



Direção-Geral de Recursos Naturais,
Segurança e Serviços Marítimos

Direção de Serviços de Administração Marítima

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Subject:	Life Saving Appliances: Immersion Suits - carriage, inspection and testing
To:	Shipowners, Companies, Operators, Recognized Organizations and Masters of Portuguese flagged vessels

1. Background

The revised SOLAS Regulation 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 watch-keeping stations' which are "remotely located" from the immersion suit storage locations. The revised Recommendation on testing of LSA adopted by resolution MSC.81(70) requires also immersion suits to be tested as described in paragraph 3 of the resolution.

2. General

2.1 This circular is intended to provide guidance to meet the minimum mandatory requirements on board the Portuguese flagged ships. Nevertheless, Owners and Companies are reminded of their obligations to provide all crew members with a safe working environment and place additional immersion suits on board where necessary.

2.2 Vessels sailing under the Portuguese flag which applies 96/98/EC (European Marine Equipment Directive MED) shall be provided with MED-approved immersion suits which are marked with the steering wheel symbol.

2.3 The suits must also be provided in sizes appropriate to the crew and supernumeraries (if any), including children. *The Portuguese administration requires that suitable child immersion suits are provided if children are travelling on board of a cargo ship.*

3. Minimum number of suits required and location.

3.1 One immersion suit is required for each person on board at the time. This means that the minimum number of immersion suits must be not less than the number of persons shown on the Cargo Ship Safety Equipment Certificate (or equivalent) plus those ones required to be provided in the considered work/watch stations “remotely operated”.

3.2 The Portuguese Maritime Administration accepts immersion suits to be placed on deck, in a box or a centralised accessible (from open deck) safety store room, within or outside the accommodation, on the way to or in the vicinity of the assembly stations or survival craft station, or distributed through the crew cabins.

Therefore both the navigating bridge and the engine control room/position are, for the purpose of this Circular, regarded as ‘remotely located’.

3.3 The minimum number of additional suits to be provided is linked to the number of persons on watch on the navigating bridge and in engine room.

The Portuguese Maritime Administration requires a minimum of two (2) additional suits on the navigating bridge and two (2) additional suits within the engine control room/position.

3.4 If a ship has locations where additional liferafts (fwd or aft) are required in accordance with paragraph 1.4 of regulation III/31 as amended, then, at least two (2) additional immersion suits must be placed at each of those stations.

Further additional suits shall be provided at any other remotely located work and watch stations. *The Portuguese Maritime Administration interprets this to mean locations where persons are permanently positioned on a regular and systematic basis, rather than locations where routine or one-off work activities are performed.* The ISM Designated Person (DP) in consultation with the Master of the vessel is responsible for identifying and declaring such locations to the Portuguese Maritime Administration/ Recognised Organisation which issues the SOLAS Convention applicable certificate.

3.5 Changes of the number of immersion suits and stowage locations shall be indicated in the fire control & safety plan.

4. Carriage of suits within tropical waters

4.1 The revised regulation also permits exemption from carriage of immersion suits when a cargo vessel which is not a bulk carrier operates exclusively within warm climates e.g. tropical waters. *In this context the Portuguese Maritime Administration considers a warm climate to extend between latitudes 30° N and 30° S.* Attention is also drawn to IMO MSC/Circ. 1046 “Guidelines for the Assessment of Thermal Protection”.

The Portuguese Maritime Administration will not exempt any vessel operating outside these limits from the immersion suit requirements whatever the duration of the proposed voyage.

5. Storage, familiarisation, inspection and maintenance

5.1 Immersion suits shall be stored in readily accessible and clearly marked locations. The conditions inside storage facilities shall ensure that suits are maintained in good condition.

All crew members must be familiar with the location(s) of immersion suits and the methods of donning these items. Drill procedures and activities will incorporate demonstrations and practice to ensure that all crew can safely use an immersion suit immediately when required. Training manuals, muster lists and instructions for on-board maintenance must be updated as necessary.

5.2 Immersion suits are to be inspected every month as required by SOLAS III/20.7.2. The manufacturer’s inspection and maintenance recommendations must be followed to ensure that the condition of each immersion suit remains suitable for immediate use. In this respect the attention of companies is also drawn to IMO MSC/Circ. 1047 “Guidelines for monthly shipboard inspection of immersion suits and anti-exposure suits by ships’ crews” and IMO MSC/Circ. 1114 “Guidelines for periodic testing of immersion suit and anti-exposure suit seams and closures” and any other subsequent guidelines.

5.3 The Portuguese Maritime Administration recognises that approved immersion suits are being offered for sale sealed in air tight vacuum packaging. These suits cannot be unpacked

and inspected as required by MSC/Circ. 1047. The Portuguese Maritime Administration accepts this type of packaging and considers that they fulfil the requirements of SOLAS III/20.7.2 and 36. In accepting Immersion suits in air tight vacuum packaging as described above the following requirements must be adhered to:

- 5.3.1 A suitable number of standard packaged immersion suits must be available for use for donning practise by the ship's crew;
- 5.3.2 The packaging of the vacuum sealed units must be inspected monthly as per SOLAS requirements of the airtight packaging in line with the manufacturer's recommendations. Should any damage be found or the seal broken or the vacuum lost, the suit must be either removed from the package and inspected as per MSC/Circ 1047 or sent for inspection and repackaging at an authorized service station;
- 5.3.3 It has to be noted that should a sealed vacuum packaged suit be removed from its sealed vacuum packaging for any reason, it should thereafter be treated as a normal unpackaged suit in respect of the inspections required under SOLAS III until such time that it is sent away for repackaging as an airtight unit by an authorized service station.

5.4 Notwithstanding paragraph 5.3 above, the air pressure test required by MSC/Circ.1114 should be conducted by an authorized service station at every 3 years interval required service, providing the airtight bag sealing is checked by ship personnel annually. It is recommended that inspections required by MSC/Circ.1047 should be carried out at the same time, whenever possible and feasible.

5.5 Immersion suits aged 10 years or more should be serviced annually at an authorized service station, where an authorized service station is one that has been formally accredited by the manufacturer of the immersion suit.

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The Director of the Maritime Administration Services Directorate

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