

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 03-10

3. DIRECTIVES AFFECTED. None.
4. BACKGROUND. IMO recently adopted amendments to SOLAS, the Life-Saving Appliances (LSA) Code, and the Revised Recommendation on Testing of Life-Saving Appliances (Res. MSC.81(70)) that impact approval and carriage of lifejackets and immersion suits on ships subject to SOLAS. These amendments include changes to donning and in-water performance testing of lifejackets and immersion suits, the addition of buddy line and lifting strap requirements, and new requirements for carriage of infant lifejackets. These amendments were formally accepted on 1 January 2010 for entry into force on 1 July 2010.
5. DISCUSSION. Effective 1 July 2010, the new SOLAS amendments require that:
 - a. lifejackets must be approved to the new test standards in IMO Res. MSC.200(80) and Res. MSC.207(81). These revised requirements include evaluation of donning and in-water performance as compared to a reference test device for adult, child, and infant lifejackets;
 - b. immersion suits must be approved to the new test standards in IMO Res. MSC.226(82), which includes oral inflation during donning for suits which include inflatable head support;
 - c. all new lifejackets and immersion suits must be fitted with a buddy line and lifting strap (IMO Res. MSC.207(81)); and
 - d. all SOLAS passenger ships must carry approved infant lifejackets. 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 is to be provided; and for passenger ships on voyages of 24 hours or greater, infant lifejackets are to be provided for each infant on board (IMO Res. MSC.201(81)).
6. IMPLEMENTATION.
 - a. The new SOLAS amendments require lifejackets and immersion suits placed on board SOLAS ships on or after 1 July 2010 to be approved to the new requirements. Existing equipment need not be replaced, provided that it remains in serviceable condition.
 - b. SOLAS amendments do not automatically change existing Coast Guard regulations, and may vary from requirements imposed by those regulations. Coast Guard anticipates the eventual issuance of specific new regulations to implement the recent SOLAS lifejacket and immersion suit amendments. Pending those new regulations, the Commandant has determined that a lifejacket or immersion suit meeting the standards and requirements contained in IMO Resolutions MSC.200(80), MSC.201(81), MSC.207(81), and MSC.226(82) is at least as effective as one that meets the requirements of 46 CFR, Subchapter Q. Therefore, such lifejackets and immersion suits have equivalent performance characteristics

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and are approved by the Commandant, for purposes of 46 CFR, Subchapter Q, pursuant to 46 CFR 159.005-7(c).

- c. The lifejackets to which the Commandant's 46 CFR 159.005-7(c) equivalency determination applies will be marked with approval number 160.155/200 or above. The immersion suits to which that equivalency determination applies will be marked with approval number 160.171/200 or above. Equipment for which Coast Guard approval numbers have been assigned is listed in the Approved Equipment Listing of Coast Guard's CGMIX database, available at <http://cgmix.uscg.mil/Equipment/Default.aspx>. Markings on devices approved by other Administrations for use on foreign-flag SOLAS ships may vary and could include "SOLAS 2010", "MSC.207(81)" or "MSC.200(80)."
 - d. Coast Guard approved lifejackets and immersion suits that do not meet the standards and requirements contained in IMO Resolutions MSC.200(80), MSC.201(81), MSC.207(81), and MSC.226(82) may continue to be used for all non-SOLAS applications.
7. **DISCLAIMER.** This guidance explains how lifejackets and immersion suits may comply with recent SOLAS amendments and be found equivalent to current Coast Guard regulatory requirements, pursuant to the Commandant's 46 CFR 159.005-7(c) equivalency determination. It therefore is intended to inform the public of the existence of that equivalency determination, but it is not a substitute for applicable legal requirements, nor is it in itself intended to, nor does it, regulate or impose legally-binding requirements on any party. Alternative approaches to complying with existing Coast Guard regulations remain available and may be discussed by contacting the Chief, Lifesaving and Fire Safety Division (CG-5214), who is responsible for implementing this guidance, at 202-372-1392.
 8. **CHANGES.** This NVIC will be posted on the internet at <http://www.uscg.mil/hq/cg5/nvic/>. Changes to the NVIC will be issued as necessary. Questions or suggestions for improvements to this NVIC should be submitted in writing to Commandant (CG-521).
 9. **ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.** Environmental considerations were examined in the development of this NVIC and have been determined to be not applicable.
 10. **FORMS AND REPORTS.** None



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