



SHIP SAFETY BULLETIN

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Subject: Wearing and using flotation devices on small non-pleasure craft

This bulletin replaces [Ship Safety Bulletin No. 06/2012](#)

Scope

This bulletin applies to all non-pleasure vessels under the *Small Vessel Regulations* that are operating within a near coastal voyage, class 2 as defined in the *Vessel Safety Certificates Regulations*.

Purpose

This bulletin replaces [SSB 06/2012](#) with new information. It:

- removes the references to allowances for fishing vessels because they are now part of the *Fishing Vessel Safety Regulations*.
- adds information about the terms used in the new Canada/United States harmonized standard to describe equipment that Transport Canada regulations call “personal flotation devices”.

The bulletin also gives options for personal flotation devices (PFDs) you may carry instead of lifejackets on vessels operating in sheltered waters or within 2 nautical miles from shore on a lake or river that are:

- passenger vessels 8.5 metres long or less;
- workboats 12 metres long or less.

Keywords:

1. Lifejacket
2. PFD
3. Inflatable

Questions concerning this Bulletin should be addressed to:

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Background

The law requires all small non-pleasure vessels carry approved¹ lifejackets. [Ship Safety Bulletin 02/2011](#) (replaced by [SSB 06/2012](#)) told vessel operators they could use PFDs that meet specific conditions instead of lifejackets. It also set a deadline of June 30, 2012 for operators to carry either a properly fitted and approved lifejacket or wear a PFD that meet the conditions given in the bulletin for each person onboard the vessel.

Conditions

On commercial vessels that are less than 15 gross tonnage and operating within near coastal voyages, Class 2, PFDs must:

- be approved by Transport Canada or the Canadian Coast Guard
- always be worn when underway:
 - in an open boat
 - on deck, or
 - in the cockpit on a vessel of closed construction
- be a highly visible colour (yellow, orange or red)
 - for inflatable devices, this refers to the colour of the internal bladder, not the external cover
- provide at least 100 N of buoyancy and have turning capability unless it is an approved suit, coat or jacket designed to provide thermal protection and buoyancy
- be fitted with retro-reflective tape and a whistle

On passenger vessels 8.5m long or less and work boats 12m long or less, operating on sheltered waters or within 2 nautical miles from shore on a lake or river, PFDs must be approved and:

- be approved by Transport Canada or the Canadian Coast Guard
- always be worn when underway:
 - in an open boat
 - on deck, or
 - in the cockpit on a vessel of closed construction
- be a highly visible colour (yellow, orange or red)
 - for inflatable devices, this is the colour of the internal bladder, not the external cover

¹ In this bulletin, “approved” means devices approved by Transport Canada, Canadian Coast Guard, or Department of Fisheries and Oceans.

- have retro-reflective tape and a whistle

Important:

- Inflatable devices – PFDs or lifejackets – are not permitted for use by persons less than 16 years of age.
- PFDs such as belt packs or pouch PFDs are not recommended on passenger vessels.
- if using inflatable PFDs on passenger vessels, then we recommend PFDs that inflate automatically

Important information

- Small commercial vessels must carry lifejackets as required under the *Small Vessel Regulations* or PFDs as described in this bulletin.
- Vessels may carry approved PFDs that don't meet the conditions of this policy as **additional equipment**. The vessels must also carry approved lifejackets for everyone on board.
- We strongly encourage owners to choose their flotation devices carefully. The annex below has important information about choosing flotation devices.

Annex

Things to consider when choosing a flotation device

Consider 4 important things when choosing a flotation device:

1. **Approval:** Shows that the device meets the standard shown on the label.
2. **Fit:** A device needs to fit properly to work properly. Every centimetre that the device slides up brings your mouth a centimetre closer to the water.
3. **Performance:** How well the device keeps your mouth out of the water. See **buoyancy** on the next page for more information.
4. **Wearability:** How easy the device is to wear regularly. You don't always choose to go into the water. Putting a device on when you get on the vessel and always wearing it (except when below deck) gives extra protection if you fall overboard unexpectedly.

Performance and wearability of traditional (inherently buoyant) flotation devices

Recent changes in technology and standards make the differences between lifejackets and PFDs smaller when comparing inflatable and hybrid devices. This means there are now devices with both high performance and wearability.

In 2015, new UL standards were introduced in Canada and the United States that are based on the international ISO system of standards. The UL standards use the term “personal flotation device” for both lifejackets and what the Canadian regulations call PFDs. ISO uses the term “buoyancy

aid” for devices like what Canadian regulations call PFDs. Do research or have a knowledgeable salesperson explain the features of the devices you are considering.

Lifejackets are designed to wear when abandoning the vessel in an emergency. They are usually more buoyant than a PFD. They give the wearer more freeboard (distance between the mouth and the water) by inclining the person onto their back to keep their face, mouth and nose further from the water. Lifejackets are designed to help turn and keep the wearer face up even when unconscious. Higher buoyancy lifejackets give the most support in turbulent waters and for long periods of time. There are no approved lifejackets that provide thermal protection.

PFDs and buoyancy aids are designed for comfort and constant wear. This means most are less buoyant than lifejackets and won’t roll wearers face up or incline them onto their backs. The wearer must be able to move their arms and legs to avoid rolling forward.

When worn, PFDs give wearers a high level of safety if they fall overboard. The buoyancy of the device makes it easier to stay afloat. If the water is cold (less than 15 °C), it gives the body a chance to recover from cold shock (gasping and shallow rapid breathing during the first few minutes after immersion) and helps protect you as you rapidly lose the ability to swim. Some PFDs have added thermal protection to slow the start of hypothermia if in the water for a long time.

Buoyancy is what supports you in the water. More buoyancy usually means greater freeboard, stability and self-righting capability. It also reduces the risk of being submerged by waves in rough conditions. Make sure that your device will support you by trying it out while wearing the heaviest load likely to be worn by people on board (clothing, boots, tools). These descriptions of the performance of devices with different levels of buoyancy will help you understand their limitations and advantages:

- **Inherently buoyant PFDs and Transport Canada approved buoyancy aids (buoyancy 69 N [newtons] or 15.5 lbs [pounds])**

These PFDs are usually more comfortable to wear but they have limited or no ability to turn the wearer face up and have less freeboard. This makes them unsuitable if you’re in the water so long that you lose consciousness from hypothermia or fatigue, or if you’re in rough waters. They also aren’t suitable for people who can’t help themselves, because you may have to move your arms and feet to keep your mouth out of the water. They’re meant to be used when rescue is close.

- **Small vessel and class 2 lifejackets (buoyancy 100 N or 22.5 lbs)**

These lifejackets are more buoyant than a PFD. However, they may not be suitable in rough water. Tests in swimsuits show that they have some ability (when fully inflated, if inflatable) to turn you to a position with your mouth and nose clear of the water (more freeboard). Like inherently buoyant PFDs, they may be unsuitable for people who can’t help themselves because you may need to move your arms and feet to keep your mouth out of the water.

- **SOLAS and class 1 lifejackets (buoyancy 150 N or 34 lbs)**

These lifejackets are meant to be used even offshore and in rough water. Tests in swimsuits show that they'll (when fully inflated, if inflatable) turn the wearer so that their mouth and nose are clear of the water, even if the person is unconscious. They should keep a fully clothed user in this position without the person having to make special efforts.

Thermal protection – If you operate in water colder than 15°C, consider wearing a device that offers thermal protection to reduce the risks of cold shock and hypothermia.

Inflatable lifejackets and PFDs – While the performance of inflatable lifejackets and PFDs is equivalent to inherently buoyant flotation devices in mild temperatures, as temperatures approach freezing, they may inflate more slowly and provide less buoyancy, therefore the use of inflatable devices is not recommended in freezing temperatures. Before using an inflatable device in cold temperatures, you should ensure that it is suitable for such use and is only used as directed on the label and in manufacturer's instructions.

Note: Operators of passenger-carrying vessels must have procedures or equipment to address the risk of cold shock and hypothermia (for example, lifejackets with thermal protection).