

**DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD**

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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 6-82

Subj: Servicing and Inspection of Inflatable Liferafts Utilizing Voluntary Third Party Inspection Organizations

Refs: (a) 46 CFR 160.051-6
(b) 46 CFR 159.010

1. **PURPOSE.** This Circular explains that inflatable liferaft servicing facilities may voluntarily use third party inspection organizations as an alternative to USCG marine inspection now required by reference (a) during inflatable liferaft servicing.
2. **BACKGROUND.** Programmatic changes developing over the past several years, and the changes in the Federal budget for 1982 and beyond, will necessitate a reorganization of the Coast Guard's manpower and its other resources. The details explained here will be of interest to vessel operators and raft manufacturers faced with a reduction of Coast Guard inspection activities in various ports. One of the immediate difficulties that this change presents will be complying with reference (a) for the inspection of inflatable liferafts and their servicing facilities because of unavailability or delay in assignment of USCG marine inspectors. Use of third party inspection organizations to perform this function can resolve this problem.
3. **DISCUSSION.**
 - a. The provisions contained in reference (b) permit the USCG to accept third party inspection organizations to conduct equipment inspection on behalf of the Coast Guard. Such organizations must have the capability and personnel for inspecting and reporting on conditions about inflatable liferaft servicing facilities and comply with reference (b). The possibilities permitted by this third party concept would include, among others, recognized classification societies, inspection services of foreign governments, or independent testing laboratories and inspection organizations.
 - b. In order to assure these organizations are available to perform this task in ports where they are needed, the vessel operators will have to indicate their needs to the manufacturers of their rafts and to the servicing facilities so that the provisions of reference (b) can be applied. The raft manufacturers will nominate organizations that can witness the annual servicing of their rafts for specific geographical areas to the Commandant(G-MVI-3) for evaluation and acceptance under reference (b). Servicing facilities should work with the raft manufacturers in making requests to use third party inspection organizations.
 - c. The inspection organization will perform these tasks in lieu of the USCG marine inspector. Each raft serviced will be witnessed and the servicing facility's efficiency and ability to carry out its duties satisfactorily will be observed.

- d. The USCG is considering requiring the use of third party organizations for witnessing raft servicing, but at the present time the use of such organizations in lieu of USCG marine inspectors will be accepted on a voluntary basis on the part of raft manufacturers and servicing facilities.

4. ACTION.

- a. Raft manufacturers and raft servicing facilities should request authorization to use third party inspection organizations to perform the witnessing required by reference (a) of liferafts being serviced where USCG marine inspectors are unavailable or where there is significant delay in their availability.
- b. All OCMI's are urged to inform vessel operators and raft servicing facilities within their zones that third party organizations can be used in lieu of USCG marine inspectors as required by reference (a).



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