

Business Engagement Assessment

<i>Title of Proposal</i>	The Code of Practice for the Safety of Small Fishing Vessels - Standards which can be used to prepare for your MCA Inspection
Lead Regulator	<i>Maritime and Coastguard Agency</i>
Contact for enquiries	<i>David Fenner</i>

Date of assessment	<i>19/2/2015</i>
Net Cost to Business (EANCB):	<i>£99,403</i>
Which area of the UK will be affected by the change(s)?	<i>All</i>
Does this include implementation of Red Tape Challenge commitments?	<i>No</i>

Stage of assessment	<i>Discussion</i>
Commencement date	<i>April 2015</i>
Price and Present value base years	<i>2015</i>
Is this directly applicable EU or other international legislation?	<i>No</i>

Brief outline of proposed change in regulatory action

To amend current guidance to recommend the fitting of Carbon Monoxide (CO) Detectors to fishing vessels of less than 15 metres in length (small fishing vessel) where there are fired heating or cooking appliances that could emit CO into spaces that can be enclosed.

Code also recommends only purchasing appliances complying with relevant standards, getting them regularly serviced by qualified persons and only using proprietary components for repairs

Why is the change proposed? Evidence of the current problem?

As a result of an Marine Accident Investigation Branch (MAIB) investigation into the death of two fishermen whilst sleeping on board the under 15m Fishing Vessel Eshcol¹ the Maritime and Coastguard Agency (MCA) was recommended to make it mandatory that all accommodation should have a CO detector fitted.

The MCA proposes to issue guidance recommending that CO detectors should be fitted where there is a fired cooking or heating appliance, that could emit CO, located in an enclosed space on a small fishing vessel which has restricted means of dispersal. This is because vessels may not only have gas fired appliances but also diesel or paraffin heaters, which may also emit CO.

This recommendation will not apply to all small fishing vessels. For instance, where a small fishing vessel does not have any such fired appliances or where these appliances are fitted in an open space that cannot be closed off, therefore allowing CO to disperse in the open air quickly. However, it will be recommended that any small fishing vessel fitted with a fired appliance in an open space such as a wheelhouse, which can be closed off, has a CO detector.

The guidance will also recommend that CO detector should have an in built Lithium battery to reduce the risk of the battery running out.

It is already a mandatory requirement for CO detector to be fitted on board vessels of 15m and over, having been included in previous Rules and Regulations which applied to these vessels but not those of less than 15m.

The cooker on the FV Eschol was also in a poor state of repair and it is possible that on a harsh environment such as a fishing vessel, the cookers and heaters should be kept in a good state of repair to counteract this environment.

¹ http://www.maib.gov.uk/publications/investigation_reports/2014/eshcol.cfm

Which types of business will be affected? How many are affected?

The MCA Ship Register shows all owners of small fishing vessels are all small or micro businesses.

On the advice of MCA Consultant Surveyors, who carry out statutory surveys on all commercial fishing vessels, it is estimated that 50% of under 15m vessels have fired appliances fitted in enclosed spaces, or where a space may be enclosed for which CO detector is now recommended. In addition, it is estimated that 10% of that 50% will need to fit a fired appliance in more than one enclosed space.

The MCA Ship Register has 5068 small fishing vessels registered in the UK. Based on this figure approximately 2534 small fishing vessels will be affected by the MGN and would be recommended to carry one CO alarms with 253 of these carrying at least two. As 2534 vessels will need one or more CO Alarms, the same number of vessels will need to ensure the appliances are serviced by a qualified person and proprietary components are used. It is not known how many vessels would replace appliances in any given year.

How will the change impact these businesses?

Quotes obtained from general equipment suppliers show the cost of a CO detector ranges between:

High Cost	£39
Best Estimate	£32
Low Cost	£29

The small fishing industry is predominately single handed or share fishermen. When they are not fishing, they are not earning income. The fitting of CO detectors is not expected to impact on fishing time and therefore can be done in non-productive working time. In addition, as they can be fitted by fishermen themselves they do not require payment to a third party to fit. As a result, we do not propose to consider the cost to a fishermen of fitting the equipment as part of the net cost to Industry. **The best estimate cost to fit one CO alarm is £32.**

Based on the information provided by MCA Consultant Surveyors following recent surveys, it is assumed that the following proportion of vessels already have CO detectors fitted on board:

High level of compliance	10%
Best Estimate	5%
Low level of compliance	1%

Therefore the best estimate equates to 2167 small fishing vessels needing one CO detector and 240 needing two.

Consultant Surveyors estimate that 5% of vessels will currently have CO alarms therefore complying with the recommendation would see 2167 vessels purchasing at least one CO alarm and 240 vessels purchasing two or more.

The total best estimate of costs, the likely costs of purchasing and fitting the alarm to all small fishing vessels which need one detector is £69,344 and to those needing at least two is £15,360, making a total of £84,704.

CO detectors can also be obtained with a life of ten years and an inbuilt lithium battery. Therefore, no ongoing costs are expected within a ten year period. No training is considered necessary, the items being fitted are familiar to fishermen through their use on other non-fishing environments.

Service costs for appliances vary but would appear to average around £60, not including parts. It is not possible to estimate the type of parts that might be required. Therefore it is only possible to estimate the service costs per year. 2534 vessels will need one appliance servicing and 253 will need at two services. Therefore the best estimate for all vessels needing one appliance servicing is £152,040 and for those needing two or more is £30,360 making a total of £182,400. When added to the costs for CO Alarms this makes a total cost of the recommendations of £267,104 for the industry as a whole.

Impact on small businesses

It is not expected that the proposed recommendation for small fishing vessels to fit CO detectors will have an impact on time. The devices would be fitted whilst the vessel is in port and therefore not impact on their fishing time. These devices are widely understood and in use by the general public and therefore they are easy to obtain and simple to fit. Again, this means that fishing time would not be affected and outside contractors would not be needed to fit them.