

**Consultation Comments – Work Boat Code 07.09.2015 to 05.10.2015**

	Date received	Code Section Reference	Summary of Comments	Response	Description of any changes made
Nick Quarmby Principal Marine Consultant Surveyor,	01/09/2015	15.5.1.1 15.5.1.3 15.4.1.1 15.4.1.3	<p>If this vessel has a fire in an engine room it fully complies with the Code as there is a separate independent fire pump available to fight this fire. The Code only prohibits placing a power driven fire pump in an engine room if this means there is no method of fighting a fire in that engine room – and this is not the case here.</p> <p>This principle is accepted for all catamaran vessels in my experience which have duplicated engine rooms and fire pumps, and without the need to apply for a specific equivalence.</p> <p>If an equivalence is required then you would have to go back over and issue one to all other similar vessels, and given that catamarans are the norm now for most offshore work in the renewables sector this could mean a lot of retro-issuing of certification.</p> <p>It would be better if the Code were amended to address this specific point, or at least to clarify it, given that it has been revised to reflect the renewables sector catamaran type of operation.</p> <p>It is absurd if we accept a catamaran with a single hand pump only in preference to one fitted with dual independent power driven fire pumps, at least not without adding the burden of certifying this as an “equivalence” despite it being a far superior arrangement. What message are we trying to send?</p>	See later entry by Jenny Vines 6/10/15.	<p>Note reinstated at the end of new 15.5.1.3:</p> <p>“Note: * This may be one of the pumps required by Section 10 (Bilge Pumping), when fitted with a suitable change over arrangement which is readily accessible.”</p> <p>New Section 15.5.1.1 and 15.4.1.1 added:            “15.4.1.1. a power driven self-priming fire pump(s)*, in a suitable arrangement which ensure that the fire main pressure and fire main availability can be maintained following the loss of an individual machinery space. It should be fitted with sea and hose connections, capable of delivering one jet of water to any part of the ship through hose and nozzle, and one fire hose of adequate length with a 10mm nozzle and a suitable spray nozzle. Fitment of a power driven pump is considered current best practice.”</p> <p>Old 15.4.1.1 renumbered to 15.4.1.2 and following changes made:</p>

I think the local RO surveyor has got it wrong in this case and that many other CA and RO surveyors would pass this arrangement without any problem.

“In lieu of 15.5.1.1 one hand fire pump (outside machinery space under consideration) may be fitted, with sea and hose....”

Old 15.4.1.2 renumbered to 15.4.1.3 with the following changes:

“where the machinery space is less than 120kW installed power and the engine is powered by diesel, one multi-purpose fire extinguisher sized appropriately and to a recognised standard, see Appendix 13, may be fitted adjacent to the main entrance to each machinery space and for those vessels with an engine casing arrangement they should be arranged to discharge into the machinery space(s) through a fire port, with a minimum...”

The same changes were made to 15.5.1 however 15.5.1.3 instead becomes:

“where the machinery space is less than 120kW installed power and the engine is powered by diesel, not less than two multi-purpose fire extinguishers sized appropriately and to a recognised standard, see Appendix 13, may be fitted outside each machinery space, each with a minimum...”

Note \* is extended to:

“Note: \* This may be one of the pumps required by Section 10 (Bilge Pumping), where two power pumps are fitted, when fitted with a suitable change over arrangement which is readily accessible. Such arrangement should not compromise the ability to remove accumulated fire extinguishing water from any space that could be

					<u>detrimental to the vessel's stability or essential services, nor allow contaminated bilge water to be accidentally applied to a fire via the fire main. Where a dedicated power driven fire pump is fitted the fire main pressure and fire main availability must be maintained following the loss of an individual machinery space."</u>
John Fearnley MECAL Ltd	01/09/2015	7.3.1.2.1	<p>I did send an email 19<sup>th</sup> Aug re different queries and including my conclusion that integral tanks wouldn't be allowed under 21487</p> <p>I also suggested wording amendment to code: ".... The other one was integral petrol tanks in a aluminium vessel. New Code does not allow this for RHIBs. ISO 21487 doesn't allow any integral tanks for petrol so I guess that answers the question. However, we should perhaps alter wording in 7.3.1.2.1 to exclude integral petrol tanks on all vessels not just RHIB's (small outboard powered catamarans are becoming quite popular for light WB &amp; fish farm duties) ..... "</p>	<p>Email Jenny 09/10/2015</p> <p>Initial comments from me are that the ISO 10088 and 21487 do preclude this. That Cheetah Marine etc are indeed building with outboard diesels and that therefore this should be clarified. I have asked Simon Owens to concur. Email sent to Simon 9/10/15.</p> <p>Only considering chapter 7 of the workboat code, it appears that 7.3.1.2.1 is fairly clear on this subject. If the vessel is not considered a RHIB then it should have '1 permanently installed fuel tank/s constructed to an appropriate standard (see Standards Appendix13) and in the case of vessels fitted with a watertight weather deck shall have arrangements such that spillage during fuel handling will drain into a suitable receptacle to prevent it draining overboard.'</p> <p>Chapter 13 refers to ISO 10088 Small Craft. Permanently installed fuel systems and fixed fuel tanks</p>	<p>The code has been updated in 7.3.1.2.1 to remove the word "RHIB" and replace with "vessel".</p>
Peter Watson	09/09/2015	16.4.1 16.2.1	<p>I am having great difficulty in understand what this means in practice? Page 90 "16.5.1 All radio communication equipment should be of a type which is approved by the relevant authority. " Does this mean that it should be IMO approved and wheel marker or does it mean that it can be individually approved by the MCA, I feel the code needs to be clearer on what is meant.</p>	<p>Reference should have been 16.4.1. We have been working towards laying down all of the standards and documenting what each piece of equipment should be. There is no international obligation to fit MED therefore we ought to fit cheaper equipment where the risk allows for this. In Germany &lt;12m vessels can use non MED and &gt;12 m vessels use MED. The difficulty of asking for too much MED equipment also is that while a radio</p>	<p>MCA have input data standards from Steve Austin into Appx 13 in the format of a table. Reference in Footnote 44 in 16.2.1 (and cross referenced to 16.4.1) has been updated to "Radio equipment placed on the market under the Radio and Telecommunications Terminal Equipment (R&amp;TTE) Directive, 99/5/EC as amended, or Marine Equipment Directive (MED), 96/98/EC as amended may</p>

				<p>operator is only expected to be qualified to Long Range Certificate (LRC) or SRC (rather than a GOC 8 day course) then the operator will not be trained in understanding many of the functions and capabilities of MED equipment. Quoting standards is fraught with difficulty as they have a short life especially in Safety of Navigation. Radio Standards have been totally rewritten recently and this process is only part complete (to end maybe mid 2016). We have however updated Appx 13 to include many of the standards that we would rely on.</p> <p>Reference in Footnote 44 to new MGN has been kept as this will supercede those quoted in the Appx 13 table.</p> <p>Email response sent to Peter and John Fernley 4/12/15</p>	<p>be installed. Appendix 13 identifies the minimum acceptable standards applicable to R&amp;TTE equipment and the equipment type reference found on the MED certificate of MED equipment. On 12<sup>th</sup> June 2016 the Radio Equipment Directive (RED), 2014/53/EU, replaces the R&amp;TTE and some of the standards identified may no longer be valid. A Marine Guidance Note, providing further guidance, and replacing those R&amp;TTE standards in Appendix 13, will be published during 2016. Where suitable equipment is not available on the market under the R&amp;TTE or RED Directive, equipment with a current valid MED certificate should be installed.”</p> <p>Email sent to John Fernley and Peter Watson to confirm our actions.</p>
John Fearnley MECAL Ltd	25/09/2015	4.6.4 24	<p>Suggest additional para:</p> <p>4.6.4 Where the certification specifies defined conditions to allow safe launch &amp; recovery, then the mother ship or shore or platform facility can be considered as a safe haven for the purpose of assigning an area category. Also refer to Section 26 requirements for Type 1 Tenders</p>	<p>Email 02/10/2015 from Paul Wilkins</p> <p>I am looking to resolve two issues now associated with its contents:</p> <p>The need for consistency between the SAN and the new Workboat/Brown Code. As a part of that, the email MECAL response on consultation proposes a new policy on application of the code as regards “safe haven”. This meaning of safe haven was not I believe considered when the workboat code or even MGN 280 was first drafted. It is not a small change. Unless the MCA provides a clear refusal, owners agree amongst themselves to accept mother ships as a safe haven</p> <p>The draft SAN I believe imposes additional effort and resources upon MO surveyors that should have clearance from Operations.</p> <p>Changes have been made to 4.6.4 and 4.6.3.</p>	<p>The following sections of the code have been changed to:</p> <p>4.6.3 Further to 24.5 it is expected that a daughter craft and crew should be safely recoverable. Where the certification specifies defined conditions to allow safe launch and recovery, then the mother ship or shore or platform facility can be considered as a safe haven for the purpose of assigning an area category. Also refer to section 24 requirements for Type 1 Tenders.</p> <p>4.6.4 Where those persons on board such a vessel cannot be safely transferred to the mother ship or platform facility, the vessel certified under this Code should be certified appropriately for the area it is being operated in to allow it to return to a safe haven ashore. See also section 24 requirements for Type 1 Tenders.</p>

				<p>Some additional text needs adding into looking 24.5 addressing the safe recovery to offshore platforms. It is unclear here whether we have any jurisdiction, hence I have put it in general terms and have made it a "should".</p> <p>What if the daughter craft are interchangeable between various safe havens and if one or other are non-UK flag? JV- Leave this for now according to PW.</p>	<p>The following wording has been added to the end of 24.5: Where a platform facility is relied upon as a "safe haven", equivalent levels of safety for the recovery should be provided.</p> <p>And added to the end of 24.2: "Guidance on daughter craft out with the scope of the application in this Code are also available."</p> <p>For consistency within the code and with planned SAN (and subsequent MGN) on daughter craft all references to "parent" vessel or "mother ship" have been changes to "mother vessel".</p>
Ian Larder MCA	28/09/2015	13.7.2 Appx 13 26.9.5.9	I'd support a proposal to remove the "where practical" for Cat 0 vessels in future Code revisions. The technology is readily available	<p>This email was in response to one from John Fernley "In responding to a client (Cat.0) enquiry about EPIRB's I sent him the applicable sections:</p> <p>13.7.1 The 406 megahertz (MHz) Emergency Position Indicating Radio Beacon (EPIRB) should be installed in an easily accessible position ready to be manually released, capable of being placed in a liferaft, and capable of floating free and automatic activation if the vessel sinks.</p> <p>13.7.2 Where compliance with Section 13.7.1 is not practicable, and the vessel carries fewer than 16 persons, the EPIRB may be stowed in an accessible place, and be capable of being placed readily in a liferaft without being capable of floating free.</p> <p>The Codes are a bit ambiguous here They require float free but offer an exemption if not practical. I'm not sure what is considered as not practical.</p> <p>I recall objection from Chay Blyth's Challenge 72 fleet that fitting HRU's to</p>	<p>The Table 13.1 has been updated to include 2 EPIRBs for Category 0 vessels.</p> <p>13.7.1 wording updated to "13.7.1 The 406 megahertz (MHz) Emergency Position Indicating Radio Beacon (EPIRB) should be installed in a location so that it is capable of floating free and activates automatically if the vessel sinks. This location should also be easily accessible so that it can be manually released and placed in a liferaft. See Standards Appendix 13."</p> <p>The underlines words have been added to the code text: "13.7.2 <u>The second EPIRB required for a Category 0 vessels</u> should be stowed in an accessible place, <u>where it is</u> capable of being placed readily in a liferaft and <u>need not be</u> capable of floating free. "</p>

				<p>life rafts could result in loss of rafts in severe conditions in Southern Ocean. So we fitted dummy HRU's of different types in exposed positions on the deck of the yachts as a trial &amp; none of them accidentally activated throughout the wrong way circumnavigation although there were problems in earlier races with water activated lifejackets (unsurprisingly) .</p> <p>So, I'm not sure why we retain the float free as just an option.</p> <p>I also feel that there should a place for personal EPIRBs in the code (Irish require it for &gt;20 miles).</p> <p>I think we did discuss this at working group &amp; I thought it went into the code but I can't find any reference. Maybe at least a recommendation in 13 to keep up with Irish”.</p> <p>The above email, Ian Lardners email have lead MCA to believe that the “Where practical “ should be removed for all vessels on the basis that the technology is readily available and that there is not really a circumstance where it would not be beneficial to have float free on a EPIRB. If the master wants to override the float free he always can so where there is concern that the vessel will not actually sink to below the level (&lt;4m) that the float free is activated then a knife may be used to release it. This has been agreed by NWA, MCA, BM and PBA was contacted but did not respond. It was also agreed within MCA</p>	<p>The below new text has been added to the code text:</p> <p><b><u>“13.9 Personal Locator Beacons</u></b></p> <p><u>13.9.1</u> It is strongly recommended, on a small workboat operating Cat 0 to 3 voyages, that at least one crew member wear a 406 MHz personal locator beacon (PLB)<sup>1,2</sup> with GPS and a light whilst on the open deck at sea. Other crew are strongly recommended to wear a Class M VHF DSC MOB (Man Overboard) with AIS<sup>3</sup>, and equipped with a light. This fitment is particularly useful when undertaking group working activities. See Standards Appendix 13.”</p> <p><i><u>Note A: A VHF DSC PLB will only inform the Coastguard if the nearest station is in VHF range. Therefore it is considered unsuitable for use on single handed vessels and it is prudent at least one other person on board vessels to have a 406 MHz PLB with GPS to ensure they alert Coastguard if they enter the water alone or with others.</u></i></p> <p><i><u>Note B: When registering a PLB consideration should be made to scheduled crew changes and to providing a 24 hour contact if the vessel operates 24 hours.</u></i></p> <p><i><u>Note C: It is anticipated that MCA will publish an MGN in 2016 giving</u></i></p>
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<sup>1</sup> This has a global range and alerts the nearest Coastguard Station to a Man Overboard situation. It will typically take 5 minutes for the Coastguard to be aware of your position and they can then locate a casualty in the water to an accuracy of 100m.

<sup>2</sup> Registration of Devices. 406MHz PLBs should be registered with the EPIRB Registry, details of which are given in MSN 1816 (M+F) – Mandatory Registration of Emergency Position Indicating Radio Beacons (EPIRBs). VHF DSC devices should be registered with Ofcom, details of which are also given in MSN 1816(M+F).

<sup>3</sup> The MMSI number can be programmed into this device so that the first alert is sent immediately to the vessel, alerting crew to the Man Overboard situation and also potentially reducing the possibility of false alerts. If the VHF/DSC is not responded to by someone on the vessel within a designated time period, other vessels in the area will be alerted. The inbuilt AIS will enable other vessels in the area equipped with AIS to locate any casualty in the water. A casualty can be located to an accuracy of 100m.

				<p>(and at SCV Codes TWG Meeting) to increase the EPIRB requirements, in light of the Cheeki Rafiki tragic accident, to include 2 EPIRBs for category 0 vessels.</p> <p>On PLB's there is general support from MCA, NWA, BM to include a recommendation for PLBs in the code (new 13.9) where there is already a recommendation (in 25.9.5.9) in for single handed operations then this should be better defined. There is unfortunately not much information on PLB's which has highlighted the need for a new MGN to be developed. The ethos recently inserted into the new Fishing Vessels codes has been followed, albeit in that case this is mandatory rather than a recommendation.</p> <p>Personal locator beacons are readily available on the market relatively cheaply and offer good support to individuals either using a type that is suitable for group work and local rescue or for notifying SAR directly of distress. Other MCA Codes have also gone down this route, such as the new fishing vessel codes. We propose to enter a recommendation on PLB's into the code to be followed by a detailed MGN guidance to operators and users.</p> <p>This was further discussed at the CABCC Meeting and SCV Codes TWG meeting and gained general support.</p> <p>From Simon Owens :The wording of 13.7.1 also needs general improvement and should be changed, not to change the intent just to improve the flow.</p> <p>Put in wording for PLB's and standards for PLBs' in the standards Annex. Also improve references in single man manning operations in Chapter 26. The decision from NWA and BM is that they</p>	<p><u>guidance on attributes of different types of PLB and training, including how to respond if the PLB accidentally goes off.</u></p> <p>13.9.2 For PLB's fitment during single handed vessel operations see 26.9.5.9.</p> <p>With footnotes:</p> <p>1. <u>This has a global range and alerts the nearest Coastguard Station to a Man Overboard situation. It will typically take 5 minutes for the Coastguard to be aware of your position and they can then locate a casualty in the water to an accuracy of 100m.</u></p> <p>2 <u>Registration of Devices. 406MHz PLBs should be registered with the EPIRB Registry, details of which are given in MSN 1816 (M+F) – Mandatory Registration of Emergency Position Indicating Radio Beacons (EPIRBs). VHF DSC devices should be registered with Ofcom, details of which are also given MSN 1816(M+F).</u></p> <p>3 <u>The MMSI number can be programmed into this device so that the first alert is sent immediately to the vessel, alerting crew to the Man Overboard situation and also potentially reducing the possibility of false alerts. If the VHF/DSC is not responded to by someone on the vessel within a designated time period, other vessels in the area will be alerted. The inbuilt AIS will enable other vessels in the area equipped with AIS to locate any casualty in the water. A casualty can be located to an accuracy of 100m.</u></p> <p><b>Where there was a recommendation in 26.9.5.9 (on single man operations) the</b></p>
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are in support. This was also discussed and supported at CBCC meeting Feb 2016.

Note on the above email from IL and notes above by JV: Much of the terminology used above refers to float free but this invariably here means an HRU.

**below underlined text has been added:**

“26.9.5.9 Skippers are most strongly recommended to wear 406 MHz personal locator beacons (PLB)<sup>4, 5</sup> with GPS and a light whilst on the open deck at sea. “

With footnotes:

4. This has a global range and alerts the nearest Coastguard Station to a Man Overboard situation. It will typically take 5 minutes for the Coastguard to be aware of your position and they can then locate a casualty in the water to an accuracy of 100m.

<sup>5</sup> Registration of Devices. 406MHz PLBs should be registered with the EPIRB Registry, details of which are given in MSN 1816 (M+F) – Mandatory Registration of Emergency Position Indicating Radio Beacons (EPIRBs). VHF DSC devices should be registered with Ofcom, details of which are also given MSN 1816(M+F).

**And in Appendix 13 (Standards Appendix) the below has been added:**

13.6 to 13.9 See Table below against section 16 of Appendix 13 for portable VHF, EPIRB and locator beacon standards.

26.9.5.9 See section 16 of Appendix 13.

16.  
PLB's  
406 MHz PLB with GPS and light  
EN 302152  
EN 60945

					VHF DSC PLB with AIS and light ITU M.493-14
Alan Nagle MCA	05/10/2015	4.6.4  24	<p>I agree that the SAN and new workboat code need to be consistent with one another, so fully understand and support the delay in publishing.</p> <p>With regard to the mothership acting as a safe haven, I believe this is already something happening by default, especially fishing protection including Falkland Islands, British Antarctic Survey etc.</p> <p>I thought we did consider and discuss the use of the mothership as a safe haven during drafting, but made a conscious decision at the time to rule this out by: making a clear statement regarding autonomous daughter that they needed to be certified as operating from ashore (SAN Para 2.5) with Para 6.1 stating they need to be coded for a relevant Area Category,</p> <p>making the SCV route as a construction standard (San Para 7.4 (c)) and again may not be considered as a mothership in the terms of the SCV Code. Noting that Dedicated Daughter Craft by definition are launched and recovered from a mothership (SAN Para 2.6) (NOTED A DRAFTING ERROR HERE, we refer to Section 6 and should read Section 7).</p> <p>The main considerations with dedicated daughter craft, is twofold, in that the vessel being used of an appropriate standard plus maintained as such and its safe operation. As a dedicated daughter craft in nearly all cases would be part of the motherships equipment, and its operation certificated through UK Load Line Exemption, unless I'm missing something, I do not see the role of the CA other than establishing the standard of the vessel if coded.</p> <p>As you say, MECAL's proposed new 4.6.4 is at odds with our current thinking, however if formalised, then clearly the limit of operation should be defined separate to the area category as I can foresee instances when we would require equipment say, as a Cat 2 or 3 but limit the distance travelled from mothership to line of Sight or VHF range. This is a similar approach to that required for manning.</p> <p>With regard to the resource issue, this vessels are already being inspected and in the most part, certificate</p>	<p>See above email John Fernley 25/9/15. See entry John Fernley 25/9/15 for action taken.</p> <p>And above email 2/10/15 from Paul Wilkins to Alan Nagle.</p> <p>And below email 6/10/15 from Jenny Vines.</p>	NFA, actions shown in other entries in this table.

			by the MCA in some way. The intent of the SAN was to provide clear guidance and improve consistence in how this is done. So do not believe that it will impose much of an additional burden.		
Bob Curry Director - Robert Curry Naval Architects Ltd.	30/09/2015	4.2.1, 4.2.2.5.2	<p>Bold text gives BC opinions</p> <p>1) a) The Code 4.2.1 Structural Strength , paragraph 4.2.1.1 requires design hull and construction should provide strength and service life for the safe operation of the vessel. Paragraph 4.2.1.2 requires all vessels operating in categories 0, 1 and 2 should be designed and built in accordance with the hull construction standards of a recognised classification society or equivalent (Seafish). <b>Agree</b></p> <p>Verification of compliance to class society Rule requirements can be given only by the classification society and verification by other organisations or persons violates the class society intellectual property rights, especially if they receive payment for this verification. We trust the MCA have discussed this with the relevant class societies and the associated legal responsibilities as class society Rules are also only legally valid when used in the classification process.</p> <p>b) Category 3 - 6 vessels may be approved in accordance with the process in a) <b>Agree</b> or in accordance Appendix 13 Standards. <b>See 2)</b></p> <p>2) Appendix 13 Standards. Acceptable requirements for categories 3 - 6 vessels are given as ISO 12215-5 Small Craft –Hull Construction and Scantlings Part 5: Design Pressures for Monohulls, design stresses, scantlings. As mentioned some time ago by email, these ISO requirements were developed only for recreational craft and the resulting scantlings were assessed against existing yacht scantlings, both classed and many unclassed. I do not think the scantling requirements given in this standard are suitable especially for FRP workboats, especially for FRP sandwich hulls, as workboats are often exposed to impacts with fixed or floating objects.</p> <p><b>We propose the requirements be modified to indicate that category 3-6 FRP workboats be designed and built in accordance with the hull construction standards of a recognised classification society or equivalent.</b></p> <p>3) The Workboat Code 4.2.1.1 requires hull design and construction should provide strength and service life for the safe operation of the vessel. The use of "construction" indicates compliance with a construction quality standard. This is particularly important with FRP hulls where quality of construction can greatly affect</p>	<p>30/09/2015 Jenny Vines</p> <p>I will look at the content properly and attempt to make any necessary changes and revert back to you soonest. We tried to make some of these changes in the many working group deliberations but I fear that some of this was stopped by the PBA and / or BM (BMF as they were then). I will have to look over the old minutes.</p> <p>1a) Though this is relevant this is not a change in MCA position. If Class Societies take exception to this approach this has not been reported to Vessel Standards Branch and is a well established procedure also for domestic passenger vessels.</p> <p>1b) And 2. MCA understand that ISO 12215 working group are preparing to undertake a review to include a section on commercial vessels. We hope that this situation will be resolved in that forum. We have inserted a footnote to 4.2.1 "ISO 12215-5 should be used with caution where the vessel hull or superstructure is fibre reinforced plastic, or where the vessel is subject to impact loading from contact with fixed structures such as offshore wind farm or turbine towers, or the vessel is a multihull (except sailing multihull), until such time that it is updated with respect to commercial vessels."</p> <p>3) Noted.</p> <p>3) Reference is made to Annex C</p> <p>4) Reference added. Thank you for the information.</p> <p>5) See changes to footnote referred to above in 1a and 2.</p> <p>Suggested changes sent to reduced WG 17/1/16</p>	<p>insert a footnote to 4.2.1 "ISO 12215-5 should be used with caution where the vessel hull or superstructure is fibre reinforced plastic, or where the vessel is subject to impact loading from contact with fixed structures such as offshore wind farm turbine towers or the vessel is a multihull (except sailing multihull), until such time that it is updated with respect to commercial vessels.</p> <p>"</p> <p>Appx 13. 4.2.2.5.2 Added footnote to ISO 12215-5 "Where this standard is applied to FRP vessels, Annex C FRP Laminate Properties and Calculations should also be referred to. This Annex is intended to support the ISO standard and is part of the scantling requirements of that standard. "</p> <p>Appx 13: 4.2.2.5.2 Added ISO 12215-4 Small Craft -Hull Construction and Scantlings - Workshop and Manufacturing</p>
		Appx 13			
		4.2.1.1, 4.2.2.5.2			

		<p>Appx 13</p> <p>4.2.2.5.2</p>	<p>the strength of the hull. For category 0.1 and 2 the class society will have hull construction quality standards. However in the case of vessels approved in accordance with ISO 12215-5 what hull construction quality standards are used for the hull construction of categories 3 - 6 ?and how is this verified in the certification process ?.This is particularly important for FRP vessels for reasons already mentioned.</p> <p>3) Workboat Code Appendix 13 Standards. Acceptable requirements are referred to as those in ISO 12215-5 Small Craft -Hull Construction and Scantlings Part 5: Design Pressures for Monohulls, design stresses, scantlings. This is a large document. In addition to the scantlings part of the standard <b>we propose if this standard is to be used for FRP vessels reference should be made to Annex C FRP Laminate Properties and Calculations as this is intended to support and is part of the scantling requirements of ISO 12215-5</b></p> <p>4) <b>We propose that the Workboat Code include requirements for quality construction for vessels approved in accordance with Appendix 13, ISO 12215-5 Small Craft -Hull Construction and Scantlings Part 5: Design Pressures for Monohulls, design stresses, scantlings.</b> The quality construction standard in ISO 12215-4 Small Craft -Hull Construction and Scantlings - Workshop and Manufacturing should be the least required. This is particularly important for FRP hulls where the quality of construction can have a great effect on the strength of the hull.</p> <p>For your information we are attaching a table of the FRP hull quality construction that generally parallels ISO 12215 requirements but is less stringent than class society FRP hull quality construction standards</p> <p>5) ISO 12215-5 applies only to Monohulls. Many offshore service craft for offshore wind farms are catamarans. While ISO 12215-7 gives requirements for catamaran yachts for the reasons given in 2) <b>we propose that FRP catamaran workboats be required to comply with the FRP workboat requirements of a recognised classification society.</b></p> <p>As a general comment, I think all MCA Codes for vessels less than 24 m should have a quality construction standard for at least FRP vessels. While the quality of steel and aluminium vessels can be reasonably assessed by visual inspection after construction this is not the case with FRP vessels. The foregoing are personal comments and they are not the comments of ABS. They are based on my long</p>		
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			experience with ABS in the design, construction and survey of FRP yachts, high speed craft and workboats, and Rule development for these vessels .For about 20 years I was also UK principal expert on ISO TC 188 WG 2 that developed ISO 12215 Parts 1 to 10.		
Kenneth J Smith Hook Marine	01/10/2015	11.6.4.1 25.4.7 25.4.8 25.4.9 25.4.10 25.4.11.2 25.4.13	Points raised in letter;  See ANNEX 1 <u>Consultation Work Boat Code\hookmaine letter 01.10.2015 KJS.pdf</u>	Section 11.6.4.1 . Agree and include. Section 25.4.7. (now numbered 25.4.2.3) Agree and include. Section 25.4.8. (now numbered 25.4.2.4) MCA are not minded to agree with this this goes against 11.6.4 which does not allow deck edge immersion (200mm freeboard required). I suggest we could make a reference to 11.6.4 in this section for clarity.  Section 25.4.9. (now numbered 25.4.2.5) These comments are addressed in the other changes made to the section. We can't do anything about a standard that is rewritten and the reference will be assumed to be updated automatically due to the wording in start of Appx 13. Section 25.4.10 (now numbered 25.4.3.1) Suggestion: "Add <i>Where the operator has a seat attached to the crane superstructure, the inclinometer must be attached to the vessel hull, and not to the slewing part of the crane. A remote display must also be in the operator's field of view.</i> " Do you have a view of whether this is relevant and if so would you include? Section 25.4.11.2 (now numbered 25.4.3.2) MCA are not here to validate and endorse a particular product which we feel is what Mr Hook is intending. It is not the MCA view that 25.4.11.2 is outdated. This has been backed up by NWA, Mecal and SCMS who were specifically asked on this point. However it was agreed that a pressure gauge should be allowable and has been inserted into a new Section 25.4.3.3	Inserted into the code: 25.4.2.3 The following wording has been added: <i>"The relief valve system, rated capacity indicator and rated limiter, should be overridden or disconnected before the test. Thorough examinations should be carried out by a competent person taking account of any instructions with respect to the crane limiting criteria. If the competent person does not have the skills or tools to override or disconnect the limiting items a makers representative should be present. Where seals need to be broken, resealing of relief valves should be done on completion of overload test.</i>  <i>LOADER CRANE: A powered crane comprising a column which slews about a base, and a boom system which is attached onto the top of the column. Overload testing and dynamic testing of loader cranes to be carried out in accordance with BS 7121-2-4<sup>4</sup>."</i>  25.4.2.5. The following wording has been added: <i>"Maintenance should be carried out in accordance with the manufacturers instruction manual. Repair and maintenance should only use parts made or recommended by the crane manufacturer."</i>  25.4.3.4 Where a saturated load is required to be lifted, consideration should be given by the master, prior to the lifting

<sup>4</sup> BS 7121-2-4:2013 Code of Practice for the Safe Use of Cranes. Inspections, Maintenance and Thorough Examination – Loader Cranes

				<p>Section 25.4.3.3)  “The CA cannot be satisfied if the load indicator issue is not resolved correctly. In particular, where a winch is fitted to the crane and loads may be lifted from below the water surface, the operator requires a real-time display of the weight on the hook as the load clears the water surface.”</p> <p>MCA should not insist on something like a real time display, though we understand that many will have it fitted. We believe that the vessel referred to was lifting wet nets from the seabed but I am not aware whether the weight of the wet nets exceeded the lifting capacity of the crane or whether the owners took the fact that a wet net is heavier than a dry net into account prior to undertaking this activity. MCA will not take forward the suggestion however we propose adding in some wording to the effect of “25.4.3.4 Where a saturated load is required to be lifted, consideration should be given by the master, prior to the lifting operation taking place, to the additional weight of the item due to the item being saturated. Where a load is being lifted from the seabed consideration should be given to suction and snagging”</p>	<p>operation taking place, to the additional weight due to the item being saturated. Where a load is being lifted from the seabed consideration should be given to suction and snagging.</p> <p>Also:  25.4.3.3 It is acceptable, to enable load indication for a hydraulic loader crane, to fit a pressure gauge to monitor the pressure in the load bearing cylinder with a relief valve to prevent overload.</p>
<p>Bob Curry  Director -  Robert Curry  Naval Architects  Ltd.</p>	<p>01/10/2015</p>	<p>4.2.1.1,  4.2.2.5.2</p>	<p>I try to use my experience to promote safety as best I can on a sound engineering basis where there are clear potential safety hazards.</p> <p>There is no question that for the safety of hull construction FRP vessels need to be constructed to a reliable hull construction quality standard. Even with the same laminates and resin the building process can result in big differences in hull strength. That cannot be assessed by visual inspection of the completed hull. This together with using ISO 12215-5 for FRP workboats, especially FRP sandwich hulls can compound the problem.</p> <p>In view of past PBA and BM objections to changes to the Workboat Code I suggest the following revised fall-back proposal.</p>	<p>See also email from Bob Curry 30/9/15 above which also deals with this same subject.</p> <p>It will not be possible at this stage to incorporate these changes as they are too fundamental to this well established principal.</p> <p>However the caution applied to the footnote in 4.2.2.5.2 should at least highlight that the ISO standard should not be used for frp.</p>	

			<p>1) All FRP sandwich laminate workboats should be designed and built to the workboat requirements of a recognised class society.</p> <p>2) All FRP workboats should be built to a reliable hull quality construction standard. I suggest the hull construction quality standard that I e mailed to you with my last e mail. This standard closely reflects ISO 12215 quality standard. The quality standard could be applied by the builders in a self-certification process with the quality documentation records given to the MCA designated surveyor.</p> <p>3) As guidance only; from GL Rules for Yachts less than 24 m, to convert to FRP workboat scantlings, FRP thickness = 1.5 x required steel thickness; section modulus (SM) of frames, etc. FRP SM = 2.35 x required steel SM. This suggests either FRP workboats are to be single skin construction, or if sandwich construction their shell outer skin is to considered same thickness as a single skin hull.</p>		
Bill Forsyth	01/10/2015	16.3.1 and 16.8  16.3.6	<p>I see a problem, 16.3.1 " vessels should be fitted with the minimum radio equipment for the GMDSS sea area in which it will operate"</p> <p>We are back to square one, example is a cat 1 vessel (150nm from safe haven) has certificate to operate out to GMDSS area A2 bounding, A3 but when inspected the skippers states " we never go more than 12 miles from a safe haven so I only require a VHF." An amendment to read " A vessel should be equipped with the GMDSS radio communication equipment to satisfy the carriage requirements of the GMDSS areas of which it is certificated to operate out to " would be more suitable and not subject to detrimental interpretation.</p> <p>Also in 16.3.6 the section containing "mmsi where applicable" I was under the impression we were requiring all new vessels and those fitting VHF post the implementation of GMDSS (around 2000 / 2001 ) to have VHF DSC so the requirement for an MMSI to ensure that the base VHF DSC is fully functional is mandatory.</p>	<p>A vessel doesn't have a specific safe haven or port that it is operated from necessarily therefore we can't necessarily state this. We believe that sea areas need to be outwith the limits of the category. This anomaly is not taken into account for other vessel types where this is a recognised method. If we use the suggested approach we cause problems elsewhere.</p> <p>GMDSS Sea area and workboat category, bearing in mind that 1. Vessels category is defined by distance from the safe haven (FSH), not from the coast. 2. GMDSS sea areas and the operational area defined by a vessels category do not coincide. 3. Vessels will not necessarily operate around the UK coast.</p> <p>To operate to the limits of the category around the UK coast: 1. Up to 60 nm FSH (Cat 2) will require A1 and A2 fit. 2. 60 to 150 miles (Cat 1) will require A1+A2 fit in most areas , but A1 + A2 + A3 fit if operated westwards of the Outer Hebrides. 3. Cat 0 restricting itself to the N Sea will require only A1 + A2 fit.</p>	<p>The following words have been added into 16.3.1 "Where the vessels operational area changes the radio fitment should be reviewed by the Certifying Authority. The vessels Sea Area should be noted on the Workboat Certificate"</p> <p>16.8, before 16.8.1: "For information: A vessel operating around the UK coast and more than 20 n. miles from the safe haven will generally need to carry A1 and A2 equipment."</p> <p>16.3.6 The words "where applicable" have been removed.</p>

				<p>If a vessel is operating beyond the UK then a vessel may find that safe havens lie within GMDSS Sea areas A3 or A4 and therefore an A1 + A2 + A3 or A1 + A2 + A3 + A4 fit become mandatory under the code.</p> <p>Our options are to either mandate Cat 0, 1, 2 vessels to carry at least A1+ A2 by deleting A1 only from Cat 2,1,0 or to insert advice as follows: “ A vessel operating around the UK coast and more than 20 miles FSH will need to cary A1 + A2 equipment.</p>	
John Fearnley MECAL	01/10/2015	27.11.2 27.11.5  2. Definitions	<p>As far as we are aware there are 3 Mecal vessels that Atlas (or their agent) have identified for "precautionary" modification &amp; they are all with the same owner.</p> <p>The owner advised us of the Atlas proposed modification to increase the seat bolting of these cranes, which in some cases would have involved removing or reducing some of the support structure webs.</p> <p>Initial calculations carried out by our surveyors/naval architects who are dealing with these Aquaculture vessels identified that this could very significantly reduce the strength of the crane attachment.</p> <p>On advice from Mecal, the client advised the Atlas agent that they were not to proceed with any modification without prior approval from us.</p> <p>We have had no approach from Atlas (or their agent) either on the proposed modification or the reasons for it.</p> <p>Owner has advised today that the Atlas agent will proceed with replacing the existing bolts with new ones of same size but different grade but will not be making modifications to increase the number of bolts. The owner states that Atlas have also advised them verbally that the current arrangement is not dangerously unsafe.</p> <p>On a more general note, historically this industry has used standard transport type cranes which should not be a problem if assessed as fit for purpose &amp; examined/tested/maintained according to the regulations.</p>	<p>Email from Jenny Vines to JF 01/10/2015</p> <p>“For information I have been on a conference call for an hour this am with our Glasgow, Belfast and Aberdeen offices. We were discussing all these fish farm boats and the targeted inspection campaign that they have recently carried out.</p> <p>I am aware that it appears to be common for the cranes to be changed out, presumably because they are hard-working cranes, maybe because they are not fully marinized cranes. They are frequently not being replaced like with like, stability is not being reassessed and the structure is not being considered by the CA. I am not here inferring that you are not doing your jobs, rather I wanted for you to be aware that this is going on and perhaps you should double check the boats that you do have. I know you are doing the structural work anyway on the 3 you mentioned earlier. It may be caused by nobody taking ownership of the vessel and that not one skipper is involved in each ship thus nobody is taking responsibility for maintenance. There may be a good case here for your surveyors to always take pictures of these type of vessel.</p> <p>Please can you double check that the stability is properly addressed and again remind the operator here of their</p>	<p>The following wording has been inserted into the code:</p> <p>“</p> <p>25.4.2.7 Consideration should be given by the owner / operator of a land based hydraulic crane on board small workboats to an enhanced maintenance schedule suitable for the environment and usage, as per BS 7121 and the Provision and Use of Work Equipment Regulations (PUWER) 1998, where it does not have marinised features.</p>

			<p>In practice these cranes do have heavy use &amp; tend to be replaced regularly.</p> <p>There may be a case for a requirement to go into new WB code for a degree of marinisation for cranes fitted to newbuilds but this would have to be carefully worded because there are different degrees of marinising which can be applied.</p> <p>I am sure that the MCA will want to coordinate a response to this problem due to it's probable widespread implications in the industry &amp; in light of the current MAIB involvement.</p>	<p>responsibility to keep you involved in any modification...</p> <p>MCA are looking at this as part of a Focal Point meeting, will be feeding this in to the consultation so that we have the opportunity to further amend the code if necessary and also are considering a safety bulletin reminding operators of their responsibilities both through H&amp;S legislation but through LOLER / PUWER etc. And we will probably in the longer term pull this in to the MGN covering application of new code to the existing vessels. Your comments / procedures and Normans earlier comments are all being considered."</p> <p>The NWA have also expressed that they would like to see a requirement for marinising of land cranes. An alternative to this which is mostly done already in industry is to restrict the load capabilities of the crane if the marinisation is not done. It is not thought that there would be any cost impact to industry because of this because it is thought by industry that this is already done on the majority of vessels and by the majority of examiners / competent persons.</p> <p>However The degree of marinising of cranes is variable in extent &amp; therefore cost.</p> <p>As Philip (Williams) pointed out, there is nothing wrong with the use of land based cranes as long as they are installed &amp; maintained properly.</p> <p>In the fish farm industry the cost difference &amp; excessive use can make it worthwhile using land or truck cranes &amp; frequently renewing them.</p> <p>A big issue in the fish farm application is the variable means of attachment of truck type cranes to the vessel via their stabiliser bases which sometimes involves a wholly unsatisfactory mixture of welding &amp; bolting.</p> <p>This has raised the aspect of marinisation of land based cranes and</p>	
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				<p>whether it is suitable to insert in text to the code covering marinisation from a stability and corrosion perspective.</p> <p>From Keith Patterson: “the policy prompted by the British Standards for cranes.</p> <p>The policy here is planned maintenance and states BS 7121-2-1:2012 7.1 Maintenance system elements The maintenance of work equipment is a fundamental requirement of the Provision and Use of Work Equipment Regulations (PUWER) 1998 [3] and of MCA PUWER 2006 [7]. PUWER 1998 [3] Regulation 5 and MCA PUWER 2006 [7] Regulation 7 require employers to ensure that cranes are maintained in an efficient state, in efficient working order and in good repair. 7.2 Types of maintenance management 7.2.1 General There are three main types of maintenance management that may be applied to the maintenance of cranes. Condition monitoring based planned preventive maintenance (predictive maintenance) (see 7.2.2), time based planned preventive maintenance (see 7.2.3) and breakdown maintenance (see 7.2.4). Not all of these are appropriate for the effective maintenance of all types of crane (see 7.3). 7.1 Maintenance system elements The maintenance of work equipment is a fundamental requirement of the Provision and Use of Work Equipment Regulations (PUWER) 1998 [3] and of MCA PUWER 2006 [7]. PUWER 1998 [3] Regulation 5 and MCA PUWER 2006 [7] Regulation 7 require employers to ensure that cranes are maintained in an</p>	
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				<p>efficient state, in efficient working order and in good repair.</p> <p>7.7 Inspection and maintenance intervals for time based systems</p> <p>The frequency at which inspection and maintenance for a time based system (see 7.2.3) is carried out should be based on the recommendations contained in the manufacturer's manual for the crane. This should however generally be taken as the maximum interval, as various factors, including the following, might require the interval to be reduced.</p> <ul style="list-style-type: none"><li>• Usage – Double shifting, frequent lifting at or near the rated capacity, high cycling, long hoist ropes and excessive slewing, which might accelerate wear of all components.</li><li>• Road use – Excessive travel on the highway or on site.</li><li>• <b>Environment – Corrosive environments, such as marine or industrial sites, which might accelerate corrosion of electrical connectors and components, drive train, structural components, fasteners and wire ropes.</b></li><li>• Feedback – Feedback from maintenance records, condition monitoring and thorough examination reports which might indicate accelerated rates of wear and deterioration.</li></ul> <p>Rather than marinisation the emphasis should be placed on maintenance and a regime suited to the environment and use. As part of the maintenance regime the owner can specify the crane be supplied with marine environment features. No features then there should be a more frequent inspection regime.</p> <p>As far a load indication goes if a hydraulic loader crane then a pressure gauge to monitor the pressure in the load bearing cylinder may be simplest with a relief valve to prevent overload but will it meet the required standard?</p>	
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				<p>3.10 rated capacity indicator (RCI) - device that gives a warning when the crane is approaching its rated capacity NOTE This was previously known as an “automatic safe load indicator”.</p> <p>3.11 rated capacity limiter (RCL) - device that prevents the crane from being overloaded NOTE This was previously known as an “overload protector”.</p> <p>The changes made I believe also address the point raised about cranes being assessed as fit for purpose plus examined, maintained and tested according to regulations.</p> <p>For changes relating to load radius charts see email from John Fernley dated 6/10/15 on section 25.4.1.4.</p>	
Keith Patterson MCA	01/10/2015	25.4 Appendix 13	<p>As part of the consultation process please include the attached amendment to para 25.4 and Appendix 13.</p> <p>See ANNEX 2.</p> <p><u>Consultation Work Boat Code\Keith Patterson 25_4 Vessels Fitted with a Deck Crane or Other Lifting Device 01.10.2015.docx</u></p>	<p>Email to NWA and MCA Focal Point surveyors by Jenny Vines 06/10/2015.</p> <p>MCA have added all the suggested changes into the code after MCA bosses gave their agreement that we can put a bit more detail into the WB Code relating to testing standards of cranes beyond sighting LOLER / PUWER solely. MCA are still sighting that it is owners responsibility but we have quoted a bit of the BS source material.</p> <p>Awaiting confirmation from Keith / NWA. MAIB have been advised of our actions.</p> <p>In light of this work it has become apparent that amongst other actions outside of the code that a definition of modification should be inserted into Section 2 and the Certificates should be updated to rehighlight to operators the</p>	<p>All suggested changes made.</p> <p>25.4.2.4 the following words are added after “as amended”: “”apply and”</p> <p>Also the first para of 25.4.2.4 is updated to: “25.4.2.4 <i>The crane or other lifting device should be subjected to a 25% overload test<sup>5</sup> at maximum load moment. Following this static overload test, the hoist, slew and luff performance should be tested at low speed, as appropriate, at 110% load; the crane shall be tested through the full operating arc of the crane which should be shown on the load test report, or as a minimum every 30 degrees of radius where continuous slewing with the test weight is difficult. Tests for a variable load-radius type of crane or other</i></p>

<sup>5</sup> It is anticipated that BS 7121-2-4 will remove this overload test in the future, in which case, this overload test will continue to be required under industry best practice (such as Lloyd’s Registers’ Code for Lifting Appliances in the Marine Environment) from the date that that standard comes into force. At that point the new BS 7121 requirements for other testing and frequency for different crane types should be followed.

				<p>need to advise their CA on any modifications or damage.</p> <p>Industry also expressed concerns that the wording in 25.4.2.4 needs updating to describe further the intent. They have found that a hydraulic crane when overloaded for 110% test will not slew 'uphill', so if you lift a test weight and the vessel takes a list on that side the slewing motor is often not strong enough to slew it towards the higher side. They don't see that this implies any safety issue but if we only state "<u>through the full arc of the crane</u>" it seems as if it is expected to be able to do this.</p> <p>Changes to 25.4.2.4 are included, as agreed by MCA and industry. Changes also address problems raised through the Carol Anne accident.</p>	<p><i>lifting device should correspond to its rated performance (e.g. load radius chart)."</i></p> <p>New 25.4.2.6 has been added:  <i>"25.4.2.6 Overload testing shall be carried out upon installation, after the crane has been in service for 4 years, 8 years, 10 years and 12 years, and annually thereafter if the crane has not been marinised<sup>6</sup>. If the crane has been marinised and the requirements of BS EN 13852<sup>7,8</sup> and EN 12999<sup>9</sup> are met then a loader crane should be tested, according to the LOLER Regulations, at least every 5 years. See also 25.4.2.7."</i></p> <p>Inserted into Section 2:  "Modification" means any material change to the vessel or its equipment that would affect the vessel's compliance with statutory requirements, or that would require an amendment to its statutory certification, including the WB2;  Inserted into the Certificates in Appendix 15:  "and that any modifications or damage to the vessel is reported to the Authorised Examiner of the CA and is approved as required and considered rectified by the Authorised Examiner (CA) as required by the relevant part of the Code.</p>
Ross Wombwell Technical Manager British Marine & British	02/10/2015	4.2.2.5.2 Appx 13	I am unaware of any specific objections we had previously to the removal of ISO 12215 from Annex 13 as an alternative construction standard, but have asked for further comments from some of our trade members to confirm.	Email from John Fearnley to Ross Wombwell 03/10/2015  As a member of the Workboat Code Edition 2 working group I recall that ISO12215 was considered by the group	NFA

<sup>6</sup> Refer to [BS 7121-2-4:2013 Part 2-4, 9.1 for testing regime of loader cranes.](#)

<sup>7</sup> BS EN 13852-1 Cranes – Offshore Cranes – General Purpose Offshore Cranes

<sup>8</sup> BS EN 13852-2 Cranes – Offshore Cranes – Loader Cranes

<sup>9</sup> EN 12999 Cranes - Loader cranes

Marine Boat Shows			<p>I have been representing UK stakeholders on the 12215-7 and -10 working groups which are also currently looking at the revision of the 12215-5 Design pressures standard informally. The ISO standards working groups whilst acknowledging the significant level use within the Recreational craft market would like to expand their use to non-recreational craft and are open to all stakeholder input in achieving this. Talks in Southampton at the last Working Group meeting highlighted this with discussions regarding the suitability for commercial vessels and whether a commercial application annex should be added to the next revision with increased requirements. The benefits to international trade of having harmonised standards across nations through the use of internationally agreed technical standards are significant and I would be grateful to anyone in the group who would be willing to engage with this standards future development to ensure that it is fit for purpose within the commercial sector if the working groups conclusion is that it currently does not meet acceptable levels.</p> <p>This standard has now been acceptable for use as a technical equivalence since this codes first publication, are any of the group aware of it having been used or any issues arising from its use?</p>	<p>as being inappropriate for onerous workboat duty.</p> <p>One comment already received from our TC (Nic Crawford) recognises 12215 as one of the few current small craft standards, since Class are uninterested in small vessels (except in creating rules for offshore energy support vessels where subsidies allow high fees to apply) and haven't updated their regs since the 90s.</p> <p>So, if there is a move in the ISO working group to mandate increased design pressures in a workboat specific annex to 12215-5 then it would become a more suitable standard than the old Class rules and be much easier to regulate by CAs, through CA driven design verification and build QC monitoring &amp; of course with the enhanced survey regime for workboats. It might even then be suitable for Cat 0, 1, 2 vessels.</p> <p>Comment JV: See response to Bob Curry email of 30/9/15 above which recognises the changes to the ISO 12215-5 standard which is on the cards.</p>	
Fraser Heasley	02/10/2015		<p>Please see comments from Bill Forsyth (email above 01.10.2015) on section 16 of the consultation document which I fully support. The feeling is we need to be more specific that if a vessel is capable of going outwith area A1 then the appropriate radio fit should be provided. Cat one vessels especially should require A2 standard – why would you opt for Cat one if you weren't planning on operating significant distances from the coast? We are seeing it regularly now where UK code vessels are operating in foreign waters and the transit voyage from UK would take them into A2 waters usually in the North Sea. We also have a small cluster of tourist vessels operating out to St Kilda on the west coast which is again outwith the A1 area – we have challenged these operators who I understand are now carrying sat phones as their means of emergency communication. I think if the code was a bit more direct in its requirements it would prevent these misunderstandings in the future deliberate or otherwise.</p>	<p>Changes made to Section 16 to clarify this, as per above email from Bill Forsyth 1/10/15.</p>	NFA

Ross Wombwell Technical Manager British Marine & British Marine Boat Shows	02/10/2015	Appx 13	Please find below (Kevin Stockwell) forwarded comments on annex 13 updated standards, should there be consideration to remove the dates of standards to allow for the regular updating through the Iso 5 year review process? This would enable the code to be auto updated to the latest accepted level of safety/good practise.	See response below to Kevin Stockwell.  This is an oversight, the dates had all intended to be removed for precisely this reason, so I have removed all of these in Appx 13.  I have replaced the reference to BSEN61779 with BSEN60079 hoping that it is a suitable standard for this situation.	Appx 13 BS EN 61779 replaced with BS EN 60079
Kevin Stockwell  Nereus Alarms Ltd	02/10/2015		Ross I note that Appendix 13 section 8.1.3 (page 242) lists BS EN 61779-4:2000. This standard has been withdrawn for a number of years and so I don't believe should be included. BS EN 61779-4 was replaced by BS EN 60079-29-1:2007 but this is really an industrial standard and I'm not sure how applicable it is to small commercial boats. Where a standard is listed in Annex 13 but is not specifically referenced in the text, is it implied that all of the requirements of that standard are met?	As above Ross Wombwell 2/10/15	
Ross Wombwell Technical Manager British Marine & British Marine Boat Shows	02/10/2015	8  Appx 13  13.6.1  13.8.1  18.4.4	Please find attached comments from one of our members regarding the electrical requirements within the draft Workboat Code.  See ANNEX 3  <u>Consultation Work Boat Code\Notes on The new Work Boat Code Tech Standard. By Simon Churchill MIET.docx</u>	General Response to Comments:  1.Paragraph 8.1.1 has historically been included to ensure metallic non-current carrying components are suitably earthed to reduce the risk of electric shock and minimise the risk of damage to equipment due to electric shock. The reference to the seawater was originally included to try and ensure that where a vessel is of non-metallic construction suitable earthing arrangements are provided. It is understood that this could cause some confusion therefore discussions are currently underway to reword this requirement in line with external standards or to rely on reference to external standards.  2.It is noted that the standards list contained within the annex does require updating. Reference to "British Marine Federation Code of Practice for Electrical and Electronic Installations in Boats, 4th Edition" will be changed to "British Marine Electrical and Electronics Association Code of Practice, 5th Edition". ISO 10133 and	<ol style="list-style-type: none"> <li>1. 8.1.1 has been reworded and renumbered to 8.1.3</li> <li>2. Changes to the references have been updated as described.</li> <li>3. The code wording has been updated to reflect the reliance on Class Rules and national standards.</li> <li>4. No action NFA.</li> <li>5. Due to changes described in 3. NFA</li> <li>6. Due to the changes described in 3 NFA.</li> <li>7. 13.6.1 has been updated to "13.6.1 Each vessel shall carry a portable VHF radio capable of operation on Channel 16 and at least one other voice channel in the international VHF marine band and operable by the gloved hand of an immersion suit. (Note particular attention should be paid to PTT button). The radio and spare batteries shall be protected</li> </ol>

				<p>ISO 13297 have been added to the list of standards. IEE Regulations have been removed.</p> <p>3.The comments regarding the cable choices are noted. The intention of listing a range of standards and Classification Society Rules is to allow the designer freedom to choose appropriate cables for their particular installation. The code wording has been updated to reflect the reliance on Class Rules and national standards therefore removing the possibility of clashes between the code and the national standards. This reliance has always been mirrored in Chapter 4 and 7.The first paragraph in Appx 13 covers the point about standards not included in the Code “Equivalent standards may be considered subject to the acceptance of the CA” and “standards are for reference information” which infers that each standard need only be followed where the standard information provided is applicable. If for instance the BMEEA COP allows for other equivalent standards then these too are applicable.</p> <p>4.The requirement 7.6.2 is in not meant to prevent parallel switching between batteries. A twin engine installation with cross connected batteries would meet the requirement. Also we have a new section 7.1.5 introduced to the consultation version “A vessel fitted with twin / multiple engine rooms should also be fitted with separate fuel systems and separate</p>	<p><i>against water damage by design or by a waterproof cover to a depth of 1 meter for 5 minutes. The construction shall not have any sharp projections that might damage a survival craft. The radio shall have a means to attach to clothing or a lanyard with a low breaking strain safety link. These requirements may be met by a Survival Craft Radio conforming EN 300 225. The vessel shall also carry an appropriate sealed primary battery or batteries able to provide at least 8 hours operation. The battery or seal shall be marked with an expiry date by manufacturer and shall be in date.”</i></p> <p>8. Requested changes made and text updated to “13.9  <b>Personal Locator Beacons,</b>  13.9.1 It is strongly recommended, on a small workboat operating Cat 0 to 3 voyages, that at least one crew member wear a 406 MHz personal locator beacon (PLB)<sup>10, 11</sup> with GPS and a light whilst on the open deck at sea. Other crew are strongly recommended to wear a Class M VHF DSC MOB (Man Overboard) with AIS <sup>12</sup> , and equipped with a light. This fitment is particularly useful when undertaking group working</p>
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<sup>10</sup> This has a global range and alerts the nearest Coastguard Station to a Man Overboard situation. It will typically take 5 minutes for the Coastguard to be aware of your position and they can then locate a casualty in the water to an accuracy of 100m.

<sup>11</sup> Registration of Devices. 406MHz PLBs should be registered with the EPIRB Registry, details of which are given in MSN 1816 (M+F) – Mandatory Registration of Emergency Position Indicating Radio Beacons (EPIRBs). VHF DSC devices should be registered with Ofcom, details of which are also given in MSN 1816(M+F).

<sup>12</sup> The MMSI number can be programmed into this device so that the first alert is sent immediately to the vessel, alerting crew to the Man Overboard situation and also potentially reducing the possibility of false alerts. If the VHF/DSC is not responded to by someone on the vessel within a designated time period, other vessels in the area will be alerted. The inbuilt AIS will enable other vessels in the area equipped with AIS to locate any casualty in the water. A casualty can be located to an accuracy of 100m.

				<p>electrical and control systems. “ which we believe also addresses this point.</p> <p>5.It is believed that your comments in 8.2.2, 8.2.3, 8.2.4, 8.2.5, 8.2.6 &amp; 8.4.3 have been resolved by the referencing out electrical requirements to relevant Classification Society and ISO standards contained within the Appendix.</p> <p>6.With regards to the general comments relating to the detail contained within Section 8 of the Code. Following discussions within the working group a decision has been made to reference out to Classification Society and ISO standards and reduce the content of the section to those parts not covered within ISO standards.</p> <p>7. on 13.6.1. In answer to the points as para 1 to 6 1 DSC portables have been available for about 5 years.</p> <p>2 Good point, presently UK does not respect the internationally agreed portable ID, so for UK waters use only, not EU. Can be recorded in MARS database as this has been recently internationally agreed. There is no date for transition.</p> <p>3 It is GMDSS compatible, so OK</p> <p>4 Good point</p> <p>5 The requirement is to protect from water damage, so if waterproof an additional case is not necessary</p> <p>6 There are many other differences between Survival Radios and normal radios and which are significant.</p> <p>7 The operational use of a survival craft radio is likely to be only on-scene</p>	<p>activities. See Standards Appendix 13 and below Notes i, ii, iii.</p> <p><i>Note i: A Class M VHF DSC MOB will only inform the Coastguard if the nearest station is in VHF range. Therefore it is considered unsuitable for use on single handed vessels and it is prudent at least one other person on board vessels to have a 406 MHz PLB with GPS to ensure they alert Coastguard if they enter the water alone or with others.</i></p> <p><i>Note ii: When registering a PLB consideration should be made to scheduled crew changes and to providing a 24 hour contact if the vessel operates 24 hours.</i></p> <p><i>Note iii: MCA have published an information leaflet (entitled Personal Emergency Radio Devices) on PLBs giving guidance on attributes of different types of PLB and training, including how to respond if the PLB accidentally goes off. See <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633925/10672-MCGA-Personal-Emergency-Radio-Devices.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633925/10672-MCGA-Personal-Emergency-Radio-Devices.pdf</a></i></p> <p>13.9.2 For PLB’s fitment during single handed vessel operations see 26.9.5.9..” 9. 18.4.4 change to :</p> <p>“A 3 cm Radar, complying with EN 62252<sup>3</sup> (Class A standard), EN 302 248 and the R&amp;TTE Directive<sup>4</sup> should be fitted, except that radars for vessels designed to operate at speeds over 30 knots are to comply with the MED. Where radar is equipped with automatic target tracking then a suitable transmitting heading device shall be fitted.”</p>
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				<p>communication with SAR assets which does not need DSC.</p> <p>A.809(19)</p> <p>2.1 The equipment should be portable and capable of being used for on-scene communication between survival craft, between survival craft and ship and between survival craft and rescue unit. It may also be used for on-board communications when capable of operating on appropriate frequencies.</p> <p>2.2 The equipment should comprise at least:</p> <p>.1 an integral transmitter/receiver including antenna and battery;</p> <p>.2 an integral control unit including a press-to-transmit switch; and</p> <p>.3 an internal microphone and loudspeaker.</p> <p>2.3 The equipment should:</p> <p>.1 be capable of being operated by unskilled personnel;</p> <p>.2 be capable of being operated by personnel wearing gloves as specified for immersion suits in regulation 33 of chapter III of 1974 SOLAS Convention;</p> <p>.3 be capable of single-handed operation except for channel selection;</p> <p>.4 withstand drops on to a hard surface from a height of 1 m;</p> <p>.5 be watertight to a depth of 1 m for at least 5 min;</p> <p>.6 maintain watertightness when subjected to a thermal shock of 45°C under conditions of immersion</p> <p>.7 not be unduly affected by seawater, or oil, or both;</p> <p>.8 have no sharp projections which could damage survival craft;</p> <p>.9 be of small size and light weight;</p> <p>.10 be capable of operating in the ambient noise level likely to be encountered on board ships or in survival craft;</p> <p>.11 have provisions for its attachment to the clothing of the user;</p>	<p>With new footnote</p> <p>“3 = EN62252 requires an open frame antenna to start and operate in 60kts relative wind (not applicable to enclosed radomes), therefore operators of RCD Design category A and B vessels or Code Cat 0, 1, 2, or 3 should be aware of this, especially if the vessel operates at higher speeds.”</p>
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.12 be resistant to deterioration by prolonged exposure to sunlight; and  
 .13 be either of a highly visible yellow/orange colour or marked with a surrounding yellow/orange marking strip.

Only communications to rescue unit and possibly ship is likely to be useful. It will probably be satisfactory for communication with responders up to 4 miles due to antenna heights. It does not support communication with aircraft – which might be blocked by a 121.5MHz beacon anyway.

Distress alerting is by primary or secondary alerting devices.

Distress location relies upon either radar or AIS SART or 121.5MHz DF receiver on a SAR asset.

Other requirements:

- can be used by any untrained person in survival craft with simple instructions
- one handed operation of a gloved hand(immersion suit)
- survive immersion
- easily located in an emergency
- 8 hours minimum battery life over operational temperature range at 10:10:80

Transmit:Receiving:Quiescent.

Type		
VHF Radio telephone and VHF DSC Handheld	+ve	Nominal range in n
	-ve	Require in Not use by Not neces point of un No type ap Possible s Not yellow

					Primary battery not certain and battery life without no secondary types Lack of attachment to person Not tested against 45degreeC temperature shock somewhat extreme range for most uses.
			VHF Radio telephone compared to VHF DSC Handheld	+ve	Cheaper £100 against £200 Easy to use for distress comms SAR can use as an additional locator with Position Rec
				-ve	UK licensing/MMSI does not permit use outside UK wa
			<p>8. on 13.8. This section has been renamed to “Emergency Locator Beacon”. The text has been changed to “In areas covered by dedicated Search and Rescue (SAR) assets (e.g. upto 60 n.m. around U.K. coast) and the EPIRB provided has a 121.5 MHz locator beacon and is of the non-float free type for placing in a liferaft an additional Search and Rescue Transponder (SART) is not required. Outside these areas; a Radar SART; or AIS-SART; or an EPIRB-AIS beacon as part of the EPIRB; is required. See Standards Appendix 13.”</p> <p>9. 18.4.4 Radar. We know from previous accidents that vessels that travel at high speed need to be able to refresh their screens faster to enable viewing other vessels they are rapidly approaching. The standards quoted are suitable given the risks. They were not in MGN 280 however where standards are developed and we are aware of them we must progress to refer to them where we can.</p> <p>Yes this is a new requirement and would cover Radar fitted on any category of vessel (eg those that are also voluntarily fitted). This was in part highlighted by a collision in the Channel between the Diamant / Northern Merchant. We will change the speed quoted from 25 to 30 knots based on the MED requirement.</p>		

				<p>MCA also note that the EN 62252 non-SOLAS radar test standard effectively limits the application of compliant radar.</p> <ol style="list-style-type: none"> <li>1. The EN 62252 standard is specified up to 30kts for target tracking and acquisition – so we should amend the design speed in 18.4.4 to 30kts.</li> <li>2. You need to be aware that EN62252 requires an open frame antenna to start and operate in 60kts relative wind (not applicable to enclosed radomes). Seems unlikely that vessel would exceed 30kts in 30kts wind, but within WBC Design Categories: Force 7 is 28-33 knots wind speed. Cat A/B Ocean/Offshore goes upto Beau Scale 8. So stakeholders should consider whether they want to specify radomes for Cat A and B vessels.</li> <li>3. The standard contains 3 classes of radar, A/B/C. Only A is intended for commercial craft and has compass safe distance requirements. So we should state Class A.</li> <li>4. Where radar is equipped with automatic target tracking then a suitable transmitting heading device shall be fitted.</li> </ol>	
<p>Mandi Wilson Director Compliance &amp; Administration Moffatt Marine Ltd</p>	<p>03/10/2015</p>		<p>Please find attached a response to the consultation from Moffatt Marine Ltd. Could I ask you to add us to the list of consultees for the future please? I would also be interest in joining the working group if you could let me know the criteria for appointment to it and process for application please?</p> <p>Also you will see that we mention that there is at least one CA out there that is issuing a refuelling endorsement under the new Code to vessels coded under MGN280 which you have advised me is not technically possible to do – and my understanding is that is despite the absence of any evidence that the</p>	<p>In response both you your email and the attachment in turn then I would like you to note the following:</p> <p>Yes we are able to add you to a list of consultees in the future and when we finally consult on the Red / Blue / Brown Code this might be the next opportunity. Ordinarily we notify the CA's of our consultation, for instance we have just completed this process for an MGN on Means of Access, and they should be involving you in their response.</p>	<p>NFA</p>

vessels meet the A-60 fire standard around the fuel tanks. Can I ask that the MCA issues some guidance that makes it clear what CAs can and can't do in this respect please, as the current situation is commercially compromising for everyone.

See ANNEX 4

[Consultation Work Boat Code\MoffattMarine Workboat Code Consultation Response 03.10.2015.pdf](#)

Presumably this is done through the committee.

It will not be possible for you to join at the working groups (WG) unless you are specifically nominated and are the sole representative for your CA body. I believe that you represent IIMS and RYA so it would need to be one of those. If you specifically need to be informed of WG then you need to speak to the appropriate CA as to how they are distributing information to you from the meetings. We do not anticipate another Workboat Code WG meeting prior to the publication of the code.

We have issued SAN 75 and plan to issue further MGN's to cover the application of sections of the new code to existing coded vessels. Here will also be described the procedure for endorsement of a WB certificate and reporting of this to the CA.

No, you are correct that any application of the new standards to existing vessels under other codes will have to be under a separate IA associated with the MGN's I refer to briefly above. These vessels are not included in the IA.

On the matter of the transfer operations you are correct in your understanding that the fuel is considered as stores rather than a cargo whilst it is in the tank, this is however only until and during the transfer operation at which point it becomes a cargo being discharged. Suitable measures therefore need to be put in place. I think that you need to appreciate that when the SCV code / MGN 280 was written this type of operation was not undertaken. This is an entirely new situation that has been allowed for only to a small sector of the industry and as far as MCA are concerned that allowance was only made with Mecal. This guidance was never promulgated unfortunately but the

				<p>effect is over taken in effect by SAN75. SAN 75 has no legal status and only purports to advise readers what is coming.</p> <p>Thank you for the comments we will take these in to account prior to when the time comes to consult on any new MGN for existing vessels.</p> <p>I am not sure that the advice is contradictory from MCA's Environmental Policy Branch but if you can cite specific incidents and document the cases then we will be able to look into it and respond formally in writing.</p> <p>It is well known that the guidance in MGN 280 in Chapter 29 is intended to be guidance only on the DG regulations etc is not intended to replace those regulations. This is clear in the Workboat Code Regulations which do not list the DG Regulations etc in the schedules at the back. Working outside the guidance in MGN 280 could result in possible enforcement action and the MCA currently propose to take a harder stance on this in future though we will propose to give the industry a reasonable amount of time to get their houses in order. This will all be described in a future MGN.</p> <p>It will be possible in future for existing vessels to become certificated under the new Workboat Code, presuming of course that they can meet the standards therein. This is unlike the restricted access we gave for application to the Workboat Code Industry Working Group Technical Standard. Vessels issued certification under that code will be encouraged to come into line with the proposed new Edition 2 of the Workboat Code.</p> <p>The MCA recognise and are working through many of the problems that you</p>	
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				<p>highlight and we will take these valuable points into account.</p> <p>Your input will no doubt ensure that we prepare the necessary MGNs as soon as possible and you have highlighted that it is not just the NWA who recognises these problems.</p>	
Steve Brooman Senior Marine Surveyor Bermuda Maritime Administration (London Office)	05/10/2015		<p>Thank you for the consultation invite regarding the Workboat (Code of Practice) regulations. On behalf of the Bermuda Government, I would like to inform you that we have no comments to add at this time.</p>	No further action.	NFA
Keith Patterson MCA	05/10/2015	4.2.2 14.2.1.1	<p>Some time ago I promised I would submit a proposal re aluminium structure. As part of the consultation process please include the attached amendment to 4.2.2 Construction and 14.2.1.1 Aluminium construction.</p> <p>See ANNEX 5 <u><a href="#">Consultation Work Boat Code\Keith Patterson aluminium structure 05.10.2015.docx</a></u></p>	<p>Unfortunately at this time it will not be possible to improve the aluminium fire survivability standards though vessel standards agree in entirety that something needs to be done to improve the standard of fire protection for aluminium hull and superstructure. MCA have commenced a program of reform for all small vessel types including passenger ships and small commercial vessels, encompassing aluminium and frp structure and this should be dealt with in this broader way and through improving the fire standards for &lt;24m cargo ships.</p> <p>These ideas will be carried forward in that forum with the intention that this part of the code is revisited and perhaps revised in the future.</p>	<p>NFA</p> <p>Update this in line with email sent to team 13/1/16</p>
Jenny Vines MCA	06/10/2015	15.5.1.1 15.5.1.2	<p>"Following emails (attached) from industry and our surveyors recently I have made changes to the WB Code by adding the following wording to the end of Section 15.5.1.1</p> <p>"Where a workboat is a multi-hull and has more than one totally independent machinery space it is acceptable to have an independent power driven fire pump in each machinery space;"</p>	<p>Email Jenny 06/10/2015 See earlier email from Nick Quarmby 1/9/15 (above).</p> <p>For actions see Nick Quarmby email 1/9/15</p>	

			<p>I also added after 15.5.1.2 a new separate unnumbered section with some standard words which I noticed had been left out of this code presumably by mistake. They were in MGN 280 and in my view should have been included here:</p> <p>“Note: * This may be one of the pumps required by Section 10 (Bilge Pumping), when fitted with a suitable change over arrangement which is readily accessible.””</p> <p>Also the following was sent to industry:  “Please see below changes that I have made to the consultation version. The question is whether to write “acceptable” e.g. inferring an equivalence or we write “preferable” eg we don’t really want hand driven fire pumps on multi-hulls.  Do you have a view?”</p>		
John Fearnley MECAL Ltd	06/10/2015	4.2.1.4 25.4	<p>Suggested guidance for consideration please</p> <p>General:  The technical requirements are stated in Sections 4.2.1.4; 11.6; 25.4; 25.7 of The Workboat Code Edition 2. Special consideration must also be given to risk assessment associated with crane testing; ref 3.11 in the Code</p> <p>Lifting operations &amp; equipment must comply with BS 7121: Part 2:2003 - Code of Practice for Safe Use of Cranes, Inspection, Testing and Examination &amp; with MGN 332 AND</p> <p>The Merchant Shipping (Lifting Operations and Lifting Equipment) Regulations 2006 (SI 2006 No. 2184), as amended (LOLER Regs)</p> <p>The Merchant Shipping and Fishing Vessels (Provision and Use of Work Equipment) Regulations 2006 as amended (the "PUWER" Regulations)</p> <p>International Labour Organisation (ILO) - Occupational Safety and Health (Dock Work) Convention, 1979 (No. 152) (Especially if working overseas)</p>	<p>The wording in 3.11 does not lend itself to this type of risk assessment. This section 3.11 is mainly aimed at fitment of equipment not covered in the code or change of use of a vessel. No additional requirement for a risk assessment has been put into the Code.</p> <p>1.It is felt that the structural attachment to the vessel is already dealt with within the code however the following words have been added to make this very clear:  “25.4.2 The Certifying Authority should verify that the structural design of the crane attachment (referred to in 25.4.1) to vessel conforms to appropriate standards for new installations and for any in service modifications involving increased local loading. The owner / operator should notify the Certifying Authority of any changes to the loading or structure or arrangement of the lifting appliances or associated vessel structure. Section 27.11.5 refers.”</p> <p>2.&amp; 3.This is covered in a new para 4.2.1.4</p>	<p>A new section 4.2.1.4 has been added:</p> <p>“4.2.1.4 The vessel structure and the equipment fitted to that structure should be verified as being of suitable strength to withstand the loads that are likely to be imposed when operating at the maximum capacity of any lifting appliance (including diver lifts), cleats, windlass, winches, bollards etc. See also Section 25 for particular applications. This should also be verified by the Certifying Authority where any modifications are undertaken. PUWER<sup>15</sup>, MGN 331(M+F)<sup>16</sup> and Code of Safe Working Practices for Merchant Seafarers (CoSWP) Chapter 20, 21, 25 and note for lifting equipment should be referred to. The builder of the workboat should provide information on the breaking strength of the strong points. Equipment manufacturers’ instructions on installation and operation should be followed as</p>

<sup>15</sup> PUWER – SI 2006 No. 2183. Merchant Shipping and Fishing Vessels (Provision and Use of Work Equipment) Regulations 2006

<sup>16</sup> MGN 331 - Merchant Shipping and Fishing Vessels (Provision and Use of Work Equipment) Regulations 2006

		<p>MCA Code of Safe Working Practices for Seamen - 2010 Ch 21</p> <p>Detailed Guidance:</p> <ol style="list-style-type: none"> <li>The installation should meet the requirements for structural attachment to the vessel.</li> <li>Arrangements should be in place by the operator to maintain &amp; test the lifting appliance &amp; associated lifting gear &amp; associated instrumentation in accordance with the applicable Regulations &amp; in accordance with manufacturers' recommendations.</li> <li>The operator should record such maintenance &amp; testing &amp; ensures that this is performed &amp; signed off by appropriately qualified personnel in accordance with the Regulations.</li> <li>Crane operations should be included in the loading conditions in the Stability Information Book &amp; approved by the CA.</li> <li>Lifting Appliances should be tested under SWL load conditions at least every 5 years (or lesser term according to manufacturers' recommendations) &amp; under overload for a newly installed or modified crane. Such tests must be carried out &amp; recorded by an independent specialist company or competent person. Note that such tests by specialist companies may not include examination of the structural attachment referred to in 1 above in which case such structural load test must be witnessed by the surveyor to include visual examination of the structural attachment (supplemented by NDE if considered necessary by the surveyor).</li> <li>Testing of lifting appliances should take into account safe limits of stability &amp; freeboard.</li> <li>Diver lifts are to be considered as appliances for lifting persons and should be designed and delegated as such with the appropriate regulations fully applied. Special consideration should be given to ensure that the Diver and/or equipment cannot become crushed,</li> </ol>	<p>“4.2.1.4 The vessel structure and the equipment fitted to that structure should be verified as being of suitable strength to withstand the loads that are likely to be imposed when operating at the maximum capacity of any lifting appliance (including diver lifts), cleats, windlass, winches, bollards etc. See also Section 25 for particular applications. This should also be verified by the Certifying Authority where any modifications are undertaken. PUWER<sup>13</sup>, MGN 331(M+F)<sup>14</sup> and Code of Safe Working Practices for Merchant Seafarers (CoSWP) Chapter 20, 21, 25 and note for lifting equipment should be referred to. The builder of the workboat should provide information on the breaking strength of the strong points. Equipment manufacturers' instructions on installation and operation should be followed as required by LOLER and PUWER Regulations. Where equipment standards are not specified in the Code the Certifying Authority should agree an appropriate standard. The breaking strength of lines/chains shall in general not exceed 80 % of the breaking strength of the respective strong point.</p> <p>4. This is already covered in 11.6.5.</p> <p>5. This will not be specified and reliance is placed on LOLER and PUWER and the Special Person for this.</p> <p>6. This is covered by new section 25.4.3 detailed in the table above (Keith Patterson 1/10/2015)</p> <p>7. words to the effect of “Special consideration should be given to ensure that the Diver and/or equipment cannot become crushed, trapped or struck and that the lift is controlled at all stages of ascent and descent. Safe means of access from the water should also be considered.</p>	<p>required by LOLER and PUWER Regulations. Where equipment standards are not specified in the Code the Certifying Authority should agree an appropriate standard. The breaking strength of lines/chains shall in general not exceed 80 % of the breaking strength of the respective strong point.”</p> <p>25.4 is renumbered into 3 separate sections 25.4.1 on design and installation, 25.4.2 on certification and testing, 25.4.3 on operation.</p> <p>25.4.1.1 has been expanded to include (as per original intention) “and 4.2.1.4 for the attachment of a lifting appliance to the hull structure.”</p> <p>A new 25.4.1.2 has been added :</p> <p>““25.4.1.2 The Certifying Authority should verify that the structural design of the crane attachment (referred to in 25.4.1) to the vessel conforms to appropriate standards for new installations and for any in service modifications involving increased local loading. The owner / operator should notify the Certifying Authority of any changes to the loading or structure or arrangement of the lifting appliances or associated vessel structure. Section 27.11.5 refers.”</p> <p>New 25.4.1.3 has been added:</p> <p>“25.4.1.3 <i>The owner / managing agent should consider the use of a suitable design code (see Appendix 13) for new</i></p>
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<sup>13</sup> PUWER – SI 2006 No. 2183. Merchant Shipping and Fishing Vessels (Provision and Use of Work Equipment) Regulations 2006

<sup>14</sup> MGN 331 - Merchant Shipping and Fishing Vessels (Provision and Use of Work Equipment) Regulations 2006

			<p>trapped or struck and that the lift is controlled at all stages of ascent and descent. Safe means of access from the water should also be considered.</p> <p>For the purpose of assigning a Safe Working Load, this should relate to the specific diving operations to be carried out but with a minimum SWL of 150kg per diver. The overload test should be carried out at 2 x SWL. Stability is specially considered under Sect 11 of The Workboat Code Edition 2.</p> <p>See also 25.7 of Workboat Code Edition 2</p> <p>8. Appropriate risk assessment should be carried out before any examination &amp; testing is carried out.</p> <p>9. All inspections, thorough examinations &amp; tests must be properly documented under an "Examination Scheme" drawn up by the operator (MGN332)</p>	<p>For the purpose of assigning a Safe Working Load, this should relate to the specific diving operations to be carried out but with a minimum SWL of 150kg per diver. The overload test should be carried out at 2 x SWL. Stability is specially considered under Sect 11 of The Workboat Code Edition 2.</p> <p>" will be included in the code.</p> <p>8. Wording to this effect will be included in the code.</p> <p>9. Wording to this effect will be included in the code.</p> <p>Asked John F and others to confirm this. Email 25/1/16.</p> <p>A definition of "marinised" has been added that was suggested by Mark Ranson / Phillip Willaims and Norman Finlay.</p>	<p><i>installations and for any in service modifications with survey and certification carried out by a Certifying Authority to ensure careful design and selection of lifting equipment. MGN 332<sup>17</sup> refers."</i></p> <p><i>New 25.4.1.4 has been added:</i></p> <p><i>"25.4.1.4 Information should be obtained by the operator / owner, and followed, regarding the amount of list and freeboard allowable under both the rated capacity and overload capacity of the crane from a competent person or an authority experienced in marine vessel design with knowledge of installing cranes on ships / vessels. In addition, where a crane is normally intended for land based use, confirmation should be obtained from the crane manufacturer or designer on how far the crane is de-rated from land based ratings whilst on the pontoon / barge / vessel, they should also provide detailing of the load radius charts in a sea state. A crane that is marinised<sup>18</sup> will have lift/radius charts that explain that the lifts are based on Sea State 0 or Harbour Conditions with a simple graph showing how the load decreases with increasing amounts of vessel heel."</i></p> <p><i>New 25.4.1.7 has been added:</i></p> <p><i>"25.4.1.7 The vessel's structure, the crane or other lifting device and the supporting structure should be of sufficient strength to withstand the loads that will be imposed when operating at its</i></p>
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<sup>17</sup> MGN 332 (M+F) – "The Merchant Shipping and Fishing Vessels (Lifting Operations and Lifting Equipment) Regulations 2006".

<sup>18</sup> For the purposes of this chapter a "marinised" crane should be understood to mean it is a type originally designed for use ashore, typically lorry mounted, that has been modified to better withstand the rigours of the marine environment. It will have been subject to a marine paint scheme and the hydraulic cylinder rams will either be manufactured of stainless steel, or of mild steel with multiple chrome coatings to reduce the risk of corrosion. In addition the crane will either have been de-rated by a significant amount, typically 30% to take account of the dynamic loading effect of being vessel mounted, or the vessel will be supplied with load charts, based on harbour conditions.

*maximum overturning moment and maximum vertical reaction. Note that lorry loaders rely not only on the structural integrity of the mountings, but also on the hull structure.* “

*New 25.4.1.9 is added:*

“25.4.1.9 The Certifying Authority should be satisfied that the safety of the vessel is not endangered by lifting operations. Means should be provided for the efficient securing of cargo and loose equipment on board during lifting operations. Instructions on safety procedures to be followed by the Master should be provided to the satisfaction of the Certifying Authority.”

*New 25.4.1.10 has been added:*

“25.4.1.10 *Where mobile cranes are operated on board a workboat (e.g. on the deck of a barge), special consideration should be given to worst case scenarios with regard to stability, structural strength of the deck and safe limits of the deck operating area.*”

*A new 25.4.2.8 & .9 (on diver lifts) have been added :*

“25.4.2.8 An appropriate risk assessment should be carried out by the owner / managing agent before any examination and testing is carried out.

25.4.2.9 All inspections, thorough examinations and tests must be properly documented under an "Examination Scheme" drawn up by the owner / managing agent. MGN332 refers.”

					<p>A new 25.7.9 &amp; .10 have been added :</p> <p>“25.7.9 Special consideration should be given to ensure that the diver and/or equipment cannot become crushed, trapped or struck and that the lift is controlled at all stages of ascent and descent. Safe means of access from the water should also be considered.</p> <p>25.7.10 For the purpose of assigning a Safe Working Load, this should relate to the specific diving operations to be carried out but with a minimum SWL of 150kg per diver. The overload test should be carried out at 2 x SWL.”</p>
John Fearnley MECAL Ltd	06/10/2015	15.5.1.1	<p>I'm confused</p> <p>Have we now lost option of extra portable extinguishers in lieu of fire pumps (apart from DG of course)?</p>	<p>Email Jenny 07/10/2015 John</p> <p>No. 15.5.1.2 is still there but to be honest if I found a twin hull 23.99 m vessel that was relying on a few fire extinguishers I would be a bit unimpressed. For actions see Nick Quarmby email 1/9/15</p>	NFA
Jenny Vines MCA	06/10/2015	4.6.4	<p>Construction: Safe Operation of Daughter Craft See ANNEX 6 <u><a href="#">Consultation Work Boat Code\Draft SAN DC-0915.doc</a></u> See ANNEX 7 <u><a href="#">Consultation Work Boat Code\FPB-Industrial Personnel.docx</a></u></p>	<p>See entry from John Fernley 25/9/15 for action taken relating to tenders and daughter craft.</p> <p>The definition of industrial personnel has been brought into line again with the IMO discussions and also the new MCA OSC &gt;12 industrial personnel code.</p>	<p>Section 2 definition of industrial personnel updated to:</p> <p>““Industrial Personnel” means all persons other than the crew or passengers or children of under one year of age, on board for transport or accommodation:</p> <p>.1 are transported or accommodated on board for the purpose of offshore industrial activities<sup>19</sup>;</p> <p>.2 are able bodied and meet appropriate medical standards<sup>20</sup>;</p>

<sup>19</sup> Examples of such activities may include safe transfer of personnel to or from offshore wind farm structures or vessels involved in their construction or maintenance, with other examples referred to under offshore operations in paragraph 6.2.2.11 of resolution A.1079(28).

<sup>20</sup> Appropriate standards are those recognised and published by the MCA. See paragraph 7.2 of Marine Guidance Note MGN 515(M) for those considered appropriate for industrial personnel in the context of this code and as an alternative to STCW I/9.

					.3 have received basic safety training, according to relevant industry standards <sup>21</sup> ; .4 have an understanding of the layout of the ship and the handling of the ship's safety equipment before departure from port (e.g. through a safety briefing); and .5 are equipped with appropriate personal safety equipment suitable for the risks to safety such personnel are likely to experience on the forthcoming voyage (e.g. immersion suits). ”
John Fearnley MECAL Ltd	07/10/2015		MCA Workboat Code and Small Commercial Vessel Code - ISO12215  I do have one comment back from our TC so far:  "...I query the use of the burst pressure of a Yokohama fender (15 t/m <sup>2</sup> ) for a design study that guesses impact energy, without using an accelerometer. It looks like a speed and angle of bow assessment set of coefficients taken from an old paper. Not sure how pertinent this is for workboats under 24 m as it's for 50+ metre vessels and for displacement of 1500 – 7000 tonnes. Contact areas for eg windfarm load calculations are smaller than a Yokohama and concentrated on bow areas rather than side shell plate (already covered under new code); other service vessels are also more likely to contact smaller areas so local impact is a more appropriate assessment / design criteria. ABS Classed OSVs 25% increased contact area scantlings seems sensible and I think is usual practice. If I get some free time I would like to do a comparable representative scantling analysis of Class v ISO 12215 to see what difference there is..."	JV comment: This is dealt with and referred to above in response to Bob Curry email of 30/9/15.	
Chris Gladish	07/10/2015	15.5.1.1	Bit confused as to why the emphasis on multi-hulls in this respect. The likelihood of fire in both, or more, high fire risk spaces at same time is remote, therefore the same requirements for fire fighting as in a single hull, or	This is dealt with in the new wording of 15.5.1 which refers to the “loss of an individual machinery space”. See entry under Nick Quarmby 1/9/16 above.	

<sup>21</sup> Industry standards e.g. Global Wind Organisation (GWO), Offshore Petroleum Industry Training Organisation (OPITO), Basic Offshore Safety Induction and Emergency Training (OPITO accredited) are accepted alternatives to STCW A-VI/1 paragraph 2. An example for personnel undergoing transfer from ship to foundation, or vice versa, will require specific transfer training.

			single fire risk , space should apply to any one of those spaces.		
John Fearnley MECAL Ltd	07/10/2015	15.5.1.1 15.6	<p>Also the below from Nic</p> <p>Numbering of 15.6 has gone awry – should be 15.6[.1] and subpara 15.6.1[.1]</p> <p>What of a fully independent (of either engine space) fire pump engine, capable of delivery to either or both engine space(s)? Duplication wouldn't make sense here..</p> <p>Doesn't 15.6[.1] mandate provision for adequately sized extinguishers in engine spaces – particularly if fixed systems.</p> <p>Where 15.6.1 is modified by 15.6.2.1 (by allowing the portable extinguishers), maybe this is the section which requires a reference to multihull's independent engine spaces: hence a footnote / subpara 15.6.2.2 “ identical firefighting capability is required for each extra main engine machinery space (where there is more than one – for example in multihulls) over and above that specified in the section(s) above”</p> <p>The footnote, re bilge pump change-over capability, to be reintroduced makes sense of the unreferenced asterisks.</p> <p>Never thought I'd be a fan of the impact assessment but maybe it should be called into play for this.</p>	<p>Updated to numbering of 15.6 has been done.</p> <p>For further actions see Nick Quarmbly email 1/9/16</p>	Renumbering of 15.6 done.
Chris Gladish	07/10/2015	15.5.1.1	<p>A further point ref bilge/fire pump duty as required by class, and may be worth considering in the WB code, is that if a pump can be used for both bilge pumping and firemain supply duties then valves must be arranged so that the fire main can not inadvertently be supplied from a, (potentially contaminated/oily), bilge. (There could of course be an argument that to avoid a free surface stability issue it might be good to pump fire water out as you are pumping it in, but this arose in some “big ship” cases).</p>	<p>Any bilge water pumped as fire main water will be done accidentally and would be rectified quickly once it is realised, any fire hazard would be minimal. Any pollution caused by this will be under Force Majeaur and therefore Pollution Regulations would not apply in this instance.</p> <p>It has been decided to not add the * Note (allowing the fire pump to be the bilge pump) to the new section 15.5.1.3 and 15.4.1.3. This will ensure that the double use of the bilge / fire main is phased out thus avoiding any stability issue.</p>	NFA
John Fearnley MECAL Ltd	07/10/2015		<p>Workboat Code Ed 2 - Air receivers</p> <p>This relates to something we've recently come across on a newbuild &amp; we feel should be included in the new code to prevent feeding a fire with released air</p> <p>Could you please consider an additional para in either Section 7 or 14:</p>	<p>This is already included in our ItS for Fire Fighting and CO2 systems.</p> <p>Comment required re installation of CO2 to MCA requirements</p>	<p>A new section 7.10.1 has been inserted in the code:</p> <p>“7.10.1 Where a vessel is fitted with air receivers in machinery spaces or other high fire risk areas, the system should be arranged such that any release of air through</p>

			<p><b>Air Receivers</b>  where a vessel is fitted with air receivers in machinery spaces or other high fire risk areas, the system should be arranged such that any release of air through the pressure relief valves or bursting discs, that may occur during a fire, is vented to the open air &amp; not within the said space, unless the volume of free air which could be released is taken into account in the calculation for quantity of firefighting medium required.</p>		<p>the pressure relief valves or bursting discs, that may occur during a fire, is vented to the open air and not within that space, unless the volume of free air which could be released is taken into account in the calculation for quantity of firefighting medium required. Instillation of any fixed fire fighting system should be fitted in accordance with 15.6.3.”</p>
Ian Lardner	07/10/2015	13.2.3.3	<p>After yesterday’s meeting, the CA surveyors in attendance approached me with concerns about my comments on there being a requirement for all inflatable liferafts (except valise-packed liferafts) and EPIRBs on small commercial vessels to be fitted as float free, irrespective of the area category of operation under the Codes or MGN280. Having studied MGN280 and the Blue Code further, it’s apparent that for some time now the Codes and MGN280 have permitted for categories 2-6 any FRP canister liferafts (in addition to valise liferafts as reported yesterday) to be stowed in a readily accessible and dedicated weathertight locker opening directly to the weather deck. I apologise for causing any confusion. It is, however, necessary to explain that the matter is not quite as simple as it may first seem and I’ve set out an explanation below.</p> <p>In 2007 the MCA entered into a discussion with Certifying Authorities, small craft operators, Class Societies and shipping companies about some of the issues we’d identified during inspections with poorly stowed liferafts and, as a result, we published MGN343, which I’ve attached to this email for ease of reference. The scope of MGN343 is not exclusive to Convention-sized shipping (9650 liferafts get a mention) and any reference to “ships” in this notice is a reflection of the regulatory position of all merchant vessels being termed “ships” – in more recent notices we tend to differentiate between small commercial vessels, passenger vessels and cargo vessels, for example. You will note that this MGN is very clear about the need for all liferafts to be “float free” and to have HRUs fitted among other requirements. I have a personal recollection that, at the time of MGN343 being published, this subject was discussed with the MGN280 Technical Committee (CAs and small craft industry) where it was agreed that this “float free” approach should ideally be taken for code vessels, except for valise liferafts which may be</p>	<p>Meeting held with RYA / MCA 14/10/15 and a goal based approach to deployment of any raft in a locker was agreed. Email sent JV to Ian Lardner 20/1/15.</p> <p>It was agreed to remove references to MGN 343 and preference given to pulling the relevant text of the MGN within the code wording. It also made sense at this stage to incorporate wording in the code to guidance on green HRU’s (eg those for non SOLAS and smaller rafts), all of which the MCA would already have expected operators / CA surveyors to have followed.</p> <p>The ordering of the liferaft requirements for Cat 0 vessels, Cat 1 vessels and Cat 2 to 6 vessels has been harmonised for clarity.</p> <p>A new section has been added to all category vessels (and whether in a dedicated locker or not) requiring a demonstration to the CAs that the liferaft can be launched in a set time. MCA are conducting tests currently with industry (on different vessel types and sizes eg sailing vessels, RNLI and workboats) and will issue guidance in 2017 on what maximum acceptable demonstration time is considered suitable. This is intended to address concerns from CA surveyors as to the location used for many rafts and to address concerns raised in a recent high profile accident</p>	<p>The following words have been added to the text of Section 13 to draw in the appropriate sections of MGN 343 which were previously intended to apply to code vessels:</p> <p>13.2.1.1 is changed as follows:  <u>“.3 the stowage of liferafts should be on the weather deck or in an open space, and shall ensure that they are accessible in all anticipated weather conditions.”</u></p> <p><u>13.2.4.2 Operators / managing agents should “inspect liferafts frequently for damage e.g. to the container. If it is damaged it needs to be checked by an approved service station.”</u></p> <p><u>“13.2.4.4 Some rafts have more than one line coming from the canister. In these cases the manufacturer’s literature must be consulted to establish which line is which.</u></p> <p><b><u>13.2.4.5 Key Points on stowage of liferafts and HRUs</u></b></p> <p><u>Owners / managing agents should ensure that liferafts:</u></p> <ul style="list-style-type: none"> <li><u>• are stowed as described in 13.2.1.1.3 &amp; .4, 13.2.2.1.3 to .5 or 13.2.3.1.3 to .5;</u></li> <li><u>• have launching instructions displayed;</u></li> </ul>

damaged if left on deck. However, we cannot access our file records at this time (due to temporary location changes inside Spring Place) so it's not possible to verify this recollection from the minutes of that meeting. In any case, it is worth mentioning that, unlike MGN280 and the Blue, Yellow, Red and Brown Codes, MGN343 is only issued as guidance. In short, the provisions of the applicable Code of Practice or MGN280 set the mandatory requirements supported by a Statutory Instrument but MGN343 issues guidance that inflatable liferafts should be float free. One final point of note is that the recently re-published MGN499 on service stations for inflatable liferafts states that the requirements for stowage of inflatable liferafts are listed in MGN343, and it is clear that 499 is also applicable to non-SOLAS (e.g. Code Boat) liferafts. MGN499 is also attached to this email for ease of reference.

Having looked through all of these documents today, and compared the requirements for other vessel types (in particular fishing vessels and domestically operated passenger vessels) it appears to me (though a more detailed review would be required) that the only vessel type for which we permit inflatable liferafts to not be float free is code vessels. Attached to this email is an extract from the LSA Regulations applicable to the range of classes of vessel within their scope as a demonstration of this point but please note that there are clearly other requirements in other Codes which are not repeated here.

I believe that the reason for Code vessels to be treated differently is to permit a degree of pragmatism with regards the fitment of rafts (and for that matter, EPIRBs) on a vessel type which may struggle to identify a suitable stowage location. However, one might also reasonably argue that the use of the term "dedicated locker" is open for interpretation by operators of code vessels of categories 2-6. There are also other questions of suitability when it comes to different vessel types. For example, a sailing vessel owner has to consider the issue of liferafts potentially being dislodged from a deck in rough weather due to heel and pitching but this is perhaps less important for a motor vessel.

It's my strong belief that the intention of the Code requirements in this area has always been to require float free arrangements as the default position but to

where the liferaft was not released possibly due to location and access.

Wording applicable to Cat 1 SOLAS rafts has been removed as it does not make sense when considering SOLAS approved rafts eg any changes to the container directly affects the approval of any raft. Any agreement to put SOLAS rafts into another container will be dealt with under a separate agreement and not documented here in the code.:  
“(which may be a suitable container other than a SOLAS container)”.

Note that since writing this email MGN 499 has been replaced by MGN 553 for non SOLAS liferaft and MGN 548 for SOLAS / MED LSA equipment.

Changes to 13.7.2.2 are supported by an email from Simon Owens and Nico Ramos the latest of which is dated 20/6/17 following conversations with Nic at Mecal and Ocean Safety current industry practices:

“I might suggest to include the following:

1. When purchasing liferaft, it is the responsibility of the Ship Owner / Manager to make sure that the correct length on the painter line is provided.
2. If excess length of the painter line is provided, this might be folded. However this is the responsibility of the Ship Owner / Manager to make sure that there is no obstacle around in order to avoid entanglement and failure in deploy the liferaft
3. It should also be noted that the painter line must not be cut, this will invalidate the Approval Certificate.”

- be lit by emergency lighting at the stowage position and launch area if the vessel is operated at night;
- clear any projections and belting when launched;
- be secured through an approved and compatible HRU, if fitted with a float free arrangement;
- have the correct painter length. See also 13.10.2.2
- ensure that the risk of the painter snagging on obstructions, that might prevent it from deploying fully, is minimised;

Owner / Managing agents should:

- Ensure that the stowage, launching and embarking locations (if different) should be clear of propellers and thrusters;
- preferably stow rafts longitudinally in horizontally fixed cradle;
- stow to give protection from weather, smoke, soot, oil, flooding and accidental damage;
- when more than one liferaft is fitted, consideration should be given for distributing these around the vessel (port/starboard and fore/aft) in order to provide redundancy in the event of an incident such as fire or collision;
- where a liferaft does not have float free arrangements, ensure liferaft can be manually released easily in an emergency by operating the senhouse slip or other release mechanism, and does not need tools or a knife;
- stow containers with drain holes at the bottom;
- consider if it will be able to float free and clear;
- consider interference with other liferafts;
- consider effects of icing;

then offer an alternative pragmatic option for vessels looking for area categories 2-6 if the default position is genuinely not achievable. My concern is that the current situation is that the “get-out” option has become the default option and there may be too many liferafts simply placed out of sight in a locker full of an assortment of equipment. I must be clear that I’m not making any statements in this email about the particular vessel in question at yesterday’s meeting, nor am I seeking to raise any fresh concerns of findings with regards to that case. However, I do feel that some action may be appropriate.

There appears to be a degree of inconsistency and ambiguity when it comes to determining the stowage location of inflatable liferafts on code vessels for category 2-6. In noting that the RYA Technical Department is already in the process of reviewing the code requirements to develop a new non-Workboat Code as an update to MGN280 for the “sport or pleasure” vessel types, and the MCA is developing a new Workboat Code with a similar purpose in mind, it is logical to take this opportunity to review the provisions in Section 13 to assess whether they achieve what is intended and to provide some clarity on what is expected for vessels new to those proposed Codes. I’ve taken the liberty of speaking with the RYA Technical Department and have agreed that we shall take this forward as an action, though I’ve not connected the action to the specific case we discussed yesterday. Incidentally, the RYA Technical Department agreed with the need to look in more detail at clarity in this area. I would ask that the MAIB note this work as “Actions Taken” rather than placing a Recommendation on the MCA or RYA. Obviously, the work on both the new “sport or pleasure” Code and the new Workboat Code would require consultation and so the opportunity to contribute to the review of Section 13 will be provided to UK small craft industry including the MAIB.

I appreciate that this email is a little unusual in nature but it’s intended to provide a clarification and to explain what we propose to do, working with our partners in industry, to address an anomaly identified as a result of the meeting yesterday. As a result, please may I ask that this email is treated with the same degree of confidence offered to delegates by the rules of engagement for the discussions held yesterday.

- consider effects on ships compass;
- carefully identify and remove transport lashings.

Owner / Managing agent should not:

- lash liferafts in cradles;
- stow liferafts fitted with float free arrangements under overhanging decks or awnings;
- allow liferafts to have contact with materials containing copper or copper compounds;
- use bottle screws instead of slips;
- concentrate all life-saving appliances in one place;
- hose down the liferaft.

Owner / managing agents should consider:

- the ability to transfer liferafts to either side of the vessel;
- height above waterline – should be as near to waterline as safe and practicable;

—  
and  
**“13.10 Float Free Arrangements, Weak Links and attachment of Liferaft Painters**

13.10.1 Owner / managing agents should consult manufactures instructions for fitting of HRUs, where they are fitted;

13.10.2 Ships operating in shallow waters or in favourable weather

13.10.2.1 On vessels, which operate only in ‘favourable weather’ it may be practicable or preferable to arrange for liferafts to float free from their stowage

If you have any questions, comments or concerns please contact me directly.

[Consultation Work Boat Code\MGN343.pdf](#)

[Consultation Work Boat Code\MGN499.pdf](#)

See ANNEX 8

[Consultation Work Boat Code\Requirements for Float Free.docx](#)

without the need for HRU to hold them in place. A weak link with the correct breaking load will still be required to secure the painter to the ship so that the inflation system is activated and the inflated raft is then able to break free.

13.10.2.2.1 In shallow water there is a danger that a sinking ship will touch bottom before the HRU has released or the raft has pulled enough painter/ firing line from the canister to activate the inflation system. Arrangements without HRUs should be considered, bearing in mind the possibility of accidental launching if the ship is likely to roll.

13.10.2.2.2 It is the owner / managing agents responsibility to ensure that when fitting a liferaft to a vessel that it should be obtained with the correct painter lengths matched for the vessel operational depth, the liferaft stowage height on the deck above the waterline and method of inflating the liferaft. A painter may be many meters long and must be deployed to its full length before the liferaft will inflate. Excessively short painters may result in a liferaft inflating before it enters the water. Excessively long painters which are attached to a firing line may require the manual handling of many metres of painter before the liferaft inflates. Owners should ensure that the arrangements give the best chance of successful manual and automatic release in the circumstances and plying area. If excess length of the painter line is provided, this may be folded, however this is the responsibility of the owner / managing agent to ensure that there are no obstacles in order to avoid entanglement

and any potential failure to deploy the liferaft. It should also be noted that the painter line must not be cut, this will invalidate the Approval Certificate.

13.10.2.3 On Open Reversible Liferafts (ORLs) the firing is typically arranged to operate after 1 – 1.5 m of line is pulled out, but this must be checked with the service station which prepared the raft. Where ORLs are stowed on cabin tops etc, the short firing line on ORLs may enable the raft to inflate before it hits the water. Where the rafts are stowed closer to the water operational procedures should cover the possibility that manual intervention may be needed to activate the inflation system. Easy access to the firing line should be available in these cases. Owners should ensure that the arrangements give the best chance of successful manual and automatic release in the circumstances and plying area.

### 13.10.3 Multiple liferafts on a single HRU

13.10.3.1 Prototype testing of HRUs is carried out in accordance with the LSA Code which only requires that the tests are carried out with a single liferaft. Approval for use of the HRU normally only applies to its use to hold down one liferaft.

13.10.3.2 Trials have been carried out to test the effectiveness of HRUs holding more than one raft to operate when submerged to a depth of 4 m. In some cases, the additional up thrust from the rafts has been sufficient to prevent the

HRU opening and releasing the rafts.

13.10.3.3 When considering whether to accept a situation where more than one liferaft is held down by a strap attached to a single HRU, the following should be taken into account:

- when multiple liferafts are to be secured on a single HRU, owners must show that the HRU used is approved for this use;

- the arrangements should be checked to ensure that the painters are not lead or connected in such a way as to inhibit release of the rafts eg., painters running through and fouling the cradle. Each painter should have its own weak link;

- that there is sufficient other LSA available so that in the event of a single HRU not operating, there would still be adequate survival craft to accommodate the persons on the ship;

#### 13.10.4 Tensioning of HRUs

13.10.4.1 Over tensioning can lead to the HRU failing to operate. Similar problems can occur when there is insufficient load on the HRU. Securing straps should be taut but not over tight.

#### 13.10.5 Vessels carrying liferafts which are not approved under the Maritime Equipment Directive (MED)

13.10.5.1 Vessels carrying non-MED liferafts, including ISO 9650 liferafts, should check the compatibility between the liferaft

and the HRU. MED approved HRUs are not necessarily compatible with smaller rafts (less than 6 people) as these may not have enough buoyancy to break the weak link. Some manufactures offer special HRUs for low buoyancy rafts.

#### 13.10.6 HRU and weak links

13.10.6.1 Where a vessel carries non-SOLAS and non-MED approved liferafts that are stowed using float free HRU units the Certifying Authority and operator should be aware that there may be some doubt as to whether or not the hydrostatic release units supplied for SOLAS size life rafts are appropriate for non-SOLAS rafts.

13.10.6.2 Additionally, there is the issue of the availability of weaker weak links which some manufacturers are marketing for use with non-SOLAS and MED approved smaller life rafts. Weaker weak links referred to below are not appropriate for liferafts approved in accordance with SOLAS.

13.10.6.3 There are essentially two concerns with the weaker weak link that the Owner and Certifying Authority should consider:

1) Are the weaker weak links strong enough to survive the tension generated by the buoyancy of the liferaft prior to activation of the inflation mechanism?

2) Following activation of the inflation mechanism, can a smaller liferaft generate sufficient buoyancy to break the weak link which has been fitted?

					<p><u>13.10.6.4 In cases where non-SOLAS life rafts are fitted, and there is any doubt with respect to the compatibility of HRU and the raft itself, then confirmation is to be sought from manufacturers and/or equipment suppliers that the breaking strength of the weak link and the size of the raft are compatible.</u></p> <p><u>13.10.6.5 Reduced Strength HRUs are available. Those with a Green weak link are the extra weak model. Those with a red weak link are the standard SOLAS models.”</u></p> <p>—</p> <p><u>13.2.3.3 the following words have been added to describe the term dedicated:</u>  <u>“(e.g. stowage space is to be for liferafts only)”</u>  <u>And at the end of each category liferaft section the following is added:</u>  <u>“The owner / managing agent should demonstrate to the Certifying Authority by physical deployment that the raft can be moved from its stowed position and stowed state to launched in the water<sup>22</sup> in the shortest practicable time<sup>23</sup>. This demonstration should be carried out at compliance examination and when there are any changes to the liferaft or modifications to the liferaft stowage arrangements.”</u></p> <p><u>Note footnotes also.</u></p> <p><u>13.2.1.1 the following wording was added after “SOLAS Standard” to emphasise the intent:</u>  <u>“and MED approved”</u></p>
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<sup>22</sup> During the test the Certifying Authority need only witness the raft being moved to the side of the vessel, adjacent to any guard wires, e.g. getting to a suitable launch site.

<sup>23</sup> The MCA is preparing guidance which will define suitable maximum demonstration time.

					<p><u>13.2.1.4 &amp; 13.2.2.1.5 the following wording was added for clarity:</u>  <u>“ See sections 13.2.4 and 13.10 for details of stowage, float free arrangements, weak links and attachments of raft painters.”</u></p> <p><u>13.2.2.1.4 the following wording has been removed from the text.</u>  <u>“(which may be a suitable container other than a SOLAS container)”.</u></p> <p><u>13.2.1.1.3 &amp; 12.2.2.1.3 The following wording has been added :</u>  <u>“and shall ensure that they are accessible in all anticipated weather conditions”</u></p>
John Fearnley MECAL Ltd	08/10/2015	25.4	<p>Jenny</p> <p>One addition to our suggested guidance would be to emphasise need for structural design approval of crane attachment to vessel for new installations &amp; for any in service changes involving increased local loading.</p> <p>Also mandatory notification to CA of any changes to loading or structure or arrangement of lifting appliances or associated vessel structure.</p>	<p>Email Jenny 09/10/2015</p> <p>Email sent for confirmation to KP and JL 18/1/15</p> <p>See changes listed in 25.4.2 email from John Fernley dated 6/10/15 above.</p>	
Mark Ranson	09/10/2015	<p>22.3.1 Appx 14 Throughout</p> <p>25.4</p>	<p>It has probably already been picked up, but the CSWP reference needs to be updated to the 2015 edition published last month.</p> <p>The draft guidance John sent looked to be a good basis - and I would agree with Norman that what the Ship Operators need to see, is not a general cross reference to the LOLER &amp; PUWER regs (although we recognize that needs to be there), but more a bullet point list of items they must complete if they have, or are intending installing a crane on board.</p>	<p>Second point is dealt with through other additions to 25.4.</p>	<p>Footnote 88 updated to refer to MIN 512 (M+F).</p> <p>22.3.1 also updated to refer to “<i>consolidated Edition 2015</i>”.</p> <p>Title change of CoSWP document changed throughout.</p> <p>Appx 14 Regulations updated and inserted a reference to new MGN 539.</p>
John Fernley	14/11/14	11.6.7	<p>This section applies a formula to allow stern gantries &amp; side haulers to be accepted without SIB, with relatively light loads</p> <p>We have a 11M cat that has side P bracket in connection with aquaculture work</p> <p>They want to be able to lift 500KG maximum</p> <p>Test gave 2 degree heel with 750kg load</p> <p>Applying the formula in 11.6.7 would limit this to less than 100kg (not enough for MOB recovery)</p> <p>Is this what is intended?</p>	<p>From JV to Paul Johnson SCMS 11/6/15</p> <p>Please see below correspondence. The text in 11.6 was inserted by Mark Ranson for the October 2013 IWG; the minutes of that meeting indicate a discussion about the text, focussing I think more on the heel test than the 1%. I recall that the 1% was deliberately very small to ensure that anything other than trivial lifts (100kg in case of a ten tonne boat) gets a stability</p>	<p>The following clarification has been added into 11.6.7:  “, having consideration for the exclusions in 11.6.1”  And in 11.6.7.2:  “, or 200 kg whichever is the greater”</p>

Not sure where this formula came from

book. It was intended, from what I recall, to allow things like marine biology samples to be hoisted.

If somebody is planning 500kg lifts for aquaculture then I think that should quite rightly have a SIB even though – being a cat – the SIB should show a good margin of stability. A SIB is neither complex nor expensive to prepare.

Can I ask your take on this? I'm not minded to allow 500kg lifts without a SIB.

I am not asking for this particular vessel as I believe that this was dealt with at the time, I am enquiring views to establish if we need to change anything in the Code.

From John Fernley to Jenny Vines  
14/6/15

Hello Jenny

Nic recalls that a figure of 250kg or 1% displacement, whichever is greater was a proposition at one time.

100 kg on a 10 tonne boat is not sensible, & also implies no MOB lifting for any vessel under 8.25 tonnes.

Any vessel that couldn't deal with 250 kg at the side would be limited to 4 or less persons because of heel test limits – and similar weight over stern would almost certainly have lower trim change effect than heel effect.

We already have a provision for fitting diver lifts in the new code which could be usefully extended to cover this:

25.7.3 The deployed lift system on a transom, in air, with the maximum intended number of divers fully equipped, should not cause a

				<p>reduction in freeboard at the aft end of more than 50% of the minimum permitted freeboard.</p> <p>25.7.4 When conducting a heel test, the deployed lift system, in air, with the maximum intended number of divers fully equipped, should not cause the vessel to exceed 7 degrees heel. If a heel angle of more than 7 degrees is accepted by the Certifying Authority, the criteria of 11.4 of this Code must be complied with.</p> <p>25.7.5 Diver lifts are considered as "person retrieval systems" under Section 11.6 of this Code.</p> <p>So whatever is decided should allow consistency with the above</p> <p>From our original enquiry, with 500kg aquaculture loading, then we should agree that it must have SIB &amp; under recent proposals for simplifying Stability Info for certain vessels, this need not be too onerous.</p> <p>JV Comment:</p> <p>My understanding here is that a person retrieval system is already discounted from the requirement to carry a stability booklet (11.6.1)</p> <p>From Chris Gladish (mecal) to Jenny 14/8/15:</p> <p>Brown Code 11.6.1. mentions exemption for "davits for tenders, where judged by CA not to have a detrimental effect .....". This seems to leave the door open so to speak, subject to definition of a davit.</p> <p>11.6.1 rules out knuckle boom cranes and brings in a totally un-realistic 1% limitation for small vessels. ( When 1 person weight is to be taken as 82.5Kg, then one person at the side represents</p>	
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				<p>a max loaded displacement of only 8.25T, for comparison). There are alternative launching arrangements which can be hydraulically operated horizontal sliding boom type, for example, which can induce similar considerations to a knuckle boom crane , except that max vcg of lifted load is fixed at a constant “jib head” height apart from varying heel angle of the vessel.</p> <p>If the following could be met: The more onerous 11.4.3.2 GM formula result of 0.5m for vessel carrying less than 1T equipment and cargo, regardless of length, Lifted item weight limited to 50% of max loading as recorded in the SCV 2, or 500kg whichever is less, It can be demonstrated that the lifted and swung out weight does not result in angle of heel &gt;7 degrees, and freeboard at any point is not less than 50% of that permitted by 12.2.3, or 250mm whichever is less, at any point during max “jib head” height and max outreach. (Any resulting limitations to be recorded in SCV2 with any cut out settings to be subject to periodical service and record). .....this may give a safe and useful solution for both work and leisure codes.</p> <p>Comments by JV: I don't believe that there is any need to define what a davit is. Standard dictionary meaning would apply (in a court of law) as its not in the code. Oxford English Dictionary says “a small crane on board a ship, especially one of a pair for suspending or lowering a lifeboat” which I believe covers a davit sufficiently.</p> <p>We could add a caveat in 11.6.1 pointing at 11.1.1.2.4 and put in a “subject to those exclusions of 11.6.1” into 11.6.7</p>	
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From Jenny to MCA focal Points  
18/11/15

All

I am just looking through a few old emails to check that I have included all suggested changes to the codes. I have come across the below exchange and wondered your views on adding the 250kg SWL restriction to having a SIB. I particularly note the points about the diver lifts not requiring SIB, so for consistency it makes little sense here, and also where person retrieval systems are fitted that those are similar to diver lifts scenario. I am not tied to the 250kg and happy for it to be reduced if you think there is a more natural figure to go with person retrieval systems, 85 kg weight X 200% test load = 170kg but this doesn't allow a margin for wet clothes or overweight people!?

11.6.7 would become:

"11.6.7 Vessels fitted with stern gantries or fitted with lifting devices over the ship's side are not required to have a stability book provided it can be demonstrated to the satisfaction of the Certifying Authority that:

The lifting device is not of a variable load radius type (e.g. knuckle boom crane), and

The SWL of the lifting device does not exceed 1% of the vessel's displacement or 250kg, whichever is the greater. Where the displacement of the vessel is not known it may be estimated from the following formula:

$$\Delta = C_B \times LOA \times Moulded\ Beam \times Load\ Draught \times 1.025$$

The Certifying Authority is to approve the value of  $C_B$  used; in the case of

doubt  $C_B$  of 0.9 can be used (for pontoons etc.) or 0.67 for others, and

A practical test has been conducted with the gantry/lifting device at the maximum rated load/radius which demonstrates the maximum heel angle of 7 degrees and minimum heeled freeboard of 250mm around the periphery of the vessel are achieved.”

Can you let me have your views please asap.

From Nick Quarmby (MCA ) to Jenny Vines 18/11/15.

Malcolm has copied me in and I am not entirely sure why we need to be wedded to any formula for determining an acceptable weight of lift for consideration of this requirement to produce a stability book if there is then the overarching practical test.

As I am reading it you could propose a 200kg lifting device which exceeds 1% of a vessels displacement, and the practical test then comes up with <2 degrees heel and 500mm residual freeboard, and you will require a stability book.

On another vessel the lifting device could be 250kg and less than 1% of the displacement and a stability book is not required, even though the practical test may theoretically result in a heel of 6 degrees.

This does not appear to be logical and fails to address the monohull/catamaran issue previously considered in the correspondence.

If all lifting devices are to be subject to practical test, on the assumption that they are not to be permitted (and the load reduced) if the heel exceeds 7

degrees or the residual freeboard is less than 250mm, then it is more logical to require stability information relative to how close they come to this limit. eg A stability book is required if the practical test of the lifting device results in a heel exceeding [4 degrees] or a freeboard of less than [500mm]. You can insert any limit you want. This way you do not need to know the displacement and the limiting lift which triggers the need for stability book is related directly to the inherent stability of the vessel.

Looking at it another way the limiting lift for a device is that which brings you to [4 degrees] – otherwise you need a stability book.

The only rider to this is whether you should apply a fixed freeboard allowance as opposed to a limit of say – 50% of initial freeboard or 250mm, whichever is the lesser (or greater? – this depends on your point of view).

From Malcolm Maclean (MCA) to Jenny Vines 18/11/15

I'd echo Nick's comments.

In 11.6.1, we already accept that a person retrieval systems is not a lifting device '*...where judged by the CA not to have a detrimental effect on the stability of the vessel*'. However, we don't apply any guidance on what we consider a detrimental effect in these cases.

Is there any benefit in defining a lower weight limit in 11.6.7 if we then go on to require a practical test to be used to demonstrate compliance in every case?

It would seem to make sense to keep the heel test and state that any vessels which don't meet the requirements (whatever we decide these should be) are to be provided with approved

stability information, or at least be subject to a more in depth stability verification. This would also mean that CA's have a means of identifying which vessels fall into the grey area implicit in 11.6.1.

I think there's a wider discussion to be had on the difference between requiring a stability booklet for certain vessels, and the need for designers to carry out sufficient stability calculations to determine the level of safety for a proposed design, and provide clear guidance to the Master based on this.

Comments by JV

We could add this in to 11.6.1. eg 7 degrees heel, 50% of the minimum permitted freeboard (12.2.3) , or 250mm, whichever is the greater, the criteria of 11.4 of this Code must be complied with. The freeboard to deck is not less than 75 mm at any point.

7 degrees heel, 50% of the minimum permitted freeboard (12.2.3) , , the criteria of 11.4 of this Code must be complied with. The freeboard to deck is not less than 75 mm at any point.

But we should not allow all vessels to not require a stab booklet just because we have done a practical test.!

This suggestion requires a complete rewrite and rethink which I am not sure that we have time for, especially given that the consultation has already happened. I suggest that this could be an amendment by MGN / SAN to any future WB Code MSN. It has been an accepted method in all the codes to date that where crane is fitted a practical test is required and a SIB is also needed. I agree this is a sensible approach. We are however in a position where we would want the majority of vessels fitted with a crane / lifting device to have a

				<p>stability booklet and this may well result in totally the opposite. I believe that the stability information provided to the master / crew is useful information, especially now that we have asked the master to be trained in the understanding and use of the SIB (where a SIB is required).</p> <p>No action taken on Stability Unit suggestions at this stage and limit of 200 kg inserted into 11.6.7</p>	
Peter Watson	11/10/15		<p>Could you confirm if because of our cat 'O' we are going to have to have mini sat c on board?</p> <p>Also from John Fernley 11/10/15: It's related to GMDSS sea area rather than area category</p> <p>However, it is confusing because new WB Sect 16 table suggests SSB <u>or</u> Satcom c/mini c for A3 but shows SSB <u>plus</u> Satcom for A4 which is defined as outside Inmarsat area.</p>	<p>If the vessel is in sea areas A1 + A2 + A3 + A4 only SSB is required internationally. Therefore a Sat Com C / mini - C is not a mandatory requirement in A1 + A2 + A3 + A4.</p> <p>Reply sent 7/12/15</p>	<p>Changes have been made to remove the requirement for Sat Com C / mini C for A1 to A4 in both table 16.8.1 and 16.8.2.</p>
Jenny Vines		25.2.1.6	The references in 25.2.1.6 needed updating	25.2.1.6 referred to LL Instructions being MSIS 3 , when it is in fact it is MSIS 1. Also a future MGN on towing operations need to be referenced.	LL Instruction updated to MSIS 1. Footnote to a future MGN inserted in 25.2.1.6 "A Marine Guidance Note, providing further guidance on towing operations, will be published during 2016"
Chris D'Alcorn	29/12/15	Table 20.2	Clarify the anchor cable calculations	<p>20.3.1 refers to a definition of mean length in Note 3 of Tables 20.1 or 2). "</p> <p>Note 3 is missing. We need to insert:</p> <p>"Note 3: For the purposes of this section, mean length is defined as:- (Length + Length on waterline) / 2 "</p> <p>This was removed by mistake, and we should reinsert above (old MGN 280 Note 4) as Note 3.</p> <p>I also notice that the ISO / EN and BS chain standards (in the old MGN 280 note 1 are missing "Chain cable should be sized in accordance with EN 24 565:1989 (covering ISO 4565: 1986 and</p>	<p>Text added: Table 20.1 &amp; 2 Note 4: For the purposes of this section, mean length is defined as:- (Length + Length on waterline) / 2</p> <p>Note 1: "EN 24 565 (covered by BS 7160 – Specification for Anchor chains for small craft), or equivalent."</p> <p>Old Note 1 and 2 renumbered to 2 and 3.</p> <p>Amended 20.3.1 to refer to Note 4 not Note 3.</p> <p>Appendix 13 BS standards in Note 1 added.</p>

				covered by BS 7160:1990 - Anchor chains for small craft), or equivalent.”).  I have added these references (after checking for validity) to Appx 13.  Checked with Mark Ranson / NF 4/1/15	
John Fernley	17/12/15 And	16.8.1  19.4.1	So, for a Cat.3 or4 vessel that complies with Section 13 Table 13.1 (it doesn't have or require to have EPIRB or SART), we cannot assign GMDSS Area unless it does have the EPIRB required by Table 16.8.1  Similarly for Navtex; it is required in 16.8.1 down to Cat.4, whereas 19.4.1 states "Other than a dedicated pilot boat, a vessel operating in Area Category 0, 1, 2 or 3 (not 4) should carry a barometer, or other means to forecast the weather conditions e.g. Navtex receiver" I do think these will be seen as contradictory & confusing  Emailed Steve Austin	The below attempts to resolve these contradictions, in favour of chapter 13 and Chapter 19.4.1. This is intended to be more in line with MGN 280 requirements eg no cost implications however it must be recognised that the improved means of dealing with Radio Communications equipment through the sea area rather than solely the Category of operation produces some difficulties that should be addressed though fitment in certain circumstances eg where Sea Area A1 is not assigned close to the shore (abroad) and where VHF can not be relied on because of geographical location and therefore an EPIRB should be fitted as a means of reporting. There is a general assumption in the Code so far that the boats are in UK waters. S.A. also mentioned that when portable VHF alone is fitted then operators can't really meet the Area A1 standard therefore we need to ensure that they can still communicate. So he needs to put a few extra caveats in to make sense of these. This is agreed and drafted with Steve Austin and consulted with John F.  16.8.1 should be amended to recommend only use of NAVTEX in cat 4. A link should be created between 16.8.1 and 19.4.1. This is done more appropriately through 16.2.2.1.  Tables 16.8.1, 16.8.2 and 16.8.3 updated to recommend only the carriage and use of NAVTEX for cat 4, 5 and 6 vessels in Sea Area A1 especially where the voyage could be more than 12 hours.	16.2.2.1 is updated to include “ <u>category 4</u> ” vessels and a reference link “ <u>See also 19.4.1.</u> ”  Note added to table 16.8.1. Note A for Sea Area A1 EPIRB. Note B for Sea area A1 NAVTEX. “Note A = This is recommended only in Sea Area A1 on category 3 and 4 operations where the vessel should be on a voyage of [<12 hours], outside this duration a NAVTEX should be fitted. Note B = This is recommendatory only in Sea Area A1 on category 4 operations, noting section 19.4.1 and that the vessel should be on a voyage of [<12 hours], outside this duration a NAVTEX should be fitted.  Note added to table 16.8.2 for Sea area A1 PLB or EPIRB  “R= <u>Recommended</u> for <u>category 5 operations where visual or other non-GMDSS means of alerting is considered to be ineffective e.g. if a vessel is working in bays with high cliffs that may impede the operation of the VHF.</u> ”  Notes C1 and C2 changed for table 16.8.3 from “required” to “recommended”.  Wording added to 13.7.1 : “ <u>Also refer to Section 16.8 for further details of carriage requirements and recommendations taking</u> ”

				<p>Tables 16.8.1, 16.8.2 and 16.8.3 updated to recommend only the carriage and use of EPIRB and / or EPIRB or PLB for cat 3, 4, 5 and 6 vessels in Sea Area A1 and consideration to be given to vessels which may be close to shore but in a bay that has high cliffs that may preclude use of the VHF radio.</p> <p>Cross references put in to Section 13 and 19.</p> <p>16.5.1 should be amended to better reflect the wording in MGN 280 16.2.6 eg adding “MMSI number where applicable”.</p> <p>It is important to highlight the shortfalls of the assignment of A1 GMDSS sea Area by giving clarity to the antennae height indicated in Appendix 1.</p> <p>Richard Linford and Steve Austin agreed that further highlight of this should be put in to 16.3.3.</p>	<p>consideration of GMDSS Sea Areas.”</p> <p>Wording added to 19.4.1: “Refer also to section 16.8.”</p> <p>The following wording added into the list in 16.5.1 “MMSI number where applicable”.</p> <p>Text added to Appendix 1 “Note: For VHF the Sea Area A1 relates to the location of the Coast Guard antenna and the height of the antenna on the vessel. MGN 22 also refers. VHF Range will be reduced from those shown in pink above when the height of the antenna above sea level reduces below 4m. In these cases refer to the Admiralty List of Radio Signals Volume 5 for Range Calculations in the section on Management of VHF. This is further described in the first footnote to Table 16.8.1.”</p> <p>16.3.3 updated as follows: “16.3.3 VHF transmission and reception ranges are reliable only within the line of sight ranges of the aerials (see the MCA’s Marine Guidance Note MGN 324<sup>24</sup>, as amended). <u>Owner/Operator reminded that vessel should only operate within reliable range of GMDSS VHF shore stations. For small vessels or someone using a portable radio this is likely to be much less than 60 nm from land / Coast Radio station and the area implied on Sea Area A1 coverage Map shown in Appendix 1. See section 16.8.1 and MGN324 VHF Range diagrams. Iridium satellite phones do not fulfil GMDSS requirements.”</u></p>
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<sup>24</sup> MGN 324 Amendment 1 Navigation: Watchkeeping Safety – Use of VHF Radio and AIS

David Fenner	14/12/15	16.13  18.4.3	<p>Sent D Fenner to J Vines: I had a query today about a new build and the Radio survey requirements. We could not identify in the new Workboat Code any requirement for the radio survey to be done by an authorised person.</p> <p>We did find this in the old brown Code</p> <p><i>“16.2.9 In relation to radio installations, the appropriate Certifying Authority is one appointed by the Maritime and Coastguard Agency for the specific purpose of radio installations, as described in Merchant Shipping Guidance Notice No. MGN.11 - Changes to delegation of the radio survey service.”</i></p> <p>Looks like we need to amend the current draft of the Code to ensure that a radio survey has to be done by an authorised person in accordance with MGN 392?</p> <p>Sent J Vines to Steve Austin (15/12/15 &amp; 12/1/16) It has come to my attention that the wording that used to be in the original Workboat Code which covered the radio instillation work is no longer in the new Edition of the Code:</p> <p><i>“16.2.9 In relation to radio installations, the appropriate Certifying Authority is one appointed by the Maritime and Coastguard Agency for the specific purpose of radio installations, as described in Merchant Shipping Guidance Notice No. MGN.11 - Changes to delegation of the radio survey service.”</i></p> <p>It wasn't in MGN 280.</p> <p>I believe that the MGN 11 referred to in here became MGN 392 though I note that MGN 392 is more about radio surveys than instillation and does not cover code boats other than to references to non Classed cargo ships.</p> <p>Was it your intention to leave out this element?</p> <p>Or should we put in similar wording to fill this gap?</p> <p>See also John Fernley email below 17/12/16 and Mark Ranson 17/5/16</p>	<p>Notes by JV and mentioned in correspondence with MCA FP's, Survey Policy, Navigation Branch, Mark Meade, Mark Ranson, John Fernley, Norman Finlay, Richard Linford and Paul Johnson:</p> <p>We need to have a 3 pronged approach to this issue:</p> <p>MSIS 5 (Instructions to Surveyors) Radio Instillations should be reissued referring to and appropriate to survey of code boat radio instillations. MSIS 5 is currently withdrawn.</p> <p>MGN 392 should be amended to allow approvals of authorised persons for Code boats. MSIS is being republished and will take account of authorised persons approvals.</p> <p>Amend the text of new WB Code (as above) to recommend a survey of radio equipment when the vessel has more than just a VHF radio. Note this is a recommendation only at this stage, which is a lesser requirement than Brown Code but greater than requirements in MGN 280.</p> <p>The authors of MSIS 5 and MGN 392 replacement have been asked to undertaken the necessary amendment to allow a code vessel radio survey to hang together.</p> <p>The response I have had from John F 17/12/15; is ““The Germans are requiring a radio survey report for workboats &lt;300GT. Sometimes they accept a report which we produce; sometimes they insist on Class. The new code should be sufficiently robust on radio for UK to help stop the Germans from doing this.</p>	<p><i>A new section has been added:</i></p> <p><u><i>“16.13 Ships Radio Survey</i></u></p> <p><u><i>16.13.1 Owners / managing agents are recommended to undertake a radio survey (see MSIS 5<sup>25</sup>) of the radio instillation every 5 years, to ascertain that the equipment is in an effective condition, if the vessel has GMDSS radio equipment fitted. An organisation authorised by the Administration to perform a survey of code vessel radio equipment should be engaged for this. Upon successful completion of the radio survey a Statement of Compliance may be issued by the authorised organisation.”</i></u></p> <p><i>In addition an amendment has been made to AIS section 18.4.3</i></p> <p><u><i>“Owners / managing agents should undertake AIS testing, if fitted, in accordance with the guidance in MGN 465<sup>26</sup> Annex 2.”</i></u></p> <p><i>And a reference added in to 25.9.4. as follows:</i></p> <p><u><i>“See 18.4.3 for guidance on testing.”</i></u></p>
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<sup>25</sup> MSIS 5 Instructions for the Guidance of Surveyors (Radio Instillations on GMDSS Ships)

<sup>26</sup> MGN 465 Navigation - Automatic Identification Systems (AIS) - Annual Testing

				<p>It shouldn't need a separate certificate or separate survey but should be part of the normal compliance survey, with SWB2 arranged to record this, plus a GMDSS statement on the code cert.”</p> <p>In addition to JF comments about radio surveys Mark R also commented as follows on 17.5.16: “Section 16 - There still appears to be no mention of a radio survey in this section despite several comments that it should be covered? - I would endorse John F and others comments as the Germans and I believe others expect to see a Radio survey certificate.”</p> <p>I have referred to MSIS 5 in the draft as there are no Regulations that we can rely on here as these workboats are neither FV's, domestic passenger vessels or classed cargo ships. The Radio Regulations are only for convention ships, passenger vessels and classed cargo ships. Radio Regulations 1991 can't just be applied to code boats and <u>we cannot just ask for a radio certificate to be issued</u>, i.e. there is no statutory basis for it. Therefore I conclude that the wording in the old WB Code can't stand. The Fishing Vessels have their own set of Radio Regulations. It is difficult presently to refer to a survey standard and an expectation of what the “authorised person” would survey to. MGN 392 (the replacement of MGN 11 which was referred to in the old WB Code) no longer refers to authorisation approvals for code vessels, this is presumably because radio surveys were taken out of MGN 280 and it was assumed that all vessels subsequently would come under MGN 280 rather than WB Code however as we all know the Regulations associated with MGN 280 weren't forthcoming.</p> <p>I believe that the WB Code radio survey requirement removal would have been a part of the dumbing down process that</p>	
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				<p>we undertook in the harmonisation of the SCV Codes (Red, Yellow, Blue and Brown AKA WB Code) to form MGN 280. In drafting the new WB Code we have used the wording of MGN 280 as the basis and we have clearly forgotten to put this back in in the drafting process. I think that we would hope any new wording to be considered as a "Minus" wrt to the Regulatory Impact Assessment compared to the old Brown Code Requirements in 16.2.9 <i>"In relation to radio installations, the appropriate Certifying Authority is one appointed by the Maritime and Coastguard Agency for the specific purpose of radio installations, as described in Merchant Shipping Guidance Notice No. MGN.11 - Changes to delegation of the radio survey service."</i></p> <p>I note that the CA's were maybe considered by the Brown Code to be authorised for this work but the feeling is now that where CA's want to do this work they should do this through the proper channels (eg apply for authorisation approval) rather than dealing with this through the CA Agreements.</p> <p>In addition to the Radio Survey and in accordance with the guidance laid down in MGN 465 a reference has been added for the awareness of the operators that AIS testing on a self certification basis is needed annually.</p>	
John Fernley	17/12/15	16	<p>"The Germans are requiring a radio survey report for workboats &lt;300GT. Sometimes they accept a report which we produce; sometimes they insist on Class. The new code should be sufficiently robust on radio for UK to help stop the Germans from doing this. It shouldn't need a separate certificate or separate survey but should be part of the normal compliance survey, with SWB2 arranged to record this, plus a GMDSS statement on the code cert."</p>	<p>See above solution to David Fenner 14/12/15</p>	NFA

Jenny Vines	12/1/16	Section 2	MED Directive 96/98/EC of 20 December 1996 has been recast / repealed by 2014/90/EU from 18 September 2016		<p>Section 2 definition of MED is updated to:  “MED” means European Council Directive 96/98/EC of 20 December 1996 on Marine Equipment, as amended, or 2014/90/EU after 18 September 2016”  Other references to 96/98/EC have been removed and simply refer to MED</p>
Jenny Vines	18/1/16	25.10	The wording with section 25.10 of the Code needs updating to better represent the short term restrictions MCA need to place, not onto SCV vessels but onto fishing vessels. The wording relating to towing needs to be updated also. These vessels should be restricted from carrying Dangerous goods. It needs to be expressly clear that Chapter 26 and Appendix 3 of the new WB Code needs to be met in order to be a light duty workboat.		<p>Definition of Light Duty Workboat in Section 2 has been modified to include:</p> <p>“or complying with another acceptable standard described in 25.10,”</p> <p>Title has been updated to include other standards other than just SCV Coded vessels.</p> <p>Title: 25.10 Vessels operating with a Small Commercial Vessel Certificate wishing to operate as “Light Duty Workboats”</p> <p>25.10.1 to 25.10.8 updated as follows:</p> <p>“25.10.1 Vessels certified under <u>another</u> Small Commercial Vessel Code may be issued with a Light Duty Workboat Certificate (see Appendix 15), for the same “Area Operating Category” for which it is already certified under that Code or Standard. This is subject to the continued validity of the vessels existing certification. These vessels however should meet the manning and training and other operational requirements of the Workboat Code.</p> <p>25.10.2 The intention of section 25.10 is principally to</p>

					<p>accommodate those vessels that are <u>necessarily</u> issued with other certification under the Small Commercial Vessel Codes of Practice <u>due to the types of their core operation</u> whilst applying appropriate technical, <u>manning and training standards</u> to address the full range of operations undertaken by small workboats.</p> <p>25.10.3 <u>A vessel issued with a Light Duty Workboat Certificate</u> is not required to have an approved Stability Information Booklet unless this is a requirement of the applicable Code of Practice.</p> <p>25.10.4 Such vessels must not:</p> <ul style="list-style-type: none"><li>• Carry more than 1 tonne of cargo;</li><li>• Be fitted with a crane or other lifting device;</li><li>• Tow vessels greater than twice their own displacement;</li><li>• Carry out frequent towing duties;</li><li>• Carry out duties that impose severe local structural loadings e.g. static pushing operations; or</li><li>• <u>Carry dangerous goods.</u></li></ul> <p>25.10.5 <u>In order for light duty workboats to be engaged in towing (beyond force majeure) the Certifying Authority must examine towing equipment as required by section 25.2 of this Code and be restricted to towing in harbour or inshore areas and meet the relevant part of section 11.7 of this Code.</u></p> <p>25.10.6 Refer to section 27.7.3 for <u>examination requirements.</u></p> <p>25.10.7 <u>Where a vessel falls outside of the limitations in 25.10.6 a Workboat Code Certificate will be required.</u></p>
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John Fernley	25/1/16	7.1.7	<p>I think there was some discussion on this, particularly for the complex vessels &gt;750kW We should exclude these from machinery spaces that require structural fire protection or require that the SFP is applied to the tanks. I note from those German standards that they are specifically excluded from machinery spaces</p> <p>Maybe it could be solved with wording in :</p> <p>7.1.7.1 Fuel tanks should be built of steel or other suitable metal. Other materials may be used if they demonstrate equivalent fuel and corrosion resistance and fire resistance to the same standard as that required for the machinery space boundary.</p>	<p>Asked Stuart Hannam and Keith Patterson, Oli Vardy and consulted with John F, Mark Ranson, Mark Meade and Norman Finlay.</p> <p>It was recognised that the same problem lies with guidance for FRP tanks and that this should also be provided to clarify the current practice.</p> <p>The wording was reordered also to make clearer the intent.</p>	<p>7.1.7.1 Fuel tanks should be built of steel or other suitable metal. Other materials may be used if they demonstrate equivalent fuel and corrosion resistance <u>and fire resistance to the same standard as that required for the machinery space boundary, where the space is not protected, the tank should be protected against the effect of fire in the machinery space.</u></p> <p>7.1.7.2.1 changed to: <u>“Where a rigid aluminium fuel tank is fitted, it should be built to a suitable standard (see Appendix 13) and it should not normally be installed within the machinery space, nor are they to form part of the boundary of such a space. They should be located in a dedicated, suitably ventilated space.-Where fitting inside the machinery space is unavoidable then it should not contribute any additional fire risk e.g. through the fitting of additional structural fire protection”</u></p> <p>And a new section added for FRP tanks:</p> <p><u>7.1.7.2.2 Where a rigid plastic fuel tank is necessary it should not contribute any additional fire risk, it should be built to a suitable standard (see Appendix 13), should not be installed within the machinery space, nor are they to form part of the boundary of such a space. They should be located in a dedicated, suitably ventilated space to prevent the build-up of explosive gases with suitable electrical equipment; NOTE Thermoplastic tanks and components may be affected by high return fuel temperature. It is therefore important for designers</u></p>
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					<p><u>and operators to understand the engine installation manual.”</u></p> <p>New Section added:  <u>“7.1.7.3 Fuel spaces shall be ventilated to prevent the build-up of explosive gases. Where petrol tanks are fitted, the requirements of ISO 11105<sup>27</sup> shall be fulfilled. See Appendix 13 and 7.3.1.2.”</u></p>
Jenny Vines	25/1/16	26.10	<p>Sent to Mark Ranson and Forkanul Quadar. Both agreed.</p> <p>I have just noticed that the single man operation requirements in OAN 703 aren't quite translated into the workboat code properly.</p> <p>Annex 7 of MGN 280 does not exist in WB Code, this is where the wording for the 2<sup>nd</sup> person capable of assisting in an emergency is listed.</p> <p>Can I please: Put wording into Chapter 26 as in OAN 703 as follows:</p> <p><b>26.10. VESSELS NOT ENGAGED IN SINGLE HANDED OPERATIONS</b></p> <p>26.10.1 Where the vessel is not suitable for single handed operations, and there is only one member of crew onboard (the skipper), Appendix 3, Table 1 requires that “a second person should be capable of assisting the skipper in an emergency should also be onboard”. The skipper should brief the second person who will be sailing on the voyage. Such brief, as a minimum will include the following (on the requirements provided as follows):</p> <ol style="list-style-type: none"> <li>1. location of liferafts and method of launching; and</li> <li>2. procedures for the recovery of a person from the sea; and</li> <li>3. location and use of pyrotechnics; and</li> <li>4. procedures and operation of radios carried on board; and</li> <li>5. location of navigation and other light switches; and</li> </ol>		<p><b>26.10. VESSELS NOT ENGAGED IN SINGLE HANDED OPERATIONS</b></p> <p>26.10.1 Where the vessel is not suitable for single handed operations, and there is only one member of crew onboard (the skipper), Appendix 3, Table 1 requires that “a second person should be capable of assisting the skipper in an emergency should also be onboard”. The skipper should brief the second person who will be sailing on the voyage. Such brief, as a minimum will include the following (on the requirements provided as follows):</p> <ol style="list-style-type: none"> <li>1. location of liferafts and method of launching; and</li> <li>2. procedures for the recovery of a person from the sea; and</li> <li>3. location and use of pyrotechnics; and</li> <li>4. procedures and operation of radios carried on board; and</li> <li>5. location of navigation and other light switches; and</li> <li>6. location and use of firefighting equipment; and</li> <li>7. method of starting, stopping, and controlling the main engine; and</li> </ol>

<sup>27</sup> ISO 11105 Small craft — Ventilation of petrol engine and/or petrol tank compartments

			<p>6. location and use of firefighting equipment; and</p> <p>7. method of starting, stopping, and controlling the main engine; and</p> <p>8. method of navigating into a suitable port of refuge; and</p> <p>9. the location of the Stability Guidance Booklet/Stability Information Booklet as applicable.</p> <p>And refer Table 1 of Appx 3 to new section 26.10.</p>		<p>8. method of navigating into a suitable port of refuge; and</p> <p>9. the location of the Stability Guidance Booklet/Stability Information Booklet as applicable.</p> <p>And refer Table 1 of Appx 3 to new section 26.10.</p> <p>Numbering of old 26.10 – 26.20 renumbered to 26.11 – 26.21.</p>
Sian Ireland, MCA	26/1/16		<p>Concern is raised that wording in Chapter 29 relating to sister vessels and the wording in 29.10 (3<sup>rd</sup> para) that we are allowing something here that is not allowed for any other vessel type that could raise a precedent. For this reason we have realised that it is not limited enough and, as worded, will apply even to RO's doing the work under an Instrument of Appointment where it had been intended to plug a gap where MCA surveyors could not meet the needs of industry. It also currently applies to sister vessels not under the same management or ownership which had been the intent. The wording should be removed from the Code, the SAN 75 edited eventually to make this clearer.</p>	<p>SAN 75 wording will be updated to something like:</p> <p>“It has also been agreed that for sister vessels operating under the same owner and surveyed by the MCA (eg not a surveyor under an Instrument of Appointment), upon a successful survey a 5 year DoC DG can be issued to the first vessel of the class, with the sister vessels being issued an interim one year DoC DG until the vessel can be surveyed to verify the conditions in Schedule 2 of the DoC DG are valid.”</p>	<p>Wording at the end of 29.10 (3<sup>rd</sup> para) has been removed from the Code:</p> <p><i>“It has also been agreed that for sister vessels, upon a successful survey a 5 year DoC DG can be issued to the first vessel of the class, with the sister vessels being issued an interim one year DoC DG until the vessel can be surveyed to verify the conditions in Schedule 2 of the DoC DG are valid.”</i></p>
Norman Findlay	26/1/16	29	<p>Ship to Ship transfers referenced in MSN 1829 aren't dealt with in the code.</p>	<p>Possibly need to update SAN 75 and include wording in the code referencing MSN 1829?</p> <p>It was decided with Environment Policy Branch (email 29/1/16 refers) that in hindsight MSN 1829 should not be referenced and therefore code wording and SAN 75 should not be amended in this respect. This is because the MSN is put in force by another SI and this deals with STS transfers, whilst many of the Code Boats are not involved in this and are written out of the requirements, so it may cause confusion.</p>	
Ian Lardner	3/2/16	13 16 Appx 13	<p>Remove the phrase “Wheelmarked” throughout and replace with SOLAS standard and MED approved.</p>		<p>Done</p>
Jenny Vines	9/2/15	Appx 15	<p>Update Certificates to include Endorsement for fuel transfers operations in accordance with 29.7 of the code and also to include wording regards reporting modification or damage to the CA. See above on</p>	<p>Insert into the limitations section of the certificates “Practice and that any modifications or damage to the vessel is reported to the Authorised Examiner of the CA and is approved as required and</p>	<p>Insert into the limitations section of the certificates “Practice and that any modifications or damage to the vessel is reported to the Certifying Authority and is approved as</p>

			cranes. Insert a new certificate for Light Duty Workboats. See above comment from John Fernley.	considered rectified by the Authorised Examiner (CA) as required by the relevant part of the Code.”	required and considered rectified by the Certifying Authority as required by the relevant part of the Code.”  Insert at the end of the Workboat Code Certificate “ <b>Transfer of Marine Gas Oil Endorsement</b> In addition to the general requirements of the Safety of Small Workboats and Pilot Boats – a Code of Practice, this vessel has been examined with regard to section 29.7 of the Workboat Code Edition 2 and has been found satisfactory to undertake Transfer of Marine Gas Oil from Designated Fuel Oil Tanks from (name tanks) CA Stamp / signature / date”  A “Light Duty Workboat Certificate” has been added to Appendix 15.
Oli Vardy	1/16	29.7.1.4 and 29.8.1.4  Appx 13	Include a standard for the transfer fuel pipe used in transfer operations. A case of garden hose use had been uncovered which highlights the need for guidance	BS EN 13765 has been identified to be a suitable standard for the hose, however it also became obvious that 29.7.1.4 needed amending in the process, and 29.8.1.4. EN 857 Type SC1 hose is also highlighted as suitable 29.7.1.4 was also brought into line with road filling HSE guidelines and the code section on flexible fuel pipes 7.4.8.	29.7.1.4 changed to “29.7.1.4 <i>The fuel hose should have a dry break coupling so that NO spillage occurs. The fuel transfer hose <u>should comply with an acceptable standard (see Appendix 13), be bonded and be of a suitable type for the system pressure and height of usage. The hose should be maintained in good condition, and inspected regularly in accordance with the manufacturer’s instructions, or at least annually. Worn or damaged hoses should be replaced:</u></i> 29.8.1.4 first bullet (on transfer hose) has been amended to reference 29.7.1.4 and Appendix 13.  Appendix 13 now states: “29.7.1.4 & 29.8.1.4 BS EN 13765 Thermoplastic multi-layer (non-vulcanized) hoses and hose assemblies for the transfer of hydrocarbons, solvents and chemicals

					EN 857 1SC Rubber hoses and hose assemblies - Wire braid reinforced compact type for hydraulic applications – Specification”
Ian Lardner	1/16	7.9	What is Ex Rated		Footnote added “Ex is the mark for ATEX certified electrical equipment for explosive atmospheres. The ATEX directive consists of two EU directives describing what equipment and work environment is allowed in an environment with an explosive atmosphere. The ATEX 95 <i>equipment</i> directive 94/9/EC, Equipment and protective systems intended for use in potentially explosive atmospheres; 94/9/EC is replaced by a new ATEX directive 2014/34/EU from 20 April 2016.”
Ian Lardner	1/16	13.2.3.1.2 i)	The reference to 13.2.1.1.1 is incorrect this should be 13.2.1.1		Referenced section changed to 13.2.1.1.
Jenny Vines	1/16	Throughout	References to owner / operator should be changed to owner / managing agent as per the definitions section.		Changes made.
Ian Lardner	1/16	Section2 Definitions	Add in a standard definition of “Float Free” arrangements for clarity. SOLAS Definition used, amended slightly to take out the phrase “survival craft” and replacing with “liferaft” as is suitable for these types of vessels, also added in that float free can be used to describe EPIRBs too. Added in clarification for the phrases “automatically released” and “ready for use”.		Insert in Section2. ““ <i>Float-free</i> ” <i>launching</i> is that method of launching a liferaft or EPIRB whereby the raft or EPIRB is automatically released from a sinking ship and is ready for use.  In the context of a vessel in commercial use, “automatically released” means release from the liferaft / EPIRB stowage location and release of the painter line through use of a weak link or similar.  In the context of a vessel in commercial use, “ready for use” means: in the case of a liferaft the raft is inflated and ready for embarkation.”
Simon Milne	2/16	11.6	Simon has noticed (through an enquiry on an existing vessel) that the text of the codes are not clear about how to handle lifting operations on the centre line of the vessel which may effect the stability and dangerously	It would also be sensible to add in “or bow” to 11.6.7 in the same way as those covered by new 11.6.8 for vessels having a stability booklet.	Insert a new section: “11.6.8 Vessels that are fitted with a stern (or bow) gantry / centre line lift that are required to have a

			effect the stability. This is not an excess requirement, rather a clarification.		<p>stability booklet (eg those not excluded by 11.6.7) should meet the following criteria. All the following criteria should be satisfied when the A frame or other lifting device is operating at its maximum vertical moment;</p> <p>.1 the range of stability from the angle of static equilibrium to downflooding or angle of vanishing stability, whichever is the lesser, is equal to or greater than 15 degrees;</p> <p>.2 the area under the curve of residual righting lever, up to 40 degrees or the downflooding angle, if this is less than 40 degrees, is equal to or greater than 0.10 metre-radians;</p> <p>.3 GM should be positive and greater than or equal to 0.05m.</p> <p>.4 the minimum freeboard to deck edge at bow, side or transom, measured at A.P. and F.P. throughout the lifting operations should not be less than half the assigned freeboard to deck edge at side amidships or at the transom. For vessels with less than 1000mm assigned freeboard to deck edge amidships the freeboard at A.P. or F.P. at deck edge should not be less than 500mm; and</p> <p>.5 the freeboard to deck edge anywhere on the periphery of the vessel is at least 250mm.”</p> <p>11.6.7 add “(or bow)” after “Stern” and before “gantry”.</p>
David MacRae	1/3/16	29.1, 29.4.5 and 14.9.6	David MacRae and Simon Roberts noticed that there is no reference to the safe means of access to escape routes and liferafts whilst carrying dangerous goods. This is a requirement of the DG Regulations and is therefore not an additional requirement. The conversation relating to certificates also highlighted that the Code does not make clear that whilst the requirements of the DG Regulations have not been excluded from the Work Boat Regulations, it is the case that the requirements in Chapter 29 are intended to apply as an equivalence to those DG regulations whilst the WB is in operation in UK waters.	SAN 75 has been updated to include all of these points in SAN 75 Rev 2.	<p>New sections have been added to the code:</p> <p>“14.9.6 When carrying dangerous goods (section 29) owners / managing agents / masters should ensure ready means of escape and means of safe access to survival craft in the event of a fire / explosion when carrying dangerous goods, under the Merchant Shipping (Dangerous Goods and Marine Pollutants)</p>

					<p>Regulations 1997 (SI 1997 No. 2367), as amended.”</p> <p>And</p> <p>“29.4.5 Ready means of escape should be provided whilst carrying dangerous goods, see section 14.9.6.”</p> <p>And a new second paragraph to section 29.1.1 has been added :</p> <p><i>”The following requirements have been developed, noting the provisions in regulation 22(2) of the Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997 (SI 1997 No. 2367), as amended. The basic philosophy of these requirements is to apply standards contained in Regulations 54 or 19 of Chapter II-2 of SOLAS to the extent that is practicable and reasonable taking into account the design features and service characteristics of these vessels, as well as the limitation placed on the operation of the vessels, subject to the vessels complying fully with the stowage and segregation requirements of the IMDG Code. The requirements below will only apply to workboats whilst operating in UK waters.”</i></p> <p><i>This point will be better reflected on the Document of Compliance DG certificates also MSF 3034 to 3036 refers.</i></p>
Oliver Vardy	1/3/16	Chapter 29 & 14	It has been noticed that where A-60 is required under IMDG Code and documented in 29.4.3 of the consultation version of the code, this is fairly meaningless for FRP structures and not very helpful for Aluminium structures. It is recommended to add text to point to MCA guidance on achieving this standard.	See entry below on 9/9/16 O. Vardy	
Oliver Vardy	7/3/16	Chapter 14	It has been noticed that the MCA guidance on use of intumescent materials is not specified so this should be referred to in the text.		<p>A new section added as follows:</p> <p>14.2.3.9 The use of intumescent materials is not acceptable for use as ‘A’ Class</p>

					<p>insulations for any of the following reasons:</p> <ul style="list-style-type: none"> <li>• their performance under smoke and toxicity tests within the FTP Code, and the knock-on effect this might have on escape and abandonment;</li> <li>• they may not be non-combustible;</li> <li>• they intumesce at temperatures in excess of the mean temperature limitation of 139 °C. This temperature could be considerably exceeded before they became effective;</li> <li>• they may lose their intumescent properties in spaces having high ambient temperatures such as machinery spaces or in low temperature fires;</li> <li>• there is no guarantee that the materials would intumesce at any stage during the life of a ship and there is no means of knowing if materials have lost their ability to intumesce;</li> <li>• they are unrecognisable from ordinary paints and coatings and any deteriorating material may be removed and inadvertently replaced by an ordinary paint or coating;</li> <li>• they may deteriorate unbeknowningly in concealed spaces; and</li> <li>• they may be affected by water or hydrocarbons.”</li> </ul> <p>A new section added:</p> <p><i>“29.4.3.3.1 Refer to section 14.2.3.9 for the use of intumescent materials.”</i></p>
Forkanul Quadar	7/3/16	Appx 3, 2.2, 2.7, 4.4	It is acknowledged that the changes made to Basic Sea Survival Course should be reinstated to allow training in either the sea Survival Course or, for vessels	References added throughout the Appx for each relevant course to the STCW table references.	Appendix 3, 2.2 last sentence changed to “...operation), the Basic Sea Survival Course or the Personal Survival Techniques

			<p>undertaking the STCW CoC route they should do the Personnel Sea Survival Techniques Course.</p> <p>Forkunal also wanted updates to MGN and MSN references in both Chapter 26 and Appx 3.</p> <p>Mark Ranson also thought that the new wording on the AEC course should be reordered eg new 4.4 should become 4.2 and old 4.2 should become 4.3 etc.</p>		<p>(STCW Table A-VI/1-1), as appropriate, and...”</p> <p>Title of 2.7: “Basic Sea Survival Course or Personal Survival Techniques Training Course”</p> <p>2.7.1 new sentence added at the end: “For operators following the STCW Certificate of Competence route, this should be the Personal Survival Techniques Training Certificate. Other operators may use the Basic Sea Survival Certificate.”</p>
Mark Lockie	7/3/16	19.1.1	<p>The wording in the code does not specify exactly what nautical publications should be carried. For instance the full SOLAS Chapter V list would be inappropriate for all code vessels such as Code of Signals, IAMSAR, notice for mariners (for cat 5 &amp; 6). This should be clarified in a footnote.</p>	<p>This came out of a phone call and was further discussed with Rakesh Pandit.</p> <p>It was decided that it was appropriate to leave flexibility at the discretion of the CA surveyor.</p>	No changes
Forkanul Quadar	7/3/16	<p>26.11</p> <p>Appx 3, 2.6.2</p> <p>Appx 3, 2.8.2</p> <p>Appx 3, 2.8.3</p> <p>Appx 3, 2.9.1</p> <p>Appx 3, 3.2</p>	<p>Forkanul highlighted that footnote 6 and MSN 1747 references were out of date since review in 2014. It is planned to amend MGN 264 quite soon so a caveat “or any subsequent amendment “ should be added to draw the readers attention to its possible existence. Add in reference to STCW table for ease re Elementary First Aid Certificate.</p> <p>Add in reference to STCW table for ease re Medical Care Certificate.</p> <p>Add in reference to STCW table for ease re Fire Fighting and Fire Prevention course.</p> <p>Refereshner training reference to MIN 469 now outdated and should be changed to MIN 520 and MSN 1865</p>		<p>26.11 title. Footnote 125 amended to refer to MSN 1842 rather than MSN 1767.</p> <p>26.11.</p> <p>MSN 1767 updated to MSN 1868.</p> <p>Appx 3, 2.6.4 “or any subsequent amendment” added to the note at the end.</p> <p>Appx 3, 2.8.2 “(Table A-VI/1-3)” added.</p> <p>Appx 3, 2.8.3 “(Table A-VI/4-2)” added.</p> <p>Appx 3, 2.8.3 “(Table A-VI/1-2)” added.</p> <p>Appx 3, 3.2. MIN 469 changed to MIN 520 and MSN 1865</p>
Jenny Vines	10/3/15	25.4.1	<p>It is noted that the Carol Anne fatal accident the CA had not reassessed the stability booklet where the crane had been changed for a different model or different weight and different lifting load and reach. It is felt that this should be directly pointed to in the code.</p>		<p>New wording added into the first sentence of 25.4.1 (now numbered 25.4.1.1) “..(and consideration should be given to re-examining the stability if modifications are made to the lifting device)...”</p>
Jenny Vines		throughout	<p>References should be made to Appx 13 in the text of the code where there are entries in Appx 13 standards, therefore making the reader more aware that these are there.</p>		<p>All references to Appx 13 inserted throughout the text of the code where there are standards quoted in Appx 13 already.</p>

Jenny Vines	April 2015	5.9 Appx 13	<p>Plastic pipes. It has become apparent from discussions with one of the builders that was fitting plastic pipes in the engine room fire main systems (eg essential systems) that under the draft consultation wording that they intended to only lag the plastic pipes in these systems. It was established that this would not be agreeable to Denmark and possibly Germany and therefore did not gain the support that was intended in the consultation changes.</p> <p>Further changes to remove “or insulation” option in 5.9.4.</p> <p>5.9.4 it was decided that we should specifically refer to the Res. A753(18) table matrix to preclude application of plastic pipes in essential systems.</p> <p>5.9.2 MCA should add “and IMO A.753(18) as amended” after class requirements to further highlights that plastic pipes can only be used in certain circumstances.</p> <p>The 800 degree for 10 minutes test referred to in 5.9.3 needs removing and replacing with another suitable fire test (ISO 10497).</p> <p>The grammar needs improving in 5.9.4.</p> <p>A standard needs to be inserted for completeness on “exhaust quality rubber hosing for exhaust systems”, ISO 13363 or SAE J2006 R2 inserted in Appx 13.</p> <p>Mark Ranson asked for 5.9.3 the word “to” to be removed from the last sentence, and 5.9.4 the word “or” to be changed to “of”.</p>		<p>5.9.2 added “and IMO A.753(18) as amended”</p> <p>5.9.3 wording changed to “...passed a <del>standard</del> fire test in accordance with ISO 10497. It should be taken...”</p> <p>5.9.4 wording changed to “<u>Any Flexible or non-metallic piping, and engine room bulkhead and deck penetrations, where failure would present a risk of flooding, which contribute any additional risk of spread of fire, fitted in a machinery space or fire risk area should be <del>efficiently insulated against fire, or be</del> of fire resistant material in accordance with eg ISO Standard 15540 or IMO A.753(18) <sup>28</sup> as amended, and the pipes are used in accordance with the fire endurance requirements matrix in appendix 4 of the Res A.753(18), or exhaust quality rubber hosing for exhaust systems where applicable (see Appendix 13), and a means should be provided to stop the ingress of water in the event of the pipe being damaged, operable from outside the space. (See section 5.9.1 for valve requirements).</u>”</p> <p>Appx 13 the following standards have been added against section 5.9:</p> <p>ISO 10497 ISO 13363 Or SAE J2006R2</p>
Paul Wilkins		13.5.3	<p>The reference in 13.5.3 should be to 22.8.2 (Personal clothing) rather than 22.4 (protection of passengers).The reference in table 13.1 to TPA’s in Cat 6 should be to 13.5.4 (vessels operating in category 6) rather than 13.5.3 (immersion suit carriage).</p>		<p>Table 13.1 reference to 13.5.3 changed to: “13.5.3”</p> <p>Section 13.5.3 reference to 22.4 changed to:</p>

<sup>28</sup> Note: IMO Resolution A.753(18) places limits on the extent to which rigid plastic piping can be used.

					“(see Section 22 including 22.1.2.7 and 22.2.8)”
Jenny Vines / Simon Milne	10/5/16	4.1.2	The wording of 4.1.2 needs moving around to represent better the intent that an open boat operating needs to have reserve of buoyancy which if coming under the simplified stability test then is required to have a swamp test but if under the stability calculation would not. This is more in line with the old Yellow Code wording, allowing for cat 5 and 6. We have also checked that we are happy for the new cat 5 to operate at night if it is an open boat, which with a provision of reserve of buoyancy then we should be.		4.1.2 updated to: “A vessel which is not fitted with a watertight weather deck in accordance with section 4.1.1 should <del>normally</del> be restricted to Area Category 3, 4, 5 or 6. An open boat should <del>normally</del> be restricted to service in Area Categories 4, 5 and 6. Sections 4.1.3 and 4.1.4 apply to a vessel referred to in section 4.1.2. <u>Both types of boats should</u> be provided with adequate reserves of buoyancy and stability for the vessel to survive the consequences of swamping when loaded with all the vessel’s equipment, fuel, cargo, activity related equipment (e.g. diving equipment) and the number of persons for which it is to be certificated. See sections 11 & 12 for applicable standard.”
John Fernley	8/5/16	20.2.4	<p>We've started working with the WB Ed 2 code for newbuild workboats.</p> <p>I suppose it is to be expected that we will discover problems that only come to light when applying the code in practice.</p> <p>One such problem has arisen with the new dredger that we are hoping to carry on with to completion.</p> <p>Having a max loaded displacement of 380 Tonnes, the code requires anchor sizes of 250kg each and 17.5mm chain.</p> <p>The previous codes would allow one 68kg Anchor, and a 34kg kedge with 12 &amp; 10mm chain respectively (which demonstrates the unsuitability of previous codes) .</p> <p>If we set class requirements to SSC G6 unlimited worldwide operation then the numbers are similar for anchor cables and sizes as specified in the new code.</p> <p>However this vessel is necessarily coastal and sheltered in nature and the area of operation is G2</p>	<p>MCA approached LR (Tim Blanchard) to find the direct reference within SSC or Marine Survey Procedures Manual / Plan Approval Circular. Reference is to SSC Part 3, Chapter 5 deals with anchoring requirements and for a given service restriction and craft type e.g. G2 pilot boat a reduction is applied to the basic equipment requirements (see Part 3, Chapter 5, Sections 3 and 4). G2 is a range to refuge of 20 nautical miles. e.g. G2 applies a factor of 0.6.</p> <p>I have spoken to Norman Findlay (who drafted the section for us) who has assured me that the 16mm is not a mistake and that was what his sources suggested was a suitable range ie to only have one entry of the 16mm in the table.</p> <p>Norman, rightly, also expressed concern about vessels moving around from contract to contract and working in different area while the anchor may</p>	<p>20.2.4 changed to: “For vessels of unusual or non-conventional ship form (including pontoon barges) <u>or working under specified restricted coastal or inshore operations</u> the anchor and cable size should be to the satisfaction of the Certifying Authority <u>in accordance with the appropriate certification standards for the vessel type recognised by one of the Load Line Assigning Authorities (4.2.2.4 refers).</u> <u>Any service restriction placed by the certification standards reduction should be noted on the Small Workboat Certificate and the owner / operator should ensure that this equipment carried is commensurate with any voyage undertaken and with any specific local environmental conditions e.g. tidal strength.”</u></p>

			<p>which gives the reduced anchor requirement in LRS SSC Rules of 144kg.</p> <p>The designers have specified two 160kg anchors, with 120m of 16mm stud link chain.</p> <p>.</p> <p>Another way to look at this is if the dredger was making a transit voyage it would not be doing so with "cargo/spoil" and it would have a displacement of around 200 tonnes. This would give a smaller anchor requirement under the new code as written.</p> <p>On a linked topic the designers remark that the chain size requirement skips past 16mm rather quickly and think that just looking at the code table of cable sizes that there might be a misprint here.</p> <p>Maybe we can apply 20.2.4 in this case as a "vessel of unusual or non-conventional ship form..." or does it need an expanded clause 20.2.4 along the lines of:</p> <p>"For vessels of unusual or non-conventional ship form or working under specified restricted coastal or inshore operations, the anchor and cable size should be chosen to comply with an appropriate recognised standard to the satisfaction of the Certifying Authority."</p> <p>(It may need to mention Class as an example but I'm not sure of the desirability or necessity of this)</p>	<p>remain the same. He mentioned one particular vessel recently that couldn't hold its anchor in 6 knots of tide. This is probably the same problem as the GMDSS equipment and the sea areas not relating exactly to the Code vessel area categories. The GMDSS area is noted on the certificate. Ideally we don't have too many restrictions and endorsements on the certificate but this might be one that needs to be put on. What are your thoughts?</p> <p>The wording used in other areas of the code for endorsements checked for continuity.</p> <p>Also email from D Gray 11/5/16:      "What we are trying to achieve as designers in this instance is to fit appropriate anchors and chain for the vessel in question</p> <p>The table of anchors and chain sizes is an improvement on the old code, but not appropriate for our dredger due to its operational profile. For example the dredger may well move from location to location, but not full of mud, so the displacement would be around 220 tonnes not 380. Another area of concern is the table of chain sizes - this does not specify whether the material is U1, U2 or U3 – which makes a big difference to the chain size requirement, and (important in our case) the weight of chain carried and therefore the size of winch required.</p> <p>Perhaps a simpler approach is to revise the code wording to</p> <p>"20.2.4                      <i>For vessels of unusual or non-conventional ship type (including pontoon barges) the anchor and cable size should be to the satisfaction of the Certifying Authority "</i></p>	<p>20.3.4 is updated to:      "20.3.4 The strength, <del>and form and material</del> of the anchor cable and its attachments to the anchor and the vessel should be approved by the Certifying Authority. <u>The material should be to the satisfaction of the Certifying Authority in accordance with the appropriate certification standards for the vessel type recognised by one of the Load Line Assigning Authorities (4.2.2.4 refers).</u>"</p>
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				<p>The difference here is our dredger has a conventional hull “<i>form</i>”, but is not a conventional “<i>type</i>” of ship. We could perhaps add “(<i>including pontoon barges, vessels with hoppers, etc</i>)”</p> <p>This is less prescriptive and allows the CA to make a judgement on such issues. The table remains as a base line, but if a reasoned alternative can be argued then the CA should be in a position to readily accept it, perhaps with the assistance of the common interpretations. This might help to keep the rules simpler overall, but give designers and builders the flexibility to propose reasonable and justifiable alternatives?”</p> <p>It was decided with industry to instead of quoting U1, U2 or U3 to specify that the material should be to class standards. This is in effect what happened under MGN 280 but this makes the situation clearer.</p>	
John Fernley	6/4/16	4.5.2.2 Appx 8	<p>I've long been a fan of David's matrix in A8 but as a matter of policy we've always retained favourable weather restriction as a logical requirement for an open boat, as by implication in 4.1.2 (normally Cats 4,5,6). Also the definition of favourable weather is not particularly restrictive.</p> <p>A client has just queried this &amp; wants to operate up to 3 miles at night without the weather restriction (no particular reason I think).</p> <p>All other conditions are in place eg secondary propulsion, PPE, RA etc.</p> <p>I'm trying to persuade them that they don't need to operate outside fav weather conditions.</p> <p>Is this worth a slight amendment to the matrix?</p> <p>Of course there is also the structural assessment factor in this</p>		<p>4.5.2.2 has been amended to include open boats as follows:</p> <p>“A rigid inflatable boat <u>or open boat</u> may only be considered for operations in Area Category 3 <u>or 5</u> (night time operations), if...”</p> <p>Appendix 8 is amended to be entitled “ALTERNATIVE COMPLIANCE STANDARDS FOR RIGID INFLATABLE BOATS <u>AND OPEN BOATS</u> WISHING TO OPERATE OUTSIDE THE HOURS OF DAYLIGHT WITHIN AREA CATEGORY 3 <u>and 5</u>”</p> <p>Figure A8.1 title is amended to : “Acceptance Matrix for Restricted Category 3 <u>and 5</u> RIBs <u>and Open</u></p>

					<u>Boats without a Permanent Substantial Enclosure.”</u>
Ben Ng / Nick Quarmby	11/5/16	28.2.3 Appx 6, 1.1.2.2	<p>...the main different between the revised MARPOL Annex I (regulation 15.6) from previous MARPOL Annex I (regulation 9(2)) is the previous MARPOL Annex I/The UK (POP) require an approved OWS in accordance with IMO type approval Guidelines to be installed on ships less than 400GT if the ship chooses to discharge oily and oily mixture into the seas but revised MARPOL Annex I doesn't.</p> <p>In the case we are going to regulate ships of less than 400GT by applying regulation 15.6 of revised (current) MARPOL Annex I – not the UK (POP)-, which means the UK (MCA) shall approve an operation equipment of a design to ensure that the oil content of the effluent without dilution does not exceed 15ppm, I would suggest ship (Master/operator) should propose an 'operation equipment' for MCA for consideration of acceptance to be used when the ship is operating within the UK territorial waters.</p> <p>...we can consider the 'operating equipment' as the filter/polisher + 15ppm alarm + automatic stopping arrangement. In term of enforcement, the visiting surveyor/inspector from either CAs or ROs should verify all the above are being maintained and in good operating condition.</p> <p>Before we proceed to consider ... and on wider issue – amending section 28.2.3.3 in Chapter [2]8 -, may I take us back to the question -Shall we agree applying revised MARPOL Annex I but not the UK (POP) Regulation on this matter? It is an important deciding factor as to how we deal with the control of discharge oil and oily mixture for ships less than 400GT for both the UK ships and ships operating in the UK territorial waters.</p>		<p>New para 28.2.3.3 added  <i>“28.2.3.3 Certifying Authorities are requested to verify sections 1.1.2, 1.2, and 1.3 in Appendix 6 by recording the arrangement such as the size of the holding tank, documentation of the approvals of the equipment and that the vessel has established record keeping of all related operations, it's maintenance and repair. These records for survey and inspection purposes shall be kept by the Master of the vessel and made available during Certifying Authorities annual examination.”</i></p> <p>Old 29.2.3.3 renumbered 29.2.3.4</p> <p>Suggested footnote to new 29.2.3.4  <i>“It is anticipated that MCA will publish an MGN in 2016 giving guidance to &lt;400 gt vessels on oil pollution prevention equipment that is acceptable to the MCA under MARPOL Annex 1 amendments.”</i></p> <p>Appx 6, 1.1.2.2 new note added:  <i>“Note: * Refer to 1.1.2.2, the MCA may consider accepting equipment approved in accordance with the IMO's relevant Resolutions for type approval of the filter, the 15 ppm alarm and the automatic stopping device in meeting the requirement of 1.1.2.2 of this Appendix 6.”</i></p>
Jenny Vines / Simon Owens	24/5/16	7.4.4 & 7.4.5  14.6.4	<p>7.4.4 contains 2 requirements and needs splitting up making 2 separate requirements. This was directed by Simon Owens in email dated 27/8/15 but had not been acted on.</p> <p>Reference in 14.6.4 to 7.4.8 is incorrect, needs changing to 7.4.12.</p>	<p>Wording on stainless steel fuel tanks is removed from 7.4.4 as this is already dealt with in 7.1.7.1</p>	<p>7.4.4 wording cut from the end of existing 7.4.4 to make a requirement on its own.: <u>“The recommended material fuel pipes is stainless steel or equivalent.”</u>  <u>Remaining wording of existing 7.4.4 becoming new 7.4.5</u></p>

					Other paragraphs renumbered accordingly. 14.6.4 Reference changed from 7.4.8 to 7.4.12.
Jenny Vines	22/12/15	22.2.7 13.13	Following development of MGN 544 this reference should be added to that in 22.7 and moved to new section 13.13		22.2.7 moved to 13.13 and " <a href="#">Refer to MGN 544</a> " added at the end. Reference to MGN 544 added into Appx 14.
Mark Ranson	17/5/16	16	Section 16 - There still appears to be no mention of a radio survey in this section despite several comments that it should be covered? - I would endorse John F and others comments as the Germans and I believe others expect to see a Radio survey certificate.  See entries above David Fenner 14/12/14 and John Fernley email below 17/12/14	See above entry from David Fenner dated 14/12/14.	NFA
Jenny Vines	27/5/16	25.2	Email to Mark Meade regarding MAIB accident report for the Asterix: Presumably bullet point 3 of their recommendation in covered in the guide? Bullets 3 and 5 are covered in the new WB Code. Interestingly bullet 4 is only covered in the WB Code for <2 X displacement vessels engaged in towing, perhaps this should be rectified.	Repeat wording in 25.2.2.4 applicable to <2x displacement vessels. Agreed by Mark Meade and Mark Ranson.	Added the following sentence at the end of 25.2.2.3 : "The vessel shall have a documented and drilled procedure and any necessary equipment to achieve a safe and rapid release of the tow in emergency conditions, which shall be verified by the Certifying Authority."
Mark Meade	31/5/16	25.2	Email sent in regard to MAIB report and recommendations on the Asterix girting accident.  I take your point about signage, it would certainly not go amiss to mention it in the new Code, I have mentioned downflooding/hatch closing the Guide but may be it could be more highlighted. I'll revisit the Guide re point 3 on the communications to make sure that is highlighted enough as well, mentioned also in the gog use notes attached.  The whole issue with the 2 x the displacement limit was originally the PBA wanting to be allowed to tow other members in without complying with stability etc. It might be a lot better to make that a specific exemption in some way – eg any towing not done for reward? - and take out the displacement issue as it seem to me that part of the Endurance disaster was a complacency about the need for stability and etc as it was a light weight tow.	Refer to entry above Jenny Vines as come too late in the day for this code. This suggestion, though it has much merit and MCA would support this in future, Unfortunately the drafting is too far down the line to take this into account.	The last sentence of 25.2.3.3 has been updated to "All watertight doors below the main deck and all weathertight doors, are to be securely closed and fully dogged at sea, <u>those on the vessel engaged in towing should have signage to this effect.</u> "

Jenny Vines	7/6/16	15.4.3 15.5.3 10.4.3	<p>Fire buckets should be removed from the code. These are not items that would be used in practice. The fire buckets have also been removed from the latest version of small domestic passenger ship requirements MSN 1823.</p> <p>Fire buckets are also referred to in 10.4.3 "Buckets required for this section may also be counted in any requirements for buckets given in section15." If removing 15.4.3 and 15.5.3 then this reference should also be removed.</p>	<p>This is in the main supported by industry, especially for those vessels &gt;15m L etc in 15.5.</p> <p>It has become clear through the discussions that industry are not meeting the required description of SI 1998 No. 1011 MERCHANT SHIPPING SAFETY The Merchant Shipping (Fire Protection: Small Ships) Regulations 1998. Which generally asks for 1 of 2 fire buckets to be fitted with a lanyard and Regulation <b>36. States</b> " (1) Every fire bucket provided in compliance with these Regulations shall be painted red and shall be clearly and permanently marked with the word "FIRE". Except in open ships every such fire bucket shall be kept filled with sand or water. (2) Except in open ships, fire buckets provided in compliance with these Regulations shall not be used for any purpose other than extinguishing fire."</p> <p>Making it clear that the bucket should be filled with sand / water should highlight that they need to be ready for use, if they are kept.</p>	<p>15.5.3 has been removed and subsequent sections of the code have been renumbered accordingly.</p> <p>15.4.3 (for vessels &lt;15m and &lt;16 persons) has been reworded as follows: "At least two fire buckets with lanyards <u>long enough to reach the sea from the weather deck.</u> Buckets may be of metal, plastic or canvas and should be suitable for their intended service."</p> <p>10.4.3 is reworded to refer only to 15.4.3 rather than generally to Section 15.</p> <p>Requirement 15.5.3 (fire buckets for vessels &gt;15m and 16 or more persons) is removed.</p>
Jenny Vines	7/6/16	Throughout 25.8.4 11.3.1	<p>Update MCA website addresses to gov.uk Post Thrill Rides Guidance on gov.uk Put in reference to Load Line Instructions for the Guidance of Surveyors being improved and republished in 2016</p>		<p>Changes to MCA web address made throughout and thrill rides web address re made and noted in relevant footnote to 25.8.4</p>
Jenny Vines / Oliver Vardy	7/6/15	Section 2	<p>Definitions for "A" Class and "B" Class fire divisions should be inserted.</p>		<p>Reference made in Section 2 to SOLAS Chapter II/2 definitions:</p> <p>"<i>"A" class</i>" divisions are those divisions formed by bulkheads and decks which comply with the criteria described in SOLAS Chapter II-2 Regulation 3;"</p> <p>"<i>"B" class</i>" divisions are those divisions formed by bulkheads, decks, ceilings or linings which comply with the criteria described in SOLAS Chapter II-2 Regulation 3;</p>

Richard Linford	15/6/16	10.5.1	<p>Verbal concern expressed: There is a clarification required to ensure that flat bottomed boats that are not open boats still require a bilge alarm eg a 40 foot swan which some surveyors are interpreting this as not required.</p> <p>From Bas Edmunds: What about a yacht with multiple sections and no drain holes joining the sections. In reality the bilge alarm would not necessarily go off if heeled if the alarm were in the bottom of one or all of these sections. Bas Edmunds (RYA) would like to suggest wording for yachts.</p>	<p>RL suggested amending 10.5.1 to add: 10.5.1.3: “.3 <u>This is not required</u> where the bilge level <del>cannot</del> be readily seen <u>on an open boat.</u>”</p> <p>BE suggested amending to a bilge alarm is not required where the bilge is less than 30cm.</p> <p>This is not acceptable to the MCA for workboats.</p>	<p>Text changed in 10.5.1.3 to: “.3 <u>This is not required</u> where the bilge level can be readily seen <u>on a boat with open bilges.</u>”</p>
Richard Linford	15/6/16	10.5.4	<p>Verbal concern was expressed: audible bilge alarms are often not loud enough and would not be able to be heard at the helming position.</p>		<p>10.5.4 added the wording “capable of being heard at all the control positions in all anticipated weather and operational conditions”</p>
Mr K Lee BV via Owen Preece BV	20/6/16	29.6.2.1	<p>As requested of ship's operator, the captioned ship is going to carry dangerous goods on deck, and we are reviewing Workboat code and note:</p> <p>(29.6.2.1) There should be an immediate availability of water from the fire main provided by an engine driven fire pump or a separate powered pump and, <b>in addition, from a manual fire pump.</b></p> <p>Please kindly advise if a portable pump, driven by engine which using petrol or MDO, is acceptable as "manual fire pump".</p>	<p>The wording has been carried over from MGN 280 and added to in the WB Code drafting in the respect of the 2 hoses. MCA are of the understanding that this intended to mean that there was a minimum of a second pump. The wording is updated to represent this meaning especially considering the MCA's current aim to move away from manual pumps.</p>	<p>Wording of 29.6.2.1 changed to: <i>“There should be an immediate availability of water from the fire main provided by an engine driven fire pump or a separate powered pump and, <del>in addition, from a manual fire pump.</del> E.g. an additional fire pump should be provided in the event of the loss of one pump. Also refer to 15.4.1 and 15.5.1. Each pump shall be capable of supplying two hoses and nozzles, required in accordance with the Code, one of the nozzles should be a spray/jet type.”</i></p> <p>A new Section 15.1.3 added “15.1.3 Where dangerous goods are carried or transfer of cargoes is undertaken in accordance with Chapter 29, refer to 29.6.2.</p>
Jenny Vines	29/6/15	29.6.2	<p>“Engine space” references in the code are to be changed to “machinery space” to allow one phrase to be used for consistency.</p>		<p>29.6.2 updated.</p>
Nick Quarmby / Keith Patterson	4/7/16	15.4.1.3 and 15.5.1.3	<p>Nick: With respect to the provision of fixed fire extinguishers for discharge into engine spaces, you run the risk of the same sort of misunderstanding if you have one for &lt;15m and two for &gt;15m once you consider multihulls.</p>	<p>Wording after “Appendix 13” updated to: “fitted adjacent to the main entrance to each machinery space and for those with an engine casing should be arranged to discharge into the machinery space(s)”</p>	<p>Changes made to newly numbered 15.4.3 and 15.5.3 as follows: “15.4.1.3 <u>where the machinery space is less than 120kW installed power and the engine is powered by diesel, one</u></p>

			<p>Should this be “each” engine space to be clear ?</p> <p>Keith: As promised I looked up the British Standards - please see attached.</p> <p>Simple rule a fixed system is required when propulsion space has more than 120kW installed.</p> <p><b>Under 120kW, a portable fire extinguisher sized and suited to flood the engine space through a fire port in the engine casing</b></p>		<p>multi-purpose fire extinguisher sized appropriately and to a recognised standard, see Appendix 13, <u>may be fitted adjacent to the main entrance to each machinery space and for those vessels with an engine casing arrangement they should be arranged to discharge into the machinery space(s) through a fire port</u>, with a minimum fire rating of 13A/113B, or a number of smaller extinguishers, giving the equivalent fire rating, in addition to that required in 15.4.2 below;”</p> <p>“15.5.1.3 <u>where the machinery space is less than 120kW installed power and the engine is powered by diesel</u>, not less than two multi-purpose fire extinguishers sized appropriately and to a recognised standard, see Appendix 13, <u>may be fitted outside each machinery space</u>, each with a minimum fire rating of 13A/113B, or a number of smaller extinguishers giving the equivalent fire rating, in addition to that required in 15.5.2 below;”</p>
Yannis Calogera, BV	8/6/16	11.7.4	<p>Please find herewith our comments on the towing stability criteria proposed in the latest MCA Workboat Code as quoted below:</p> <p><i>11.7.4 For vessels with stability information booklets, the book should include loading conditions for towing. Stability for towing conditions may be deemed satisfactory if the heeling lever (defined below) does not exceed 0.5 times the maximum GZ for the most critical loading condition.</i></p> <p><i>Heeling Lever = (0.6 x Max. Bollard Pull x Vertical Distance between Hawser and Centre of the Propeller(s)) / Displacement</i></p> <p><i>The height of the hawser should be measured at:</i></p> <p><input type="checkbox"/> <i>the fixed gog, or the side rails if higher, if a fixed gog is always used; or</i></p>	<p>MCA JV, Malcolm Maclean and Simon Milne have assessed the BV Class requirements and the new proposed amendments (paper SDC3/21 amended by MSC 76 noted in MSC76/25) to IMO Intact Stability Code and have decided to refer to those future amendments within the WB Code.</p>	<p>11.7.4 has been split in two, creating a new 11.7.5 just containing the towing conditions criteria.</p> <p>A new 11.7.6</p> <p>“In lieu of compliance with 11.7.5 the vessel should be shown to comply with section 2.8 of Part B of the IMO’s amended Intact Stability Code <sup>29</sup> (2008 IS Code) in its entirety.”</p> <p>Old 11.7.5 and 11.7.6 are renumbered 11.7.7 and 11.7.8.</p>

<sup>29</sup> IMO International Code on Intact Stability, 2008, Resolution MSC.267(85), as amended.

□ *the top of the winch drum (with no towline deployed), or the side rails if higher, if a fixed gog is not always used.*  
*If the maximum GZ occurs at an angle greater than 30 degrees of heel then the GZ value for 30 degrees of heel should be used instead of the angle of maximum GZ.*

As the heeling lever is taken as the vertical distance between the hawser and the centre of the propeller(s), this is essentially a tug *self-tripping* stability criterion, whereby the available thrust which can be directed in transverse direction is defining the heeling moment causing the tug to heel (it is assumed that the towline force - with the towline perpendicular to the tug's centre line - is equal to the transversely directed thrust, thus forming a couple). The fixed value of 0.6 times the BP (equivalent to available thrust at zero forward speed) does not take into consideration the work done within the SafeTug JIP to which BV, LR and ABS have participated and which have lead to the development of the harmonised towing stability guidelines currently considered by IMO's SDC Sub-Committee. Based on R&D work (MARIN) and experience feedback we know that the available thrust depends on the type and arrangement of the propulsion system (e.g. two fixed ducted propellers with rudders, azimuth stern drive (ASD), etc.) as well as the towing arrangement (location of towing point(s) (e.g. towing hook, fairlead, etc.)). Different tug designs respond differently to a self-tripping situation. Moreover, modern tugs often have multiple towing points (e.g. ASD tugs can usually tow over the bow and over the stern), in which case the tug responds differently depending on which towing point is used (in particular due to the difference in longitudinal distance between the thrust application point and the towing point). As a consequence, the value of 0.6 may be too low in some cases (e.g. typical ASD tug towing over the stern), while it may be too high in other cases (e.g. ASD tug towing over the bow). In the harmonized stability criteria the feedback from R&D as well as design and operational experience has been taken into account, which has lead to a more sophisticated assessment of the percentage of thrust (or BP) to be considered for different propulsion and towing arrangements.

The stability criterion that the heeling lever should not exceed 0.5 times the maximum GZ is intended as a

			<p>safe margin against capsizing. That said, the criterion does not reflect well the actual physics of the heeling and righting process, in particular the energy balance between energy available to heel the tug (under the action of its own thrust) and energy available to tighten the tug. The area contained between the heeling lever curve and GZ curve between zero heel and the first intersection of the curves (static angle of equilibrium) is a measure for the available heeling energy, whereas the area contained between the GZ curve and the heeling lever curve between the first and second intersection of the curves (or between the first intersection and the angle of downflooding if this occurs before the second intersection) is a measure for the righting energy. Setting a fixed maximum value for the GZ curve may generally achieve a positive energy balance, but it is a rather simplistic approach which may be penalising existing proven designs, while at the same time it could overestimate the implicitly assumed righting energy due to the fact that the downflooding point is not taken into account (theoretically you could have a downflooding point soon after reaching the angle corresponding to 0.5 times the maximum GZ, which could be detrimental for the tug's stability). Straightforward application of the safety principle that the righting energy should be greater than the heeling energy has lead to the criterion adopted by the harmonised towing stability guidelines, duly taking into account the downflooding point (which is a key factor in actual stability incidents with tugs).</p> <p>Finally, when developing regulations we should be exercise prudence in ensuring that the assumed loads (in this case heeling moment) are consistent with the applied criteria. During the development of the harmonized towing stability guidelines many existing proven designs have been checked to ensure that the level of safety of at an appropriate level (generally proposed requirements are slightly more stringent than the existing requirements) without imposing a step increase in requirements when there is no justification to do so.</p>		
Richard Blackhurst	11/7/16	Appendix 3, section 2.9 and 4	It was my understanding as from January 2017 crews area required to have the relevant training and for this to be refreshed every 5 year is this a recommendation or mandatory as you can see from Ray's email he is assuming its a recommendation?		Appx 3, 2.9. Added “. The Master or nominated fire fighter should undertake refresher training of the Fire Fighting and Fire Prevention course at least every 5 years.”

Nick Quarmby	6/7/16	4.6 and 24	<p>4.6.3 comment "I am not certain if there is a requirement to specify this on the WB Code certificate itself. If this is something which we require to be on the certificate then I think we should state this and the WB Code certificate should include an item to carry the relevant information, which it presently does not. Having said this, there will have to be some sort of specification for the crane used to lift the workboat, where the crane is a dedicated one and the workboat is of substantial size, and I would expect this to have a defined operational limit in terms of sea state or otherwise. So this offers the possibility that this section could refer to these limits instead. "</p> <p>4.6.4 comment "Not really sure what this means. There is no purpose in having a workboat if the persons on board cannot safely be transferred to and from the vessel, either by ladder or when lifted with the vessel. I see no application for this clause unless there is something missing relating to the applicable conditions. If you apply as written then if the personnel cannot be safely transferred you certify the WB for the run to shore, but the people are still unable to get on or off so this offers no advantage."</p> <p>24.5 comment "The only practical application of this clause is to consider the limits for which the recovery equipment is designed and within which the WB's operation is limited. You are not going to provide recovery equipment which can operate beyond the limits within which you intend to operate the WB. You certainly will not <u>anticipate</u> recovering the WB in these conditions."</p> <p>24.6 first bullet point comment: "Does this clause imply that type 1 tenders have to be launched and recovered manned, and not boarded by ladder?"</p> <p>24.7 first bullet point comment: "Does this mean that you can only have a type 2 tender on a WB and no other vessel type ? This would support our view that providing a "type 2 tender" on a Convention sized vessel is not acceptable as it does not provide the same level of safety as employing a certified vessel from shore to undertake storing or crew transfer duties. In our view "fit for the purpose intended" would broadly align with meeting WB Code Cat 6 for such vessels.</p>		<p>4.6.3 second sentence is changed to "Where the <u>workboat</u> certification specifies defined conditions to allow safe launch and recovery, <u>these conditions should be noted on the certificate and met and</u> then the mother ship or shore or platform facility can be considered as a safe haven for the purpose of assigning an area category."</p> <p>4.6.4 A second sentence is inserted "In effect this vessel cannot be considered as a daughter craft."</p> <p>24.5 the word "operational " is added after "ALL anticipated";</p> <p>24.6 first bullet:</p> <p>"<u>where applicable</u>" added at the end.</p> <p>24.7 first 3 bullets changed to :</p> <ul style="list-style-type: none"> <li>• "The mother vessel <u>should be Coded, certified under Loadline or other equivalent arrangement and be fit for the purpose intended, or</u>;</li> <li>• <u>If it is</u> not certified under the Code of Practice <u>or other as above</u> it should be fit for the purpose intended, regularly inspected by the operator, owner or managing agent and maintained in a safe condition, or;</li> <li>• <u>It should</u> be considered as work equipment under POWER<sup>30</sup>;</li> </ul>
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			24.7 second bullet point comment: This does not make good sense, should this bullet point start with ALTHOUGH?		
John Fernley	18/5/16	Table 20.2	I also noticed in Table 20.2 that the final column refers to "cable" sizes. This should really specify "chain" size because cable is defined as chain or rope elsewhere in that section. Maybe needs another suffix to apply equivalent breaking strength for rope or wire		Table 20.2 updated "cable " to "chain" New note 5 added "Where rope is used the breaking strength of the rope or wire should be equivalent to that of the chain specified in the Table."  20.3.2 updated to : "20.3.2 The cable for main anchors and for spare anchors may be of chain, <u>wire</u> or rope, <u>subject to section 20.3.3.</u> "
Alan Nagle	13/3/15	29.4.4.3	Ref 29.4.4.3 "Upon successful completion of a survey, a Document of compliance for the Carriage of Dangerous Goods harmonised with expiry date of the vessel workboat code will be issued..."  Ref:29.7 – I believe we should add something in here on under the heading "arrangements for Vessels operating outside of the UK", that the transfer arrangements would be subject to agreement and any requirements of the Ports State in which the vessel intends to operate.	This is in line with current policy and mirrors 29.10 second paragraph.  See also later emails Simon Graves / Shiva / David MacRae / JV dated circa 31/8/17.	29.4.4.3 the following additional words have been added:  "with expiry date of the vessel workboat code"  New 29.7.4 inserted "Where a vessel is operating outside of the UK the transfer arrangements carried out according to 29.7 are subject to agreement and any requirements of the Port State/s in which the vessel is operating. Section 29.1.6 refers. It will be for each Port State to decide whether to accept the Endorsement of the Workboat Code issued by the Certifying Authority."  Old 29.7.4 renumbered to 29.7.5.  29.10 now states : <b>"29.10 Dangerous Goods Document of Compliance"</b>  <i>The following describes the format and criteria for issuing a Document of Compliance for the carriage of Dangerous Goods (DoC DG).</i>

					<p><i>The Certificate should remain valid for a maximum of 5 years and be harmonised with the Workboat Code Certificate or Loadline Exemption Certificate, as appropriate. The conditions on the DoC DG Schedule 2, should however be confirmed on annually by the Certifying Authority to ensure the vessel remains "Fit for Purpose" and can continue to carry IMDG Code Dangerous Goods in accordance with UK Legislation. This annual inspection should address items such as fire hoses, sprinkler systems and structural arrangements, and subject to the structural and safety systems remain in place and functionally operable (eg 29.4, 29.5 and 29.6 are met) then the DoC DG will remain valid. Where the annual inspections are carried out under MGN 280 this particular DoC annual examination may not be carried out by the owner / managing agent."</i></p>
Jenny Vines	20/7/16	19.6 29.8.1.5.4	<p>It was realised whilst reviewing SAN 75 that the bridge visibility requirements only specifically are required when carrying deck cargos under 29.8, whereas it should be more generally applicable to any carriage of DG situation. It is suggested therefore to remove the explicit wording from 29.8.1.5.4 and create a new general section 29.4.4 which applies to all vessels carrying DG. A cross reference also needs to be made to 19.6. Amend 19.6 to apply wheelhouse visibility to the carriage of all cargos, not just DG.</p>		<p>The following words are added at the end of 19.6  "Wheelhouse visibility should not be restricted by any cargo when in the secured stowed position."</p> <p>29.4.4. New section added:  "29.4.4.1 For Wheelhouse visibility requirements refer to 19.6."</p> <p>Old 29.4.4 &amp; .5 renumbered.</p> <p>29.8.1.5.4 reworded to: "For wheelhouse visibility requirements refer to 19.6."</p>
Paul Wilkins	5/8/16	24.4	<p>As a consequence of introducing daughter craft and the mother ship as a safe haven, we should say something about the GMDSS radio provision on the daughter craft and whether the daughter craft is expected to raise a distress signal with the shore or with the mother ship. I don't believe you would want all</p>	<p>It was decided to link the limitations of a daughter craft to those established in the ERV Code eg limiting the daughter craft to within 10 miles of the mother vessel, in favourable weather and daylight. It was also decided to eliminate</p>	<p>The following text added to 7.6.5:  <u>"A vessel that is either fitted with a throttle that is sprung loaded to return to idle, or is fitted with a permanent substantial enclosure (see 4.5.2.2) in way of the control</u></p>

			<p>daughter craft to be equipped with satellite communications and EPIRBs.</p> <p>Note from JV: The opportunity was taken to ensure consistency in application to vessel types between 7.6.5, 24.4, 24.7 and 26.9 on the use of kill cords and that kill cords are not required when there is a permanent enclosure in way of the control position or when the throttle automatically returns to idle.</p>	<p>the opportunity of the daughter craft being operated if its hull structure is not suitable for offshore operations, hence excluding Cat 5 and 6 vessels. Cat 5 and 6 descriptions do not refer to safe havens either only to nominated points of departure which is not suitable use in this case of a movable mother ship.</p> <p>We have clarified that MCA will permit vessels certified to any other Area Category to operate as a Type 1 tender;</p> <p>We have clarified that Type 1 tenders are only covered by section 24 limits and allowances “when operating as a Type 1 tender” – mother ships as the safe haven etc. – the ability to recover under section 24.5 being an explicit requirement; and</p> <p>It is implicit that any vessels certified 0, 1, 2, or 3, can choose to operate under Area Category 4 limitations or alternatively, operate from the shore.</p> <p>The GMDSS allowances have been agreed within MCA with Steve Austin and FPs and all changes are agreed with Richard Linford, John Fernley, Norman Finlay, Mark Ranson and Mark Meade.</p> <p>The addition of the endorsement on the certificate is in line with changes suggested by Alan Nagle in his email 5/10/16 listed in the table above.</p>	<p>position is excluded from the use of <u>kill cords.</u>”</p> <p>New references to 7.6.5 added to 24.4, 24.7. 26.9.5.8 as follows:</p> <p>“<u>See 7.6.5 for exclusions to the fitment and use of kill cords.</u>”</p> <p>24.4 has been reordered and new emphasis applied and new notes have been added as follows:</p> <p>“24.4 Type 1 Tenders <u>may, when meeting the qualifying conditions below, treat the mother vessel as a safe haven (see Note 2). In order to do so, Type 1 tenders</u> should:</p> <ul style="list-style-type: none"> <li>(a) be separately named; and</li> <li>(b) be coded and certified independently of the mother vessel with the exceptions of Area Category 5 or 6 vessels, and when operating as a Type 1 Tender should also be subject to the limitations applied in (d) and (e) below, see also Note 1;</li> <li>(c) The vessel’s Workboat Certificate should be endorsed “suitable for use as a daughter craft restricted to X miles from the mother vessel” to indicate that it is suitable for operation as a daughter craft.</li> <li>(d) fit a kill cord and use it at all times during navigation and whilst the engine is on (as per section 7.6.5) if the tender is an inflatable boat, a boat fitted with an buoyant collar or an open boat that achieves planing speeds. A spare kill cord should also be carried on board or the kill system should be capable of override to facilitate the rescue of the person going overboard with the cord attached. See 7.6.5 for exclusions to the fitment and use of kill cords;</li> <li>(e) regardless of a tender’s certified Area Category, be limited</li> </ul>
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					<p>to operations no more than 10 miles from the mother vessel and to daylight hours in favourable weather; and</p> <p>(f) additionally on communications including GMDSS:</p> <p>i The crew of the Type 1 tender should be suitably qualified for the equipment on board e.g. if GMDSS is fitted;</p> <p>ii Where GMDSS or an EPIRB are not carried, procedures should be in place for the mother vessel to continuously monitor the communication method and the daughter crafts location;</p> <p>iii if not remaining in visual range and within 3 miles of the mother vessel, should be fully equipped and operated as per the certified Area Category (subject to 24.4(e) and Note 1); and</p> <p>iv if remaining in visual range and within 3 miles of the mother vessel, the Type 1 Tender need not carry GMDSS equipment or an EPIRB but all the tenders' crew are recommended to wear PLB's (meeting the guidelines in 13.9.1) and the tender should be fitted with VHF radio equipment (in accordance with 16.8) suitable for the receiver heights (see 16.3.3 for details) and distance from the mother vessel, so as to enable effective communication between the mother vessel and the Type 1 tender at all times.</p> <p>v The MMSI number of the type 1 tender should be registered under that of the mother vessel.</p> <p>Note 1: Type 1 tenders should be operated, restricted and manned in accordance with the certified area category (subject to 24.4 (b), (c), (e) and (f) above). Operators of Type 1 tenders needing to operate</p>
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					<p>outside these limitations should contact the Administration.</p> <p>Note 2: Type 1 tenders should have a risk assessment of the operation and equipment carried as per the occupational Health and Safety responsibilities to the Type 1 tender under their permit to work scheme. Hence, amongst other considerations, where crew need to leave the vessel for some part of the work of that Type 1 tender consideration should be given to a means to remotely locate those persons (e.g. see 13.9.1) and be able to communicate with both the mother vessel and the Type 1 tender, if persons are left on board; and the crew of the Type 1 tender (if on board) should consider keeping visual safety watch on any off-ship working personnel.”</p>
Mark Mead	13/7/16	Appx Section 4 3	<p>I'm not sure if it's me, but I would have thought that in 4.2 it should be saying 'AEC Part 1 applies to' rather than 'AEC Part 1 does not apply to'. If AEC Part 1 does not apply, why would anyone think they need Part 2? And I thought the idea when we created the new certification structure was that we don't insist on already certificated people having to take the Part 2 (unless they want to go for a better certificate).</p>	<p>Checking with Forkanul. Sent a holding response to Mark M.</p> <p>Forkanul later agreed to changes (email 6/8/16)</p>	<p>Appendix 3 part 4.2 last sentence changed to “It will not be a requirement, for persons crewing on workboats that the AEC Part 1 <del>does not apply</del>es to, to attain this higher level Part 2 qualification.”</p>
Sian Ireland MCA / Owen Preece BV	25/8/16	27.16.1 Appendix 15	<p>Email from Sian Ireland to Owen Preece: I have discussed 'Certificate of Compliance' versus 'Statement of Compliance' with our Codes Branch. As MGN 280 uses the term 'Certificate of Compliance' to mean the formal Certificate issued on behalf of the UK, they will remove this term from the new Workboat Code in relation to non-UK vessels in order to avoid any confusion.</p>	<p>Email to Sian 2/9/16: “Do I take it that Section 27.6.1 of the WB Code Edition 2 should be updated? Or should the whole certificate at the back of the code be renamed? Surely not!</p> <p>I'm not sure that 27.6.1 is worded quite right as I thought policy was as you describe below. I therefore thought that we do hand out a “certificate of compliance” to these vessels. I thought that the legislation is clear on this? Can you confirm the actual position.”</p>	<p>27.16 removed reference to “Certificate” in the title of 27.16 and removed “certificate from the second sentence of 27.16.1.</p> <p>Appendix 15 changed the title and references throughout of the second “certificate” in Appendix 15 to “Workboat Statement of Compliance”.</p>
Oli Vardy	9/9/16	14.2.3.7.1 29.4.3	<p>We have been reconsidering the provision of SFP for FRP and Alu craft carrying DG (Apologies for the TLAs). Effectively A60 protection required. One option already open is to use MGN 407 but realistically this will necessitate a fire test and these can be somewhat</p>	<p>Agreement reached with industry at MCA focal points that these clarifications and alternative arrangements should be allowed.</p>	<p>14.2.3.7.1 added to the end: “Where insulation is required for FRP structure if an A15 equivalent standard is required an acceptable alternative is Annex 1 Part 11 of the</p>

costly, and whilst it works fine for big production builders like Sunseeker and Princess it is not so helpful to one offs.

As an alternative I have proposed that we use the Part 11 test (Annex 1) FTP Code.

This is for a number of reasons;

SFP has been tested for both FRP and Alu under this test and Class Societies are issuing type approvals, so these materials can be readily obtained.

This fire test is internationally recognised and in turn is more likely to hold water with other Flag states when these vessels are operating abroad... we have had many issues in the past where our domestic standards are not acceptable to other administrations.

The approvals are appropriate for HSC carrying large numbers of pax and this should be more than sufficient to offer decent level of SFP for a Workboat, even if carrying more than 12 offshore.

In the Code there is still provision for very little SFP if builders perform a burn through test or use fire retardant gelcoats or intumescent paints... none of which offer very much in the way guaranteed SFP. I think this might be an easy win for safety and for industry so I think we should put it in.

Your thoughts and comments greatly appreciated!

Proposed wording to added to the Code as follows;

#### **SFP for FRP Alternatives**

14.2.3.7.1 Where it is not possible for the vessels described in 14.2.3.1 to meet the fire test prescribed in FTP Code, or those vessels described in 14.2.3.4 or 14.2.3.5 to meet an equivalent level of fire protection, such vessels may be fitted with insulation which provides an equivalent level of fire protection to the machinery space boundaries. Insulation that has been approved to meet A-15 standards (with steel) will be considered to meet this standard. Where insulation is required for FRP structure if an A15 equivalent standard is required an acceptable alternative is Annex 1 Part 11 of the FTP Code 2010 – Test for fire resisting divisions for HSC. Acceptable insulations will have the notation of 'Fire-resisting divisions 60'. The approval shall state the orientation of the division and whether the division is load bearing or non-load bearing. The insulation need not be fitted lower than 300mm below the light waterline on hull sides.

FTP Code 2010 – Test for fire resisting divisions for HSC. Acceptable insulations will have the notation of 'Fire-resisting divisions 60'. The approval shall state the orientation of the division and whether the division is load bearing or non-load bearing. The insulation need not be fitted lower than 300mm below the light waterline on hull sides.

New 29.4.3.2 added:

"29.4.3.2 - Where an A60 insulation is required for an FRP structure reference should be made to the performance standard in MGN 407. An acceptable alternative to this for FRP is an insulation that has been type approved for use on HSC as tested and approved to Annex 1 Part 11 of the FTP Code 2010 – Test for fire resisting divisions for HSC. Acceptable insulations will have the notation of 'Fire-resisting divisions 60'. The approval shall state the orientation of the division and whether the division is load bearing or non-load bearing."

New 29.4.3.3 added:

"29.4.3.3 - Where an A60 insulation is required for an aluminium structure insulation should be an approved 'A' Class type tested under Part 3 of the FTP Code and be fitted in accordance with the conditions stated in the approval certificate. Alternatively the insulation and structure should be type approved for use on HSC as tested and approved to Annex 1 Part 11 of the FTP Code 2010 – Test for fire resisting divisions for HSC. Acceptable insulations will have the notation of 'Fire-resisting divisions 60'. The approval shall state the orientation of the division and whether the division is load bearing or non-load bearing."

			<p><b>Dangerous Goods (Section 29)</b></p> <p>So the section for Alu will read;</p> <p>“29.4.3.3 - Where an A60 insulation is required for an aluminium structure insulation should be an approved ‘A’ Class type tested under Part 3 of the FTP Code and be fitted in accordance with the conditions stated in the approval certificate. Alternatively the insulation and structure should be type approved for use on HSC as tested and approved to Annex 1 Part 11 of the FTP Code 2010 – Test for fire resisting divisions for HSC. Acceptable insulations will have the notation of ‘Fire-resisting divisions 60’. The approval shall state the orientation of the division and whether the division is load bearing or non-load bearing.”</p> <p>And the section for FRP will read;</p> <p>“29.4.3.2 - Where an A60 insulation is required for an FRP structure reference should be made to the performance standard in MGN 407. An acceptable alternative to this for FRP is an insulation that has been type approved for use on HSC as tested and approved to Annex 1 Part 11 of the FTP Code 2010 – Test for fire resisting divisions for HSC. Acceptable insulations will have the notation of ‘Fire-resisting divisions 60”. The approval shall state the orientation of the division and whether the division is load bearing or non-load bearing.”</p>		<p>New sections added:</p> <p>“14.2.2.6 Where dangerous goods are carried, refer to 29.4.3.3.”</p> <p>“14.2.3.7 Where dangerous goods are carried, refer to 29.4.3.2.”</p>
Mark Ranson	Appx 2.12.1	3,	<p>Whilst trying to direct a member to the reference for basic food hygiene training for his crew - and cross referencing it to the list of courses in MIN 513, I realized we should probably tighten up the current wording in 2.12.1 to tie in better with MIN513 - should we also have a footnote reference to MIN513?</p> <p>We currently say;- "All seafarers engaged in the preparation of food will be required to undertake a basic food preparation, handling and food storage course - Basic Food Handlers Course, level 2"</p> <p>However, looking at MIN 513 and checking with Rosemary this afternoon - I believe that last phrase would better read as '- Basic Food Hygiene or Food Safety Course, level 2' or we could simplify the whole paragraph still further and say;-</p>		<p>2.12.1 changed to :</p> <p>2.12.1 All seafarers engaged in the preparation of food will be required to undertake a <u>'Basic Food Hygiene' or 'Food Safety' course, level 2, as listed in MIN 513<sup>31</sup>.</u></p>

<sup>31</sup> MIN 513 (M) Maritime Labour Convention 2006: Food and Catering

			"All seafarers engaged in the preparation of food will be required to undertake a 'Basic Food Hygiene or Food Safety' course, level 2, as listed in MIN 513"		
Simon Milne	10/10/16	29.4.3.1	The text refers to 3 metres from the bulkhead but this should mean 3m or more.		29.4.3.1 "or more" inserted after the words "...three metres.."
Simon Milne / MAIB	17/10/16	25.8	<p>The text in the WB Code is not specific to planing vessels or "high speed vessels" which is defined as one operating &gt;20 knots but restricted to vessels operating at speed which does not have an associated definition. This should be rectified.</p> <p>Also in light of the MAIB investigation into the Osprey / Osprey 2 it should be clearer that vessels that operate at high speed should be required to provide a seat for each person on board (eg including crew), that those persons should be asked to stay in their seats (not to stand or move to another "seat" and that all inboard seats does not refer to seats on the sponsons.</p> <p>Reference to "personnel in 25.8.3 should be changed to "persons" to be more inclusive to crew / passengers rather than inferring industrial personnel.</p> <p>The phrase "front on the boat" should be changed to "forward part of the vessel".</p>	<p>This is not considered to be a change in policy because previously this has been implicit in the requirement to undertake a risk assessment of the operation and the references in the code to the industry RYA / PCA publications "Small Passenger Craft High Speed Experience Rides" and "Passenger Safety on Small Commercial High Speed Craft".</p> <p>It is agreed within MCA and NWA etc that it is not appropriate to define a particular speed where it is appropriate to exclude persons from sitting on the sponsons, nor is it considered to be a problem for those operating at slower speeds (not planning). Therefore references have only been put in to "or those operating in a planning mode" and to sitting (or not) on the gunwale of the vessel eg a planning hullform does not necessarily mean that a persons can not sit on the sponsons. This may cause vessels to have multiple modes allowing different numbers of passengers.</p>	<p>Title changed to add at the end: "or operating in a planing mode"</p> <p>25.8.1 the following words added in to the first sentence "or operated in planing mode"</p> <p>Wording added to the end of 25.8.2 as follows:</p> <p>"25.8.2 Vessels should ... that persons avoid the greatest shock loads. These loads will normally be greatest at the forward part of the vessel. Operators should remind persons to remain seated (or stood over jockey seats, as appropriate) during operation unless moving about the boat for a specific purpose. Operators of RIBs and open boats should ensure that persons only sit in designated seats. Inboard seats do not include the gunwale or the tubes of a vessel fitted with a buoyant collar."</p> <p><u>25.8.3 and 25.8.2 "personnel" changed to "persons".</u></p>
Sian Ireland	11/1/17	3.1.6	A comma needs to be added into this section after "suspended", on the second line, to enable (as was the intention of the text), to apply the "for no longer than 5 years" to the part of the sentence "certification has lapsed". This application to lapsed certificates is as per all other statutory requirements for other vessels.		3.1.6 ",," added to read "suspended,"
YSDA, David Gray	23/8/16	11.3.1	<p>Email forwarded on from Jane at YDSA:</p> <p>"Dear Jane</p> <p>In checking a recent stability book, the issue of using a single pendulum to record angles of heel during an inclining test has been raised. Historically the use of a single pendulum on a small vessel has been accepted by members of the YDSA checking community without question, and somewhere I have a memory of reading a paragraph of an official guidance stating this was</p>	This was discussed widely within MCA through focal points, codes and stability experts and reported back to YDSA at their Nov 2016 CA Committee Meeting.	Text added to the end of 11.3.1 as follows: "Where it is considered impracticable to adopt the procedures given in MSIS1 any deviations to the number of pendulums should be agreed by the certifying authority and consideration should be given by

			<p>acceptable practice. Certainly we have historically used a single pendulum for small vessels – that was until recently.</p> <p>My business partner Simon Cormack is a nominated surveyor for SCMS, and he was pulled up on this last year for a small boat he inclined. He was unable to find any official guidance which permitted the use of a single pendulum.</p> <p>Attached are the guidance notes from the MCA for Loadline Vessels for reference (as now mentioned in the latest draft of the new workboat code 11.3.1) , but these do not officially apply to vessels under 24m (or do they if they are referenced in the code?)</p> <p>I have checked through all the official documentation I can find but can find no advice, nor the paragraph I recall reading many years ago.</p> <p>Can I ask you to raise this with the relevant CA members, and hopefully we can between us find something definitive one way or another on this subject. The last thing we want is an audit by MCA requiring us to re-incline boats because of this issue. I look forward to your advice.</p> <p>Best regards David”</p>		<p>the certifying authority to conducting the test more than once. There should be a minimum of 8 weight movements. The use of an electronic inclinometer<sup>32</sup> is an acceptable alternative to the second pendulum if it is calibrated (where this provision exists) and readings are recorded.”</p>
David Greening	3/5/17	12.2.4.1	<p>Is 12.2.4.1 really suggesting a full calculation of the Merchant Shipping (Load Line) Regulations which I think should only be applied to vessels over 24m Load Line Length (Convention Size)?</p> <p>And if this is not the case, am I correct in thinking that the minimum freeboards as determined by 12.2.3.1, 12.2.3.2 and 12.2.3.3 are the only acceptable methods for vessels less than 24m?</p>	<p>It is clear that because the freeboard is now been insisted upon then that although the requirement and wording has not changed from Brown Code or MGN 280 then an interpretation to further describe the intention is required.</p>	<p>The following words are added at the end of the first paragraph of 12.4.2.1  <u>“See MSN 1752 as amended Schedule 5 Table B and calculation for ships &lt;24m and noting the corrections for Type B ships “other than timber freeboards” that are required for lack of superstructure, lack of sheer, block coefficient, depth and bow height shown in Schedule 4.”</u></p>
Jenny Vines	3/5/17	14.5	<p>The “Love for Lydia” MAIB report has highlighted the need again that all vessels should be fitted with Carbon monoxide alarms. I therefore recommend that a recommendation highlighting text already in the code should be put into the Code to fit CO alarms in accommodation and other spaces that might be subject to exhaust or poorly burning fuels.</p>		<p>New wording effectively repeating 14.5.7 and 14.6.13 is added:  “14.8.5 CO detection should be installed as per 14.5.7 and 14.6.13. CO detection is not required when heating or cooking is undertaken using electrical cookers or heaters. It is strongly recommended that CO detection is provided in accommodation and other</p>

<sup>32</sup> Where an electronic device is used it should be demonstrable that the output resolution and tolerance is suitable for the application.

					accessible spaces where there is a possibility of exhaust gas penetration in the event of an exhaust leak. See Appendix 13.”
Lorraine Weller, MCA	19/6/17	28.1.4	It is highlighted that MGN 387 which was referred to originally has been replaced as MGN 563 and now includes the guide previously referred to as Annex E. Lorraine also wanted it to be clear that these regulations on port waste apply to all ships which go to sea and therefore applies to all Workboats. The reference to the SI needs changing from the amendment 2009 SI to the parent 2003 SI.	This is not a change of MCA policy just highlighting MCA intention that the regulations apply and updating references to the MGN.	The reference to SI 2009 No 1776 has been updated to SI 2003 No 1809. The following is added at the end of the first sentence “ <i>these Regulations apply to all vessels that proceed to sea.</i> ” The second sentence is replaced by the following after and including MGN 387 : “ <i>MGN 563 (M+F)</i> <sup>33</sup> which includes at Annex E a current version of the “ <i>Port Waste Management Planning – A Guide to Good Practice</i> ””

<sup>33</sup> MGN 563(M+F) - Guidance on the Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003 and amendments