

**Commonwealth of Dominica**



**Office of the Maritime Administrator**

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

**SUBJECT: Life-Saving Appliances and Equipment**

**REFERENCE: (a) International Convention for the Safety of Life at Sea, 1974 (SOLAS), as amended;**

**(b) International Life-Saving Appliance (LSA) Code, as amended;**

**(c) Resolution MSC.81(70), Revised Recommendation on Testing of Life-Saving Appliances, as amended;**

**(d) Resolution A.761(18), Recommendations on Conditions for the Approval of Servicing Stations for Inflatable Life Rafts, as amended;**

**(e) MSC/Circ.1114, Guidelines for Period Testing of Immersion Suit and Anti-Exposure Suit Seams and Closures**

**(f) MSC.1/Circ.1278, Guidance on Wearing Immersion Suits in Totally Enclosed Lifeboats**

**(g) MSC.1/Circ.1243, Unified Interpretations of SOLAS Chapter III**

**APPLICABILITY:** This Circular applies to all ships, mobile offshore drilling units (MODUs) and mobile offshore units (MOUs) subject to references (a) through (c) above.

**PURPOSE:**

This Circular addresses a number of recent issues and requests involving Life-Saving Appliances aboard Commonwealth of Dominica flag vessels that have been presented to the Dominica Maritime Administration for interpretation and clarification of its policy.

**REQUIREMENTS:**

**General**

**1. Approval of Equipment**

The Commonwealth of Dominica Maritime Administration will accept equipment approvals granted by another State that is a Party to the SOLAS Convention, or a Recognized Organization (RO) on behalf of the Administration or other Party to the SOLAS Convention; provided, the approvals are fully in accordance with Convention requirements. All newly installed life-saving equipment must comply with references (a) through (c) above.

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. Approval of Service Providers**

The Administration recognizes servicing facilities that are approved by a State which is Party to the SOLAS Convention or by an RO on behalf of the Administration or other Party to the SOLAS Convention; provided the approvals are in compliance with reference (d) above, as amended. 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.

The Administration does not, however, maintain an exhaustive list of every world-wide service station so recognized. As a result, the Administration relies upon local knowledge and the extensive network of RO offices. The RO station offices should

know the suitability of such service stations in their area. The service station recommended by the RO will be acceptable to the Administration.

### **3. Equipment and Servicing**

The SOLAS Convention requires that inflatable life rafts, inflatable life jackets, marine evacuation systems, and inflated rescue boats be serviced at approved servicing facilities.

On vessels that have implemented the Harmonize 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 of last servicing 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.

The RO 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.

The Administration recognized that annual servicing of the large numbers of the life rafts required for passenger ships under their unique voyage conditions may impose difficulties. The Administration therefore endorses 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.

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.

The periodic testing of immersion suits shall be conducted according to reference (e) above. Suits less than 10 years old shall be tested at intervals not exceeding three (3) years; suits older than 10 years, or suits which have seams or closure that are in questionable condition may be required to be tested more frequently. Immersion suit 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.

#### **4. Life Rafts**

Life rafts provided in compliance with SOLAS Regulation III/31.1.4 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. Consideration should also be given to facilitate launching.

As described in reference (g) above, remotely located survival craft such as the life rafts provided in compliance with SOLAS Regulation III/31.4.1 shall be provided with an embarkation ladder or other means of embarkation enabling descent to the water in a controlled manner as per SOLAS Regulation III/11.7. For this purpose, knotted ropes are not considered an acceptable means of embarkation.

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 measure 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 Administrator.

#### **5. Immersion Suits and Thermal Protective Aids**

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

An immersion suit shall be provided for every person on board the ship, unless expressly provided otherwise under reference (a). 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.

Additional immersion suits as required under SOLAS III/32.3.3 shall be provided for each person on watch or at any normal work location that is remote from where immersion suits are normally stowed. For the purposes of this paragraph, a normal work location is a location where a crewmember regularly carried out normal work functions. Examples may include but are not limited to: control rooms, machine/work shops, galleys, offices, and remote lookout positions. Such a work location would be considered remote if it is not in the direct vicinity of the primary survival craft and/or normal stowage position of the individually assigned immersion suits, and could not

reasonably be retrieved in the event of an emergency. At a minimum, additional suits shall be provided to the navigation bridge and the engine control room for all watch standers at those locations.

An immersion suit of appropriate size shall be provided for every person assigned to crew the rescue boat or assigned to the marine evacuation system part in accordance with Regulation 7.3 of Chapter III of reference (a) above. The immersion suits provided under this requirement may be used to comply with paragraph 5.2 above.

A minimum of two (2) immersion suits and two (2) lifejackets must be provided at locations where remotely located survival craft are stowed in accordance with SOLAS Regulation III/31.1.4 and as detailed in reference (g) above.

Reference (a) contains provisions for exempting vessels, other than bulk carriers, as defined in Regulation IX/1 of reference (a) above, that are exclusively engaged on voyages in warm climates from the requirement to carry immersion suits and/or thermal protective aids. The Administration considers voyages in warm climates to be those within the zone between 30° North and 30° South latitudes. The thermal protective aids required by the LSA Code Sections 4.1.5.4.24, 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.

## **6. Guidance on Wearing Immersion Suits in Totally Enclosed Lifeboats**

The Administration fully concurs with reference (f) above, and strongly recommends that owners, operators and Masters emphasize those items in paragraph 4 of reference (f) above be followed on their vessels. Abandon ship drills are a good opportunity to examine and demonstrate the use of immersion suits. Crew training during these drills should emphasize that immersion suits are intended primarily to ensure thermal protection in cases where the totally enclosed lifeboats cannot be embarked upon.

**Any questions can be directed to:**

**Technical Department**  
Tel: + 1 508 992 7170  
e-mail: [technical@dominica-registry.com](mailto:technical@dominica-registry.com)

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