

**Consultation Responses – The Small Seagoing Passenger Ships Code**

Responder	Comment	MCA Response
Smit International (Boskalis)	<p>One area where we find it difficult to interpret the rules, is with regards to the minimum qualifications of crew members. This is very comprehensively laid out in MGN 280 with regards to Workboats, but the requirements for Domestic Passenger Vessels are not as specific and do not seem to give any advice with regards to qualifications for Engineers. It is recommended that the guidance with regards to manning, contained in the new “Small Seagoing Passenger Ship Code”, should be expanded to include the same level of detail that is presently contained in MGN 280.</p>	<p>Manning levels and seafarer qualifications for the crew of seagoing passenger ships are governed by separate regulatory instruments and are thus not duplicated in the SSPS Code. The level of detail given in the Code is considered to be sufficient to provide guidance. Since the consultation, the MCA has published comprehensive supporting information on qualifications (i.e. MSN1853 “The Merchant Shipping (Boatmasters’ Qualifications, Crew and Hours of Work) Regulations 2015. Structure and Requirements”) which we believe meets the intent of the commentator.</p>
	<p>Page 107, para 25.2.2 (2) (a). I believe the paragraph referred to should be 25 not 24.</p>	<p>Thank you, this has been corrected in line with your suggestion.</p>
Passenger Boat Association	<p>A concern has arisen over smaller vessels up to 12 metres having to ‘double up’ on liferaft capacity in order to provide redundancy in the event of liferaft failure for whatever reason. The comment is that such a requirement can introduce significant stability issues where there is limited space to mount a second canister. Furthermore, were a second canister to be mounted in the passenger seating area then this would reduce passenger capacity and therefore present a commercial disadvantage. These problems would probably not occur on a larger vessel.</p> <p>A possible solution for smaller vessels is to accept a single ORIL of 100% or 120% capacity provided that the installed liferaft has built in redundancy. Such a product is available commercially and features two air bottles and two firing heads, one for each tube but both linked to the painter which triggers the inflation of the raft. The</p>	<p>The liferaft requirements in the SSPS code have been based on the requirements of the EU passenger ships directive 2009/45 EU which also has a requirement for redundancy in the case of a single failure and has a higher overall requirement for liferaft provision. The requirements have been aligned in this area to maintain an equivalent level of safety to the directive. An equivalent 12m steel vessel would be subject to the directive requirements.</p> <p>As a result of discussions with industry, the SSPS code does already contain a partial concession in this area for vessels that are fitted with ORILS and carry up to 60 passengers.</p> <p>It is not considered at this point that equipment such as that described would provide equivalence to the redundancy requirement</p>

	raft will support 65 persons with only one tube inflated (details to be supplied). This option may be enhanced by a suitable inventory of lifejackets and/or a flotation raft.	
Seafari Adventures Forth	<p><b>13.1 New requirement for 200% liferaft capacity</b> This idea may be relevant and possible on larger passenger ships, however this is simply not practical on a 12m vessel, the vessel carries one 65 man ORIL for a maximum of 55 pax plus two crew which gives 114% liferaft capacity on its passenger licence. If the other two liferafts carried for the 60ml coding are included then we can provide 147% total liferaft capacity.</p> <p>The size and weight of an additional 65 man ORIL liferaft at 169kg impacts on the stability and freeboard on a small vessel particularly when the only space to site it is on the wheelhouse roof.</p> <p>Given that a 12m coded vessel can carry 12 pax up to 60 miles from the coast with one life raft this proposal for 200% capacity cannot be justified on vessels 12m and under.</p>	<p>Following earlier discussions with industry, the SSPS Code does not require 2 x 65 person rafts (i.e. 200%) in this instance. The requirement is only for 120% which, for up to 58 persons on board, could be achieved with two smaller rafts of 35 person capacity.</p> <p>All maritime standards differentiate between passenger carrying and non-passenger carrying vessels due to the number of people exposed to risk and the fact that passengers are not trained seafarers. It is therefore considered appropriate that liferaft redundancy requirements are included in the SSPS Code.</p>
	<p><b>13.3.4 New requirement for lights on lifejackets</b> Under the new draft SSPS code vessels may operate 24 hours a day and 365 days per year. Amongst the requirements is a need for lifejackets to be fitted with lights. For a vessel operating only in daylight hours the fitting of lights to the lifejackets is an unwelcome financial burden (75 lights at £18 each which is £1350 every 3 years). Can such a vessel be exempted?</p>	<p>This requirement is in line with up to date international standards. The new code allows vessels to go further afield and, even if operations are daylight only, it could well be dark by the time to rescue (given the greater distances involved) if a problem occurs towards the end of the day.</p>
	<p>What is the number of parachute flares required – 13.3 says 6 and 14.2.3 says 12 flares</p>	<p>This has been corrected, both sections now make it clear that the requirement is 6 flares for a Class D vessel and 12 for a Class B or C.</p>

	<p><b>13.4 New requirement for a SART and EPIRB</b> If the vessel is fitted with AIS and the EPIRB transmits GPS info does this negate the need for a SART?</p>	<p>14.2.4 makes it clear that the requirement is for a SART (radar or AIS) <i>or</i> GPS facility incorporated in 406MHz EPIRB therefore a vessel would not need to carry both.</p>
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