

# MARINE SAFETY AND SECURITY MANAGEMENT SYSTEM

## TIER I – POLICY

**Alternative to carrying immersion suits or anti-exposure suits as per Part 0.1, section 3.28(1) of the *Fishing Vessel Safety Regulations*.**

Effective Date	Date of Revision

# MARINE SAFETY AND SECURITY MANAGEMENT SYSTEM

## TIER I – Policy

### Alternative to carrying immersion suits or anti-exposure suits as per Part 0.1, section 3.28(1) of the *Fishing Vessel Safety Regulations*.

#### 1 Policy Objective

- 1.1 To improve safety on small fishing vessels with no deck or deck structure engaged in close to shore operations by allowing people to wear personal flotation devices (PFD) and have available a device with means for communication/location instead of carrying an immersion suit or anti-exposure work suit.

#### 2 Policy Statement

- 2.1 Instead of carrying immersion or anti-exposure work suits as required by item 5(b)(ii) of subsection 3.28(1) of the *Fishing Vessel Safety Regulations* (FVSR), people on fishing vessels that are less than 9m in length that have no deck or deck structure, may wear an approved personal flotation device (PFD).
- 2.2 People wearing a PFD must also have available for use a manually activated EPIRB, PLB or waterproof portable very high frequency (VHF) handheld radio capable of Digital Selective Calling (DSC) that meets the requirements of the *Navigation Safety Regulations, 2020* (NSR, 2020).
- 2.3 The PFD and EPIRB, PLB or waterproof portable VHF handheld radio capable of DSC that substitutes for the carriage of immersion suit or anti-exposure suit must be worn aboard the vessel when it is underway. Each person is required to wear a PFD and be equipped with a distress communication device.
- 2.4 PFDs that are used instead of immersion or anti-exposure suits must meet the requirements of section 3.2 (3) of the FVSR, and
  - be of a type approved as per the *Small Vessel Regulations*, **or**
  - be a Level 70 buoyancy aid certified by UL LLC as per the standard UL 12402-5 and UL-12402-9 according to Tier I Policy - [Acceptance of Level 70 Buoyancy Aids Certified to UL12402-5 as Personal Flotation Devices](#).

### **3 Scope**

3.1 This policy applies to fishing vessels that:

- are less than 9 metres in length;
- have no deck or deck structure; and
- are operating under the *Fishing Vessel Safety Regulations* on sheltered waters voyages or near coastal voyages, Class 2, restricted to 2 nautical miles from shore.

### **4 Authority**

4.1 Section 3.21 of the *Fishing Vessel Safety Regulations* made under the *Canada Shipping Act, 2001*.

4.2 This policy falls under the overall authority of the Director General of Marine Safety and Security.

4.3 The Marine Safety and Security Executive Committee has approved this policy for general use.

### **5 Responsibility**

5.1 The Executive Director of Domestic Vessel Regulatory Oversight will make sure this policy is developed, approved, and maintained.

5.2 The Regional Directors of Marine Safety and Security are responsible for implementing this policy.

5.3 Please email questions or comments to [marinesafety-securitemaritime@tc.gc.ca](mailto:marinesafety-securitemaritime@tc.gc.ca), or mail to:

Manager, Small and Fishing Vessels, Design and Equipment Standards  
(AMSDS)

Transport Canada

Place de Ville, Tower C

330 Sparks St

Ottawa, ON K1A 0N5

### **6 Related Documents**

6.1 *Fishing Vessel Safety Regulations*

6.2 *Navigation Safety Regulations, 2020*

6.3 TP 14475, *Canadian Life Saving Appliance Standard*

- 6.4 TP 14612, *Procedures for Approval of Life-Saving Appliances and Fire Safety Systems, Equipment and Products*

## **7 Background**

- 7.1 The *Fishing Vessel Safety Regulations* require that, if the water is less than 15°C, certain fishing vessels carry an immersion suit, or an anti-exposure work suit of an appropriate size for each person on board.
- 7.2 There is often a lack of space on small fishing vessels to store and access these suits. Lack of space may also make the donning of stowed suits difficult in emergency situations which may arise quickly, especially on a small vessel. In such situations, a PFD, which is already donned and equipped with means of communication and/or means of locating the wearer, offers improved safety over the potential safety of an immersion suit or anti-exposure suit which, in an emergency, may not be able to be employed.
- 7.3 Level 70 PFDs provide increased options for design, contributing to greater comfort and versatility while providing users a level of safety equivalent to that of PFDs certified to CAN/CGSB 65.11-M88 and CAN/CGSB 65.15-M88.
- 7.4 This policy supports the [Memorandum of understanding for approval of personal lifesaving appliances \(canada.ca\)](#).

## **8 Definitions**

- 8.1 EPIRB means an emergency position-indicating radio beacon.
- 8.2 PLB means a personal locator beacon operating in the 406 MHz band.

## **9 Date of Application**

- 9.1 This policy comes into effect on October 3, 2023.

## **10 Date for Review**

- 10.1 This policy will be reviewed 5 years after it is published.

## **11 RDIMS Reference**

- 11.1 The English version of this document is saved in RDIMS under reference number #19017349. The applied naming convention is PUBLICATION – TP 13585 – POLICY - Alternative to carrying immersion suits or anti-exposure suits as per Part 0.1, section 3.28(1) of the *Fishing Vessel Safety Regulations*.
- 11.2 La version française du présent document est dans le SGDDI et porte le numéro de référence #19592128 La règle d'affectation des noms est PUBLICATION – TP 13585 – POLITIQUE – Solution de rechange au transport

de combinaisons d'immersion ou de protection contre les éléments, conformément à la partie 0.1, paragraphe 3.28(1) *du Règlement sur la sécurité des bâtiments de pêche*.

11.3 This is the first approved and finalized revision of the English version of this document.

## **12 Keywords**

- Lifejacket
- Personal Flotation Device
- UL 12402-4
- CGSB 65.7
- Immersion Suit
- Anti-Exposure Suit