

St. Kitts & Nevis International Ship Registry

*The Special Care Registry, because owners, their ships
and seafarers are deserving of special care.*



www.StKittsNevisRegistry.net

West Wing, York House
48-50 Western Road
Romford, RM1 3LP
United Kingdom
Tel: +44 (0) 1708 380400
Fax: +44 (0) 1708 380401
Email: mail@StKittsNevisRegistry.net

CIRCULAR LETTER TO CLASSIFICATION SOCIETIES & SURVEYORS TO THIS ADMINISTRATION

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CARRIAGE OF IMMERSION SUITS

Interpretation of and Requirements for Amendments to SOLAS that entered into force on 1st July 2006

With Resolution MSC. 152(78), the International Maritime Organisation made amendments to the International Convention for the Safety of Life at Sea (SOLAS), 1974. These amendments entered into force on 1 July 2006 and apply from the first safety equipment survey on or after 1st July 2006. In view of the interpretations possible within these amendments, we state herein our Administration's considered interpretation of them as applicable to St. Kitts & Nevis ships.

1. The above stated amendments, paragraph 3 of Regulation 32, Chapter III of SOLAS 1974, (as amended), states that an immersion suit must be provided for every person on board cargo ships.
2. A ship other than a bulk carrier, as defined in Regulation 1, Chapter IX of SOLAS 1974, (as amended) (see below), which is constantly engaged on voyages in warm climates, may be exempted from the said requirement. Having considered the IMO Guidelines for assessment of thermal protection contained in Circular Letter MSC/Circ. 1046, we have decided to define the following as warm climate sea areas for the scope of exempting ships from this regulation:
 - I. The sector of the globe between latitude 30 degrees North and 30 degrees South.
 - II. The part of the Mediterranean Sea South of latitude of 36 degrees.
 - III. The sea area within 20 nautical miles coasts of the African Continent which are not included in I and II above.
 - IV. The whole of the Persian Gulf, including inland waterways to latitude 31 degrees North.

"Bulk carrier" means a ship which is constructed generally with single deck, top-side tanks and hopper side tanks in cargo spaces, and is intended primarily to carry dry cargo in bulk, and includes such types as ore carriers and combination carriers.

3. Workstation is any place of the ship where the crew is occupied performing its normal duties except watch-keeping duties. Remotely located workstations are those located more than 100 metres, measured horizontally, from the place where the immersion suits are stowed.

4. Watch Station is any place of the ship where the crew performs its normal watch-keeping duties. Remotely located watch stations are those located more than 50 metres, measured horizontally, from the place where the immersion suites are stowed.
5. The monthly inspection of immersion suits required by regulation 20.7/Ch III/SOLAS 1974, as amended, must be carried out in accordance with the Guidelines contained in IMO Circular Letter MSC/Circ. 1047, which is attached.
6. A periodic testing of the immersion suits, in accordance with the Guidelines contained in IMO Circular Letter MSC/Circ. 1114 (copy attached), must be carried at intervals not exceeding three years. Immersion suits over three years of age must be tested by the next safety equipment survey.
7. A ship shall continue to carry the number of lifejackets required by regulation 7.2/Ch III/SOLAS 1974, as amended, even if its immersion suits are classified as lifejackets.

Ship Owners, Managers & Operators are not required to apply for the Exemption mentioned at (2) above, which may be taken in to account by Recognised Organisations & authorised Surveyors of Ships when carrying out surveys and issuing certification.

Yours truly,



Nigel E Smith
International Registrar of Shipping and Seamen