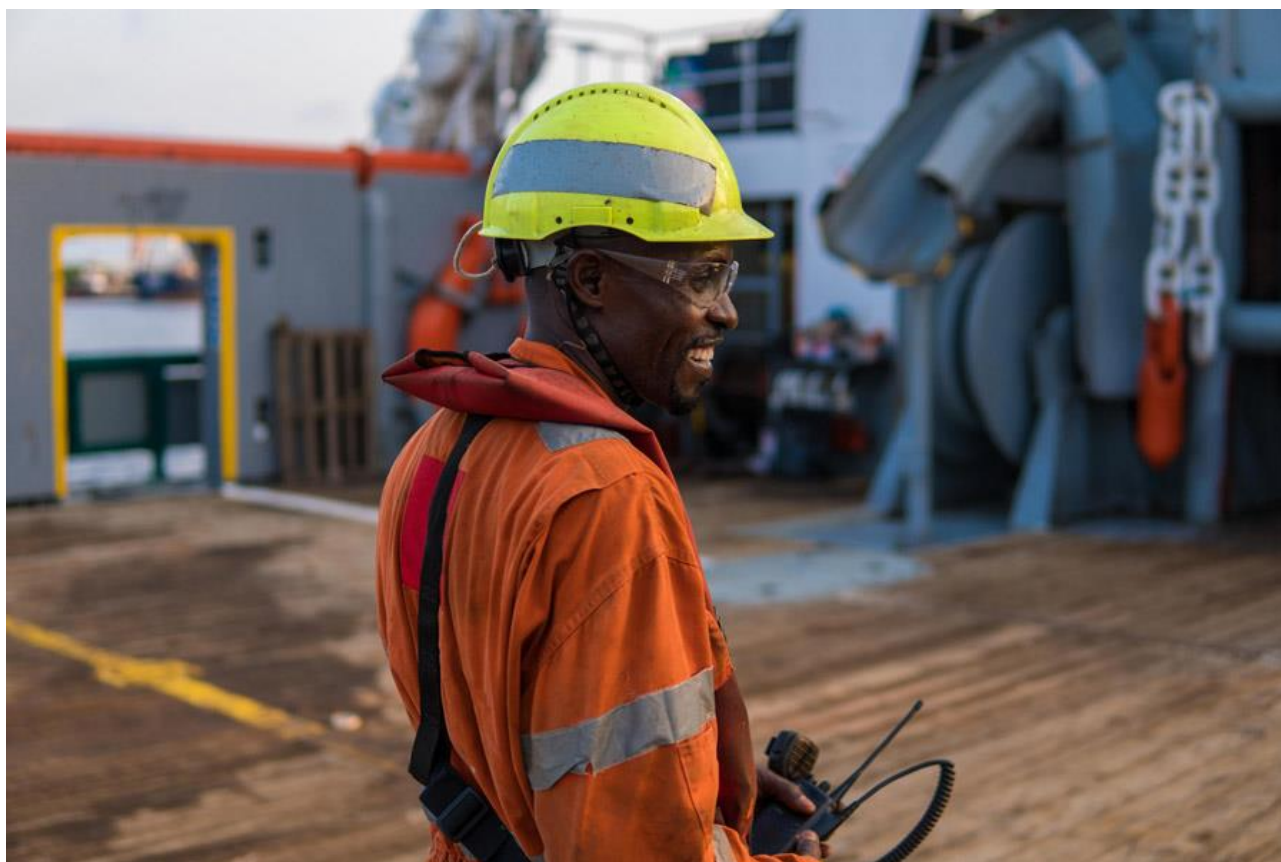


PERSONAL PROTECTIVE EQUIPMENT (PPE): THE FINAL SAFETY BARRIER

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INTRODUCTION

Ships are large, heavy duty sea transport machines. They are known to be hazardous places in which to both work and live. In such an environment, the provision and habitual use of Personal Protective Equipment (PPE) is essential. Regrettably, the feedback from P&I and other surveyors is that PPE is often not being used properly or consistently by ships' crews. These situations generate an increased risk scenario together with shipowner exposure to the high costs of medical care, evacuation/repatriation, legal defence and injury/death compensation. This MM Risk Bulletin is therefore focused on the subject of PPE and its pro-active utilisation as a critical loss prevention tool.

BACKGROUND

Shipowners have long been required under flag state law to provide a safe place of work for their crew members. This includes the provision of approved PPE, appropriate training and the active encouragement of its use. This obligation is now reinforced by the provisions of the [Maritime Labour Convention \(MLC\)](#), Reg. 4.3 – Health and safety protection and accident prevention. This includes the requirement that:

“Each [Flag State] Member shall ensure that seafarers on ships that fly its flag are provided with occupational health protection and live, work and train on board ship in a safe and hygienic environment.”

WHAT TYPES OF PPE ARE REQUIRED?

Comprehensive advice on the different types of PPE and their use is available at Chapter 8 of the UK MCA’s [Code of Safe Working Practices for Seamen \(COSWP\)](#). The carriage of a copy of the COSWP manual is mandatory only on board UK flag vessels. However, COSWP is so highly regarded and well known, it has become the global marine industry standard in terms of seafarer occupational health.

A quick reference table from COSWP which outlines the various types of PPE and their application is reproduced as below. COSWP also provides detailed instructions and coloured diagrams on PPE use and maintenance.

Type	Examples
Head protection	Safety helmets, bump caps, hair protection
Hearing protection	Earmuffs, earplugs
Face and eye protection	Goggles and spectacles, facial shields
Respiratory protective equipment	Dust masks, respirators, breathing apparatus

Type	Examples
Hand and foot protection	Gloves, safety boots and shoes
Body protection	Safety suits, safety belts, harnesses, aprons, high-visibility clothing
Protection against drowning	Lif jackets, buoyancy aids and lifebuoys
Protection against hypothermia	Immersion suits and anti-exposure suits

Table courtesy of [Code of Safe Working Practices for Seamen \(COSWP\)](#) : Chapter 8.4.3 – page 101

OBLIGATIONS OF THE SHIPOWNER

The law of the flag state will dictate the precise requirements for the provision and use of PPE on board each vessel. As indicated above, these provisions will be required to adhere to the principles set out in the MLC at Standard 4.3. A helpful explanation of the seafarer occupational health regulations enacted in the UK is provided by the UK MCA's Merchant Shipping Notice [MSN 1870 \(M+E\)](#). This Notice should be considered as a useful guideline for all ships of all flags.

Under UK law, shipowners must provide the requisite PPE at no cost to the employee mariner. Many other flag states have adopted similar requirements. This obligation will usually also be supported by seafarer employment contract terms.

Other shipowner PPE obligations provided by [MSN 1870\(M+E\)](#) are as follows:

Reg. 8(4) A competent person should inspect each item of protective equipment at regular intervals and in all cases before and after use. All inspections should be recorded. Equipment should always be properly stowed in a safe place after use.

Reg. 9 Defective or ineffective protective equipment provides no defence. It is therefore essential that the correct items of equipment are selected and that they are properly maintained at all times. The manufacturer's instructions should be kept safe with the relevant apparatus and, if necessary, referred to

before use and when maintenance is carried out. PPE should be kept clean and should be disinfected as and when necessary for health reasons.

MM recommends to their members that these PPE inspection and maintenance requirements should be considered for adoption and incorporation into their fleet Safety Management System (SMS) manual procedures.

OBLIGATIONS OF THE SEAFARER

There is an old saying that, "You can take a horse to water but you cannot make him drink." Seafarers can behave in a similar manner when it comes to the use of PPE. By way of analogy, they have been provided with the requisite PPE but they do not want to use it because they do not see it as being necessary. Situations like this require assertive leadership by example in combination with positive re-education.

The leadership goal must be to create and maintain a safety culture environment. In such cultures, the seafarer who does not 'suit up' with appropriate PPE before starting work is seen as a danger to himself and the team members around him. Seafarers who do not respond positively must be formally warned that failure to use PPE may be considered as grounds for dismissal. They should also be reminded that if they are injured while working, any wilful failure to use the PPEs provided could negate their entitlement to compensation.

CONCLUSION AND TAKEAWAY

PPEs represent the final link in a pre-planned chain of shipboard safe work practices that should provide multiple barriers to seafarer injury and death. As such, PPEs provide the ultimate barrier that should only engage if all other safe work practice barriers have failed. If they do engage, PPEs can mean the sudden difference between life and death. The proper use of PPEs must therefore be promoted and enforced on board as being an essential and habitual part of 'suited up' for the job. MM would like to invite their members to download and review the publications referred to in this Risk Bulletin. Members should then consider the content of their SMS manual procedures regarding ship operations in relation to the use and maintenance of PPEs. The ISM Code encourages the on-going updating and improvement of SMS manuals. MM is therefore hopeful that this Risk Bulletin will promote both discussion and upgrading of their members' SMS manuals by improving shipboard procedures regarding the daily and proper use of PPEs.