

South African Maritime Safety Authority



Marine Notice No. 12 of 2010

New Compulsory Standards for Lifejackets used on South African Vessels

TO ALL PERSONS PURCHASING, SUPPLYING, INSPECTING OR USING LIFEJACKETS ABOARD SOUTH AFRICAN SHIPS, INCLUDING RECREATIONAL VESSELS.

Marine Notice No.21 of 2009 is cancelled

Summary

This Notice is a general advisory to the maritime industry which introduces the new standards applicable to the sale and use of lifejackets in South Africa.

It also introduces SAMSA's interim policy with respect to the new standards in lieu of the fact that existing maritime legislation has not as yet been amended to accommodate these new compulsory changes which take precedence.

1. Precis

A new statute came into effect on the 6th April 2009 which makes the ISO (also read European) standards relating to all Personal Flotation Devices (PFD's) compulsory in South Africa. The new statutes consist of an enabling set of regulations and ten SANS compulsory standards covering all types of lifejackets and buoyancy aids.

Aside from any arrangements regarding the disposal of existing "legal" (i.e. compliant with the previous legislation) stock levels on the shelves, it is illegal to sell any PFD's in South Africa which do not comply with these new standards. In addition there is a "Regulator" who's responsibility it is to ensure, *inter alia*, that PFD's which do not meet the national standard are not stocked or sold to the public.

Manufacturers and importers of PFD's have to satisfy the "Regulator" that the items intended for sale meet the national standards. The Regulator is also responsible for ensuring the continued quality of the product.

Control is effected by the Regulator through the statutory requirement to obtain approval to market these items of safety equipment before being allowed to sell the PFD's to the industry. The proof of having obtained this approval is indicated on the garment by a unique number:

(EXAMPLE OF THE HOMOLOGATION NUMBER:

ZA / 8032 / 2009 / 0001

ZA - Denotes South Africa

8032 - VC Specification

2009 - Year of Approval

0001 - Manuf. Company Number Eg. "ZERO" Product.)

By which means the approval process can be tracked, and by which inspectors, surveyors and safety officers can be assured that the item is of the correct standard.

The markings on, and information supplied with, the new PFD's is more informative than before which should aid buyers in making the correct choice of PFD.

Unless there are unforeseen developments regarding this new regime, it should no longer be necessary for SAMSA to approve or stamp PFD's as it should theoretically not be possible to purchase sub-standard items of equipment.

SAMSA however has the responsibility of dictating the use of such safety equipment on South African vessels as well as determining the performance level of the PFD required to satisfy the statutory obligation to have such equipment aboard, according to the intended use of the vessels.

Until further notice, all PFD's supplied legally under the old regime remain suitable for their intended use. That is to say all existing;

- SAMSA approved SOLAS lifejackets;
- SAMSA approved "horseshoe" Working Type Lifejackets;
- SAMSA approved Buoyancy Aids.

2. The new statutory requirements and compulsory standards

On the 6th February 2009, [*came into force two months afterwards – i.e. on the 6th April 2009*] the old compulsory specifications VC 8012 and the standards SABS 1417 (50 Newtons of buoyancy), 146 (73 Newtons of buoyancy) and 170 (155 Newtons of buoyancy) were replaced by a whole new lifejacket regime comprising of enabling legislation (R91 – which is a revised VC 8012) as well as ten SANS standards have been introduced. Eight of which are compulsory specifications for PFD's and two which relate to testing procedures and guidance regarding the use of the items.

The relevant standards relating to the compulsory standards of the various PFD's are as follows;

- SANS 12402-1: Personal flotation devices -Part 1: Lifejackets for seagoing ships -Safety requirements'. (Level 150)
- SANS 12402-2: Personal flotation devices -Part 2: Lifejackets for extreme offshore conditions (level 275) -Safety requirements.
- SANS 12402-3: Personal flotation devices -Part 3: Lifejackets for offshore conditions (level 150) - Safety requirements.
- SANS 12402-4: Personal flotation devices -Part 4: Lifejackets for inland/close to shore conditions (level 100) Safety requirements.
- SANS 12402-5: Personal flotation devices Part 5: Buoyancy aids (level 50) -Safety requirements.
- SANS 12402-6: Personal flotation devices -Part 6: Special purpose Lifejackets and buoyancy aids - Safety requirements and additional test methods.
- SANS 12402-7: Personal flotation devices -Part 7: Materials and components Safety requirements and test methods.
- SANS 12402-8: Personal flotation devices -Part 8: Accessories -Safety requirements and test methods."

NOTE: The level reflects the nominal number of Newtons of buoyancy provided at that level of performance.

2.1 The new regime

Some of the relevant statutory measures which define the new regime include;

- ✓ A “Regulator” whose duty it is to ensure that all flotation devices sold in SA are compliant, whether made locally or imported [*National Regulator for Compulsory Specifications (NRCS)*];
- ✓ So that buyers and inspectors can determine if the item on the shelf is the correct one there is a unique and visible “approval number” which is traceable and which must appear on every flotation device sold [*e.g. RSA xxxxxx – minimum font size 6mm high*];
- ✓ To allow for imports, equivalent standards are allowed, for example ISO, IEG and EN, in which case the testing would be waived, but the RSA number would still have to appear on the items;
- ✓ To allow for better fitting equipment there is a spread of sizes and designs allowed in each category of flotation device.
- ✓ It still falls to SAMSA to legislate regarding which performance levels are required to be met according to the foreseeable conditions expected to be met.

3. Interpreting the new requirements

Finding direct equivalencies to the old types of buoyancy aids and lifejackets which were sold and which are still in use is not really possible due to the change in the philosophical approach involved in the selection process.

Various sets of South African regulations currently mention lifejackets, for example;

- ✓ SOLAS (which stays the same as it is regulated by IMO);
- ✓ The Life Saving Equipment Regulations 1968, where two types of lifejacket are envisaged, namely a 155N SOLAS type and a “Working Type Lifejacket” of 73 Newtons, both to be fitted with lights;
- ✓ The Merchant Shipping (National Small Vessel Safety) Regulations 2007, where there are references to SABS 146, 1417 as well as ISO/CE equivalent standards which are to be totally replaced by the new SANS or equivalent standards.

Amendments will be made to these statutes in due course so that they are aligned with the new legislation.

4. The new classes and descriptions of flotation devices

4.1 Classes

Lifejackets

These devices provide face-up flotation with levels of support sufficient for various open and rough water uses.

Lifejackets have a buoyancy distribution sufficient to turn users, when tested on users wearing swimming costumes according to ISO 12402, to a position where the mouth has a defined freeboard above the water’s surface, even when the user is unconscious.

Buoyancy aids

These devices should be comfortable for continuous wear and provide lift, without significant face-up turning ability, to float the conscious user with the level of support marked on the device. Buoyancy aids shall at least be suitable for sheltered waters, but at higher performance levels may be suitable for some users in other waters.

Special purpose lifejackets and buoyancy aids

These devices perform as above with different levels of support, but have modifications related to special applications for use. These applications shall not relate to essential requirements such as in-water performance, stability and safety in use. The specific conditions for use shall be stated on their label to maintain essential requirements.

4.2 Performance levels

Level 275

This level is intended primarily for offshore use under extreme conditions and by people who are carrying significant weights and thus require additional buoyancy. It is also of value to those who are wearing clothing which traps air and which may adversely affect the self-righting capacity of the lifejacket. It is designed to ensure that the user is floating in the correct position with his mouth and nose clear of the surface. See SANS 12402-2.

Level 150

This level is intended for general application or for use with foul weather clothing. It will turn an unconscious person into a safe position and requires no subsequent action by the user to maintain this position. See SANS 12402-3.

Level 100

This level is intended for those who may have to wait for rescue, but are likely to do so in sheltered water. The device should not be used in rough conditions. See ISO 12402-4.

Level 50

This level is intended for use by those who are competent swimmers and who are near to bank or shore, or who have help and a means of rescue close at hand. These garments have minimal bulk, but they are of limited use in disturbed water, and cannot be expected to keep the user safe for a long period of time. They do not have sufficient buoyancy to protect people who are unable to help themselves. They require active participation by the user. See ISO 12402-5.

4.3 Accessories required for lifejackets

According to the standards certain accessories are either standard or optional. Certain critical accessories have been ruled to be mandatory in South Africa as follows:

Accessory Mandatory (M) / Optional (O)

Emergency light	M ^a
Whistle	M
Lifting loop	M
Buddy line	O
Retro-reflective material	M
Deck safety harness	O
Overpressure relief valve	O
Multi-chamber system	M ^b
Protective covers	O
Spray hood	O

a Compulsory for all commercial vessels over 25 GT , pleasure vessels over 100GT and passenger vessels operating at night or outside of the harbor.

b Only for inflatable PFD's.

5. NEW REQUIREMENTS

5.1 Lifejackets for seagoing ships shall comply with SANS 12402-1: *Personal flotation devices - Part 1: Lifejackets for seagoing ships -Safety requirements*'.

The reference to seagoing vessels applies to vessels covered by SOLAS and the performance level is 150.

5.2 Lifejackets for extreme offshore conditions shall comply with SANS 12402-2: *Personal flotation devices -Part 2: Lifejackets for extreme offshore conditions (level 275) -Safety requirements*.

In the South African context, this is interpreted by SAMSA to apply to any vessels certificated to operate south of 40 degrees south latitude, and includes SOLAS vessels, fishing vessels or any other South African registered vessels.

5.3 Lifejackets for offshore conditions shall comply with SANS 12402-3: *Personal flotation devices -Part 3: Lifejackets for offshore conditions (level 150) -Safety requirements*.

In the South African context this is interpreted by SAMSA to apply to all vessels certificated to operate “offshore”. (SAMSA definition in the South African context is as follows: “offshore” means any vessel, regardless of size, operating at night and/or more than 15 miles offshore.)

5.4 Lifejackets for inland/close to shore conditions shall comply with SANS 12402-4: *Personal flotation devices -Part 4: Lifejackets for inland/close to shore conditions (level 100) Safety requirements*.

In the South African context this is interpreted by SAMSA to apply to any vessels certificated to operate near-shore during daylight hours. (SAMSA definition of near-shore means all vessels on voyages of less than 16 hours and always operating less than 15 nautical miles from shore.)

In addition, any passenger vessels whether operating in sheltered waters (including inland waters) or operating from a harbor less than 5 nautical miles offshore and 15 nautical miles from a safe haven, are required to carry level 100 lifejackets.

5.5 Buoyancy aids shall comply with SANS 12402-5: *Personal flotation devices Part 5: Buoyancy aids (level 50) -Safety requirements*.

In the South African context this is interpreted by SAMSA to be an appropriate PFD to meet the mandatory requirements for all vessels other than passenger vessels operating on inland waters, and category E vessels, which operate less than 1 nautical mile from shore.

(It is no longer considered safe to use buoyancy aids only on category D vessels – operating less than 5 nautical miles from shore.)

In addition this level of PFD is appropriate as a buoyancy aid when required to be worn by crewmembers at the workplace by regulation.

5.6 Special purpose lifejackets and buoyancy aids shall comply with SANS 12402-6: *Personal flotation devices -Part 6: Special purpose Lifejackets and buoyancy aids -Safety requirements and additional test methods*.

These are PFD designed specifically for certain sports and applications.

Examples would be white water rafting or canoeing, kayaking, windsurfing, dinghy sailing, water skiing etc. - as well as PFD's for young children less than 6 years old.

5.7 SPECIAL NOTE 1

The industry has many times voiced concerns regarding the need to carry buoyancy aids as well as lifejackets in certain operations, however the performance requirements of a lifejacket are so different from those expected of a buoyancy aid that one can never fully replace the other.

The SANS/ISO/EN standards make provision for inflatable lifejackets which comply fully with the performance of a lifejacket as well as being easy and comfortable to wear, thus also fulfilling the role of a buoyancy aid.

Many types and styles of PFD's are made for the overseas market where they are very widely used for the exact same reasons; that being that nobody plans for an emergency and if one makes it a habit of wearing an inflatable PFD it is always ready to be deployed.

5.8 SPECIAL NOTE 2

Although SAMSA interprets the new standards as detailed above, and expects our surveyors to enforce and promote the use of the new higher standards, especially with respect to the intended area of operation of the vessel. We acknowledge that the current references to compulsory carriage of lifejackets on vessels under 100 gross tons, prescribes the use of 70 Newton "working type" lifejackets.

SAMSA is well aware that on some vessels, in the smaller vessel categories under 100 tons, storage space may be a problem.

On the basis that the level 100 lifejacket has 30 Newton more buoyancy, and is therefore a reasonable substitute for the working type lifejacket on smaller vessels under 100 Gross Tons, where space is a problem and the nature of the operation does not absolutely dictate the use of the higher specification lifejackets.

Changes to the regulations are not immediately in the pipeline and in the interim SAMSA will monitor the situation and apply their minds to the problem when amending the regulations.

Remember

“THE BEST LIFEJACKET IS THE ONE YOU ARE WEARING”

The industry is therefore encouraged to explore this possibility as the suppliers will only stock those items demanded by the industry.

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