



THE BAHAMAS MARITIME AUTHORITY

BMA INFORMATION BULLETIN No. 76

CARRIAGE OF IMMERSION SUITS ON CARGO SHIPS

Guidance for Shipowners, Managers, Masters, Bahamas Recognised Organisations and Bahamas Approved Inspectors

This bulletin gives guidance on immersion suits following the publication by MSC.152(78) of revisions to SOLAS Regulation III/32.3 *Personal life-saving appliances, immersion suits and thermal protective aids*

References: MSC.152(78)
MSC/Circ. 1046
MSC/Circ. 1047
MSC/Circ. 1114

1. General

- 1.1. Revised SOLAS Reg. III/32.3, (in force 1st July 2006), 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.
- 1.2. The BMA has received a number of requests for interpretation on the revised regulation and the following comments are intended to provide guidance to meet the minimum requirements. However, Owners and Managers are reminded of their obligations to provide all crew members with a safe working environment and place additional suits on board where necessary.

2. Minimum number of suits required

- 2.1. One immersion suit is required for each person on board at the time. The suits must be approved equipment and provided in sizes appropriate to the crew and supernumeraries (if any), including children.
- 2.2. The BMA anticipates that immersion suits would normally be stored in either one or more central location(s) e.g. adjacent to lifeboat stations, or will be distributed through the crew cabins. Therefore both the navigating bridge and the machinery space are, for the purpose of this Regulation, regarded as ‘remotely located’.
- 2.3. The minimum number of additional suits to be provided is linked to the numbers of persons on watch on the navigating bridge and the main machinery space. The BMA considers two (2) additional suits on the navigating bridge, and two (2) additional suits

within the machinery space to be the minimum necessary on the majority of vessels. On smaller vessels where there is one watch-keeper in the machinery space the number of additional immersion suits may be reduced to one (1).

- 2.4. Further additional suits must be provided at any other remotely located work and watch stations. The BMA 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 DPA of the vessel is responsible for identifying and declaring such locations to the relevant Recognised Organisation which issues the SOLAS Convention certificate.
- 2.5. To illustrate the above principle, a machinery space which is normally operated in the unmanned mode (UMS) would require two (2)¹ additional immersion suits to account for periods when watch keeping is undertaken, but would not require additional suits for those working within the space during the day.

3. Carriage of suits within tropical waters

- 3.1. 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 BMA considers a warm climate to extend between latitudes 30° N and 30° S. Attention is also drawn to MSC/Circ. 1046 “Guidelines for the Assessment of Thermal Protection”.
- 3.2. The BMA will not exempt any vessel operating outside these limits from the immersion suit requirements whatever the duration of the proposed voyage.

4. Storage, familiarisation, inspection and maintenance

- 4.1. Immersion suits must be stored in readily accessible and clearly marked locations. The conditions inside storage facilities must ensure that suits are maintained in good condition.
- 4.2. All crew must be familiar with the location(s) of immersion suits and lifejackets 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.
- 4.3. 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 managers is also drawn to MSC Circular 1047 “Guidelines for monthly shipboard inspection of immersion suits and anti-exposure suits by ships’ crews” and MSC Circular 1114 “Guidelines for periodic testing of immersion suit and anti-exposure suit seams and closures” and any other subsequent guidelines.

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¹ Which may be reduced to one (1) in accordance with paragraph 2.3