

Marine Information Bulletin

Carriage and compliance of coastal liferafts – equivalent solution and exemption

Background

As of 1 June 2009, vessels in Queensland must be equipped with the safety equipment required under the *National Standard for Commercial Vessels Part C Section 7A (NSCV C7A) – Safety Equipment*. Existing ships have until 1 June 2011 to comply.

Inflatable coastal liferafts complying with NSCV C7A have not been readily available until recently.

An equivalent solution has been approved allowing commercial ships required to carry liferafts to be equipped with appropriate inflatable coastal liferafts that comply with the pre-2008 *Uniform Shipping Laws Code (USL Code)*.

How the equivalent solution applies

An equivalent solution has been approved for certain ships to allow the continued use of USL Code compliant liferafts until the liferafts are declared unserviceable. USL Code compliant liferafts used under this equivalent solution must carry NSCV compliant emergency packs that include EPIRBs.

Liferafts that have a capacity greater than 12 persons are taken to be compliant with the requirements of the NSCV C7A emergency pack, if the items allocated per person in the standard (ISO 9650:1) meet the maximum number of persons allowable in the liferaft.

A copy of the notice of equivalent solution must be kept with the ship's documents required under legislation.

The details of the local equivalent solution and the approval date will be noted on the ship's certificate of registration.

A copy of the notification of equivalent solution is attached.

Exemption from carrying a coastal liferaft

Previously, class 2C and class 3C ships less than 15 metres that satisfied the flotation requirements of the USL Code, or if the ship was less than six metres and had a positive flotation statement, were not required to carry coastal liferafts.

An exemption was approved for ships mentioned above that were operating in Australia, or for which a certificate of compliance for design or an intent to build was received, before 1 October 2010 to continue to operate without carrying a coastal liferaft.

The exemption will be reviewed before 1 October 2015 with consideration to be given to single national jurisdiction requirements current at that time.

A copy of the notification of exemption is attached.

A question and answer sheet related to the equivalent solution and the exemption is attached.

Information

For further information about this Marine Information Bulletin, email msqmail@msq.qld.gov.au.

Other Marine Information Bulletins covering various topics relating to the safe operation of vessels can be obtained from Maritime Safety Queensland's website www.msq.qld.gov.au and from the following Maritime Safety Queensland regional offices:

Airlie Beach	(07) 4946 2200
Bundaberg	(07) 4131 8500
Cairns	(07) 4052 7400
Gladstone	(07) 4973 1200
Hervey Bay	(07) 4194 9600
Mackay	(07) 4944 3700
Mooloolaba	(07) 5477 8425
Pinkenba	(07) 3860 3500
Southport	(07) 5539 7300
Townsville	(07) 4726 3400

Questions and answers

Liferaft compliance

Q. My ship is equipped with a USL Code compliant liferaft as NSCV compliant liferafts were not available at the time I equipped the ship. Must I now spend money on an NSCV complaint liferaft?

A. An equivalent solution has been provided to allow continued operation of a ship fitted with an appropriate inflatable coastal liferaft complying with the requirements of the pre-2008 USL Code.

Q. Will I have to update to an NSCV compliant liferaft at some time in the future?

A. The equivalent solution will apply until the USL Code compliant liferaft is declared unserviceable by your safety equipment service agency.

Q. Are there any conditions to the equivalent solution?

A. Three pertinent conditions apply:

- Under the conditions of equivalent solution the USL Code compliant liferaft must be re-equipped with an emergency pack complying with requirements of NSCV C7A annex D3 before 1 June 2012. An EPIRB must be included as part of the emergency pack.
- The ship shall in all other respects comply with the safety equipment requirements of NSCV C7A.
- A copy of this notice of equivalent solution shall be kept with the ship's documents required under section 133 of TOMSR.

Q. How do I take advantage of the equivalent solution?

A. Ship operators must apply to the regional harbour master or regional director for approval to operate under this equivalent solution.

Q. What information should I include in my application?

A. Applications should contain ship details and a copy of the liferaft's most recent certificate of service. Applicants will not be asked to present a safety case to support their application.

Note: after 1 June 2012 liferaft certificates of service must show that an emergency pack complying with NSCV C7A, including an EPIRB, is carried.

Q. Do I have any further obligations?

A. A copy of the notification of equivalent solution must be kept with the ship's documents. Details

of the equivalent solution must be endorsed on the ship's registration certificate for the solution to apply.

Q. My liferaft/s has an EPIRB as part of the emergency pack. Must the parent ship also carry an EPIRB?

A. If operating in an area where the carriage of an EPIRB onboard is a requirement then the parent ship must also carry an EPIRB.

A copy of the notification of equivalent solution is attached.

Carriage of liferafts

Q. Under the USL Code my ship was exempt from carrying a coastal liferaft as the ship has flotation according to appendix N of section 10 of the USL Code (or a positive flotation statement). What has changed?

A. Under NSCV C7A class 2C and class 3C ships less than 15 metres must be equipped with a coastal liferaft for 100 % compliance unless fitted with level flotation in accordance with NSCV C6B.

Q. So the standards have changed in relation to flotation requirements. What's the difference?

A. Ships with flotation compliant with the requirements of USL Code section 10 appendix N may not comply with the level flotation requirements of NSCV C6B.

Ships built to comply with the advice provided in the Guidance on positive flotation for commercial ships under 6 metres: 1 May 2007 in the *Accredited Persons Guidance Manual* should comply with the level flotation requirements of NSCV C6B. However, to remove any ambiguity ships for which a positive flotation statement has been issued in the approved form are included in the exemption.

Q. It seems my ship may not comply with the new level flotation requirements. Do I now have to carry coastal liferafts?

A. An exemption has been provided to allow ships that previously had appendix N flotation or positive flotation statements and did not carry coastal liferafts to continue operation without carrying liferafts.

Q. What ships qualify for the exemption?

A. The exemption applies to ships of class 2C and class 3C less than 15 metres built to the USL Code and fitted with internal buoyancy complying with appendix N of section 10 of the

USL Code and for ships of class 2C and class 3C less than 6 metres for which a positive flotation statement has been issued. The ship must have been operating in Australia, or is a ship for which a certificate of compliance for design or an intent to build was received, before 1 October 2010.

Q. How do I take advantage of the exemption?

A. There is no need to apply for approval to operate under the exemption. However, a ship operating under the exemption must carry a copy of the notification of exemption with those documents required under legislation.

Q. How long does the exemption last for?

A. The exemption will be reviewed before the 1 October 2015. Stakeholders will be advised of any changes at that time.
A copy of the notification of exemption is attached.

NOTIFICATION OF EQUIVALENT SOLUTION
Transport Operations (Marine Safety) Regulation 2004

Maritime Safety Queensland
Brisbane, 2 March 2011

I, Werner Bundschuh, Director, Safety Standards Branch, Maritime Safety Queensland, pursuant to sections 26A and 26B of the *Transport Operations (Marine Safety) Regulation 2004* grant approval for the ship detailed in the schedule to operate under a local equivalent solution to the provisions of the *National Standard for Commercial Vessels, Part C, Section 7A Safety Equipment*.

Relevant required outcomes

NSCV C 7A, 2.1 Type and quantity – that a vessel must be provided with safety equipment of type and quantity appropriate to control to acceptable levels the risks associated with the operation of the vessel, taking into account its area of operation and the number of persons on board as well as other risk factors that might be relevant.

NSCV C 7A, 2.18 Means to sustain and prolong life of evacuees – survival equipment must be arranged and equipped to protect health and safety of evacuees in the event that rescue is delayed.

Relevant deemed-to-satisfy requirements

NSCV C 7A, tables 2, 3 and 4, have requirements for class B and C ships to carry inflatable coastal liferafts.

NSCV C 7A, edition 3, annex D, clause D2, has requirements for the design and construction of coastal liferafts:

D2 Design and construction

An inflatable coastal liferaft shall comply with:

- a) the requirements for a Group A liferaft specified in ISO 9650-1; and
- b) the requirements specified in this Annex.

Where there is any conflict in requirements between the ISO 9650-1 specifications and this Annex, the requirements in this Annex shall apply.

Approved local equivalent solution, including any associated limitations, such as restrictions on operations

- a) The ship is fitted with an appropriate inflatable coastal liferaft complying with the requirements of the pre-2008 USL code.
- b) The equivalent solution is current until the liferaft is declared unserviceable.
- c) A USL code compliant liferaft must be re-equipped with an emergency pack complying with requirements of NSCV C 7A Annex D3 before 1 June 2012. An EPIRB shall be included as part of the emergency pack.
- d) The ship shall in all other respects comply with the safety equipment requirements of NSCV C 7A.
- e) A copy of this notice of equivalent solution shall be kept with the ship's documents required under Section 134 of TOMSR.

SCHEDULE

<Ship name, registration number>

Werner Bundschuh
Director, Safety Standards Branch
Maritime Safety Queensland

NOTIFICATION OF EXEMPTION
Transport Operations (Marine Safety) Act 1994
Transport Operations (Marine Safety) Regulation 2004

Maritime Safety Agency of Queensland
Brisbane, 21 October 2010

I, Patrick Quirk, General Manager, Maritime Safety Queensland, pursuant to section 18A of the *Transport Operations (Marine Safety) Act 1994* exempt certain ships from those requirements of Part 2, Division 3, sections 13(1) & (2) and Division 4, section 23 (1) and (2) of the *Transport Operations (Marine Safety) Regulation 2004* that require those ships to be equipped with a coastal life raft for 100% compliance as prescribed in the National Standard for Commercial Vessels part C, section 7, subsection A, subject to the following conditions;

CONDITIONS

- The ship is a class 2C or class 3C ship less than 15 metres in length and is fitted with internal buoyancy complying with appendix N of section 10 of the Uniform Shipping Laws code.
- The ship is a class 2C or class 3C ship less than 6 metres in length and has a statement in the approved form that the ship has positive flotation.
- The ship was operating in Australia, or is a ship for which a Certificate of Compliance for Design or intent to build was received before 1 October 2010.
- That this exemption be reviewed before 1 October 2015 with consideration of single national jurisdiction requirements current at that time.

PATRICK QUIRK
General Manager
Maritime Safety Queensland