



SHIP SAFETY BULLETIN

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Subject: WEARING AND USING FLOTATION DEVICES
Small Non-pleasure Craft & Small Commercial Fishing Vessels

This bulletin replaces Ship Safety Bulletin No. 02/2011

Scope:

This Ship Safety Bulletin replaces Bulletin 02/2011 and contains important information for all non-pleasure vessels under the *Small Vessel Regulations* and the *Small Fishing Vessel Inspection Regulations* that are:

- Under 15 gross tonnage
- Operating within a Near Coastal Voyage, Class 2 as defined in the *Vessel Certificates Regulations*

It also provides options for Personal Flotation Devices (PFDs) you may carry in lieu of lifejackets on the following vessels operating in Sheltered Waters or within 2 nautical miles from shore in a lake or river.

- Passenger vessels of 8.5 metres or less in length
- Work boats of 12 metres or less in length
- Fishing vessels of 12.2 meters or less in length

Purpose:

This bulletin replaces Bulletin 2011/02 with new information. It:

- Requires that if PFDs are used instead of carrying approved¹ lifejackets, then they must be worn at all times when the vessel is operating.
- Limits the scope to vessels operating within Near Coastal Voyages, Class 2.

¹ In this bulletin, “approved” refers to devices approved by Transport Canada, Canadian Coast Guard, or Department of Fisheries and Oceans.

Keywords:

1. Lifejacket
2. PFD
3. Inflatable

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- Accepts approved waist length bomber style PFDs that are designed to provide thermal protection.
- Accepts most approved¹ PFDs in lieu of lifejackets on certain small vessels operating in Sheltered Waters or within 2 nautical miles from shore on a lake or river, provided that the conditions set out in this Bulletin are met.
- Discourages the use of inflatable flotation devices requiring two steps to put on, on passenger vessels.

Background:

The law requires all small non-pleasure vessels and small commercial fishing vessels to carry approved¹ lifejackets. Ship Safety Bulletin 02/2011, *Wearing and Using Flotation Devices Small Non-pleasure Craft & Small Commercial Fishing Vessels*, informed vessel operators that PFDs meeting specific conditions could now be used in lieu of lifejackets. It also set a deadline of June 30, 2012 for operators to either carry properly fitting and approved¹ lifejackets or PFDs that meet the prescribed conditions for each person onboard the vessel.

Conditions

A. On commercial or fishing vessels that are less than 15 gross tonnage and operating within Near Coastal Voyages, Class 2, PFDs must:

1. Be approved by Transport Canada or Canadian Coast Guard.
2. Be worn at all times when in an open boat, or when on deck on a vessel of closed construction, and underway.
3. Be of a highly visible colour (yellow, orange or red). For inflatable devices, this refers to the colour of the internal bladder, not the external cover.
4. Provide a minimum of 100 N of buoyancy unless it is an approved suit, coat or jacket designed to provide thermal protection as well as buoyancy.
5. Be fitted with retro-reflective tape and a whistle.
6. Provide self-righting capability unless it is an approved suit, coat or jacket designed to provide thermal protection.

B. On passenger vessels 8.5m or less in length, work boats 12m or less in length, fishing vessels 12.2 m or less in length operating on Sheltered Waters or within 2 nautical miles from shore on a lake or river, PFDs must:

1. Be approved¹ and meet all of the above conditions except items 4 and 6.

Important:

- Inflatable devices – PFDs or lifejackets – are **not permitted** for use by persons less than 16 years of age.
- PFDs such as belt packs or pouch PFDs are **not recommended** on passenger vessels.
- If using inflatable PFDs on passenger vessels then PFDs that inflate automatically are recommended.

Important Notes:

1. Small commercial vessels and small fishing vessels must carry lifejackets as required under the *Small Vessel Regulations* and the *Small Fishing Vessel Inspection Regulations* or PFDs as described in this Bulletin.
2. Vessels may carry approved¹ PFDs that do not meet the conditions of this policy as *additional equipment*. However in such cases the vessels must also carry approved¹ lifejackets for everyone on board.
3. Transport Canada strongly encourages owners to choose their flotation devices carefully. The Annex below contains important information about what to consider when choosing flotation devices.

ANNEX

Things to Consider When Choosing a Flotation Device

Lifejacket or PFD?

When choosing a flotation device, there are four important things to consider: approval, fit, performance, and wearability.

- Approval indicates that the device meets the criteria for the standard shown on the label.
- Proper fit is needed for optimum performance. Every centimetre that the device slides up brings your mouth a centimetre closer to the water.
- Performance refers to how well the device will keep your mouth out of the water. See *Buoyancy* on the next page for more information.
- Wearability, or how suitable the device is for regular wear, is important. Remember, you don't always choose to go in the water. Putting a device on when you get on the vessel and keeping it on at all times, except when below deck, will give extra protection if you fall overboard unexpectedly.

Overviews:

Performance and Wearability of Traditional (inherently buoyant) Flotation Devices

Recent changes in technology and standards mean that the differences between lifejackets and PFDs are not as pronounced when comparing inflatable and hybrid devices, meaning you can now have devices that provide both high performance and wearability. Do your research or have a knowledgeable salesperson explain the features of the devices you are considering.

Lifejackets are designed for wear when abandoning the vessel in an emergency situation. They generally provide more buoyancy than a PFD and give the wearer more freeboard (distance between the mouth and the water) by inclining the person onto their back to keep their face, mouth and nose, further from the water. Lifejackets are designed to help turn and keep the

wearer face up even when unconscious. Higher buoyancy lifejackets provide the most support in turbulent waters and extended periods of time. There are no approved lifejackets that provide thermal protection on the market at this time.

Personal Flotation Devices (PFDs) are designed for comfort and constant wear. As a result, most models provide less buoyancy than lifejackets and will not roll wearers face up or incline them onto their backs. The wearer must be able to move arms and legs to avoid rolling forward. When worn, PFDs provide the wearer with a high degree of safety if he or she falls overboard. The buoyancy the device provides makes it easier to stay afloat, and if the water is cold (less than 15 °C), it gives the body a chance to recover from cold shock—gasping and shallow rapid breathing that occurs the first few minutes following immersion—and provides protection against the rapid failure in swimming ability that follows. Some PFDs have added thermal protection to delay the onset of hypothermia if in the water for an extended period of time.

Buoyancy is what supports you in the water. More buoyancy generally means greater freeboard, stability and self-righting capability. It also reduces the risk of being submerged by waves in rough conditions. Make sure that your device will support you by trying it out while wearing the heaviest load likely to be worn by people on board (clothing, boots, tools). The following descriptions of the performance provided by devices with different levels of buoyancy will help you understand their limitations or advantages.

- **Inherently Buoyant PFDs (Buoyancy 69 N [newtons] or 15.5 lbs [pounds])**

These PFDs are generally more comfortable to wear, but because they have limited, if any, ability to turn the wearer face up and have less freeboard, they are not suitable if you will be in the water so long that you lose consciousness due to hypothermia or fatigue, or if you are in rough waters. They are also not suitable for people who are unable to help themselves, as movements of arms and feet may be needed to keep the body in a position with the mouth out of the water. They are intended for use when a means of rescue is close at hand.

- **Small Vessel and Class 2 Lifejackets (Buoyancy 100 N or 22.5 lbs)**

These lifejackets have more flotation than a PFD. However, they may not be suitable in rough water. Tests in swim suits show that they have some ability (when fully inflated, if inflatable) to turn you to a position with your mouth and nose clear of the water (more freeboard). As with inherently buoyant PFDs, they may not be suitable for people who are unable to help themselves, as movements of arms and feet may be needed to keep the body in a position with the mouth out of the water.

- **SOLAS and Class 1 Lifejackets (Buoyancy 150 N or 34 lbs)**

These lifejackets are intended for use even offshore and in rough water. The same tests in swim suits show that they will (when fully inflated, if inflatable) turn the wearer so that the mouth and nose are clear of the water, even if the person is unconscious. They should keep a fully clothed user in this position without the person having to make special efforts.

Thermal Protection - If you operate in water colder than 15°C, consider wearing a device that offers thermal protection to reduce the risks of cold shock and hypothermia.

Note: Operators of passenger-carrying vessels must have procedures or equipment to address the risk of cold shock and hypothermia. This could be achieved with lifejackets that offer thermal protection.