

SHIPPING NOTICE 01/2011

INFANT AND OVERSIZED LIFEJACKETS.

**To: OWNERS, MANAGERS, CHARTERERS AND MASTERS OF CAYMAN ISLANDS SHIPS
(INCLUDING COMMERCIAL YACHTS).**

1. BACKGROUND

- 1.1 The purpose of this Shipping Notice is to clarify the Cayman Islands policy with respect to IMO Resolution MSC.201(81) which brings into force amendments to SOLAS III/7 regarding personal life-saving appliances. The Resolution introduces the requirement to carry infant and oversized lifejackets.
- 1.2 The entry into force date for this Resolution was 1st July 2010.

2. APPLICATION

- 2.1 SOLAS III/7.2 as amended by MSC.201(81) states:

“2 Lifejackets

2.1 *A lifejacket complying with the requirements of paragraph 2.2.1 or 2.2.2 of the Code shall be provided for every person on board the ship and, in addition:*

.1 for passenger ships on voyages less than 24 h, a number of infant lifejackets equal to at least 2.5% of the number of passengers on board shall be provided;

.2 for passenger ships on voyages 24 h or greater, infant lifejackets shall be provided for each infant on board;

.3 a number of lifejackets suitable for children equal to at least 10% of the number of passengers on board shall be provided or such greater number as may be required to provide a lifejacket for each child; and

.4 a sufficient number of lifejackets shall be carried for persons on watch and for use at remotely located survival craft stations. The lifejackets carried for persons on watch should be stowed on the bridge, in the engine control room and at any other manned watch station; and

.5 if the adult lifejackets provided are not designed to fit persons weighing up to 140 kg and with a chest girth of up to 1,750 mm, a sufficient number of suitable accessories shall be available on board to allow them to be secured to such persons."

- 2.2 As written, the requirements of SOLAS III/7.2 apply to all ships constructed on or after 01 July 1998.
- 2.3 The Cayman Islands shares the view with other Administrations that this was not the original intention of the amendment, the original intention being that the amendment would apply to all ships. This view is confirmed through MSC.1/Circ.1304 "*Guidance for the application of SOLAS Regulation III/7, as amended by Resolution MSC.201(81)*". Whereby, the MSC at its eighty-sixth session having recognised the need for clarification of the scope of application of SOLAS III/7, as amended, in relation to infant lifejackets, agreed that the amendments should apply to all passenger ships regardless of their date of construction.
- 2.4 Unfortunately, no such clarification is currently provided by the IMO for the scope of application of SOLAS III/7.2.1.5 (the provision of oversized lifejackets).
- 2.5 Taking into account that the original intention of the amendment and the clarification with respect to infant lifejackets, Port State Control Officers may interpret the requirements for oversized lifejackets in accordance with MSC.1/Circ.1304. For this reason Cayman Islands ships are strongly advised to comply with the amended SOLAS III/7 regardless of the date of their construction.
- 2.6 Under section 2.2.1.3 of the LSA Code all new adult lifejackets, supplied to ships after 01 July 2010, that are not designed to fit persons weighing up to 140 kg with a chest girth up to 1,750 mm shall be supplied with suitable accessories to all them to be secured to such persons.

3. CARRIAGE REQUIREMENTS

- 3.1 SOLAS III/7.2.1.1 & 7.2.1.2 specify the exact carriage requirements, SOLAS III/7.2.1.5 is much more subjective.
- 3.2 The new regulation III/7.2.1.5 states:

"if the adult lifejackets provided are not designed to fit persons weighing up to 140 kg and with a chest girth of up to 1,750 mm, a sufficient number of suitable accessories shall be available on board to allow them to be secured to such persons."

- 3.3 To determine "a sufficient number" with respect to III/7.2.1.5, a risk assessment should be conducted by the operator. It would be expected that the operator will undertake a documented risk assessment of the likely number of such accessories required on board, taking into account the number of persons for which the vessel is certificated, the usual maximum number of adults on board, and the likely number of adults in the weight and size range beyond that which the existing lifejackets will fit, up to a maximum of 140 kg and 1750 mm girth.
- 3.4 If the documented risk assessment indicates that the number of accessories required is less than 5% of the total number of persons carried or for two persons (whichever is the greater) then the assessment will require formal approval by the Cayman Islands Shipping Registry. However, it is unlikely such an assessment will be approved as the assessment will need to consider the possibility of persons who are not crew or "regular passengers" (such as pilots, etc) requiring an appropriately sized lifejacket while onboard.
21. When accessories are used to meet the provision of SOLAS III/7.2.1.5 operators should ensure that;
- a) The accessories are approved for use with the relevant lifejacket or confirmed by the manufacturer to be compatible;
 - b) Procedures on board ensure that as far as reasonably practicable the accessories are distributed to those who may best benefit from them, and that passengers and crew are informed of their existence;
 - c) Procedures for distributing and using the accessories are exercised during routine shipboard musters and drills; and
 - d) There should only be one type of accessory for any one type of lifejacket.