization and its personnel to perform the functions of the manufacturer in accordance with reference (f). Marshall Islands Technical Circular #1, reference (i), provides more specific guidance to ROs in carrying out this function.

3.0 Equipment Servicing

- 3.1 The SOLAS Convention requires that inflatable life rafts, inflatable life jackets, marine evacuation systems, and inflated rescue boats be serviced at approved servicing facilities. Requests to extend servicing interval in accordance with reference (a) are only considered when exceptional circumstances exist. Requests should be fully justified by

substantiation of circumstances and plans to service at first opportunity.

- 3.2 On vessels that have implemented the Harmonized System of Survey and Certification (HSSC) inspection scheme, the inflatable life rafts, any inflatable life jackets, and any installed evacuation systems must be examined and certification verified during the annual, periodical, and renewal surveys stipulated in the 1988 SOLAS Protocol. On other vessels, this equipment is to be serviced just prior to, or during, the Cargo Ship Safety Equipment Certificate periodical and renewal surveys.
- 3.3 The servicing interval and procedures for inflated rescue boats must be in accordance with the manufacturer's requirements. The facility performing the servicing must comply with the requirements of Paragraph 2.1 above.
- 3.4 The Classification Society surveyors must be satisfied that the servicing has been completed satisfactorily prior to endorsing or issuing the Cargo Ship Safety Equipment Certificate or HSSC Cargo Ship Safety Certificate. Attendance of the surveyor during the servicing of the life raft is not mandatory.
- 3.5 The Administration recognizes that annual servicing of the large numbers of life rafts required for passenger ships under their unique voyage conditions may impose unnecessary difficulties. The Administration therefore approves the servicing of life rafts in smaller more manageable groups throughout the certification year. Each life raft, however, must be serviced in a sequence that ensures that no life raft will exceed a 12-month servicing interval.
- 3.6 Reference (k) should be followed for maintenance and inspection of lifeboat air cylinders. Requirements for the air cylinders for totally enclosed lifeboats shall be the same, where applicable, as with Self-Contained Breathing Apparatus air bottles.
- 3.7 In addition to monthly inspections as specified in 8.0 below, reference (h) should be followed for conducting periodic air testing of immersion suits. Suits less than ten years old shall be tested at intervals not exceeding three years; suits older than ten years, or suits which have seams or closures that are in questionable condition may be required to be tested more frequently. Immersion suit air tests may be conducted on board ship if suitable equipment is available. Any necessary repairs should be conducted by an approved service provider in accordance with manufacturer's recommendations.
- 3.8 Annex 1 of reference (g) shall be followed for the inspection, maintenance of lifeboats, launching appliances, and on-load release gear.

4.0 Life Rafts

- 4.1 Life rafts provided in compliance with SOLAS Regulation III/31.1.4 are to be transportable and launchable by one person. They may be stowed in protected positions provided they are readily available at all times. Particular care should be given to their accessibility when deck cargoes are carried. Where appropriate, portable guard rails or bulwarks should be provided to facilitate launching.

- 4.2 On occasion, it may be necessary to temporarily carry persons on board in excess of the number currently authorized. When physically possible, the installed lifeboats should be recertified to provide the necessary capacity. If the existing lifeboats are already certified to their maximum capacity, the Administration may allow, for legitimate verifiable reasons, the substitution of inflatable life raft capacity appropriately installed in accordance with regulatory requirements to augment the required lifeboat complement as a temporary measure of equivalency. These temporary measures will be limited to the minimum period of time required for the additional persons to be on board and in general, will not exceed two (2) months. This accommodation will only be allowed with the specific approval of the Administration.

5.0 Lifeboat Damage

- 5.1 When any lifeboat is damaged and declared unseaworthy or is found in need of repair and no replacement boat is readily available, life raft(s) with capacity for all the persons on board may be substituted, as a temporary measure, but only with specific approval of the Administration. The minimum survival craft capacity prescribed by SOLAS Chapter III must be maintained.
- 5.2 Where the defective boat is a motorboat and there is no other motor lifeboat on board, the total survival craft capacity provided is to include a powered rescue boat meeting the requirements of Regulation III/31.2 of SOLAS.
- 5.3 These temporary measures will be limited to the minimum period of time required for replacement and, in general, will not exceed three (3) months.

6.0 Lifeboat Equipment Dispensation (LSA Code Section 4.4.8.32)

- 6.1 For the purposes of LSA Code Section 4.4.8.32, Mobile Offshore Drilling Units and Mobile Offshore Units (i.e., FPSO, FSU, or other permanent moored factory or storage vessels) while on station and being served by a standby vessel, or when on station and located within 25 kilometers (16 miles) of another manned platform, MODU, MOU, or from a harbor of safe refuge, are considered by this Administration to be engaged on a voyage that will permit the food rations (LSA Code Section 4.4.8.12) and fishing tackle (LSA code Section 4.4.8.26) to be dispensed with. Lifeboat equipment dispensations for all other vessels will be handled on a case by case basis. Requests for such dispensations should be forwarded to the Office of the Maritime Administrator in Reston Virginia.

7.0 Lifeboat Falls

- 7.1 In accordance with reference (a), lifeboat falls must be renewed when necessary due deterioration or at intervals of not more than five years, whichever is earlier. Additionally, falls must be turned end for end at intervals not exceeding 30 months.
- 7.2 In lieu of meeting the 7.1 requirement above for end-for-ending the falls, falls shall be periodically inspected and renewed at intervals of not more than four years or whenever necessary due to deterioration, whichever is earlier.

8.0 Immersion Suits and Thermal Protective Aids

8.1 Immersion suits shall comply with section 2.3 of reference (b).

8.2 At first Safety Equipment Survey after 30 June 2006:

8.2.1 An immersion suit shall be provided for every person on board the ship. Additional immersion suits shall be provided for each person on watch or at a normal work location that is remote from where immersion suits are normally stowed.

8.2.2 Reference (a) contains provisions for exempting vessels that are constantly engaged on voyages in warm climates from the requirement to carry immersion suits and/or thermal protective aids. Procedures for granting the exemption are found in Marshall Islands Technical Circular #4, reference (j).

8.3 Existing vessels until first Safety Equipment Survey after 30 June 2006:

8.3.1 For vessels operating exclusively on voyages within warm climates, immersion suits and thermal protective aids are not required. The thermal protective aids required by LSA Code Sections 4.1.5.1.24, 4.4.8.31 and 5.1.2.2.13, however, are an integral part of survival craft and rescue boat equipment which must be provided regardless of vessel route.

8.3.2 For vessels with open lifeboats operating above 50° North and 50° South latitudes, the Administration requires that immersion suits be provided for all persons on board.

8.3.3 For cargo vessels less than 85 meters in length operating above 30° North and 30° South latitudes, where only life rafts are carried in accordance with SOLAS, Chapter III, Regulation 31.1.3, all persons are to be provided with immersion suits.

8.3.4 The three (3) immersion suits per lifeboat required by SOLAS, Chapter III, Regulation 32.3.2 for cargo ships and 22.4.2 for passenger vessels are intended for use by the designated and/or certified persons in charge of the lifeboat. They may be kept in the staterooms of the assigned personnel.

8.3.5 All persons in the crew of a rescue boat are to be provided with immersion suits, if different from the persons in charge of the lifeboat noted in 8.3.4 above.

8.4 Immersion suits and thermal protective aids are to be assigned by the Master. It is recommended that they should be kept in staterooms along with life jackets.

8.5 A normal work location for the purposes of paragraph 8.2.1 is a location where a crew member carries out normal work functions other than watchkeeping. Examples include

but are not limited to: control rooms, machine shops, galleys, and offices. These locations would be considered remote if the individual could not reasonably retrieve their assigned immersion suit in the event of an emergency.

- 8.6 For purposes of paragraph 8.3.1 and the SOLAS exemption referred to in 8.2.2, the Administration considers voyages in warm climates to be those within the zone between 30° North and 30° South latitudes.
- 8.7 The immersion suits provided to each crew member may be counted towards the suits which are required for crew who are assigned to a rescue boat or marine evacuation system party.





PANAMA MARITIME AUTHORITY
Directorate General of Merchant Marine
Segumar Panama

Merchant Marine Circular No. 165

To: Owners/Operators of Panamanian Vessels, Recognized Organizations and Masters.

Subject: Guidelines for Periodic Testing of Immersion Suits and Anti-Exposure Suit Seams and Closures

References: MSC.1/Circular.1114; SOLAS Regulation III/20.7

The purpose of this Merchant Marine Circular is to inform all parties involved with Panamanian flag vessels, of the approved guidelines adopted with the purpose to avoid the deterioration over time of the seams and closures of immersion suits and anti-exposure suits.

The monthly shipboard inspections of immersion suits and anti-exposure suits are very helpful in identifying obvious problems with a suit, but do not adequately address deterioration of seams and closures (zippers, etc.); which may not be readily apparent by visual inspection. Such deterioration can be detected by pressurization of the suit with air, and testing of the seams and closures for leaks with a soapy water solution.

In order to ensure adequate strength and water tightness of seams and closures of immersion suits and anti-exposure suits with age, it is requested that each suit be subjected to an air pressure test, which we describe next, at intervals not exceeding three years, and every two years for suits over ten years of age:

.1. A suitable head piece, fitted with a mean to inject air into the suit, should be inserted into the face orifice of the suit and secured so as to minimize leakage around the face seal. A low-pressure monitoring device, either integral to the fitting for air injection or as a separate device, should also be inserted. If the suit is fitted with detachable gloves and/or boots, the wrists and/or cuffs should be sealed by inserting a short length of suitable diameter plastic pipe and securing the gloves and/or boots with suitable wire ties or hose clamps. The zipper should be fully zipped, and any face flap closed. The suit should then be inflated to a pressure of 0.7 to 1.4 kPa (0.1 to 0.2 psi). If an auxiliary inflatable means of buoyancy is provided, it should be inflated through the oral valve to a pressure of 0.7 kPa (0.1 psi) or until firm to the touch.

.2. Each seam and closure of the suit - and each seam, oral tube and attachment points and joint or valve of any auxiliary inflatable means of buoyancy - should then be covered with a soapy water solution containing enough soap to produce bubbles (if leakage is noted at a foot valve to the extent that air pressure cannot be maintained, the valves should be sealed for the test).

.3. If leaks are revealed by the propagation of bubbles at seams or closures, the leaking areas should be marked and, after cleaning the suit thoroughly with fresh water and drying it, repaired in accordance with the suit manufacturer's recommendations.

4. It is recommended that the air pressure test be performed at a suitable shore-based facility equipped to make any necessary repairs in accordance with the manufacturer's recommendations. In view of the wide variety of materials and adhesives used in immersion suits and anti-exposure suits, any repairs to a suit shall be carried out by a facility which has access to the original manufacturer's recommended servicing instructions, parts and adhesives, and suitably trained personnel. The air pressure test may be carried out on board ship if suitable equipment is available.

Recognized Organizations are requested to include the air pressure test of Immersion Suit and Anti-Exposure Suit Seams and Closures in the items to be checked during the surveys for Safety Equipment Certificate and Passenger Ship Safety Certificate.

July 2008

Inquiries concerning the subject of this Circular or any request should be directed to:

Directorate General of Merchant Marine

Panama Maritime Authority

Phone: (507) 501-5031 / 501-5033

Fax: (507) 501-5083

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CIRCULAR LETTER TO CLASSIFICATION SOCIETIES & SURVEYORS TO THIS ADMINISTRATION

CIRCULAR LETTER No. SV06/2007

DATE: August 2007

CARRIAGE OF IMMERSION SUITS

Interpretation of and Requirements for Amendments to SOLAS that entered into force on 1st July 2006

With Resolution MSC. 152(78), the International Maritime Organisation made amendments to the International Convention for the Safety of Life at Sea (SOLAS), 1974. These amendments entered into force on 1 July 2006 and apply from the first safety equipment survey on or after 1st July 2006. In view of the interpretations possible within these amendments, we state herein our Administration's considered interpretation of them as applicable to St. Kitts & Nevis ships.

1. The above stated amendments, paragraph 3 of Regulation 32, Chapter III of SOLAS 1974, (as amended), states that an immersion suit must be provided for every person on board cargo ships.
2. A ship other than a bulk carrier, as defined in Regulation 1, Chapter IX of SOLAS 1974, (as amended) (see below), which is constantly engaged on voyages in warm climates, may be exempted from the said requirement. Having considered the IMO Guidelines for assessment of thermal protection contained in Circular Letter MSC/Circ. 1046, we have decided to define the following as warm climate sea areas for the scope of exempting ships from this regulation:
 - I. The sector of the globe between latitude 30 degrees North and 30 degrees South.
 - II. The part of the Mediterranean Sea South of latitude of 36 degrees.
 - III. The sea area within 20 nautical miles coasts of the African Continent which are not included in I and II above.
 - IV. The whole of the Persian Gulf, including inland waterways to latitude 31 degrees North.

"Bulk carrier" means a ship which is constructed generally with single deck, top-side tanks and hopper side tanks in cargo spaces, and is intended primarily to carry dry cargo in bulk, and includes such types as ore carriers and combination carriers.

3. Workstation is any place of the ship where the crew is occupied performing its normal duties except watch-keeping duties. Remotely located workstations are those located more than 100 metres, measured horizontally, from the place where the immersion suits are stowed.



ISO 9001

4. Watch Station is any place of the ship where the crew performs its normal watch-keeping duties. Remotely located watch stations are those located more than 50 metres, measured horizontally, from the place where the immersion suits are stowed.
5. The monthly inspection of immersion suits required by regulation 20.7/Ch III/SOLAS 1974, as amended, must be carried out in accordance with the Guidelines contained in IMO Circular Letter MSC/Circ. 1047, which is attached.
6. A periodic testing of the immersion suits, in accordance with the Guidelines contained in IMO Circular Letter MSC/Circ. 1114 (copy attached), must be carried at intervals not exceeding three years. Immersion suits over three years of age must be tested by the next safety equipment survey.
7. A ship shall continue to carry the number of lifejackets required by regulation 7.2/Ch III/SOLAS 1974, as amended, even if its immersion suits are classified as lifejackets.

Ship Owners, Managers & Operators are not required to apply for the Exemption mentioned at (2) above, which may be taken in to account by Recognised Organisations & authorised Surveyors of Ships when carrying out surveys and issuing certification.

Yours truly,



Nigel E Smith
International Registrar of Shipping and Seamen





CỤC ĐĂNG KÝ VIỆT NAM - VIETNAM REGISTER
PHÒNG TÀU BIỂN
SEA-GOING SHIP CLASSIFICATION AND REGISTRY DEPARTMENT

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THÔNG BÁO KỸ THUẬT - TECHNICAL INFORMATION

Date: 18 November 2005

Ref. No.: 021KT/05TB.E

Subject: Provision of immersion suits in accordance with Regulation III/32.3 of SOLAS 74 for Vietnamese cargo ships engaged on international voyages.

To whom it may concern

At the session 78 (from 12 May to 21 May 2004), the Maritime Safety Committee (MSC) of the International Maritime Organization adopted the Resolution MSC.152(78) which makes amendments to the International Convention for the Safety of Life at Sea (SOLAS) 1974 as amended. These amendments shall be deemed accepted on 01 January 2006 and shall enter into force on 01 July 2006. The Regulation 32.3, Chapter III - SOLAS 74 as amended, for provision of immersion suits has been completely revised as follows:

"Regulation 32. Personal life-saving appliances

The existing text of paragraph 3 is replaced by the following:

3 Immersion suits

- 3.1 This paragraph applies to all cargo ships. However, with respect to cargo ships constructed before 1 July 2006, paragraphs 3.2 to 3.5 shall be complied with not later than the first safety equipment survey on or after 1 July 2006.
- 3.2 An immersion suit complying with the requirements of section 2.3 of the Code* shall be provided for every person on board the ship. However, for ships other than bulk carriers, as defined in regulation IX/1, these immersion suits need not be required if the ship is constantly engaged on voyages in warm climates where, in the opinion of the Administration, immersion suits are unnecessary.
- 3.3 If a ship has any watch or work stations which are located remotely from the place or places where immersion suits are normally stowed, additional immersion suits shall be provided at these locations for the number of persons normally on watch or working at those locations at any time.

- 3.4 *Immersion suits shall be so placed as to be readily accessible and their position shall be plainly indicated.*
- 3.5 *The immersion suits required by this regulation may be used to comply with the requirements of regulation 7.3.*

**Code means the LSA Code*

With reference to the above amendments, please be informed of the application of these amendments as follows:

1/ Application:

- i New ships (which have keel laid on or after 01 July 2006): to be complied at the delivery of the ship.
- ii Existing ships (which have keel laid before 01 July 2006): to be complied at the first survey of Safety Equipment (annual, periodical or renewal survey) on or after 01 July 2006.

2/ Exemption:

A ship other than a bulk carrier, as defined in regulation 1/Ch IX/SOLAS 1974, as amended, which is constantly engaged on voyages in warm climates of the sector of the globe between latitude 25 degrees North and 25 degrees South, may be exempted from the above requirement, provided that the exemption is subject to official approval of VR Head Office for each specific case.

3/ *Workstation* is any place of the ship where the crew is occupied performing its normal duties except watch-keeping duties. *Remotely located workstations* are those located more than 100 metres, measured horizontally, from the place where the immersion suits are stowed. If the vessel has such *remotely located workstations*, additional immersion suits shall be provided at these locations for the number of persons normally working at those locations (one immersion suit for each person)

4/ *Watch station* is any place of the ship where the crew performs its normal watch-keeping duties (wheel-house, engine control room, ...). *Remotely located watch stations* are those located more than 50 metres, measured horizontally, from the place where the immersion suits are stowed. If the vessel has such *remotely located workstations*, additional immersion suits shall be provided at these locations for the number of persons normally working at those locations (one immersion suit for each person).

5/ According to Regulation 7.3; Chapter III, SOLAS 74, as amended, an immersion suit shall be provided for every person assigned to crew the rescue boat. (normally 3 immersion suits for each rescue boat). The immersion suits provided as per Regulation 32.3 are also considered to be complied with Regulation 7.3.

6/ A ship shall continue to carry the number of life jackets required by regulation 7.2, Chapter III, SOLAS 1974, as amended, even if its immersion suits are classified as lifejackets.

7/ Inspection and service of the immersion suits:

.i Monthly inspection of the immersion suits shall be carried out by crew members according to Regulation 20.7, Chapter III, SOLAS 1974, as amended and the Circular MSC/Circ.1047 (see the attached).

.ii The immersion suits shall be serviced and tested periodically with interval not exceeded 3 years according to Circular MSC/Circ.1114 (see the attached).

8/ At the first SE survey on or after 01 July 2006, the surveyor shall verify the immersion suits provided on board ship in compliance with the Regulation 32.3 and entry the number of immersion suits on Record of Equipment for the Cargo Ship Safety Equipment Certificate (form E).

9/ This Technical Information must be placed on board ships flying Vietnamese flag.

Manager of Sea-going Ship's Class. & Reg. Dept.



Nguyen Vu Hai