



## BERMUDA SHIPPING NOTICE

### Carriage of Infant and Oversized Lifejackets in Bermuda ships.

#### Summary

IMO resolution MSC.201(81) entered into force on 1<sup>st</sup> July 2010. The Resolution amends SOLAS III/7 and introduces requirements for the carriage of infant lifejackets and oversize lifejackets. The amendments are not specific in terms of the numbers required in every case and this notice sets out the position for Bermuda ships.

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#### General.

The amendments to SOLAS III/7 contained in the Resolution state:

*.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 of less than 24 hours, 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 of 24 hours 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;*

*.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 any other manned watch station; and*

*.5 if the adult lifejackets on board are not designed to fit persons weighing up to 140 kg and with a chest girth up to 1750 mm, a sufficient number of suitable accessories shall be available on board to allow them to be secured to such persons.*

The current Regulation III/7.2 is not expressed as applying to “all ships” and the amendment does not introduce this wording which might suggest that the change applies only to ships constructed on or after 1<sup>st</sup> July 1998. However the Bermuda Maritime Administration is of the view that the intent of this amendment is that the change should apply to all passenger ships and all cargo ships over 500 GT from 1<sup>st</sup> July 2010. The Department understands that Port State Control authorities in many countries also interpret it in this way.

Owners, managers and operators of Bermuda ships should therefore assume that these amendments apply regardless of the keel laying date of the ship.

**Infant lifejackets.**

The position for vessels engaged on voyages of up to 24 hours is clear; there should be a number of infant lifejackets at least equal to 2.5% of the passenger number.

For passenger vessels engaged on voyages of more than 24 hours the requirement is for an infant lifejacket for each infant. Owners and managers should therefore make an assessment of the numbers of infants carried normally and arrange to supply sufficient infant lifejackets so that the requirement for one for each infant is met at all times.

In the case of a ship in which infants are not accepted for carriage there will not be a requirement to carry infant lifejackets.

Tenders in passenger ships should be regarded as passenger vessels on voyages of less than 24 hours and they should be outfitted with sufficient infant lifejackets for 2.5% of the tender passenger numbers, except in tenders fitted in ships where infants are not carried.

The LSA Code defines an infant as a person under 100 cm in height and less than 15 kg in weight.

**Oversized lifejackets in cargo ships.**

A number of current lifejackets in service fitted before the change in standards will accept a person of up to 140 kg and up to about 1400 mm chest girth. However many will not accept the additional size up to 1750 mm. The IMO requirement is that a sufficient number of suitable accessories be provided to allow them to accommodate such persons.

The Bermuda Maritime Administration will accept two approaches to meeting this requirement:

1. The carriage of a minimum of two strap extensions that will work with the ship's existing lifejackets to accept a larger person, or
2. A risk assessment which demonstrates that the likelihood of a crew member requiring the provision of an oversized lifejacket is negligible, provided that a copy of the risk assessment is available on board and that procedures are in place to ensure that an oversize lifejacket is provided on board if it is needed.

It is possible that the risk assessment will conclude that no oversized lifejackets are required.

**Oversized lifejackets in passenger ships.**

In passenger ships it is unlikely that a situation will arise where there will be no need for oversized lifejackets. The determination of a "sufficient number" is not clarified in the SOLAS amendments and hence Bermuda passenger ships should make an assessment from their operating history of the numbers needed. Where the existing outfit of lifejackets does not meet the requirements to accommodate persons up to 140 kg and 1750 mm the ship should be supplied with a number of accessories for the existing lifejackets, or suitable additional lifejackets, so that at any time any passenger who is likely to need one is able to be supplied.