Offshore Special Regulations – 4.20

Liferaft Servicing

A submission from Janet Grosvenor, Chairman of the Liferaft Working Party

Purpose or Objective

To review and clarify the wording of the liferaft servicing requirements and delete the concept of 'inspection'.

Proposal

4.20 Liferafts MoMu0,1,2
4.20.5 Liferaft Servicing MoMu0,1,2

a) Liferafts based on type are to be serviced at a service station approved by the manufacturer at the following maximum intervals:

   i) SOLAS liferafts annually.

   ii) ISO 9650 canister packed liferafts no less frequently than every 3 years.

   iii) ISO 9650 valise packed liferafts no less frequently than 3 years except that hired valise liferafts shall be serviced annually.

   iv) ISAF liferafts annually

   v) ORC liferafts annually

b) Servicing certificates (original or a copy) shall be kept on board.

Current Position

4.20 Liferafts MoMu0,1,2
4.20.5 Liferaft Servicing and Inspection MoMu0,1,2

IMPORTANT NOTICE Recent evidence has shown that packaged liferafts are vulnerable to serious damage when dropped (e.g. from a boat onto a marina pontoon) or when subjected to the weight of a crew member or heavy object (e.g. an anchor). Damage can be caused internally by the weight of the heavy steel CO2 bottle abrading or splitting neighbouring layers of buoyancy tube material. ISAF has instituted an investigation into this effect and as an interim measure requires that every valise-packed liferaft shall have an annual certificate of servicing. A liferaft should be taken for servicing if there is any sign of damage or deterioration (including on the underside of the pack). Persons in charge should insist on great care in handling liferafts and apply the rules NO STEP and DO NOT DROP UNLESS LAUNCHING INTO THE SEA.
a) Certificates or copies, of servicing and/or inspection shall be kept on board the yacht. Every SOLAS liferaft and every valise-packed liferaft shall have a valid annual certificate of new or serviced status from the manufacturer or his approved service station.

b) A liferaft built to OSR Appendix A part I ("ORC") packed in a rigid container or canister shall either be serviced annually or may, when the manufacturer so specifies, be inspected annually (not necessarily unpacked) provided the yacht has on board written confirmation from the manufacturer’s approved service station stating that the inspection was satisfactory.

c) A liferaft built to OSR Appendix A part II ("ISAF") packed in a rigid container or canister shall either be serviced annually or may, when the manufacturer so specifies, have its first service no longer than 3 years after commissioning and its second service no longer than 2 years after the first. Subsequent services shall be at intervals of not more than 12 months.

d) A liferaft built to ISO 9650 Part 1 Type Group A, packed in a rigid container or canister shall be serviced in accordance with the manufacturer’s instructions but NOT less frequently than every three years.

e) A liferaft built to ISO 9650 Part 1 Type Group A packed in a valise shall be inspected annually by an approved manufacturer’s agent and serviced in accordance with the manufacturer’s instructions but NOT less frequently than every three years.

f) Liferaft servicing certificates shall state the specification that the liferaft was built to. See OSR 4.20.2

Reasoning

SOLAS liferafts have to be serviced every year as required by SOLAS regulations. A liferaft ceases to be a ‘SOLAS Liferaft’ if it is not serviced annually.

ISO 9650 canister liferafts shall be serviced no less frequently than every 3 years as manufacturer guidelines remain weak.

For ISO 9650 valise liferafts no substantial supportive evidence has been produced to warrant the increased service requirements over canister liferafts. However all accept that they are more prone to damage, hence we have retained the annual servicing for hired liferafts (where the owner may not have been fully responsible for the care of the liferaft since it’s last service). ISAF should continue to push the ISO committee to look more closely into this issue.

The ISAF liferafts shall now be serviced annually. This is a deliberate change from the 3 year, 2 year, 1 year progressive requirement as these rafts are not built to the same material specifications as the newer ISO liferafts. It will also encourage users to upgrade from the ISAF standard to the newer ISO standards (which have a formal approval process). In addition we are not aware of any manufacturer still producing an ISAF liferaft and therefore most of the rafts in circulation are likely to already be in the situation of requiring an annual service.

ORC liferafts are older rafts and annual servicing is warranted.