

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 1-92, CHANGE 1

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Subj: CH-1 to NVIC 1-92, Implementation of Lifesaving Equipment Requirements for Commercial Fishing Vessels

Ref: (a) Commercial Fishing Industry Vessel Regulations, 56 FR 40364 and 46 CFR part 28

1. **PURPOSE.** This Circular updates Navigation and Vessel Inspection Circular (NVIC) No. 1-92, by clarifying regulations and policy concerning inflatable liferafts for commercial fishing vessels.
2. **DISCUSSION.**
 - a. Except for a liferaft installed on board a commercial fishing industry vessel before September 15, 1991, each liferaft used to meet the regulations for survival craft on commercial fishing vessels, must be a Coast Guard approved liferaft. This is the requirement established in reference (a), sections 28.105(b) and 28.120(d).
 - b. Unapproved liferafts, installed before September 15, 1991, may continue to be used under certain circumstances explained in NVIC 1-92, enclosure (1).
 - c. Confusion still exists, however, because of the wording of the requirements for inflatable liferafts in Tables 28.120(a) and 28.120(c). In these tables certain vessels are required to carry an "inflatable liferaft with SOLAS A Pack!" or "inflatable liferaft with SOLAS B Pack." Some people have concluded that any inflatable liferaft would be acceptable, as long as the survival equipment pack was to the SOLAS A or SOLAS B standard. This is incorrect. The only liferafts that should be marked in any way with the term "SOLAS," are those that meet all of the SOLAS standards, not just the equipment pack contents. Coast Guard approved liferafts meeting the SOLAS standards carry approval numbers in the 160.151/... series.
 - d. One of the SOLAS requirements not related to equipment packs, is that the capacity of a "SOLAS" liferaft must be at least six persons. Other Coast Guard approved liferafts are required to have a minimum capacity of four persons, and this has been the generally accepted minimum capacity for the U.S. liferaft industry. The unavailability of four person SOLAS liferafts has caused confusion and dissatisfaction for owners of smaller vessels that carry crews of four or fewer persons. Six-person liferafts typically cost 10% more than four-person liferafts and also weigh about 10% more. These cost and weight differences can be significant for smaller vessels.

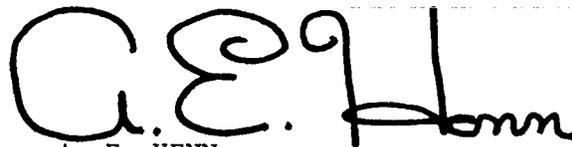
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- e. Approval and equipment pack markings on four-person liferafts have been inconsistent. Some approved four-person liferafts have been marked with 160.151/... series approval numbers and/or "SOLAS A Pack" or "SOLAS B Pack" markings. These incorrect markings are to be changed by liferaft servicing facilities whenever they are found. Four person liferafts should only be marked "Ocean Service," "Limited Service," or "Coastal Service." In some cases the marking may be "Ocean Service (A)" or "Limited Service (B)" as an indication that the equipment pack is essentially equivalent to a "SOLAS A Pack" or "SOLAS B Pack."
 - f. On May 5, 1992, the Coast Guard's Commercial Fishing Industry Vessel Advisory Committee unanimously adopted a resolution which urged the Coast Guard to interpret the liferaft requirements for fishing vessels with crews of four or fewer persons, in such a way that approved four-person liferafts could be used. The Coast Guard agreed with the resolution, and will make future regulatory modifications to clarify the intent of the regulations. In the meantime, this Circular establishes the policy that will be followed for the inflatable liferaft requirements.
3. IMPLEMENTATION. The following policies will be observed in the interpretation of the inflatable liferaft requirements in 46 CFR Tables 28.120(a) and 28.120(c):
- a. Table 28.120(a) or 28.120(c) requires "inflatable liferaft with SOLAS A pack":
 - (1) For a liferaft installed on the vessel on or after September 15, 1991, a Coast Guard approved SOLAS liferaft with "SOLAS A Pack." These liferafts carry approval numbers in the 160.151/... series. If the vessel carries a crew of four persons or less, a Coast Guard approved four-person "Ocean Service" liferaft will also be acceptable. These liferafts carry approval numbers in the 160.051/... series.
 - (2) For a liferaft installed on the vessel before September 15, 1991, any one of the following:
 - (a) A Coast Guard approved SOLAS liferaft with "SOLAS A Pack." These liferafts carry approval numbers in the 160.151/... series.
 - (b) A Coast Guard approved "Ocean Service" liferaft. These liferafts carry approval numbers in the 160.051/... series.
 - (c) An unapproved liferaft which meets the standards in NVIC 1-92, enclosure (1), paragraph 1, including "A Pack" equipment as described in paragraph 5 of the enclosure. These liferafts should not indicate "SOLAS A Pack" unless they were approved to the SOLAS standards by the maritime safety administration of another country.
 - b. Table 28.120(a) or 28.120(c) requires "inflatable liferaft with SOLAS B pack":
 - (1) For a liferaft installed on the vessel on or after September 15, 1991, a Coast Guard approved SOLAS liferaft with "SOLAS A Pack" or "SOLAS B Pack." These liferafts carry approval numbers in the 160.151/... series. If the vessel carries a crew of four persons or less, a Coast Guard approved fourperson "Ocean Service" or "Limited Service" liferaft will also be acceptable. These liferafts carry approval numbers in the 160.051/... series.

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- (2) For a liferaft installed on the vessel before September 15, 1991, any one of the following:
 - (a) A Coast Guard approved SOLAS liferaft with "SOLAS A Pack" or "SOLAS B Pack." These liferafts carry approval numbers in the 160.151/... series.
 - (b) A Coast Guard approved "Ocean Service" or "Limited Service" liferaft. These liferafts carry approval numbers in the 160.051/... series.
 - (c) An unapproved liferaft which meets the standards in NVIC 1-92, enclosure (1), paragraph 1, including "A Pack" or "B Pack" equipment as described in paragraph 5 of the enclosure. These liferafts should not indicate "SOLAS A Pack" or "SOLAS B Pack" unless they were approved to the SOLAS standards by the maritime safety Administration of another country.

- c. Table 28.120(a) or 28.120(c) requires "inflatable liferaft":
 - (1) For a liferaft installed on the vessel on or after September 15, 1991, any Coast Guard approved liferaft with approval numbers in either the 160.151/... or 160.051/... series. These may be "SOLAS A Pack," "SOLAS B Pack," "Ocean Service," "Limited Service," or "Coastal Service" liferafts.
 - (2) For a liferaft installed on the vessel before September 15, 1991, any one of the following:
 - (a) Any Coast Guard approved liferaft with approval numbers in either the 160.151/... or 160.051/... series. These may be "SOLAS A Pack," "SOLAS B Pack," "Ocean Service," "Limited Service," or "Coastal Service" liferafts.
 - (b) An unapproved liferaft which meets the standards in NVIC 1-92, enclosure (1), paragraph 1, including "A Pack," "B Pack," or "Coastal Pack" equipment as described in paragraph 5 of the enclosure. These liferafts should not indicate "SOLAS A Pack" or " B Pack" unless they were approved to the SOLAS standards by the maritime safety administration of another country.



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