



Technical Circular

No.: 37/2021

Date: 16th July 2021

Subject: Republic of Marshall Islands Marine Safety Advisory No. 09-21 Reg. Defective or Improperly maintained Immersion Suits.

1. The Maritime Administration of Republic of Marshall Islands (RMI) has issued Safety Advisory No. 09-21 informing that there have been multiple instances of defective or improperly maintained immersion suits on RMI-flagged vessels.
2. One of these instances resulted in a preventable United States (US) port State control detention, where 29 of 32 immersion suits were unserviceable due to unsealed seams. These suits were only five years old.
3. In another instance, the damage to the zipper closures on multiple immersion suits was apparently the direct result of the crew's efforts to maintain them. Their application of petroleum jelly was intended to lubricate the zipper closures. Instead, it appears that the product caused the material to breakdown and resulted in the inability to use the zippers.
4. In order to prevent future instances of defective or improperly maintained immersion suits, Owners, Operators and Masters are advised as follows;
 - a. Ensure all immersion suits (including extras, if aboard) are properly fitting, well-maintained and ready for use in an emergency.
 - b. Regularly inspect all immersion suits in accordance with the manufacturer's instructions, including use of the correct zipper lubricant.
 - c. The periodic immersion suit inspection and testing is included in the vessels Safety Management System.
 - d. Any necessary repairs should be done by an approved service provider following the manufacturer's recommendations.
5. Administration has advised that "Spot checking" and not inspecting all immersions suits thoroughly is not acceptable and requires that **all** immersion suits to be inspected during annual surveys.
6. Flag State inspectors will also be inspecting **all** immersion suits during the annual safety inspections.

7. Ship owners/ operators and masters are advised to be guided by above and ensure compliance.

Enclosure:

1. Republic of Marshall Islands Marine Safety Advisory No. 09-21.

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Republic of the Marshall Islands

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MARINE SAFETY ADVISORY No. 09-21

To: Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

Subject: IMMERSION SUITS FOUND UNSERVICABLE

Date: 7 July 2021

This Marine Safety Advisory (MSA) is being promulgated to reiterate the importance of properly inspecting and maintaining all immersion suits on Republic of the Marshall Islands (RMI) flagged vessels. It supersedes MSA No. 18-19.

BACKGROUND

In 2019, the RMI Maritime Administrator (the “Administrator”) issued MSA No. 18-19, *Immersion Suit Deficiencies*. This MSA focused on the importance of following the manufacturer’s instructions for maintaining immersion suits, including use of the correct zipper lubricant. Since then, there have been multiple instances of defective or improperly maintained immersion suits on RMI-flagged vessels, one of which resulted in a preventable United States (US) port State control detention where “29 of 32 immersion suits were unserviceable due to unsealed seams.” In this case, there were three identifiable failure points.

1. The Recognized Organization (RO) completed the vessel’s annual surveys less than six months earlier with no mention of any problems with the immersion suits;
2. A flag State safety inspection was completed three months earlier with no mention of any problems with the immersion suits; and
3. Immediately before the inspection, the Master signed the Critical Items Checklist ([MSD 340](#)) which certified that “All immersion suits visually inspected both internally and externally for tears, cracks, and deterioration. Zippers fully operational, not deteriorated, and open and close without binding.”

This ship was subsequently detained by the US Coast Guard after finding 29 out of 32 immersion suits were not fit for use. These suits were only five years old.

On a second occasion during a flag State inspection, an inspector found 38 out of 39 immersion suits not fit for use. In this case the immersion suits were also only five years old. The manufacturers of these immersion suits were “Dongtai City Jianghai Lifesaving & Firefighting Equipment Limited Company” and “DongTai City Dong Fang Marine Fitting Co., Ltd.,” respectively.

This MSA is evaluated annually by the Administrator and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.



Photographs of the two aforementioned cases. Left - premature failure of zipper sealant (glue). Right - seam failed after pulling the zipper all the way up and then down. In addition to these cases, the Administrator continues to find immersion suits in unserviceable condition during Quality Control Boardings and during Annual Safety Inspections.

RECOMMENDED ACTION

In order to prevent future instances of defective or improperly maintained immersion suits, owners, operators, Masters, officers, and crew members must regularly inspect all immersion suits in accordance with their safety management system and also thoroughly inspect all immersion suits prior to calling US ports in accordance with the Critical Items Checklist ([MSD 340](#)). ROs acting on behalf of the Administrator should inspect all immersion suits during annual surveys. Flag State inspectors will also be inspecting all immersion suits during the annual safety inspections. It has become clear that “spot checking” and not inspecting all immersions suits thoroughly is not acceptable and could put a seafarer’s life in jeopardy in the event of an emergency.