

Submission: **SR32-07**

Offshore Special Regulations

ISAF Lifteraft - Appendix Interpretations

A submission from the Chairman of Offshore Committee
(on behalf of the working party)

Proposal:

The secretariat to work with Alan Green in incorporating the interpretations within the appendix.

Current Position:

Interpretation Number 5 - Liftrafts

Questions and Answers

1 ISAF OSR Appendix A Part II, 1.1.1 (20 days afloat).

Q Is a test mandatory to prove compliance with 1.1.1 (a liferaft must be capable of withstanding exposure for 20 days afloat, etc.)?

A A test for this requirement is not currently specified. To assure compliance we recommend the test in the LSA Code, Testing and Evaluation of Life-Saving Appliances, Part I, 5.5 Mooring out tests, modified from 30 to 20 days.

2 ISAF OSR Appendix A Part II, 1.4 (Drop Height).

Q Must the liferaft be packed in its valise or container for this test?

A Yes. The test in ISAF OSR Appendix A Part II, 2.1 refers.

3 ISAF OSR Appendix A Part II, 1.9 (Ventilation).

Q Can a canopy entrance be left partly open (eg at the top, away from seawater) as the required means of ventilation?

A No. 1.9 specifically requires ventilation to be present when the entrances are closed.

4 ISAF OSR Appendix A Part II, 1.41 (Gas Cylinder).

Q Some types of cylinder are supplied with markings indicating service pressure but not test pressure. Is the service pressure sufficient marking? Why is the test pressure needed?

A A cylinder should be marked with the test pressure. This provides a reference for checking that the bursting disc or safety device required by ISAF OSR Appendix A Part II, 1.42, is a correct match.

5 ISAF OSR Appendix A Part II, 2.4.3 (Flooding Resistance Test).

Q Why is there a reference at the end of this paragraph stating “*see 1.3”?

A The reference carries an asterisk (*). In ISAF OSR Appendix A Part II, 2.4.1 the word “persons* ” also carries an asterisk: it is to this asterisk that the italic reference refers. ISAF OSR Appendix A Part II, 1.3 defines the meaning of “persons”.

6 ISAF OSR Appendix A Part II, 5 (Grab Bag).

Q Is it the responsibility of the yacht owner or of the liferaft manufacturer to supply a Grab Bag?

A ISAF OSR Appendix A Part II, 5 states that a Grab Bag should be used to augment the ISAF liferaft. Recommended Grab Bag specifications and contents are listed in ISAF OSR 4.21.3. It would be useful for liferaft manufacturers to note this information in their literature and/or product labelling. There is no reason why a liferaft supplier should not also offer to supply a Grab Bag with the ISAF-recommended contents but the Grab Bag is deliberately specified as a separate item from the liferaft to enable an owner to make up a Grab Bag if he/she so wishes.

7 ISAF OSR Appendix A Part II, 1.42 (Bursting Disc).

Q We have been unable to obtain ISO 6718 and have been referred instead to ISO 4126-4 which describes “pilot operated safety pressure relief devices” that are different to those we wish to use. Is it acceptable for us to install a corrosion proof safety disc which we are fully satisfied will burst at or below the cylinder test pressure?

A If your preferred device is, by comparison with that in ISO 6718 *“an equivalent safety device to prevent bursting of the cylinder (and will) operate prior to the internal cylinder pressure reaching the hydraulic test pressure of the cylinder”* then your preferred device will meet the ISAF specification.

8 ISAF OSR Appendix A Part II, 4.10 (Torches Sealed For Life).

Q Instead of sealed-for-life torches is it acceptable to comply with SOLAS LSA Code Chapter IV regulation 4.1.5: *“One waterproof electric torch suitable for Morse signalling together with one spare set of batteries and one spare bulb in a waterproof container”*, or two such torches?

A No. Whilst the ISAF approach in general is to respect the SOLAS standards as these are often more strict than those of ISAF, in this case the SOLAS definition is less prescriptive. The ISAF requirement is *“2 waterproof sealed-for-life torches. Each torch shall be sealed in clearly marked packaging, which prevents the operation of the torch until the packaging is removed. Torch packaging shall be clearly marked with the expiry date of the torch. Each torch shall be capable of providing a*

continuous light of 6 hours.” One of the aims of the ISAF liferaft specification is to encourage improvement in liferaft equipment and to make it easier and more suitable for its intended purpose. The reason for moving to sealed, disposable units is to obviate the task of fiddling with batteries and bulbs with cold, numbed hands in a heavy seaway when everything is soaking wet and small parts such as torch bulbs are easily lost.

Alan Green

Chairman ISAF Special Regulations sub committee.

24th June 2005

Reason:

As Above