

## CONSULTATION COMMENTS

### CONSULTATION ON FISHING VESSEL (CODES OF PRACTICE) REGULATIONS

<u>Consultee</u>	<u>Consultation Comments Received</u>	<u>Responses</u>
MacDuff Shipyards	<p><b><u>1. Registered Length Definition</u></b> We note that the old definition of 'registered length' (being the length from the fore part of the stem to the fore side of the rudder stock) has been removed, and the only interpretation of Registered Length is now the Length between perpendiculars, conforming to EU legislation. For the avoidance of doubt, can we ask for guidance on how this is to be taken forward in the context of registration and licence transfer.</p> <p><b><u>2. Measurement of Under 15m Vessels</u></b> At the moment these vessels are measured for Tonnage using the old registered length x registered breadth x registered depth x 0.16. Is it the intention that vessels already registered will remain on the register with existing figures, and that new vessels will be registered using the same formula, but substituting the new registered length (LBP) ? This will obviously create anomalies, or are you proposing to re- register all? Likewise on the division of sizes on the Tables, two identical vessels could fall into different bands depending on when it was built. Changing the definition on how registered length is to be recorded may mean that some vessels which did not require stability data may require to comply, and vice versa. In licence transfer, when requiring to match Tonnage, are differences in calculation to be taken into account?</p>	<p>The definitions of length are contained in the MS (Tonnage) Regs 97 and MS (FV) (Tonnage) Regs 1988</p> <p>All vessels should be measured in accordance with these Regulations. Rather than risk confusion within the Codes, the Codes have been amended to refer directly to the relevant Regulations for avoidance of doubt. Measurements are only to be taken when a vessel is built or is lengthened/shortened or asks to be remeasured. For licencing and registration purposes, the length already stated on the Certificate of Registry is considered to be the length of the vessel and will not be changed. The definition of Length between perpendiculars is to be reinstated in the Codes.</p>

### **3. Tonnage Measurement**

When ITC69 Tonnage was adopted for these vessels the EU formula for Nett Tonnage was not. It was decided by MCA/MAFF to hold on to the old formula for gross tonnage using the previously recognised registered dimensions ( $L \times B \times D \times 0.16$ ) and to enter this as the nett tonnage. This predictably caused confusion as the "L" was described as registered length.

It is highly likely that many (if not the majority) of vessels in this category have this registered length recorded on their Tonnage Certificate instead of LBP.

It is probably of little consequence but how are we to deal with nett tonnage on new vessels?

Are you proposing to shift to EU Nett Tonnage or change it again?

Industry will also require guidance on the existing break point above which a skipper requires certification to take charge of a vessel.

At the moment this is set at 16.5M Registered Length, which is calculated using the old registered length.

If this measurement is to be removed then how are we to proceed in the future?

Existing vessels which are below 16.5M registered length (old measurement) - do owners retain the right to go to sea without certification?

On new vessels, where are you proposing to draw the line?

Is it to be 16.5M LBP?

It is possible to design to any breakpoint, but on existing vessels there will be anomalies, as some vessels less than 16.5M old registered length will be more than 16.5M LBP, and vice versa.

It is therefore important that it is made clear to Industry how this is going to be dealt with.

The Codes now only refer to the Tonnage Regulations, there is no intention to change how Tonnage is measured. The Current Regulations should be followed.

It is not possible to amend the requirements for the length of vessels which require Certificates of Competency in these Codes as they are set by the Fishing Vessel (Deck Officer and Engineer Officer) Regulations 1984. This will be reviewed as part of the work to address STCW-F in the UK. Vessels of 16.5m Registered length according to their Certificate, whether new or existing will be required to carry Certificated officers.

**4. Under 15m Stability Training**

Regarding 3.28 and 3.29 – there is no legislation in place to make it compulsory for anyone on board to have stability awareness training. It is only voluntary for the skipper.

**5. Scupper Valves -Draft Code for Vessels 15M LOA to less than 24M LBP**

4.3.2.1. (111) mention is made of scupper valves, but no mention is made of the restriction made on fitting these on vessels with low freeboard.

**6. Anchors and Cables – 15m-24m Code**

4.4.4. Anchors and Cables

Table – interpolation is not clear, as there should only be one figure in the EN column.

This will be reviewed as part of the implementation of STCW-F in the UK.

This is addressed in the Fishing Vessel Instructions to Surveyors MSIS 27 Chapter 3.

“**Weathertight shelters** – built over the freeboard deck, if fully weathertight (i.e. enclosed as defined in 1.2.19 of MSN 1770) and at least 1.8 metres in height above the freeboard deck would be considered to be enclosed superstructures. The minimum freeboard of 300mm should be maintained, if practicable, over the full length of weathertight shelters to provide for easy drainage of the enclosure through non-return valves at deck level. Where deck level non-return valves would be immersed at an angle of heel of 10° or less in any loading condition the freeboard should be increased or powered drainage pumps, discharging from a point high in the side of the shelter, must be used; and the non-return valves removed and their openings sealed. All doors and hatches in the weather tight boundary of the shelter are to be marked “Keep closed at sea”.

This Table replicates Seafish table and is confirmed as correct.

	<p><b><u>7. Rescue Ladders – 15-24m Code</u></b>  7.1.5.1 This asks for a permanently mounted rescue ladder to 300mm below the waterline.  This appears to be a new requirement, and I cannot recall it ever being discussed.  It is normal practice on a <u>new</u> vessel to fit a recessed ladder down to the main deck level, as sketched on the Seafish Standards (new draft)  We are not in favour of making recesses on the ships side below the waterline.  This section is in normal text implying that it is for new and existing vessels. There is no way we are fitting recesses on the hulls of existing vessels.</p>	<p>The Code will be amended to apply this requirement to new vessels</p>
<p>Andrew Masson – Echomaster</p>	<p><b><u>1. EPIRBS on all vessels. – All Codes</u></b>  The Draft proposals make carriage of a satellite GPS EPIRB a mandatory requirement for even open vessels. With Automatic Float Free housings, I am unsure how well mounting and activation arrangements would comply with the EPIRB manufacturers recommendations and may lead to an increase in accidental activations.</p>	<p>The Codes will specify that EPIRBs should be Float free with HRU and that they should be fitted in accordance with manufacturers recommendations</p>
<p>Derek Cardno – SFF</p>	<p><b><u>1. Shore Power – 15-24m Code</u></b>  Shore power for when crew are living on board whilst in port with fire detection and Safety systems operable from shore power, should this not read “If the vessel are using shore power while the crew are living onboard this should not affect the early warning safety detection systems”?</p> <p><b><u>2. EPIRBS – Under 15m Code</u></b>  Also if the voluntary codes are going to take the requirement for an EPIRB down to 7m should their not be guidance on the installation of a float free system for smaller boats?</p>	<p>The Code has been amended to reflect this comment</p> <p>The guidance to use manufacturers instructions is considered appropriate due to poterntial variations in designs.</p>

<p>Andrew Blyth – RINA</p>	<p><b><u>1. Summary Box – MGN for Small FV Code</u></b></p> <p>The summary box on page 1 includes reference to reintroducing stability requirements for vessels from 12 to 15m length, and yet this is not referred to in clause 4.2. While reference is made in clause 4.4, it should be included in clause 4.2 for completeness and clarity.</p> <p><b><u>2. Layout of Code – Small FV Code</u></b></p> <p>This Code does not include a table of contents, so it is very difficult to identify the location of topics on which one may wish to focus. This has made the process of commenting much more difficult. I strongly recommend that in the finalised Code such a table of contents is included.</p> <p>The structure of the document is as a result confusing. It is suggested that a format similar to the other FV Codes is adopted (albeit greatly simplified), so that it is very clear which paragraphs apply to which vessels. Each section and subsection should have their own tier of numbering. Running continuous clause numbers across diverse subsections (some of which are limited in their application) makes the Code very unclear in my opinion.</p> <p>Page 2: section 3.0 Code Requirements. This is a <u>major section of the Code</u> and yet the title is given in lower case, which does not make it sufficiently prominent or easy to locate. In contrast bold capitals are used in some subsequent <i>subsections</i>, eg: clauses 3.17, 3.18. It is suggested that a consistent format should be adopted throughout, similar in style to (but not necessarily exactly the same) as the other FV Codes.</p>	<p>The MSN has been amended to reflect this comment.</p> <p>A Table of Contents has been added to the Code.</p> <p>It is not considered the the current version of the Code lends itself well to formats similar to the 15-24m Codes at this stage. In addition, users of the Code are familiar with the layout.</p> <p>The Code has been amended to reflect this comment.</p>
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**3. Stability Guidance – Small FV Code**

No guidance could be found as to what measures should be adopted by skippers/owners of under 12m vessels and existing under 15m vessels in respect of maintaining sufficient stability and freeboard. Some reference is needed to the proposed MGN 526 and MGN 503 giving alternative methods of assessing these topics. Statements such as those given in clauses 3.27 to 3.29 are worthy but meaningless unless proper guidance is provided. Clauses 3.14 and 3.15 recommend the carriage of stability guidance on under 12m vessels but no idea is given on what this should comprise or how this may be obtained. This recommendation is therefore meaningless.

Fishermen must be given simple means of determining whether or not their vessel is overloaded, whether a given lift is safe, and whether or not they have sufficient freeboard. In my opinion this is a vital omission in this Code. If MCA cannot tell skippers how to judge these things, how can they be expected to do so? In this context I urge the adoption (or at least recommendation) of the Wolfson Freeboard Guidance Mark for all boats for which a full stability book is not required, which addresses all these aspects at minimal cost.

We cannot complain that fishermen overload their boats if we do not tell them what comprises safe loading!

Where a stability information book is required, please refer to the comments made on Annex 3 on the 15-24m Code.

Where a stability information book is NOT currently required, it is strongly suggested that a stability record book be required, to contain records of:

It is intended to address this in the next version of the Code to address Stability issues in more detail.

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The Code has been amended to recommend the keeping of records of stability for existing vessels under 15m.

- periodic freeboard checks in the lightship condition each with an associated profile photograph (to facilitate detection of weight growth)  
- results of rolling or heeling tests conducted per MGN 503 (to facilitate detection of changes in stability)  
- size and positioning of Wolfson Guidance Freeboard Marks (to provide direct guidance to skippers on safe loading & lifting)  
PLUS a concise summary of key safety messages based on section 3 of the attached Fishermen's Safety Guide.

**4. Freeboard Requirements – 15-24m Code**

It is suggested that section 4 should refer to the introduction of freeboard requirements in section 3.2 of the Code.

**5. Stability – 15-24m Code**

The introduction of the following is applauded:

- new clauses in section 2
- clause 3.1.3.1 on lightship particulars
- section 3.2 on freeboard requirements
- clauses 3.1.5.2 and 3.1.5.3 on a static heel test

In clause 3.1.3.2. Parameters should be set as to when a reinclining is required. The text of clauses 3.1.3 and 3.1.4 of the Over 24m Code could usefully be introduced.

However it is suggested that clause 3.1.5.3 should read 'with one derrick stowed and one at maximum outreach' instead of 'both derricks at maximum outreach', in order that a substantial heel angle is recorded. The current text does not make it immediately clear that fishing gear is only to be lifted on one side. Furthermore it is important that the weight of the fishing gear assumed is recorded, so that this

M975, and the formulation in MSN 1770(F) already cover vessels down to 12 m RL.

Chapter 3 of MSIS 27 The Instructions for the Guidance of Surveyors for Fishing Vessels sets out parameters for re-inclining but a decision is based on the extent of weight growth/modifications and margins of stability.

The word "both" has been removed. The weight and dimensions of gear for beamers should always be recorded in the stability information. A breakdown of the weights and locations of items forming part of the gear should be listed in the stability booklet too.

calculation can meaningfully be related to subsequent heeling tests.

Annex 3: While the stability book contains much essential information, the format does not enable the skipper to quickly refer to important safety information. As a result it is often not consulted by them and they are unlikely to be aware of the most critical loading conditions. Such information needs to be prominently and readily available. It is therefore recommended that the following information be provided on a couple of pages at the start of the book to provide a simple and clear statement of:

- the lightship weight and freeboard on which the information is based, against which the owner can monitor any weight growth
- minimum freeboard for the two or three most stability critical loading conditions for which information is provided together with diagrams or a table describing these conditions
- any safety-critical operational information such as ballasting or minimum fuel levels required to maintain stability, maximum safe lifting capacity in varying loading conditions, etc.

In addition a concise summary of key safety messages should be provided regarding such topics as overloading, avoiding free-surfaces, the effect of modifications, the dangers associated with lifting and hauling back on fast gear, etc, (which could be condensed from section 3 of the attached Fishermen's Safety Guide).

It is also suggested that blank pages be provided for recording of future Rolling or Heel Tests conducted (MGN503 refers).

This is agreed, but this information is only of value when it's used by the skipper / crew. Changing stability information formats may make things clearer but without knowledge of stability or even stability awareness training for FV crew then it's effect is limited. This will be tied in with the next revision of MGN 281

It should be noted that all booklets approved by MCA should also bear a stamp on the front cover highlighting important notes which the skipper needs to read before using the stability information. These notes would normally include the most important safety / stability critical messages.

This will be addressed in the next revision of MGN 281, not this Code.



### **6. Stability – Over 24m Code**

The introduction of clauses 3.1.5.2 and 3.1.5.3 on a static heel test is applauded. However it is suggested that clause 3.1.5.3 should read 'with one derrick stowed and one at maximum outreach' instead of 'both derricks at maximum outreach', in order that a substantial heel angle is recorded. The current text does not make it entirely clear that fishing gear is only to be lifted on one side. Furthermore it is important that the weight of the fishing gear assumed is recorded, so that this calculation can meaningfully be related to subsequent tests.

### **7. Stability – All Codes**

In its recommendations to MCA after the second FV Safety Forum on 18 September 2013 the Royal Institution of Naval Architects included:

- *Because vessels using bulk fishing methods are those most vulnerable to overloading and loss of stability, consideration should be given to requiring a full stability analysis for all such vessels, regardless of their length.*

Using length as the basis for requiring a full stability analysis, whilst very clear in its application, naturally leads to skippers engaged in bulk fishing avoiding such a requirement by procuring boats just shorter than the critical length.

I would urge MCA to consider requiring all vessels engaged in bulk fishing to be subject to a full stability analysis. I realise that there may be some issues connected with existing legislation, but firmly believe that this requirement should be linked to the specific vulnerability of the vessel (in this case the dangers of inadvertent overloading), as well as its length.

The word "both" has been removed. The weight and dimensions of gear for beamers should always be recorded in the stability information. A breakdown of the weights and locations of items forming part of the gear should be listed in the stability booklet too.

It is intended to address this in the next version of the Code to address Stability issues in more detail.

	<p>Implementation of this suggestion requires a definition of “bulk fishing”. The following wording is put forward for consideration and refinement:</p> <p>Bulk Fishing: Methods of fishing in which:  a) the catch is loaded onto a vessel in bulk, thus including all forms of trawling and seine netting, and  b) the maximum storage capacity below the gunwale can contain a catch weighing more than [10]% of the vessel's lightship.</p>	
Karle Kane	<p><b><u>1. Qualifications – Small FV Code</u></b>  As part of the consultation process ref. Annex C - Draft Small Fishing Vessel Code, I wish to raise a point relating to qualifications for fishermen.</p> <p>Currently training required that a STCW or Sea-fish approved course must be undertaken, regardless of any other training a person has completed or at what level, surely there should be wider scope for exceptions or acceptance of equivalency, I know this has happened in the past, but it seems individuals quite often go by what's in the Code/Regs.</p> <p>As examples of issues I allude to, I note;</p> <p>1. One day Basic Fire Fighting: Could a Fire Brigade trained fire fighter or persons trained on a Offshore Fire Fighting Team Training Course not be considered competent., it seems this is currently not the case, which makes a mockery of the STCW training as it is Fire Fighters in areas</p>	<p>This should be addressed by amendmens to the Fishing Vessel (Safety Training) Regulations and is to be considered as part of the implementation of STCW-F in the UK</p>

such as Tyneside do the training.

Fire Fighter training for offshore firefighters (Team member or leader) that is currently undertaken in many centers, exceeds by far the training given on the one day Basic Fire Fighting course.

2. One day Basic Survival Course, One Day Fire Fighting and One Day First Aid. Could the Full Offshore Survival Course ( This includes Survival, First aid and Fire Fighting) not be accepted as suitable training.

Having completed the Offshore Survival, First Aid and Firefighting training (5 day) on 8 occasions attended refresher training 'both in UK (South Shields & Aberdeen) & Holland (Vlissegen Marine School), I see little if any additional information or training that is imparted by the current Sea Fish Training courses over the Full Offshore course.

3. The One Day Safety course.

I see no training outwith Sea Fish that would cover this.

4. I would note that in the past Sea Fish and in some cases I believe the MCA have exempt persons from the Basic Training requirements 'based on training other than the STCW or Sea Fish courses'. For a variety of reasons I believe this needs to be considered in the new draft.

5. Sea Fish - MCA.

It should be made clear that Sea Fish can qualify alternative Fisher-mans certification, rather as I have found that Sea Fish accept certification from other sources and then to

have the MCA surveyors state later this is not acceptable. This can and has led to significant loss of earnings in cases I'm aware of.

#### 6. Training Syllabus.

I would note that access to the training syllabus for the Basic Courses should be made accessible to the public, through reference access in the Codes.

#### **2. Vessel Inspection Checklists – Small FV Code**

These are open to interpretation by individual surveyors (3 times I've been given different views of equipment standards/type) e.g. USCG v SOLAS v BSI v DEM approved lights for life-jackets. Metal bucket rather than a Steel Bucket. I would propose the checklists are more specific and that where a standard is applicable it is stated in the checklist...it seems the wording in the various Regs / Notes are not always clear...even to surveyors.

#### **3. LSA – Small FV Code**

1. Vessels below 7mts should carry a hand held dry powder extinguisher, I make this observation based on the fact that at present all you may have to fight a hydrocarbon ( petrol or diesel oils) type fire is water.....not the recommended medium as any competent fire fighter would advise.

2. Petroleum products i.e. Fuel stowed on board should be contained in approved metal containers.

3. Vessels under 7m should carry a small oil spill kit.....I make this observation based on my observations around harbour areas in the North East re. the amount of hydrocarbons incl. fuel and lubricants that are currently

The Guidance in Annex 2 provides greater detail on Standards than was available in the previous Code. In addition, MCA are developing new Surveyors Aide Memoires which will ensure greater consistency in interpretation.

Agreed, the Code has been amended.

This is contained in HSE guidance which is now referenced in the Code

This requirement is contained in MARPOL regulations

	<p>being lost overboard or pumped from the bilges. My own local Marina being quite bad at times.</p>	
<p>Louise Hall – Shipowners Club</p>	<p><b><u>1. General Comments – All Codes</u></b> I have read through the consultation and I think that making the codes mandatory will have a big impact on the industry. As an insurer that specialises in small vessels we see firsthand claims that occur when people have not take into account the good practice guidance which is in place. Many years ago we had a spate of claims related to the poor maintenance of the lifting gear on board, some resulting in fatalities. At this time the standards in place governing these aspects were only advisory and therefore were not followed. It is hard to develop a safety culture throughout the industry on a voluntary basis as not all crew are so aware of the consequences, and as an insurer it is hard to insist on harder standards than what the vessel’s certifying authorities themselves enforce.</p> <p><b><u>CONSULTATION QUESTIONS</u></b></p> <p>Q1 In full agreement that all vessels should carry EPIRBs or SARTS.</p> <p>Q2 No, the voluntary aspects for carrying EPIRBs should be removed if we want a real safety culture to develop.</p> <p>Q3 In relation to Q2, I feel leaving the utilisation of PFD’s as optional is not fully taking advantage of this review. I have included a link to Fishsafe who did an excellent campaign entitled ‘real fisherman wear Pfd’s’ <a href="https://www.fishsafebc.com/index.php?id=10">https://www.fishsafebc.com/index.php?id=10</a>. If you keep this as optional then they will not be habitually worn unless the myths are addressed, which I think this campaign really managed to do.</p> <p>Q18 Insurance costs going down with this implementation. It is natural that if an operator’s</p>	<p>The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force.</p>

	<p>incident rate, and therefore claims costs, reduce then this will have a positive effect on their Loss Ration and in turn on future premium increases.</p>	
<p>Charlie Hill</p>	<p><b><u>1. EPIRBS – Small FV Code</u></b>  On reviewing the above document I would like to add comment to the use of EPIRB's mounted on the vessel, this is for the smaller commercial vessels in particular which work out of remote small tidal harbours. (Section 4.2 in the attached doc)</p> <p>The harbours the smaller commercial/part-time fisherman work out of have poor lighting, facilities are limited, harbour's dry out &amp; vessels are prone to vandalism as well as kids playing on the vessels. Installing EPIRBS on these vessels I feel would greatly increase the amount of false alarms, causing great expense &amp; unnecessary exposure to the emergency services. Also causing the vessel owners bad press as well as costly replacement of the EPIRBs. I am all for EPIRBS however making them a mandatory fixture on all commercial registered vessels I do not feel is the best way forward for the smaller vessels which operate out of these harbours. What I would propose as mandatory but again it's the same as the lifejackets it would be hard to police, would be Personal location beacons to be a requirement for each of the crew onboard, these could be checked at the inspection for certificate renewal.</p> <p>I cannot emphasize enough I am all for EPIRB's, however I have seen at hand what happens to vessels in the smaller harbours. I am a registered part-time fisherman which works out of a small harbour in the Moray Firth (Cullen), the majority of us work 19ft – 21ft range vessels mostly through the Spring/Summer months.</p>	<p>The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force.</p>

<p>Robert Greenwood – NFFO</p>	<p><b><u>1. EPIRBS – Small FV Code</u></b>  Many under 10m and under 7m are kept in publicly accessible areas like beaches or municipal harbour hard standings. There is a concern that the Category 1 type EPIRBS could be stolen and cause either malicious activations or just cost of replacement issues.  This issue cannot be linked specifically to an exact size of vessel but we would welcome a change to the wording that would allow for insecure vessels to be able to hold a category 2 EPIRB as an alternative. The assessment of the vessel security could be checked at time of vessel inspection , or if this is not accepted then our fall back would be to allow under 7m vessels to carry Cat 2 EPIRBS. Our final point on this would be that there is striving innovation in the market and the Category 2 EPIRB is in our opinion being surpassed by some of these innovations, allowing the devices to signal distress automatically as well as provide a location. Being overly prescriptive with the type of EPIRB replacement for under 7m vessels may stifle safety improvements in the future. I suggest that there could be a list of equivalent PLB options that is maintained in a separate MGN or MIN which is more flexible than the vessel codes.</p> <p><b><u>2. Liferrafts – Small FV Code</u></b>  The distance from port suggested in the proposed codes for the smallest liferaft option suitable for vessels within 3 miles of port is not practical or able to prove. It would be preferable to have this lowest grade of liferaft as a distance from shore than a distance from port.</p>	<p>The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force.</p> <p>The Code has been amended to include statement to say Vessels operating 3 miles from shore may use open reversible liferafts constructed to SOLAS standard, MED approved (“Wheelmarked”) or DfT approved. Lifteraft(s) should be equipped to a level equivalent to a “DfT E” pack<sup>1</sup>. This may, where necessary, include a “grab bag” to supplement the equipment integral to the liferaft.</p>
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<sup>1</sup> DfT E Pack requirements can be found in MSN 1676 (M&F), Schedule 4, Part 4

	<p><b><u>3. Term Fisher – All Codes</u></b>  Although I know the reasons behind why you have chosen to use the term Fisher, I still find the term abhorrent to our industry. In terms of defining a Fisher you may as well define the crew as Crew or Workers, allowing the industry to remain untainted by this forced political correctness. Even the ubiquitous Wikipedia’s gender specificity pages have the following statement when referring to the attempt to redress to gender neutral job titles “ some proposed gender-neutral terms have not attained such common usage (as with fisher as an alternative to fisherman)”. Although inevitable that this will be forced upon us I would welcome a spate discussion being opened with the industry to discuss how this could be handled in the wider usage.</p> <p><b><u>4. PFD Wearing – All Codes.</u></b>  The term “Shall” within in the PFD statements in all codes could lead to confusion, and although the wording is backed with the EC Directive 93/103 I feel it could lead to confusion in its application. It would be clearer if the wording was changed to recommended.</p>	<p>The Code has been amended to refer to “fisherman”</p> <p>The Codes will state that PFD wear is recommended.</p>
<p>Bill Forsyth  – MCA</p>	<p><b><u>Under 15m Code</u></b></p> <p><b><u>Summary</u></b>  Page one Bullet Point</p> <ul style="list-style-type: none"> <li>• Carbon Monoxide Monitors for vessels with enclosed spaces that contains a fired cooking or heating appliance</li> </ul> <p><b>RESPONSE</b>  It was previously discussed that this would also be required for vessels where an engine exhaust penetrated though the wheel house or crew bunk space</p>	<p>The Code has been amended to require Carbon Monoxide Monitors where engine exhausts penetrate through a wheelhouse or accommodation space.</p>



**Under 15 Code Annex C checklists**

- The liferaft, which is mandatory, can be fitted with either a Float free Release **of** Hydrostatic Release Unit mechanism.

**RESPONSE**

Is the word “of “ a typo

**Fire extinguishers (Fixed)**

For fixed systems in machinery spaces where the space is never occupied an automatic discharge system is acceptable, providing that an indication of discharge is given.

For machinery spaces that can be occupied, the system should be designed and installed in accordance with its manufacturers' instructions. These spaces should incorporate an advance warning alarm system, within the space, (audible and visual). The space should be able to be made gastight to contain the extinguishing agent, and to starve the oxygen supply. Systems fitted should be based on the class of fire risk.

Fire extinguishers (Fixed)

**RESPONSE**

“For fixed systems in machinery spaces where the space is never occupied an automatic discharge system **maybe** acceptable subject to the agreement of the attending MCA surveyor.”

*Automatic Inert gas aerosol systems are not acceptable when fitted without the ability to make the compartment gas*

The Code has been amended accordingly.

The Code has been amended accordingly.

*tight prior to the release of the agent . AFFF or dry powder systems have been accepted in other vessels.*

### **Lifejackets and Personal Floatation Devices (PFDs)**

A vessel is required to carry life-saving appliances (LSA) including lifejackets for all persons on-board through regulation forming part of the “Statutory LSA”. These Statutory Lifejackets are of a type designed tested and maintained to a standard appropriate to the vessel type and area of operation. These lifejackets are to provide persons buoyancy in an abandon ship scenario.

Lifejackets should be stowed either in a deckhouse or other dry and readily accessible position or best alternative position and have stowage positions clearly and permanently marked.

A statutory lifejacket can be very bulky in nature, cumbersome to move in when worn on deck, however once in the water, they provide a high level of buoyancy for the wearer awaiting rescue.

A PFD can be a lifejacket or a buoyancy aid or wearable buoyancy device that also provides persons buoyancy in the water. The intended use of a PFD is to be constantly worn when on deck in case of falling overboard, rather than intentionally entering the water or survival craft during an abandon ship scenario.

A PFD can be much smaller and more streamlined such as a waistcoat styled buoyancy aid enabling the user to continue to perform tasks whilst wearing it on deck, with the added level of safety that should they fall overboard, the PFD will offer them added buoyancy and increase the chances of survival until recovered.

In the event of an abandon ship scenario, individuals should, if time permits, remove their PFDs and don the statutory lifejacket provided on the vessel, which will offer

The Code will remain unchanged PFDs are not to be considered abandon ship equipment.

them a higher level of buoyancy than their PFD and a greater chance of survival.

A lifeline and harness attaching the person to the vessel may be worn, instead of or in addition to the PFD.

Lif jackets should be of the solid-filled type, or if inflatable should comply with **BS EN 396 or BS EN 399 (soon to be replaced by EN ISO 12402)**, with gas inflation and at least 150 Newtons buoyancy. One lifejacket per person should be carried, fitted with light, whistle and reflective tape. Lif jackets should be serviced and maintained at the manufacturers recommended service intervals by a service station.

#### **RESPONSE**

*An incorrect statement particularly if the PFD worn is a Mullion Compact where this is approved as an ISO 12402-3 lifejacket*

#### **RESPONSE**

*The ISO 12402 standard already applies*

#### **Lifebuoys**

Should be marked with the vessel name and port of registry or fishing vessel number and fitted with reflective tape and may be circular or horseshoe or torpedo in shape.

#### **RESPONSE**

I would recommend expanding on location of lifebuoys to include "the location of at least one lifebuoy should permit its rapid deployment and be easily reached without leaving the working deck of the vessel " This is of relevance on full shelter vessels where the lifebuoys may have been stowed on the shelter or wheel house top, thus reaching them

The Code has been amended accordingly.

exposes a crew member to a high risk of injury or falling overboard.

**Radio**

When operating offshore up to 30 nautical miles from the coast, a VHF radio should be adequate to contact a coastal radio station in good conditions. For vessels' operating more than 30 nautical miles from the coast it is strongly recommended that additional means of communication with greater range such as a Medium Frequency radio are carried.

Coastguard Maritime Rescue Co-ordination Centres maintain a listening watch on VHF Channel 16 via loudspeaker. The primary means of distress and urgency alerting should be via VHF DSC. On medium frequency (MF), the only means of distress and urgency alerting available is via MF DSC.

The Coastguard Maritime & Rescue Co-ordination Centres provide the UK's Radio Medical Advice Service for vessels at sea. To seek medical advice or medical evacuation, call the Coastguard on VHF Radio whereupon you will be placed in direct contact with the appropriate medical expertise. This service is free.

**RESPONSE**

The correct phrase is now " Coastguard Operations Centres "CGOC's"

The Code has been amended accordingly.

Derek  
Cardno –  
SFF

## All Codes and Response to Consultation Qs

### List of Consultation Questions

**Q1.** Do you agree that all vessels should be required to carry EPIRBs? Are there reasons why certain categories or sizes of vessels need not carry an EPIRB or are there other conditions in which vessels need not carry an EPIRB?

*SFF in principle agree strongly that the carrying of an EPIRB is a must for all crewed vessels. We accept as a safety control measure it holds no value but as an early warning tool in the time of distress it's invaluable. After lengthy discussions it's the feeling of our own safety committee that the carrying of an EPIRB on a single handed fishing vessels would not be helpful for alerting others to a distress. SFF would then strongly recommend the need to look at PLB's as being an option for those fishermen instead of a mandatory requirement to carry an EPIRB.*

**Q2.** For vessels which do not currently have the equipment on board that the Codes propose to make mandatory, is there any evidence that a voluntary approach would lead to an increase in its use?  
*SFF feels that for smaller vessels the cost will be too high if the requirements were to become mandatory immediately. SFF would like the requirements to remain as a voluntary requirement. This may just be for a relatively short period until a survey maybe done on the impact of our own membership. This would also give the introduction of EMFF to get bedded in, as there will be provision within the funding to meet the new requirements. If the new requirements are made mandatory then EMFF can't be applied for.*

The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force to enable EMFF funding to be utilised. Single handed vessels can also choose to have PLB instead of an EPIRB.

The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force.

**Q3.** Consultees are invited to submit any additional evidence or other relevant information on the costs and benefits of the proposed Regulations (Option 1) that are identified in this IA

*SFF dose not agree with Option 1 that all FV's under 15m must have an EPIRB for the reasons above*

**Q4.** Consultees are invited to provide details of any additional costs and benefits of the proposed Regulations (Option 1) that have not been identified in this IA, and provide any additional evidence or other relevant information that is available on these costs and benefits.

*In relation to costs consideration should be given to the longterm cost of maintaining the equipment. The replacement of batteries is an expensive business and do not always work.*

**Q5.** Consultees are invited to comment on any of the assumptions that have been made in this IA, and are invited to propose alternative assumptions and provide supporting evidence or other relevant information.

*In relation to evidence why a PLB should be an option for a single handed fisherman there are several MAIB reports into the loss of a single handed fisherman where no EPIRB being onboard would of made any difference to the situation. One example would be the Breadwinner report where the fishermen was pulled overboard and when the vessel went ashore it still did not sink thus the EPIRB would never activated.*

The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force. Single handed fishermen will be allowed to carry a PLB rather than an EPIRB,

The Impact Assessment has been amended to reflect that the entire piece of equipment may be replaced rather than a battery.

The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force. Single handed fishermen will be allowed to carry a PLB rather than an EPIRB,

<p><b>Q6.</b> Consultees are invited to propose alternative assumptions regarding the number of fishing vessels which would join the UK flag each year of the appraisal period, and provide supporting evidence or other relevant information <i>SFF have no comment on this question but to suggest that accurate figures maybe obtained from the devolved nations fishery offices.</i></p> <p><b>Q7.</b> Consultees are invited to propose alternative assumptions regarding the number of fishing vessels which would leave the UK flag each year of the appraisal period, and provide supporting evidence or other relevant information. <i>SFF have no comment on this question but to suggest that accurate figures maybe obtained from the devolved nations fishery offices.</i></p> <p><b>Q8.</b> Consultees are invited to submit any additional evidence or other relevant information on the additional costs of fitting and maintaining the new equipment that would be required by the proposed Regulations (Option 1). <i>Replacement batteries for EPIRBS including the installation cost can be higher than the purchase price. Estimating costs going forward will be difficult but in the last 10 years products haven't changed much in cost but man hours for repairs have increased dramatically.</i></p> <p><b>Q9.</b> Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring skippers to conduct drills on board vessels when they are inspected against the Code of Practice. In particular, consultees are invited to advise</p>	<p>Devolved Administrations derive their data on vessel numbers from the Registry of Shipping. No other sources of data have been identified</p> <p>Devolved Administrations derive their data on vessel numbers from the Registry of Shipping. No other sources of data have been identified</p> <p>The Impact Assessment has been amended to reflect that the entire piece of equipment may be replaced rather than a battery.</p> <p>MCA are working with Industry to develop new Drills guidance, in particular guidance on Man Overboard Drills to ensure drills are well planned and do not place extra cost on the owner.</p>
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whether there would be any additional costs to business from this requirement, including whether the requirement to conduct drills would impact on the productivity of affected fishing vessels and whether it would result in any additional employment costs for affected businesses. *SFF feel that there would be no extra cost for the business if the drills to be carried out were planned and discussed prior to the surveyor attending. The additional cost we would be in the time the surveyor stays onboard the vessel. Normal procedure is drills are carried out last and several of our members have complained that surveyors have used up time while doing drills. If FV's are kept to a high standard then owners should be rewarded by a reduction in the survey fee paid up front.*

**Q10.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs to owners of informing MCA of significant modifications to UK registered fishing vessels, particularly on whether there would be any additional costs to business from this requirement. *SFF has no comment to this question but feels more dialogue is needed. In the IA it is mentioned that owners can email or call in proposed modifications, which is fine, but industry would like to know what would be the next step as this might have a large impact on costs.*

**Q11.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring Safety Certificates for vessels under 15m. *SFF would like more information on this subject*

MCA would consider the proposals and either agree them or visit the vessels to discuss the changes, which for under 15m vessels is at no cost. Likely costs of changes to the modification are in large part unquantifiable due to the large variety of possible modifications.

It is already a requirement for vessels over 15m to agree modifications in advance with the MCA.

MCA already supply Certificates to Small FVs, which they must send to RSS when Re –Registering. This is a formalisation of the process.



**Q12.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring an inspection upon change of ownership, particularly on whether there would be any additional costs to business from this requirement.

*SFF has no comment to this question*

**Q13.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring new vessels of 12 – 15m to undergo a stability test and have a completed Stability Book.

*SFF has no comment to this question*

**Q14.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring vessels of 24m and over to have shut offs for exhaust fans, particularly on the costs per vessel of meeting this requirement.

*SFF agrees with the author of the impact assessment that there is already a high compliance*

**Q15.** Consultees are invited to submit any additional evidence or relevant information on the impacts of the proposed Regulations (Option 1) on safety.

*SFF believe that combining the present information into 3 codes is the way forward. SFF appreciate that the introductions on some items will have a safety impact on the UK fleet but this must just be looked at a first step forward but an important step to take. Before implementation though SFF is strong in its desire to*

This comment is reflected in the Impact Assessment

	<p><i>canvas the impact to the new requirements mentioned in Q1 &amp; 2</i></p> <p><b>Q16.</b> Consultees are invited to submit any additional evidence or relevant information on potential benefits of the proposed Regulations (Option 1) to Government. <i>SFF have nothing further to add accept the benefit to Government would be a demonstration of a commitment to assist FISG to improve fishing safety.</i></p> <p><b>Q17.</b> Consultees are invited to submit any additional evidence or relevant information on simplification benefits of the proposed Regulations (Option 1) to business. <i>Simplifying the interpretation of the codes must be good for industry</i></p> <p><b>Q18.</b> Consultees are invited to submit any additional evidence or relevant information on the impact of the proposed Regulations (Option 1) on insurance costs. <i>SFF doesn't believe that there will be a benefit to industry through insurance costs.</i></p> <p><b>Q19.</b> Consultees are invited to advise whether any of the non-monetised costs to business would significantly impact on the OITO assessment above. <i>SFF agrees with the implementations of the new simplified codes will be a benefit to industry but like all things new wither it can be monetised or not it will cost business.</i></p>	<p>This comment is reflected in the Impact Assessment</p> <p>This comment is reflected in the Impact Assessment</p> <p>This comment is reflected in the Impact Assessment</p>
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	<p><b>Q20.</b> Consultees are invited to submit any additional evidence or relevant information on the impact of the proposed Regulations (Option 1) on small and micro businesses.</p> <p><i>With many of the costly changes affecting the under 15m FV's there will be a big impact to micro business. With any new requirements and with the best IA in the world cost ended up being more than the IA. SFF suggestion is to canvas members on the new requirements and investigate EMFF options. The MCA in conjunction with industry will need to sell the new requirements under the codes especially on the safety side.</i></p> <p><b>Q21.</b> Consultees are invited to submit any additional evidence or relevant information on the impact of the proposed Regulations (Option 1) on competition</p> <p><i>SFF have no comments to this question</i></p>	<p>The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force. This phase in period also applies to liferafts on vessels of 7m Registered Length (L) to less than 15m (LOA) and decked vessels of 7m (L) to less than 10m (L). This allows owners to apply for EMFF funding to purchase this equipment.</p>
<p>Andrew Woods - RNLI</p>	<p><b><u>General – All Codes</u></b></p> <p>Consistency of Units: 15-24m code uses kg/cm<sup>2</sup>, Over 24m code uses bar for pressure (and Newtons/mm<sup>2</sup>). SI units?</p> <p>Risk Assessments are frequently referred to - is there a preferred methodology and format that should be used? Could MCA include example?</p> <p>Icing areas defined in stability sections are not the same throughout all codes - should they be consistent?</p>	<p>The Codes have been reviewed and amended for consistency of units.</p> <p>MGN 20, which gives Risk assessment guidance, is referred to in the Code. Risk Assessment folders exist but to name them would favour those over any new folders created in the future.</p> <p>Both are correct. The &gt; 24 m icing areas are taken from EC/97/70 which in turn uses ICES fishing area boundaries as a basis. The 15-24 m Code areas are based on historical UK Load Line ItoS, this in turn uses the old ICLL winter area</p>

	<p>Changes applies to Small Code          Could MCA provide a definition for extensive and maybe examples? - 4.4</p> <p>Could MCA provide a definition for substantial and maybe examples? – 3.7</p> <p>Muster lists - could MCA include an example of a typical muster list as an appendix to the code. – 3.19</p>	<p>limits. The discrepancy goes even further as there are older &gt;24 m vessels using the 15-24 m requirement. It is possible to choose one consistent set of areas but we'd need to be clear on the overlapping areas to ensure we cover &gt;24 m directive requirements which are mandatory (see EC/97/70 Part B, Chapter III, Reg. 8).</p> <p>Paragraph 3.7 of the Code is considered to be</p> <p>Section 3.7 of Chapter 3 of MSIS 27 gives advice which helps guide the surveyor on this, we could refer to this or include in the Code (reference is preferred as MSIS can change)</p> <p>“A vessel which undergoes “major” modifications should comply with the stability requirements for ‘new’ vessels as far as it is reasonable and practical to do so. The extent of proposed modifications should be discussed with the local Consultant Surveyor (FV) and Stability Unit prior to any work being carried out. Major modifications are defined as:</p> <ul style="list-style-type: none"> <li>• any change that substantially alters the dimensions of a ship,</li> <li>• any change that substantially alters the cargo-carrying capacity of a ship,</li> <li>• any change that substantially increases a ship’s service life,”</li> </ul> <p>Reference is made to MGN 430 which contains Muster List examples.</p>
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<p>Should the word floatation be replaced by Flotation throughout as this is the more commonly used version (in OED)?</p> <p><b><u>Annex 2 – Small Code</u></b></p> <p>Could there be an additional requirement written into this Annex regarding the provision of adequate hard points/towing points and marking of these points so that rescue vessels know where to attach lines.</p> <p>Could there be additional requirements for provision of suitable points of access/egress?</p> <p>Is there a risk, especially on smaller vessels that in the event of a vessel being swamped by a large wave the liferaft is accidentally inflated or deployed. Is there a method for preventing accidental deployment? - Liferafts</p> <p>Are there other methods that RNLI have knowledge of that assist? Do RADAR reflectors make a difference when searching for vessels? Yes anything that enhances the echo profile aids the ability for detection as part of SAR activity – Radar Reflectors</p> <p><b><u>Annex 3 – Small Code</u></b></p> <p>Could the following statement be added? In addition to the loading conditions defined any other operating/loading condition that may realistically occur and that results in a less favourable stability condition should also be considered and calculated for. – Annex 3 – Chapter 10</p>	<p>The Code has been amended</p> <p>Code has been amended to provide guidance on Hard Points/Towing Points</p> <p>Guidance on access/egress is an issue for both the vessel and port and not suitable for coverage in the Small Fishing Vessel Code.</p> <p>Reference to MGN 267 - Stowage of Liferafts and EPIRBs has been included</p> <p>In principal there is agreement but if an attempt is made to cover every perceivable 'worst case' loading condition, there will be scenarios which do not comply with standard criteria requirements e.g. hopper loading analysis which is already covered for 15-24 m vessels. MCA looks to identify the highest risk operations and / or those which reduce stability to the greatest degree and highlighting any warnings or</p>
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	<p><b><u>Annex 4 Small Code</u></b></p> <p>Should there be a requirement for further lightweight surveys at certain intervals similar to passenger vessel reqts in IMO IS Code? Also could a statement be added regarding 'substantial' changes that may affect VCG requiring a further inclining trial? Annex 4 – Chapter 16</p> <p><b><u>Definitions – 15-24m Code</u></b></p> <p>No definition for Inclining Trial but lightweight trial is defined. Could a definition be added.</p> <p>The definition is not quite accurate - can't easily get vertical CG from a lightship trial. – 1.2.40</p> <p><b><u>General – 15-24m Code</u></b></p> <p>A section on hard point for towing/alongside towing/mooring? – Chapter 4</p> <p><b><u>Access and Egress – 15-24m Code</u></b></p> <p>Is it really acceptable to only have a single access/egress point from a machinery space on a boat of 15m or longer? – 5.7.5</p>	<p>limitations to be observed in the stability booklet but this would not form part of the Code, but instead a revisioun of MGN 281</p> <p>This could only occur if MCA were going to require inclining tests to be carried out. The LSC is not going to be of significant benefit if we have no basis (inclining or other stability test) for comparison. This is an issue which will be addressed as part of the development of Stability Standards for Small Fishing Vessels</p> <p>MSIS 9 and MSIS 27 both give details on the procedure to be followed for LSCs and inclinings.</p> <p>The lightship check referred to is a comparison against a known basis to check for weight changes rather than to establish the vessel's actual lightship particulars but it is agreed VCG cannot be calculated from an LSC.</p> <p>Code has been amended to provide guidance on Hard Points/Towing Points</p> <p>New build vessels require twoescapes but some existing vessels will have only one and the Code needs to recognise this</p>
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**Fire Protection – 15-24m Code**

Can the RNLI offer advice on what else to include in the risk assessment from a rescue perspective - 6.1.2

Marked Rescue Zone - would the RNLI recommend that appropriate rescue zones for coming alongside be considered/marked, etc.? - 7.1.6

RNLI comment - should this be required for all vessels? - 9.5.5.1

**Annex 3 15-24m Code**

Free surface correction calculation is poorly shown. Rho is shown as pi rather than ri. This could be mistaken for p. LB3/12 is not correctly shown in the text - 12 is not underneath the LB3 – Annex 3 – 9(i)

Include a further statement; Any other operating/loading condition that may realistically occur that results in a less favourable stability condition. – Annex 3 – 10(ii)

**Annex 4 – 15-24m Code**

Consistency when referring to A-60, B-15 bulkheads (some are shown as B15, A.60, A.30)

Seafish Review of Risk assessment guidance will commence soon.

It is considered that paint will degrade and on most vessels it will be clear where to come alongside

Steel vessels do not require Radar Reflectors

Pi is taken from 75 Rules Schedule 3 and is correct. However LB3/12 section has been amended.

In principal there is agreement but if an attempt is made to cover every perceivable 'worst case' loading condition, there will be scenarios which do not comply with standard criteria requirements e.g. hopper loading analysis which is already covered for 15-24 m vessels. MCA looks to identify the highest risk operations and / or those which reduce stability to the greatest degree and highlighting any warnings or limitations to be observed in the stability booklet but this would not form part of the Code, but instead a revision of MGN 281

The Code has been amended accordingly.

**Definitions – Over 24m Code**

No definition for Inclining Trial but lightweight trial is.

Definition not strictly true - can't get vertical CG from a lightship trial. - 1.2.51

**Stability – Over 24m Code**

MCA Surveyor witnesses - could there be an explanation of preferred method of calculation of GM (least squares) somewhere in the document? 3.1.4.1(ii)

Include a further statement; In addition to the loading conditions defined any other operating/loading condition that may realistically occur and that results in a less favourable stability condition should also be considered and calculated for. (3.1.5.2 does partially) - 3.1.5.1

Icing areas are different to those listed in Under 15m and 15-24m codes - 3.1.6

The Codes have been amended to refer to MSIS 9 Approval of Stability Information in order that alternative methods for non standard hull forms can be accommodated.

The lightship check referred to is a comparison against a known basis to check for weight changes rather than to establish the vessel's actual lightship particulars but it is agreed VCG cannot be calculated from an LSC.

There is no preferred method stated. This is deliberate as there are at least 5 ways to derive GM and all of them should be equally valid for a wall-sided vessel. As above, MCA needs to ensure there is some flexibility for non-standard hullforms too.

At present, the skipper and owner both sign a statement confirming that the conditions in the booklet are the most onerous. We'd always expect that stability information is relevant to a vessel's operation.

Both are correct. The > 24 m icing areas are taken from EC/97/70 which in turn uses ICES fishing area boundaries as a basis. The 15-24 m Code areas are based on historical UK Load Line ItoS, this in turn uses the old ICLL winter area limits. The discrepancy goes even further as there are older >24 m vessels using the 15-24 m requirement. It is possible to choose one consistent set of areas but we'd need to be clear on the overlapping areas to ensure we cover >24 m directive requirements which are mandatory (see EC/97/70 Part B, Chapter III, Reg. 8).



<p>Should the most onerous condition (for stability) be identified and the lifting calculation be done for that? - 3.4.3</p> <p><b><u>E</u></b> <b><u>ire Protection – Over 24m Code</u></b></p> <p>Is it really acceptable to only have a single access/egress point from a machinery space on a boat of 15m or longer - 5.3.1.2</p> <p>Consistency of Units: 15-24m code uses kg/cm<sup>2</sup>, Over 24m code uses bar for pressure (and Newtons/mm<sup>2</sup>) - SI units? - 5.5.8.6</p> <p><b><u>LSA – Over 24m Code</u></b></p> <p>Consideration given to inclusion of casualty recovery systems that reduce the effects of hydrostatic squeeze fitted to rescue boats. - 7.2.2.4 (iv)</p> <p>Consideration to accidental operation if swamped by waves? - 7.2.2.4 (viii) (b)</p> <p>Consideration of accidental operation if swamped by waves? - 7.2.11.1 (i)</p>	<p>In principal there is agreement but if an attempt is made to cover every perceivable ‘worst case’ loading condition, there will be scenarios which do not comply with standard criteria requirements e.g. hopper loading analysis which is already covered for 15-24 m vessels. MCA looks to identify the highest risk operations and / or those which reduce stability to the greatest degree and highlighting any warnings or limitations to be observed in the stability booklet but this would not form part of the Code, but instead a revision of MGN 281</p> <p>In this instance, it is a requirement of the EC Directive 97/70 and Torremolinos Protocol. New build vessels require two escapes but some existing vessels will have only one and the Code needs to recognise this</p> <p>The consistency of units has been addressed.</p> <p>It is currently considered that the Fishermen’s Safety Training courses should deal with how to recover a person and available equipment.</p> <p>Reference to MGN 267 - Stowage of Liferafts and EPIRBs has been included</p> <p>Reference to MGN 267 - Stowage of Liferafts and EPIRBs has been included</p>
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<p><b><u>Shipboard and Fishing Operations – Over 24m Code</u></b>  Include helo ops as a training drill (medevac, etc.) 8.2.2.5 (vi) does mention this. - 8.2.2</p> <p><b><u>Communications and Navigation – Over 24m Code</u></b>  Gross Tonnage is dimensionless - should not use the word tonnes when referring to Gross Tonnage. Rewrite to 'Fishing Vessels of 3000GT...' - 9.6.5.2</p> <p><b><u>Crew Accommodation – Over 24m Code</u></b>  Clear headroom - 2m seems excessive as 'headroom' would it be better to define a minimum deck to deckhead height? -- 10.4.2.2</p> <p><b><u>Typographical Comments</u></b></p> <p><b><u>Small Code S.I</u></b>  Typo - applicable code (missing c) – Chap 5 – 17.1</p> <p><b><u>Small FV Code</u></b>  Typo ... and either allow registration or require the... (missing 'or') – 3.10  inclining trial (missing trial) – 3.34  Typo EPRIB - should read EPIRB – Annex 1 – Checklists  Typo ... on in Chapter 6,... (on is not required) – Annex 2 – Electrical Systems</p>	<p>This replicates the Torremolions Protocol 1995. Helicopter Operations are covered during Basic Safety Training.</p> <p>The Code has been amended</p> <p>This comes from ILO 188 and future proofs the Code.</p> <p>All following Typographical errors have been amended in the Codes with the exception of CO2 which is considered correct</p>
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...wetness, high humidity and high temperature (including sweating) - should including sweating come after wetness?  
– Annex 2 – Electrical Systems

Typo ...gasconsuming... (Space or hyphen required between gas and consuming) – Annex 2 – Gas Detector

**15-24m Code**

Typo/formatting - unnecessary gap in text before 139 degrees – 1.2.53

... member is fitted andthe... space required - 1.2.53, b

... penetrate into theship... space required - 1.2.53 ii

0,5L - should this not be 0.5L in UK - 1.2.59.2

...Regulationos... (Regulations) - 1.3.10.1

...switches shall fitted... (should read ...shall be fitted.) - 4.2.5.1

sq symbol between number and degrees - 4.3.2.1 (i)

...type. Nonreturn... hyphen required (Non-return) - 4.3.2.11

.....top if the... (if should be of) - 4.4.3.2 (i)

... constructed of noncombustible... hyphen required (noncombustible) - 5.1.1.6

...with the Fire TestProcedures code... space required - 5.1.1.9

CO<sub>2</sub> - 2 should be subscript not superscript - 5.5.2

CO<sub>2</sub> - 2 should be subscript not superscript - 5.6.6 (iii)

...protected by noncombustible... hyphen required (noncombustible) - 5.9.1.1

...shall be noncombustible... hyphen required (noncombustible)- 5.9.2.1

nonsmokers - hyphen required (Non-Smokers) - 10.1.2.3

...shall be of a noncombustible... hyphen required (noncombustible) – Annex 4 - 3.2.17

...beams and carlings... should be carlins – Annex 4 - 3.4.1 (i)b

In every? to which... something missing between to and which (vessel?) – Annex 4 – 3.6.2

K=... than one firePump... space required (Fire Pump) – Annex 4 - 3.7.1

...it can be supplies... should read supplied – Annex 4 - 3.9.5

...shall be provided which will... doesn't make sense - suspect something is missing – Annex 4 – 3.10.6

	<p><b><u>Over 24m Code</u></b></p> <p>...0.004 metres... should be metres - 2.3.2.1 (iii)</p> <p>inclining trial (trial to be added) - 3.1.3.1</p> <p>690N/mm<sup>2</sup>, 2 should be superscript - 4.5.2.7</p> <p>CO<sub>2</sub> - 2 should be subscript not superscript - 5.1.4.9</p> <p>...buoyancy device that buoyancy... something missing after 'that'? - 6.1.1.3 (ii)</p> <p>...operations at the significant... remove the? - 6.1.3.4</p> <p>...persons on board shall be provided... Shall be provided to be removed - makes little sense when read as part of the whole paragraph. - 7.2.1.2 (ii)</p> <p>Should this read 4.5m for window - seems large! - 10.2.3.2 (iii)</p>	
<p>Fran West – Seafield Navigation</p>	<p><b><u>Navigation Requirements – 15-24m Code and Over 24m Code</u></b></p> <p>Paper charts while being carried and correct at time of MCA survey are rarely if ever used on fishing vessels as primary navigation.</p> <p>The mandatory carriage of paper charts does not make them suitable for navigation.</p>	<p>Mandatory carriage of paper charts (an appropriate port/folio of paper charts (APC), from a govt authorised agency or hydrographic office) is really just to avoid the pitfalls that regarding use of ‘plotters’ or ECS (Electronic Chart System), as commonly known within the nautical lexicon. There being no standards for the ECS hardware, and their application and data software – data being the electronic charts not the ENCs or even RNCs. Consequently, there also not being any regular chart updates (or chart-corrections, as it used to be called) to</p>

	<p>Fishing plotters are the primary navigation source coupled with in most cases leisure quality charts from various providers , not official ENC's. In many case the leisure charts are graticuled in degrees minutes and seconds, not degrees minutes and decimal minutes as would be expected on a vessel for ease of use. also the electronic charts are not kept up to date by the vessels , many of these charts have not been updated in over 15 years.</p> <p>So while they comply with the letter of the law, they do not practice it.</p> <p>Safety conscious fishermen have already fitted official ENC to their plotting systems and where possible had them upgraded and reclassified by the SFIA (Seafish) as Mini-Ecdis as laid out in MGN319.</p> <p>They also carry a set of updated paper charts as a backup, although most safety conscious vessels will carry a dual mini ecdis so that failure of the solitary primary plotter does</p>	<p>take due note of the Notices to Mariners and any other relevant pieces/parts of the MSI (Maritime Safety Information).</p> <p>See comment above</p> <p>We wouldn't term it that they 'comply with the letter of law' by having APC during surveys and inspections and then quickly dumping the same preferring the ECS. Although it may be difficult to prove it, however, it's like saying that at 0300 hrs in the morning there were no cars on the road so jumping a red light should be ok, – it's still an infringement of the law!</p> <p>ECDIS, for certain SOLAS class vessel, was/is only mandated after due FSA and CBA (formal safety assessments and cost/benefit analyses) extolling clear benefits and enhancement of the safety of navigation. Fishing vessel industry may do something similar?</p> <p>ECDIS, for certain SOLAS class vessel, was/is only mandated after due FSA and CBA (formal safety assessments and cost/benefit analyses) extolling clear benefits and enhancement of the safety of navigation.</p>
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not mean a return to port to have it repaired, instead allowing them to continue to fish.

This is true in most fishing vessels regardless of size . Today there is no requirement at present for ECDIS to be carried on any fishing vessel, Mini Ecdis was created to be a halfway house, providing the functionality of Ecdis while continuing to be suitable for use as a fishing plotter.

There are no ECDIS systems available today that can be used as a fishing plotter on a commercial fishing vessel. Ecdis was never intended for that purpose. Mini Ecdis is being used successfully by the safety conscious skippers to fulfil both roles.

Most fishermen feel that the paper chart exercise, is just that: a paper exercise. It does not have the desired result of enhancing safe navigation. Making the Mini Ecdis mandatory would have this desire effect.

#### **Can I make the following suggestions**

if the paper charts are to continue as primary navigation and mini ecdis and ecdis are to be suggestions only, then the following wording needs adjusting:

#### **annex E:**

#### **9.5.3.4 rewording to**

"An equivalent electronic chart display and information system (MINI ECDIS ) conforming to Marine Guidance Note No.319 (M&F) Acceptance of Electronic Chart Plotting Systems for Fishing Vessels Under 24 metres and Small Vessels in Commercial Use (Code Boats) Up To 24 Metres Load Line Length, may be accepted."

The Codes don't insist that the APC are the primary means or the only means but state due acceptance – Annex E 15-24m: *"9.5.3.4 An equivalent electronic chart display and information system (ECDIS) conforming to Marine Guidance Note No.319 (M&F) Acceptance of Electronic Chart Plotting Systems for Fishing Vessels Under 24 metres and Small Vessels in Commercial Use (Code Boats) Up To 24 Metres Load Line Length, may be accepted."*

The Codes have been amended however, see the 15-24m Code section 9.5.3 and 24m and Over Code Section 9.5.4

**9.5.3.5 rewording to**

"Back-up arrangements to meet the functional requirements of section 9.5.3.2, if this function is partly or fully fulfilled by electronic means. An appropriate folio of paper nautical charts may be used as a back-up arrangement for MINI ECDIS or ECDIS. The back-up shall display in graphical (chart) form the relevant information of the hydrographic and geographic environment which are necessary for safe navigation."

If the paper charts were to become backup and the Mini Ecdis or Ecdis be primary then the following would need amending:

**annex E:**

**9.5.3.3 rewording to:**

An equivalent chart display and information system (ECDIS) shall be carried in addition to the chart carriage requirements of section 9.5.3.1.

**9.5.3.4 rewording to:**

An equivalent electronic chart display and information system (MINI ECDIS) conforming to Marine Guidance Note No.319 (M&F) Acceptance of Electronic Chart Plotting Systems for Fishing Vessels Under 24 metres and Small Vessels in Commercial Use (Code Boats) Up To 24 Metres Load Line Length, may be accepted in place of ECDIS

**9.5.3.5 rewording to:**

Back-up arrangements to meet the functional requirements of section 9.5.3.2, if this function is partly or fully fulfilled by electronic means. An appropriate folio of paper nautical charts may be used as a back-up arrangement for ECDIS or Mini Ecdis. The back-up shall display in graphical (chart) form the relevant information of the hydrographic and



geographic environment which are necessary for safe navigation.

Similar should be applied to annex G for the over 24 meter vessels since they have the same working space and operational constraints.

if the paper charts are to continue as primary navigation and mini ecdis and ecdis are to be suggestions only, then the following wording needs adjusting:

**annex G**

**9.5.4 rewording to:**

An equivalent electronic chart display and information system (ECDIS) may be accepted as meeting the chart obligations of section 9.5.3.

**Insert 9.5.4.1**

An equivalent electronic chart display and information system (MINI ECDIS) conforming to Marine Guidance Note No.319 (M&F) Acceptance of Electronic Chart Plotting Systems for Fishing Vessels Under 24 metres and Small Vessels in Commercial Use (Code Boats) Up To 24 Metres Load Line Length, may be accepted in place of ECDIS

If the paper charts were to become backup and the Mini Ecdis or Ecdis be primary then the following would need amending:

**9.5.4 reworded to:**

An equivalent electronic chart display and information system (ECDIS) shall be carried in addition to the chart obligations of section 9.5.3.

	<p><b><u>Insert 9.5.4.1</u></b>  An equivalent electronic chart display and information system (MINI ECDIS) conforming to Marine Guidance Note No.319 (M&amp;F) Acceptance of Electronic Chart Plotting Systems for Fishing Vessels Under 24 metres and Small Vessels in Commercial Use (Code Boats) Up To 24 Metres Load Line Length, may be accepted in place of ECDIS</p>	
<p>David Polley  – MCA</p>	<p>I am keen to present some feedback on the Small FV Code, however despite having been aware of MGN 502 for some time, I was unaware of these consultation documents. Surveyors that regularly use the Codes should be identified and supplied with the documents by email. I was made aware of the consultation process by an external body which should not be the case. Below are my points, do not hesitate to contact me if you need further clarification.</p> <p>Draft MSN XXX</p> <ul style="list-style-type: none"> <li>• Page 1 main changes; first bullet point is confusing as liferafts are currently a requirement for all vessels over 10M</li>   <li>• Page 1 last sentence ref EPIRBS; the wording does not indicate whether built in GPS will be a requirement. Wording left open to interpretation creates confusion.</li>   <li>• Page 4 para 3.3; first sentence does not make sense. A Small FV Certificate is issued when any recorded defects on the Inspection Form have been confirmed rectified.</li> </ul>	<p>The MSN has been amended</p> <p>The MSN has been amended</p> <p>The Code has been amended</p>

	<ul style="list-style-type: none"> <li>• Page 6 para 3.16; the definition of ‘at sea’ is not consistent with the definition in other applicable regulations. (many fishing vessels are operated within categorised waters, ie. Not ‘at sea’)</li> <li>• Page 10 para 4.13; prefer to see the word ‘recommended’ removed</li> <li>• Page 14 para 4.39; Radio Licences and reference to the <u>mandatory</u> radio training course should be moved to follow on from mandatory training section</li> <li>• Page 17; typo on EPIRB at the bottom of all the checklists</li> <li>• Page 24; disagree with the statement on battery operated detectors being unsuitable</li> <li>• Page 25; ‘Engine driven pumps are acceptable but are liable to failure’ – why accept them then? We should insist the fire pump is independently powered and located external to the main engine.</li> <li>• Page 26; Lifejacket section requires looking at. There are some confusing statements. It must be remembered for many small boats an EN396 or ISO 12402 standard lifejacket is supplied as the statutory lifejacket. Also the ISO standard has now replaced the EN standards. The last paragraph on page 26 which states the standards ‘one per person, light, whistle and tape’ should be moved to the first paragraph. One per person is now not correct given that some vessels will require 2 spare lifejackets. Only inflatable lifejackets require servicing by a service station.</li> </ul>	<p>The Code has been amended.</p> <p>The word recommended has been removed.</p> <p>The Code has been amended</p> <p>The Code has been amended</p> <p>After consideration by Consultant Surveyors, the Code has not been amended,</p> <p>After consideration by Consultant Surveyors, the Code has not been amended,</p> <p>The Code has been amended</p>
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	<ul style="list-style-type: none"> <li>• Page 27; Liferafts – the ranges referred to (150miles, 60miles), are not on the Certificate anywhere, so how does an Inspector determine which type of liferaft is required. The certificate refers to Radio areas A1 and A2. The statements are clearly cut and pasted from other Codes containing non relevant information; ie. Para 2 refers to 16 persons, clearly not relevant for a small fishing vessel.</li> <li>• Page 29; Medical Kit; consideration should be given to acceptance of smaller medical kits for open vessels less 7m and single handed fishermen</li> <li>• Page 30; when operating beyond 30 miles, surely the Radio regulations require MF/HF radio as statutory ? as above phrases like ‘strongly recommended’ should be avoided where possible</li> <li>• All the checklists should contain a reference to the additional guidance at Annex 2</li> <li>• Consider including an EPIRB registration form and EPIRB registry contact details as an Annex.</li> </ul> <p>I strongly believe we are missing some major issues, given this opportunity to review the Code and SI. Some more general points which do not appear to have been addressed:</p> <ul style="list-style-type: none"> <li>• The difference between buoyant and handheld smoke signals needs to be identified. A handheld</li> </ul>	<p>A level of trust needs to be applied to fishermen and accept their stated operating areas. If they have an incident, then enforcement might then raise awareness.</p> <p>Unable to amend as this requirement is addressed by Medical Regulations</p> <p>SOLAS Chapter 5 applies in this instance.</p> <p>The Code has been amended</p> <p>The Code has been amended to include contact details and how to register. However, Registration forms are liable to change so are not included.</p> <p>The Code has been amended</p>
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	<p>signal burns for 60s against a buoyant one which burns for 3mins, yet we accept either or.</p> <ul style="list-style-type: none"> <li>• Why are we still accepting Non-DSC fixed radios ?</li> <li>• Portable VHF radios should be a requirement for all vessels carrying a liferaft, consistent with other Maritime Regulations</li> <li>• Portable VHF radios as mandatory for single handed fishermen</li> <li>• PLB accepted as equivalent to EPIRB for single handed fishermen</li> <li>• All liferafts should be fitted with HRU <u>and</u> quick release hook. Float free rafts should not be accepted.</li> <li>• SOLAS approved lifejackets (ie. Solid buoyancy foam filled), should be a requirement on all vessels over 7m</li> <li>• Manoverboard recovery method should be on all vessels, for single handed fishermen there must be a method of unaided recovery onboard</li> <li>• Areas of operation, or weather limitations, should be introduced</li> <li>• Introduction of an independent Radio Survey on vessels over 12m, or all vessels operating outside area A1</li> </ul>	<p>This is still accepted as some vessels still have non DSC fitted.</p> <p>The Code has been amended</p> <p>It is considered that single handed fishermen should decide which radio equipment is most suitable.</p> <p>Code is amended to allow single handed fishermen to decide between EPIRBs and PLBs</p> <p>The Codes remain consistent with proposed new Workboat requirements. Additional Guidance in new MGNs 5533 and 548 has been referenced</p> <p>Code is meant to be fit for purpose, i.e. Abandon Ship, additional guidance is provided on the differences between Lifejackets and Personal Flotation Devices.</p> <p>SFIN 10 addresses boarding ladders for new vessels.</p> <p>This will be considered in the development of next version of Code</p> <p>Outside Scope of this Code</p>
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	<ul style="list-style-type: none"> <li>• An endorsement on the certificate permitted single handed operations</li> <li>• Emergency steering means on all vessels</li> </ul>	<p>We will review this in development of next version of Code</p> <p>We will review this in development of next version of Code. Seafish Standards to already require new vessels to have emergency steering when controlled from Helm or control position</p>
<p>James Plimmer – McMurdo</p>	<p>Annex B – Under 15m FV Code</p> <p>Check list of requirements – OPEN vessels less than 7 Metres (L)</p> <ul style="list-style-type: none"> <li>• Satellite EPIRB – Cat 1 or 2??</li> <li>• Consider adding Grab Bag and SART.</li> </ul> <p>Personal Locator Beacons</p> <ul style="list-style-type: none"> <li>• Consideration should be given to the description – Personal EPIRB is not considered accurate – the correct terminology is PLB.</li> </ul> <p>Check list of requirements – OPEN vessels 7 Metres and above to less than 12 Metres (L)</p> <ul style="list-style-type: none"> <li>• Satellite EPIRB – Cat 1 or 2??</li> <li>• Consider adding Grab Bag and SART.</li> </ul> <p>Check list of requirements – OPEN vessels 12 Metres (L) and above to less than 15 Metres (LOA)</p> <ul style="list-style-type: none"> <li>• Satellite EPIRB – Cat 1 or 2??</li> <li>• Consider adding Grab Bag and SART.</li> </ul> <p>Check list of requirements – DECKED vessels of less than 10 Metres (L)</p> <ul style="list-style-type: none"> <li>• Satellite EPIRB – Cat 1 or 2??</li> <li>• Consider adding Grab Bag and SART.</li> </ul>	<p>The requirements were discussed with Industry representatives. It is considered that vessels under 10m would be able to assess whether they wished to have a PLB or and EPIRB. The devices could be used as appropriate in distress situations. Vessels with liferafts requiring SOLAS A or B Packs should also carry a SART.</p>

	<p>Check list of requirements – DECKED vessels 10 Metres and above (L) to less than 12 metres (L)</p> <ul style="list-style-type: none"> <li>• Satellite EPIRB – Cat 1 or 2??</li> <li>• Consider adding Grab Bag and SART.</li> </ul> <p>Check list of requirements – DECKED vessels 12 Metres and above (L) to less than 15 metres (L)</p> <ul style="list-style-type: none"> <li>• Satellite EPIRB – Cat 1 or 2??</li> <li>• Consider adding Grab Bag and SART.</li> </ul> <p>Additionally we strongly recommend all personnel are fitted (either in their lifejacket or on their person) with either a PLB for solo crew or a Personal AIS beacon for multi crew vessels, this will aid in the local recovery of a man overboard by their own vessel saving time and possibly a life.</p> <p>This has recently been highlighted in the inquest regarding the loss of 3 Irish Fishermen in 2013;      “They also recommended that State funding be provided for the supply of personal alarm devices to all people who go out in fishing vessels, which would set off a signal if coming into contact with water and that these also be tested on a regular basis”.</p>	
<p>Belshie Pool – South Devon and Channel Fishermen</p>	<p>South Devon and Channel Shellfishermen is an Association representing more than 60 vessels of varying category, from &lt;7m to &gt;24m. Due to the diverse nature of our membership, we have encouraged vessel owners to respond to the consultation on an individual basis. However, during discussions, some common themes have arisen and these have been highlighted below:</p>	

**Q1. Do you agree that all vessels should be required to carry EPIRBs? Are there reasons why certain categories or sizes of vessels need not carry an EPIRB or are there other conditions in which vessels need not carry an EPIRB?**

Whilst safety is of paramount concern to our members, it has been suggested that PLB's would be more appropriate for skippers of smaller, open vessels. In our opinion, the highest risk for skippers operating single handed vessels is man overboard and therefore a PLB would be more appropriate.

**In addition:**

- The mandatory installation of life-rafts for vessels over 7m may not be practicable for some of our vessels, due to the limiting factor of space on the older builds.
- We feel that the requirement detailed in the SI to notify MCA of any grounding incidents requires clarification, as in some ports our vessels ground on a daily basis.
- In our opinion, the paragraph 3.30 in the code for <15m vessels regarding vessel stability is unclear. Changes in fishing gear can occur on a daily basis and therefore we feel that the requirement to notify the MCA on such changes needs further clarification.

The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force to enable EMFF funding to be utilised. .

A range of liferafts is available, consensus from the consultation is that liferafts for 7m should be required.

Groundings are when vessel is steaming

The Code has been amended to provide clearer guidance on notification.



<p>David Appleton – Nautilus</p>	<p>Nautilus International, the Trade Union and Professional Organisation representing over 23,000 Masters, Officers, Officer Trainees (Cadets), Marine Pilots, Port Personnel and other Maritime Professionals welcomes the opportunity to comment on the consultation on the proposed fishing vessels (codes of practice) regulations.</p> <p>Nautilus fully supports the introduction of these measures to improve safety in what is still an unacceptably dangerous occupation. We hope that enforcement will be sufficiently robust to ensure the effectiveness of the regulations.</p>	
<p>Richard Blackhurst – Seafish</p>	<p>Comments regarding the consultation of Codes:</p> <p>U15m Fishing Vessel CoP</p> <ul style="list-style-type: none"> <li>• There is no stability criteria provided for multi-hull vessels, we have a few builders who build over 12m RL catamaran fishing vessels.</li> </ul> <p>15 – 24m RL CoP</p> <ul style="list-style-type: none"> <li>• Again there is no criteria provided for multi-hull vessels, we have had enquiries for over 15m LOA catamaran fishing vessels.</li> <li>• The code states “All boats shall have a permanently mounted rescue ladder or equivalent suitable arrangements which will enable a person who has fallen overboard to get on board again. Convertible rope ladders are not regarded as permanently mounted. The lowest step shall be arranged at least 300 mm below the waterline” we state in the U15m Seafish Standards that the lowest step is to be 600mm below the waterline, this was due to industry stating that 300mm was not low enough to enable a</li> </ul>	<p>The Code Vessel stability requirements for multihulls (see section 11 of the new Workboat Code) have been included as an equivalent provision.</p> <p>The Code Vessel stability requirements for multihulls (see section 11 of the new Workboat Code) have been included as an equivalent provision</p> <p>The Code has been amended to reflect SFIN 10</p>

	<p>crew member who was fully clothed, wet and exhausted to manage.</p>	
<p>Stella Dean – South Coast Fishermen’s Council</p>	<p>1. There is general concern that the smaller under 10m fishing boats will be physically unable to carry life rafts.</p> <p>2. There is confusion as the proposals refer to Length Overall and just (L) which is probably registered length but this is not clear and all other Government Agencies just refer o LO – Length Overall. This needs clarification.</p> <p>3. There is a general lack of consistency with practical and common sense when boats with sealed decks are required to carry balers AND fire buckets. Balers cannot be used on sealed decks. Too much equipment on very small boats gets in the way and will be dangerous and detract from safety.</p> <p>4. The requirement to notify “substantial modifications” is very difficult to know what is substantial.</p>	<p>A range of liferafts is available, concensus from the consultation is that liferafts for 7m should be required.</p> <p>L is Registered Length. Other Agencies use LOA due to non Fishing Safety Directives from EU. Traditionally measurement for Fishing vessels is Registered length, except for 15m LOA, which also derives from an EU Directive</p> <p>Consultant Surveyors advise that bailers and buckets are required.</p> <p>Section 3.7 of Chapter 3 of MSIS 27 gives advice which helps guide the surveyor on this, we could refer to this or include in the Code (reference is preferred as MSIS can change)</p> <p>“A vessel which undergoes “major” modifications should comply with the stability requirements for ‘new’ vessels as far as it is reasonable and practical to do so. The extent of proposed modifications should be discussed with the local Consultant Surveyor (FV) and Stability Unit prior to any work being carried out. Major modifications are defined as:</p> <ul style="list-style-type: none"> <li>• any change that substantially alters the dimensions of a ship,</li> <li>• any change that substantially alters the cargo-carrying capacity of a ship,</li> <li>• any change that substantially increases a ship’s service life,”</li> </ul>

	<p>5. In drying harbours and beach boat landings it would not be practical to notify of groundings as this happens multiple times on a daily basis.</p> <p>6. EPIRBS on the smaller under 10m boats and specifically those around 7m and worked singly handed a personal location beacon would be the most appropriate requirement. In the event of an accident there might not be time for a single handed fisherman to activate an EPIRB but a PLB would be with the fisherman and be automatically activated in an emergency. This is basic common sense and trust you will be able to adjust the Code accordingly.</p>	<p>Groundings are when vessel is steaming.</p> <p>The Code has been amended to require EPIRBs for vessels of 10m and above with vessels of less than 10m able to choose between an EPIRB or providing every member of the crew with a Personal Locator Beacon. The requirement is being phased in so that it will become mandatory for all vessels two years after the Code comes into force to enable EMFF funding to be utilised.</p>
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