## Lifejackets

A submission from Ken Kershaw

### Proposal

<table>
<thead>
<tr>
<th>5.01</th>
<th>Lifejacket</th>
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<tbody>
<tr>
<td>5.01.1</td>
<td>Each crew member shall have a lifejacket as follows:-</td>
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<td><strong>a)</strong></td>
<td>In accordance with ISO 12402 – 3 (Level 150) or equivalent,</td>
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<td><strong>(i)</strong></td>
<td>In accordance with ISO 12402 – 3 (Level 150) or equivalent, including EN 396</td>
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<td><strong>(ii)</strong></td>
<td>Lifejackets manufactured after 1 January 2011 shall be in accordance with ISO 12402–3 (Level 150) and any additional national, government, prescriptions thereto and shall be fitted with:-</td>
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<tr>
<td>•</td>
<td>an emergency light in accordance with either ISO 12402-8 or SOLAS LSA code 2.2.3.</td>
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<td>•</td>
<td>a spayhood in accordance with ISO 12402-8.</td>
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<td>•</td>
<td>a full deck safety harness in accordance with ISO 12401 (ISO 1095) including a crotch or thigh strap (holding down device) as specified in ISO 12401 (ISO 1095).</td>
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### Notes:

ISO 12402 requires Level 150 lifejackets to be fitted with a mandatory whistle and retro-reflective material. Also, when fitted with a safety harness, ISO 12402 requires that this shall be the full safety harness in accordance with ISO 12401. Any equivalent lifejacket shall have equal requirements.

**Note:** persons of larger than average build are generally more buoyant than those of average build and so do not require a lifejacket with greater levels of flotation. Wearing a Level 275 lifejacket may hamper entry into liferafts.

| **b)** | fitted with either a crotch strap(s) / thigh straps or a full safety harness in accordance with ISO 12401, |
| **c)** | Crotch straps or thigh straps together with related fittings |

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and fixtures should be strong enough to lift the wearer from the water.

c) fitted with a lifejacket light in accordance with SOLAS LSA code 2.2.3 (white, >0.75 candelas, >8 hours), **
d) if inflatable have a compressed gas inflation system, **
e) if inflatable, regularly checked for gas retention, **
f) compatible with the wearer's safety harness, **
g) clearly marked with the yacht's or wearer's name, **
h) fitted with a splashguard / sprayhood in accordance with ISO 12402 – 8, MoMu0
i) Fitted with a PLB unit (as with other types of EPIRB, should be properly registered with the appropriate authority) MoMu0

It is strongly recommended that a lifejacket has:
j) a splashguard / sprayhood See ISO 12402 – 8, MoMu1,2,3,4
k) a PLB unit (as with other types of EPIRB, should be properly registered with the appropriate authority) MoMu1,2,3,4
l) if of a gas inflatable type, a spare cylinder and if appropriate a spare activation head MoMu1,2,3,4

Current Position

See above

Reason

There is a common misunderstanding that a lifejacket compliant with the old EN 396 standard is “equivalent” to one compliant with the newer ISO 12402-3 standard. This is not so. The main differences between the two standards are that:

- EN 396 permits the use of materials which maybe inadequate in a marine environment, ISO 12402 includes a much higher material requirement.
- EN 396, unlike ISO 12402, does not address the addition of either crotch straps, hold down devices or deck harness attachment features in a meaningful and safe manner.

The latter of these is thought to be one of the reasons for the increased debate concerning crotch straps undertaken at recent OSR meetings.

Accepting that there are many lifejackets compliant with EN 396 within offshore fleets the submission is to formally legalise these but at the same time introduce a requirement that lifejackets manufacture after 1 January 2011 be compliant with the ISO 12402-3 standard and fitted with a sprayhood, light and ISO 12401 deck harness attachments.
Notes:

(i) Under the EU PPE Directive all new lifejackets sold in the EU shall be to ISO 12402, EN 396 is no longer an EU legally accepted standard.

(ii) The US Coastguards have given notice that it will soon recognise ISO 12402 but with additional federal requirements.

(iii) Some Australian state authorities already specify ISO 12402 as equivalent to their own state requirements.

(iv) The availability of ISO 12402 lifejackets is now common.

(v) At sometime in the future it would be sensible to delete from the OSR the use of EN 396 lifejackets and lifejacket features. This would clarify the OSR requirements at the same time as improving safety.