

EBA Position Statement Personal Flotation Devices

Executive Summary

The European Boating Association¹ (EBA) recommends that, as a minimum, everyone on board a recreational craft has an appropriate Personal Flotation Device (PFD). Anyone on board a recreational craft should wear an appropriate PFD if they:

- are told to by the person in charge; or
- want to wear one.

Person in charge and/or PFD owners are recommended to familiarise themselves with the information supplied by the manufacturer, particularly instructions on how to check the lifejacket before each use.

The EBA believes that selection of the appropriate PFD when Recreational Boating² is critical.

If it is to perform as intended, a PFD needs to be suitable for the activity.

The advice of national boating bodies should be sought by regulatory authorities before legislating to ensure that any regulation concerning the mandatory use of PFDs is proportionate, pragmatic and effective.

Background

The EBA General Assembly has regularly discussed where the line should be drawn between the need for regulation and the freedom of boating particularly on safety issues where governments might introduce unsuitable regulation without consultation. One such issue has been the mandatory wearing of lifejackets.

In discussion, there is universal support for the proposal that the person in charge must take responsibility for themselves and their crew and that education is preferable to ill-considered regulation. Furthermore, the EBA believes that it has a role in influencing regulators to ensure that regulation is proportionate, pragmatic and effective and above all any need is supported by a sound risk assessment and objective evidence.

Classes of PFD

PFD are available in a wide variety of materials, styles and designs, however, they can all be divided into one of two main classes:

- those which provide face up in-water support to the user regardless of physical conditions (lifejackets); and
- those which require the user to make swimming and other postural movements to position the user with the face out of the water (buoyancy aids).

It is important to understand that no PFD guarantees rescue; they are always to be seen as an aid to reduce the risk of drowning.

Performance criteria

Within these two classes there are a number of levels of support, types of buoyancy, activation methods for inflatable devices, and auxiliary items (such harnesses, spray hoods, crotch straps and location aids), all of which will affect the performance of a PFD and therefore the user's probability of survival.

PFDs that do not require intervention (automatically operating PFDs) are suited to activities where persons are likely to enter the water unexpectedly; whereas PFDs requiring intervention (e.g. manually inflated PFDs) are only suitable for use if the user believes there will be sufficient time to produce full buoyancy, or help is close at hand. In every circumstance, the user should ensure that the operation of the PFD is suited to the specific application.

The PFD Standard (ISO 12402) specifies different performance levels to satisfy the needs of different users. The performance levels (in Newtons) are as follows:

- Level 275 Lifejackets intended primarily for offshore use. They are also of value to those who are using clothing which traps air and which will adversely affect the self-righting capacity of the lifejacket. They are designed to ensure that the user is floating with their mouth and nose clear of the surface at an angle and with sufficient freeboard to limit mouth immersions in waves.
- Level 150 Lifejackets intended for general offshore and rough weather use where a high standard of performance is required. As tested, they will turn an unconscious person in swimming attire into a safe position. Additionally they should maintain a fully clothed person in a safe position with no subsequent action by the user.
- Level 100 Lifejackets intended for those who may have to wait for rescue, but are likely to do so in sheltered and calm water. Whilst these lifejackets may be less bulky than other types of lifejacket, they should not be used in rough conditions or when there is wave splash.
- Buoyancy aids (level 50) are intended for use by those who are competent swimmers and who are near to shore, or who have help and a means of rescue close at hand. These devices

have minimal bulk and cost, but they are of limited use in disturbed water and cannot be expected to keep the user safe for a long period of time. They do not have sufficient buoyancy to protect people who are unable to help themselves. They require active participation by the user.

In addition there are PFDs which provide the general levels of flotation above but which have been adapted for a special purpose such as those for use in white water. These are set out in Part 6 of ISO 12402 and in particular provides a specification for offshore sailing lifejackets that provide an enhanced level of protection for those sailing offshore. This meets the requirements of World Sailing Offshore Special Regulations.

Selection and use

Before purchasing a PFD, the user should evaluate the risks to which he or she is likely to be exposed. Certain activities present a higher risk of sudden immersion due to falls overboard, capsizing and the like. Certain users, e.g. dinghy sailors, may be better served by devices of less than 100N of buoyancy, if help is close at hand.

It is essential that the best available advice is sought to select PFDs that conform to the circumstances in which they will be used. Similarly, those framing legislation regarding the use of these PFDs must consider carefully which PFD and performance level and/or intended application is most appropriate for the foreseeable conditions of use and the expected consequences in such emergencies.

The advice of national boating bodies should be sought by regulatory authorities before legislating to ensure that any regulation concerning the mandatory use of PFDs is proportionate, pragmatic and effective.

The EBA Position on Personal Flotation Devices

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Notes

¹ **European Boating Association**

The European Boating Association, Europäischer Sportschiffahrtsverband, Association Européenne de Navigation de Plaisance, is a civil, not for profit association of recreational boat users'

organisations, founded in 1982, and established as an Unincorporated Association whose members agree to be governed by its constitution. The EBA member organisations (see <http://www.eba.eu.com/participantorgs>) collectively represent in excess of 1.5 million recreational boaters and an estimated 20 million active participants.

The purpose of the EBA is to represent the mutually agreed common interests of national recreational boat users' organisations in Europe, and in particular to:

- Coordinate and develop recreational boating activities in Europe by exchange of information, and action on matters of mutually agreed common interest.
- Promote the practice of all activities on the water, promoting and exchanging knowledge and experience between recreational boat users' organisations in Europe.
- Represent EBA members in environmental, regulatory and technical matters affecting their safe enjoyment of recreational boating activities on the water.
- Encourage the safe, unhampered and environmentally sustainable use of recreational boats on all European waters.
- Provide the link between the European institutions and EBA Members for consultation and information on proposed EU directives and regulations.
- Provide the link between other relevant global and regional organisations and EBA Members.

² Recreational Boating

The EBA is the European representative organisation for recreational boating.

There is no general consensus as to the terminology used to describe the types of boat used for "recreational boating", with expressions such as "recreational craft" or "private pleasure craft" being used to describe only subsets of such types of boat for the purposes of specific pieces of EU legislation. "Recreational boating" also includes the use of beach- or slipway-launched water toys such as wind surfers, sailing dinghies, inflatable boats and personal watercraft.

Boats used for "recreational boating" may be small or large, propelled by sail and/or power and used on inland waters and/or at sea. "Recreational boating" at sea can range from close-to-shore to trans-oceanic.

"Recreational boating" also includes the use of such boats privately owned and operated by the owner, hired (on bareboat or skippered charter) or used to provide a service (such as training or race participation).

In the context of this document, therefore, the EBA considers "recreational boating" to mean using boats that are designed or adapted for sport or leisure, whether propelled by sail and/or power, for the purposes for which they are designed or adapted.