



The Sub Aqua Association,  
Space Solutions Business Centre  
Sefton Lane  
Maghull, Liverpool  
L31 8BX

7th December 2025

Miss Penelope Schofield ,  
Senior Coroner for West Sussex, Brighton and Hove,  
Parkside Chart Way,  
Horsham,  
RH12 1XH.

**Inquest into the death of Dominic Edward Arthur Hurley  
Regulation 28: REPORT TO PREVENT FUTURE DEATHS**

Dear Miss Schofield,

Thank you for your letter of 18th November 2025 together with the Regulation 28 report and for the copies of Mr Hurley's complete medical screening forms.

My reading of the information provided would suggest that the Immersion Pulmonary Oedema (IPO) was linked to the cause of death and that failure to identify that he had previously suffered an IPO is the concern you are seeking to address.

I note from Mr Hurley's medical questionnaires that IPO was not specifically listed as a condition requiring to be notified.

The SAA use the medical screening system managed by the UKDMC (United Kingdom Diving Medical Committee) (<https://www.ukdmc.org/>). I have checked my medical form archive and note that "immersion induced pulmonary oedema" was introduced in the May 2020 version of the declaration at question 17. The current version, May 2024, of the form has this at question 16.

The SAA require our members to complete the diving self-declaration form as follows:

1. On commencement of SCUBA diver training,
2. At the annual membership renewal, renewals due on the 1<sup>st</sup> March 2021 would be the first time the updated forms was used.
3. Prior to attending an SAA national course, which involves scuba diving
4. On change of their personal medical conditions.

Whilst the SAA have adopted the UKDMS system members are also likely to complete a medical screening form managed by the Undersea and Hyperbaric Medical Society ([UHMS Medical Screening Forms](#)) when diving on holiday. I have looked at the latest version of their form and this also includes "Immersion Pulmonary Edema" (American



spelling). The SAA have no direct involvement with this screen service.

I believe that the revision to the current dive medical screening forms now meet the change you are now seeking to make.

IPO in diving was discussed at length by the BDSG in 2019. The response to the feedback the SAA have incorporated the identification and treatment of IPO in:

- The initial training, the SAA One Star Diving syllabus and in the training manual for that course,
- The second level of training, the SAA Two Star Diving syllabus and in the training manual for that course,
- The SAA Oxygen Administration and Emergency Diver First Aid course.

Whilst the three changes already implemented in the SAA training programme reference will also be included in other syllabuses as they are reviewed.

The SAA have included articles about IPO in two newsletters to SAA membership:

- July 2017 – The SAA Decompression Officer, [REDACTED] flagged the issue with the membership and referenced an updated SAA Elementary Diver lecture to include this. The SAA Elementary Diver grade has since been replaced by the SAA One Star Diver grade.
- February 2019 – the NDO provided feedback from the January 2019 BDSG meeting. This covered prevention, identification and treatment.

I believe that the SAA has advised its membership and revised their training programme in such a manner as to have already implemented the changes required to mitigate the risk of IPO when diving, in so far as any risk can be mitigated. However, the SAA will ensure that the membership is reminded of the importance of accurately completing medical by emphasising the fact at renewal and with periodic reminders in their newsletter.

I am more than happy to provide copies of any of the documents I have mentioned if you would like to see them.

I have copied this response to:

- [REDACTED] (UKDMC Medical Referee) – SAA Medical Advisor,
- [REDACTED] – Chair of the BDSG (British Diver Safety Group).
- [REDACTED] – BSAC Safety and Development Manager

Yours sincerely,

[REDACTED]

SAA National Diving Officer