

Para	Original Text	Suggested Text	Comment	Consultee	MCA Response
General			Failure to address Overloading	Alan McNaughton	A section on overloading, from MSN 1871 has been added
General			Freeboard Levels stated are questionable	Alan McNaughton	This section is removed from the MGN
General			Skippers should seek the advice of those with professional knowledge	Alan McNaughton	It is the MCA view that fishermen should be given responsibility for their own vessel and its safety. They may ask for assistance if requested from Naval Architects which MSN 1871 advises.
1.2	The MCA recommend a minimum operating freeboard of 300mm for all fishing vessels. Where this cannot be met, operations should be restricted to 20 miles from a safe haven, in favourable weather and in daylight.		This sentence should be deleted. A freeboard of 300mm is already low. Anything less is unlikely to meet a Wolfson freeboard and even that may not equate with IMO A168 stability criteria. Unsafe advice which exposes MCA to severe criticism, noting "Heather Anne" casualty, MAIB report where vessel and life was lost exactly in these circumstances	Alan McNaughton	The reference to freeboard levels has been removed
General			Wolfson Mark is not the most suitable measurement	Alan McNaughton	The Wolfson guidance has been reviewed and is considered to be acceptable
6.1.4	75% forward of the transom		This seems a bit far forward, what is the reason for this calculation	Keith Patterson MCA	This information is taken from the Wolfson research

6.1.8	The attachment of fishing wire to the trawl winches should always be arranged for quick removal. The rope type of attachment is most effective and allows the wire to be parted from the winch drum quickly.		Is this a length of rope between the fishing wire and the winch drum? There could be 200 fathoms of wire to be paid out before this is exposed. Better if reference could also be made about quick release of the winch brake.	Keith Patterson MCA	MGN has been amended
General			Concern that majority of information is only aimed at under 15m FVs	Andrew Blyth	The MGN is intended for Under 15m vessels with no stability criteria
General			Apply Wolfson only to vessels with no Stability book	Andrew Blyth	The MGN does not apply Wolfson, MCA are considering the application of the Wolfson mark as a mandatory requirement for existing vessels.
General			More freeboard information would be good	Andrew Blyth	The MCA has added additional information on freeboard in the new section on overloading

General			<p>My vessel has 240mm of freeboard light, 200 loaded. This provides perfectly adequate reserve buoyancy. It's roll period remains medium/stiff. You recommend that in future I cannot operate in the hours of darkness. I either go out or return in the dark or both, I operate up to 40 miles offshore so this MGN will put me out of business. Stability is not affected by darkness or depth of water so why? Remove this recommendation. Other parts of the notice display a lack of understanding of small boat stability and operation, some are too vague and others over complex. Concentrate on introducing the technical measures in new builds, in conjunction with naval architects and qualified MCA and Seafish inspectors</p>	Greg Philpot	<p>This is only a recommendation and it is for the owner/skipper to consider what is safe operation, based on any results from the guidance given. MCA are separately considering mandatory requirements for vessels under 15m. The Wolfson Mark has been reviewed and accepted.</p>
General			<p>Is this Doc to address stability for all , or only for those lacking stability information</p>	Barry Deakins	<p>This is intended as information for all fishermen but will be of particular use for those who own vessels without stability information</p>

General			Not enough research or trialling of the Wolfson mark has been carried out	Tony Morall	The Wolfson guidance has been reviewed and is considered to be acceptable
General			Is the Wolfson Mark accurate	Tony Morall	The Wolfson guidance has been reviewed and is considered to be acceptable
General			Where is overloading tackled	Tony Morall	A new section on overloading has been included
General			Wave heights - According to the annex the information to be presented in the Stability notice includes "significant wave height of the maximum recommended sea states" is ambiguous and should be changed to read "Maximum observed wave heights for operation", or preferably replaced by "maximum Beaufort Scale", which is better understood by Fishermen.	Tony Morall	The Wolfson guidance has been reviewed and is considered to be acceptable. This information is taken from the guidance
Summary			A strong recommendation should be made for vessels over 12m to comply with the IMO stability standards, and for all existing vessels to be subjected to a roll test carried out in the "normal port departure condition"	Tony Morall	MCA are separately considering mandatory requirements for vessels under 15m

1.2			A minimum freeboard of 300mm similar to the workboat code rising to 600mm should be recommended, providing that it satisfies the IMO stability criteria A.168. A Freeboard of 300mm is considered very inadequate for an open fishing vessel. In the Nordic Standards the freeboard amidships shall be less than 500 mm in vessels with freeing ports.	Tony Morall	Reference to Freeboard level has been removed
6.1.4			Safety Zones should be replaced by risk zones	Tony Morall	This forms part of Wolfson, which has been reviewed.
3.2	Before attempting a heavy lift, or freeing snagging gear, inform the coastguard, bring the warp as far inboard and as low as possible, close all the doors and hatches and ensure that all crew are on deck, wearing lifejackets.		The first point is a very good suggestion but in the real world it isn't practical. If the coastguard were to be informed every time a FV was snagged on an obstruction the airwaves would be filled.	Derek Cardno	The section on Important points has been rewritten and removes this reference
3.2	Before attempting a heavy lift, or freeing snagging gear, inform the coastguard, bring the warp as far inboard and as low as possible, close all the doors and hatches and ensure that all crew are on deck, wearing lifejackets.		We have already mentioned hatches above. The action to close hatches should be standard practice as surveyors make sure owners know that hatches must be closed at sea not just when towing.	Derek Cardno	The section on Important points has been rewritten

3.2	Before attempting a heavy lift, or freeing snagging gear, inform the coastguard, bring the warp as far inboard and as low as possible, close all the doors and hatches and ensure that all crew are on deck, wearing lifejackets.		Is this abandon ship lifejackets or a Personnel Flotation Device's? This paragraph is a good opportunity to include the message about encouraging fishermen to wear a PFD while on the working deck at all times.	Derek Cardno	The section on Important points has been rewritten
3.2	If the maximum recommended lift from the vessel's side is exceeded, abandon the lift immediately. The position of the gear should be marked for retrieval by a larger vessel.		Very difficult to measure the weight that the FV is snagged on. A better statement to make is "after attempting safely to remove fishing gear from an obstruction the position of the gear should be marked for retrieval by a larger vessel.	Derek Cardno	The section on Important points has been rewritten
3.2	The vessel may become unsafe if heavy items are moved up, heavier gear is fitted or lifting points are moved.		This point is confusing. In the above we are talking about preparation for sailing, maintenance of free ports/scupper, crew, towing, becoming snagged and the operation of becoming unsnagged. What are we trying to say here? By my reading we are talking about modifications. This needs to be moved up at the beginning of this section.	Derek Cardno	The section on Important points has been rewritten

3.2	Secure all gear and the catch against shifting.		<p>This is a good point but should be moved up before we talk about snagging. The securing of gear should be mentioned as good house keeping on board. Items of gear should be properly secured before sailing that ensures that in any sea state or movement of the boat it will not move. The shifting of catch is difficult as any catch when it has been taken on board is in a liquid state. Owners can be encouraged to ensure every opportunity has been take to reduce the moment of their catch while the crew work up the haul. This could be items like position of the hopper, size of hopper and dividers in the hopper. If the fish is to be stowed on deck sufficient dividers need to be installed to stop the movement of the catch. When bulk fishing the reception tank/hold must be suitable for this type of fishing. Owners are encouraged to seek assistance from the MCA, when wishing to change their FV to this</p>	Derek Cardno	The section on Important points has been rewritten
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			type of catch stowage due to the stability implications.		
3.2			Reference should also be made to the pending Land Obligations Regs from EU, which will have a huge affect on all vessels.	Derek Cardno	The MCA consider that this MGN should concentrate on the basic of stability.
6.1.7	As fishing vessels load their cargo at sea, It should always be remembered that no matter how inherently stable the vessel may be, that if the net snags on an obstruction, the vessel may be overwhelmed. Due regard should always ensure that the towing point is as low as possible. To save the ship, the fishing gear may have to be buoyed and jettisoned to recover later, possibly using a bigger vessel.		Why are these points here? Would it not be better to place them up under section 3	Derek Cardno	Agreed and wording has been moved
6.1.8	The attachment of fishing wire to the trawl winches should always be arranged for quick removal. The rope type of attachment is most effective and allows		Why are these points here? Would it not be better to place them up under section 3	Derek Cardno	Agreed and wording has been moved

	the wire to be parted from the winch drum quickly.				
7			I would like to see a bigger push for training and for it to be placed at the beginning of the MGN. A greater attempt has to be made to get those working on an under 16.5m FV's into stability training.	Derek Cardno	Agreed and wording has been added
Annex 1 8			If section 3 is changed in the M Notice then this will also need to change.	Derek Cardno	This has been amended accordingly.
3.2			Modification that significantly alter the vessel should be notified to the MCA in advance, and additional stability information may be required.	MAIB	MSN 1871 addresses this by requiring notification in advance of modifications
4			Minumum of 300mm	MAIB	This has been removed. MCA are seperately considering mandatory requirements
4		Add - Modifications – Be aware of the effect vessel modifications may have on stability. A newer lighter main engine may degrade the stability as much as fitting a heavier gantry or deck winch. Do not simply fit more ballast to counter any adverse effect of modifications as it may dangerously	Modifications – Be aware of the effect vessel modifications may have on stability. A newer lighter main engine may degrade the stability as much as fitting a heavier gantry or deck winch. Do not simply fit more ballast to counter any adverse effect of modifications as it may dangerously	MAIB	MSN 1871 addresses this by requiring notification in advance of modifications

		reduce a vessel's freeboard.	reduce a vessel's freeboard.		
6.1.1	During 2003 to 2006, the Maritime & Coastguard Agency in response to the Marine Accident Investigation Branch (MAIB) Recommendations, sponsored a number of initiatives aimed at reducing the number of stability associated accidents onboard United Kingdom fishing vessels.	During 2003 to 2006, the Maritime & Coastguard Agency in response to the Marine Accident Investigation Branch (MAIB) Recommendations, sponsored a number of initiatives aimed at reducing the number of stability associated accidents onboard United Kingdom fishing vessels. The research was conducted by the Wolfson Unit of Southampton University		MAIB	Amended
6.1.2	There are two key aspects to the Wolfson Guidance. Firstly it provides a vessel specific calculated safe loading card. Effectively a notice which states how much load can be lifted in any given sea-state. The second part is it offers the skipper a form of 'loadline' along similar lines to that applied to all merchant ships, i.e. a freeboard mark on the side of the vessel.#	The Wolfson Guidance method provides simple loading guidance that can be applied to any vessel. Based on the vessels size it provides advice to the operator on the level of safety from capsizing in various sea states		MAIB	Amended

6.1.3	These two things should allow the skipper degrees of confidence to ensure that his vessel is stable at all times.	The method can produce guidance for vessels without any stability information by simply using the vessel's length and breadth to provide a freeboard guidance mark and 'traffic light' stability notice which should be displayed in the wheelhouse. The method can also be used to produce simplified stability information for vessels which already possess a stability information book.		MAIB	Amended
6.1.6	Further details explaining how the Wolfson Guidance was developed and the formulas for manual calculation thereof are included in the Annex to this MGN	Further details explaining how the Wolfson Guidance was developed and the formulas for manual calculation thereof are included in the Annex to this MGN. This includes how simplified stability information can be derived for fishing vessels which already have a stability information book.		MAIB	Amended

6.1.7	As fishing vessels load their cargo at sea, It should always be remembered that no matter how inherently stable the vessel may be, that if the net snags on an obstruction, the vessel may be overwhelmed. Due regard should always ensure that the towing point is as low as possible. To save the ship, the fishing gear may have to be buoyed and jettisoned to recover later, possibly using a bigger vessel.		Delete	MAIB	Agreed
6.1.8	The attachment of fishing wire to the trawl winches should always be arranged for quick removal. The rope type of attachment is most effective and allows the wire to be parted from the winch drum quickly.		Delete	MAIB	Agreed

7.1	<p>Skippers and crew should attend the Seafish 1-day Intermediate Stability Awareness course. Contact your nearest Seafish Approved Training Provider for details or call Seafish on 01472 252300. See MGN 411 for further details on fishermen's training.</p>	<p>To increase understanding of fishing vessel stability skippers and crew should attend the Seafish 1-day Intermediate Stability Awareness course. Contact your nearest Seafish Approved Training Provider for details or call Seafish on 01472 252300. See MGN 411 for further details on fishermen's training.</p>		MAIB	Information on training has been moved to the front of the MGN
Annex 1 8			Why have this in MGN and Annex	MAIB	This information has been moved to the main body of the MGN
Annex 1 10			Where have figures 3-5 and the Appendix gone from the version published in MGN 427? These are referred to earlier in the Annex. The removal of section 11 and 12 on heeling tests and instrumentation are understood in this rewrite but the figures are still relevant.	MAIB	The Stabiity Notices referred to have been reinstated
General			GENERAL: Consider the use of the terms Wolfson Stability Guidance and Wolfson Guidance Mark (instead of 'freeboard mark') throughout, in order to emphasise the advisory rather than	Andrew Blyth	Agreed

			statutory nature of the information and hence reducing resistance from fishermen.		
3.2		Stop any lifting operation well before water encroaches on the weather deck.	Add this	Andrew Blyth	Agreed
3.2		If substantial changes are made to the vessel (eg: fitting a deck shelter, new gantries or net drums, replacing an older engine by a modern lightweight version), the stability will have changed and needs to be checked by a naval architect or surveyor.	Add this	Andrew Blyth	MSN 1871 addresses this by requiring notification in advance of modifications
3.2		Maintain the hull and deck, watertight doors and hatches and seawater pipework in order to preserve good watertight integrity. Maintain and regularly check bilge alarms.	Add this	Andrew Blyth	Wording added
4	This is what gives the vessel the ability to right itself and remain upright.	It is essential that you maintain some freeboard in all loading conditions. This is what gives the vessel the ability to survive in a seaway		Andrew Blyth	Wording added

Annex 1	For additional guidance to calculate the size of freeboard marks for vessels without stability data and further examples of stability notices see Appendix 1 to Annex 4		Where are these (or Annexes 2 and 3)?.	Andrew Blyth	Wording has been amended.
annex 1 5.1	Figure 4 and Figure 5. Figure 3		These figures are missing from this MGN.	Andrew Blyth	This has been amended accordingly.