

CONSULTATION OUTCOME

MSN 1870 (M+F) Personal Protective Equipment Regulation 1999

| Company / Organisation | Section | Comment | MCA Action Taken / Comment |
|---|--------------------------------|---|---|
| Marine Accident and Investigation Branch (MAIB) | Section 1.1 Line 4 | Spelling error:or at risk form a should reador at risk from a | Agreed and corrected |
| | Section 2.3 | Remove the word 'traditionally' as workers may or may not be part of a long-standing custom and practice to supply their own PPE. | Agreed and amended |
| | Section 3.1 General | There is no mention in this section or Annex 1 about fit testing requirements for tight fitting respirators. | No Alteration Fit testing is part of use not storage and maintenance; and section 4 is generic guidance. Code of Safe Working Practice for Merchant Seafarers (COSWP) Chapter 8.8.3 |
| | Section 5.2 | Review the use of upper and lower case when reference to 'Standard' or 'standard'. | Agreed and amended |
| | Section 5.3 | The construction of this section makes it difficult to read. Suggest this is replaced with 'Any reference to EN or BS standards or other standards contained in the annex, means that standard which provides equivalent levels of safety, suitability and fitness for purpose when in use'. | Sentence reviewed |
| | Annex 1 Table column heading | Suggest changing the heading <i>Protective clothing and equipment to be provided to Personal protective equipment and clothing to be provided.</i> | Agreed and amended |
| | Annex 1 Table row 7(a) | Add comma – Protection against nuisance dust, mist, particles and dust of low toxicity. | Agreed and amended |
| | Annex 1 Table row 7(a) | Suggest removing the word dust or replacing it with particulate in sentences <i>Disposable dust respirators</i> and <i>General purpose dust respirators</i> . This probably relates to times when respirators were referred to as masks i.e. dust masks. The terms <i>tight fitting</i> and <i>loose fitting</i> are not covered in the MSN. | Use of "particulate" agreed Noted to review if the term 'tight fitting and loose fitting' is contained within (COSWP). |
| | Annex 1 Table row | The reference to 2 meters is out of date and does not reflect the current definition for working at height. | Agreed and amended |
| | Annex 1 Table row 12 | A lifebuoy is not personal protective equipment or clothing. The word <i>either</i> in the following sentence should be removedimmediate use and either a MCA | Agreed The word 'lifebuoy' has been removed and minor adjustment to the sentence. |
| | Annex 1 Table row | Suggest remove the word 'belt' from 'Safety belt harness'. | Agreed and amended |
| | Annex 1 Table row 12 | Do you mean a MCA approved lifejacket or do you meaneither a MCA approved lifejacket or PFD conforming to | Agreed Sentence has been amended. |
| | Annex 1 Table row 17, column 1 | Suggest rewriting sentence in column 1 e.g. Work in engine rooms, machinery spaces or anywhere there is a foreseeable risk of fire or explosion. | Agreed Sentence has been amended. |
| | Annex 1 Table row 17 | Refer to MCA actions taken in MAIB report No. 17/2016 (fire on board <i>Arco Avon</i>). MCA undertook to introduce an appropriate standard in MSN 1870 (M+F) for overalls for work in engine rooms etc. This was based on research conducted by HSE (HSE Research Report 222 – Annex A to MAIB report). | Amended HSE confirmed standard; BS EN ISO 14116 index 2 |
| UK Chamber of Shipping | | The UK Chamber of Shipping thanks the MCA for the opportunity to participate in this consultation and having reviewed the document, the Chamber has no comments to make on the proposed changes. The document has been shared with members of the Chamber and no issues have been raised. The Chamber believes that the amendments proposed are aligned with the current BSI standards and welcomes the publication of the MSN. | Noted |