HS -OSC Code Consultation - Responses

Email No	Date Received	Name of Contributor	Brief outline of E-mail content	Responses
1	03/12/2015	Internal MCA	Bringing author's attention to minor typos.	Corrections made. On the comment reference the Code, Chapter 8, Section 8.10.2, the standard by default is the HSC Code (para 1.2). Therefore sufficient liferafts must be carried for the personnel on board in accordance with the requirements of 8.10.
2	08/12/2015	Internal MCA	It seems MCA is assuming that all new ships certified under the proposed interim HS-OSC would be classed with one of our ROs. I am raising this because section 6 of annex I of the code does not include MCA as one of the Certifying Authority for carrying out survey and certification. I am unaware of any unclassed SPS vessels on our flag, but certainly there are a number of Code boats being built under the new workboat code which are unclassed and MCA is acting as CA.	The concern is that the MCA could be believed by industry as the initial RO when only acting as a CA. Such use of MCA resources would have additional impacts for which the MCA is currently not prepared to undertake. It is unrealistic of owners to expect unclassed vessels to become HS-OSC.
3	08/12/2015	Classification Society	Query about item in Chapter 3 - Additional Structural Requirements (4.9.3.). ''The structure should be robust with scantlings in excess of those typically required from the Recognised Organisation''. Believed that this item would be removed as discussed previously.	Comment accepted and the text is amended to reflect it.
4	10/12/2015	Classification Society	Agreed the sentence previously mentioned about additional structure requirements could be re-written as '' 'The structure should be robust with scantlings in line with those typically required from the Recognised Organisation'. This would eliminate the queries regarding the quantification of 'required excess'.	Text is amended to reflect this comment, similar to the previous comment above.
5	23/12/2015	Classification Society	Has two main concerns with original statement about Additional Structure Requirements, firstly excess must be quantified 10%, 20%? Secondly, why? This suggests that RO rules are not sufficient. Suggestion of another suitable statement in respect of the Additional Structural Requirements (4.9.3.), 'The structure should be robust with scantlings in line with those typically required from the Recognised. However this can only be verified by the RO whose rules have been applied not by other	Text amended, similar to the previous two comments above (3 and 4).

			Certifying Authorities, as they are not capable of interpreting and verifying the requirements.	
6	30/12/2015	Internal MCA	**a.** If the requirement for these vessels is to meet the HSC Code as cargo vessels with a few additions and omissions shown in the MSN, then it is unclear why they require what appears to be a general exemption from HSC Code Cargo Craft requirements. Do clauses in the HSC Code which do not appear in the MSN legally apply or not once the MSN and exemption are issued? **b.** It is unclear why this provision is only being applied to HSC unless there is an intention to also uplift the WB Code and other vessels >24m of up to 500GT to enable them to conduct a similar service. **c.** You do have to be very clear what the MCA position is with regard to service speed if we introduce this Code. If the vessel can only qualify for application of the Code and certification by meeting the HSC speed threshold for definition as HSC, then can the vessel be permitted operate at speeds lower than this in service ? If this is permitted then we just end up with lightly constructed craft operating at low speed, and not conventional heavy duty craft whose operators are excluded. Failure to operate at full speed will be an ISM failure, at least in transit to a site – heaven knows what we do about vessels running around at offshore sights between pylons. This looks like a hospital pass to MOs for consistent application. **d.** Previously HSC Passenger craft have been required to operate at max service speed up to their design weather/sea state limitation, and then MCA's position was they had to stop operating beyond this limit – as opposed to Class who accept a reduced service speed beyond the service weather limits. **e.** The Code is written specifically for offshore renewable industry application, but this is very restrictive if operators want to operate a	a. There are two elements to the exemption or equivalences: i) For the range of technical differences from the HSC Code, which are largely to do with the size of the vessels. ii) To create within the same package, the concept and conditions for industrial personnel whom do not otherwise exist. b. The alternative for non-HSC of < 500 GT is to comply with the SPS Code, as indicated in MGN 515 (M). c. We do not intend to police the speeds at which vessels operate in service. The speed criteria is as defined in the HSC Code, with a slight change. What they do in practice is master's discretion but within the regulatory framework. No different from other HSC. d. HSC Passenger craft have been required to operate up to the sea state that passengers will tolerate as indicated in the PtO. Clearly, industrial personnel should be able to tolerate increased levels but under no circumstances should structural design levels be exceeded. **e.** Agreed, we should cautiously indicate this. Unfortunately, other administrations in

			similar vessel that does not service wind farms but a civil engineering project. Can we please give the renewable sector as a prime example and leave the general usage open or subject to agreement. This is particularly important if you are a UK operator and want to take one of these vessels abroad if the N Sea market dries up. What you are serving is irrelevant since the Code is based upon the level of training of the personnel carried, not on their actual job or where they are working. This selective silo mentality is not useful in implementing a consistent application. The Code provides for you taking your vessel abroad, but presumably only on the condition that you go to a windfarm.	developments at international level are also somewhat dogmatic and over cautious in clinging to a wind farm-only approach. There is also the question of other offshore industrial personnel training regimes of which we may know little, and will need to be assessed case by case and in conjunction with other administrations.
7	12/01/2016	Internal MCA	Concerned with increased demand on the MCA and its surveyors as feedback from insured operators is that we are overstretched now.	The size and nature of the industry and sectors of industry are not determined by MCA resources. More the other way around. It is not intended that the MCA conducts any of the surveys directly but will delegate, retaining only ISM and MLC. Consequently, this is not a significantly great increase in MCA surveyor workload and will encourage owners to remain under the UK flag. See also comment (2).
8	14/01/2016	Vessel designer/ consultant	Annex1, 1 General - Load Length comment Annex 1, 2. Definitions, 2.4 - Load line length, suggestion of rewording for load line definition Annex 1, 5 Operational requirements, 5.1 - The explicit statement of '' Load Line Length '' should be retained. Annex 1, 7 Alternative modes of operation - safety standards - suggestion of rewording of load line length. Annex 1, 8 Lifting Equipment - It was discussed at working group meetings that cranes are routinely used at sea Annex 1, 9. Additions & Exceptions to the HSC Code, Chapter 1 .5.51.3. FMEA - No details of reduced format for FMEAwas suggested but no details proposed. Annex 1, 9. Additions and Exceptions to the HSC Code, Chapter 2 – Buoyancy, stability & subdivision - Suggested rewording in relation to definition of craft length.	Agreed and amended. Agreed and amended. Affected through change in definition of length as above. No alternative text has been proposed. The current requirements are covered by the stability conditions and by LOLER and PUWER, as for other craft. No alternatives have been proposed. Agreed and incorporated with revised text. Agreed and amended with suggested revised text.

			Annex 1, 9 Additions & Exceptions to the HSC code Chapter 2 - Buoyancy, stability & subdivision - Suggested rewording of description of damage application. Annex 1, 9 Additions & Exceptions to the HSC code Chapter 7.7.5 - Fire Pumps, fire mains, hydrants & hoses - Comments reference the need for two fire pumps and their size Annex 1, 9 Additions & exceptions to the HSC code Chapter 7.10 - Firefighter's outfit - Comments on the requirements of certain crafts to have firefighter's outfits on board. Annex 1, 9 Additions & exceptions to the HSC code, Chapter 7.17 - Requirements for craft and cargo spaces intended for the carriage of dangerous goods - Section is erroneously listed under Chapter 4 in draft code, suggestion for new wording. Annex 1, 9 Additions & exceptions to the HSC Code, Chapter 8 - Life Saving appliance & arrangements - Comments with reference to Marine Evacuation Systems (MES) and operational freeboards between 2.5 m - 3.25m. Annex 1, 9 Additions & Exceptions to the HSC Code, Chapter 8 - Life saving appliances & arrangements - The section numbering 8.10.5 is incorrect, this should read 8.10.1.5. Additional statement a to c unnecessary as covered in the requirements of 8.10.1.5. Annex 1, 9 Additions & exceptions to the HSC code, Chapter 12.8.2 - Emergency source of electrical power - Comments on the requirement of emergency power capacity for a cargo craft. Annex 1, 9 Additions & exceptions to HSC code, Chapter 13.10 - Night vision equipment - Comments on the unsuitability of night vision equipment and the general consensus that vessels of this type should be exempt at working group meetings	Agreed and amended with suggested revised text. Agreed and amended with suggested revised text. The second pump may be portable. Text has been amended to limit this requirement. There are elements of cargo or baggage within Chapter 4, but it is appreciated that further reference needs to be made to the HSC Code Chapter 7 Part , but more in particular to Part D for dangerous goods. Amendments made. Noted and agreed. The document will be checked to correct any erroneous references. Some amendments made. See also (9) below. Noted and agreed. Agreed.

			Annex 1, 9 Additions & exceptions to the HSC code -Chapter 13.14 Sound reception system - Comments on the unsuitability of sound reception systems and the general consensus that vessels of this type should be exempt at working group meetings. Annex 1, 9. Additions & Exceptions to the HSC Code. Chapter 15.3 – Field of vision from the operating Compartment – Comment about the necessity of full visibility of crew transfer activities over the bow required. Annex 1, 9. Additions & Exceptions to the HSC Code, Chapter 15.3.3 – Total arc of blind sectors – Suggestion that the total arc of blind sectors requirement is relaxed to 30◦ for vessels less than 30m in length.	Text is included to ensure good visibility over the transfer area. No justification for this proposal is given. Manoeuvring in and around offshore renewables, frequent transfer or personnel and for potential recovery of persons from the water emphasis the need for good visibility.
9	15/01/2016	Vessel Owner/ Operator	Emergency Power Requirements: Would prefer 6 hours to 12 hours due to operating area of vessels. Fire Pump Capacity: Would prefer portable mechanised fire pump that can supply 2 x hoses Permit to Operate: Will MCA allow RO's to undertake ISM audits/surveys in Europe 24 Hour Operations: Problems with crew being unable to sleep on certain ships and being able to conduct 24hr operations. Dangerous Goods: Limits to personal items only when carrying over 12 persons, this is an unnecessary restriction and this should refer back to HSC 2000. Section 8: The use of lifting gear prohibited if over 12 persons are carried at sea. Considers that this is an unnecessary restriction and that the Master should ensure crane operations are within the stability limits of the vessel before use. Section 8.10.5: When more than 5 crew are carried a rescue boat is to be fitted. Unnecessary and costly addition for vessel this size with MOB recovery system and a low freeboard.	Some concession has been given for the industrial context but no further, as conditions may be site specific. Agreed in line with other, similar comments. General UK requirements for ISM prevents this, although RO ISMs are accepted on an interim basis. Some reflection of this is included, without being prescriptive. Sleeping berths may be provided, but only for 'crew'. This is not intended and HSC Code standards are applicable. Dangerous goods section has been reviewed and amended. This appears contrary to the line taken at meetings with industry. Further clarification required.

			Restrictions on Significant Wave Height: 1.2 ≥ 1.5m significant wave height mentioned during 7/12 meeting, this should be vessel specific.	The rescue boat provision /modified by the HSC Code 2000, is UK policy. This is unclear and clarification is being sought.
10	15/01/2016	Representative of offshore developers and contractors	General: Necessity to have two vessels to support teams in respect to the scenario given in relation to code. General: ≥ 24m seems to suggest that a craft requires a workboat code and a HSC certificate could they be combined. 1.2.1.2: Comment about the necessity for a vessel to have an ISM to obtain a HSC certificate and also the requirement for the company to have a Document of Compliance and SMS even if only one vessel in the fleet is a HSC. 1.9: An alternative to section 1.2.1.2 seems to be a permit to operate on named routes only. A problem may then arise if the route needs to be changed quickly. How quickly could a new permit be issued? 3.3: Application area: The sentence should be clarified. Does it really say that the Code applies to foreign flagged vessels operating in UK waters? 7: No sure why statement '' you may reduce the number carried '' is included. Clarification needed for 12 and above to ensure it is not misinterpreted. Do we need to use a standard weight of each person? 8: Lifting Equipment: What is the reasoning behind the limitations of 12 persons during lifting operations? 9: From an operational aspect difficult to interpret. It state ''should not normally'' which could be applied differently each time. If MCA	This is an incorrect interpretation. While the provision for both will be facilitated, they are individual legal standards and cannot be combined. There are also significant differences to operation and the mixing of the two sets of provisions is unacceptable. An additional Workboat certificate is not a requirement, but may be beneficial for the operator. It is true because HS-OSC recognises that the risks are different. At the same, most operators already hold voluntary ISM certification. The code already offers some relaxation from the HSC Code standards by permitting permits for areas of operation. It offers a basis of equivalence, non-cabotage and a level playing field. Since we do not know what alternatives may be offered in practice, some assessment of equivalence will be made. This offers the flexibility (of manning etc.) to operate as a Workboat under the UK Workboat Code for purposes of relocation and cost. A standard weight is not applied other than via physical fitness and stability conditions. This was discussed and agreed during meeting with industry. It was decided that when undertaking the carriage of personnel that it would not be necessary to use own shipboard cranes 'at sea'.

			consulted could cause difficulty in planning. Should this be addressed as a clear cut statement?	It is intended to see and allow for any exceptions to this. So far, no exceptions have been put forward or proposed.
11	15/01/2016	Representative of offshore contractors	General Comments: Hopes the MCA will give consideration as to how to harmonise the UK code with the final outcome of the IMO debate on the carriage of Industrial Personnel. Annex 1, Preamble: The reference to Section 9 of MGN 515 is potentially confusing and should be more clearly explained. 3. Application: There should be a clear application date. 4. Industrial personnel requirements: 4.1.1 – footnote 7: The reference to the list of industrial activities in IMO Res.A.1079 is potentially confusing. Should be made clear the types of work that people are being transferred to do and not give any room for misinterpretation. 5. Operational requirements: 5.1: The reference to 'space allowance' should be defined. 8. Lifting Equipment: The scope of lifting equipment should be defined.	Efforts to harmonise will continue both through the IMO, with interested and neighbouring States. Work at the IMO is likely to have a long lead time and it is therefore inappropriate to wait for that outcome. Improvements have been made to the text reflecting this comment. The application date will be finalised at the time any general exemption is also finalised and or any international standard that the UK adheres to. At the same time, it is not intended to make the HS-OSC Code exclusive to only new vessels, if existing vessels are able to comply. (similar to 2e) It is not intended to make the operations exclusive to wind farms or even renewables, but the position of other administrations cannot be relied upon. This element is also reflected in MCA guidance MGN 515 for Special Purpose Ships and will be kept under review. 5.1 Further detail would be overly-prescriptive and there is further limit (36 persons on board) is imposed for vessels of less than 24 metres. Lifting equipment are covered by general requirements – LOLER and PUWER.
12	15/01/2016	Classification society	Annex 1 Chapter 15 section 15.3, Field of Vision: Clear parameters for the wording adequate in both the horizontal and vertical planes are needed. Adequate could mean one thing to one person and something different	It is not necessary to expand upon the requirements contained in the HSC Code. As personnel transfer takes place in a forward position, with any 'additional'

			to another. Clear parameter are also required for acceptability (i.e. field of vision, allowable blind sections but to mullion in the wheelhouse window). 2. Fire Pumps: Suggestion that portable pumps could be considered rather than a second fixed pump.	visibility being covered by a combination of HSC Code requirements and ISM. Agreed and incorporated.
13		Vessel Designer/ Consultant	During the HSC review there was going to be a paragraph to cover the requirements of machinery systems with regards to alarm and monitoring such that they met Class requirements but not full HSC requirements similar to that specified in the German Code. This was driven by the cost of type approval and the cost of the additional sensors and alarms. I notice that we do not have a section on this so can you let me know if this has been taken any further with regards to including it in the final draft.	There is no record of such a discussion taking place. The text referred to does not explicitly state that standards may be less than full HSC and if so interpreted, would amount to a much broader and unacceptable delegation of standards for hull machinery etc. that would not be acceptable, or would demand comprehensive development of such standards within the HS-OSC Code.