

Consultation workshop on the ‘Proposed requirements and Impact assessment following the review of standards for older UK passenger vessels.’ – Summary

Overview:

A workshop was held for operators of domestic passenger vessels and other interested stakeholders on 29th November at the MCA HQ in Southampton. The aim of this workshop was to discuss the consultation proposals and allow initial queries and points to be raised in a face to face manner. A further aim was to outline the impact assessment process to operators and provide guidance on putting together a consultation response and providing evidence.

The workshop was held in two duplicate sessions to allow for a greater number of operators to attend. Although the direction of discussion inevitably varied between the two sessions the base framework of the workshop was the same. After an introduction and refresh of the aims and background to the review the consultation proposals were each discussed.

This document provides a summary of some of the key discussion points for all consultees. Numbers in brackets denote the appropriate paragraph of the consultation document. Where costs were discussed operators were advised to provide as much information and evidence as possible in any consultation response. This summary is not intended to be taken as a comprehensive set of minutes for the workshop sessions.

Key Points:

Phase-in (31) – the phase-in period of two years as proposed in the consultation document was discussed. During both sessions concern was expressed that this time period was too short – particularly if major changes to vessels were to be required. Discussion suggested that five years might be more realistic, this would allow operators to budget accordingly. It was also noted that operators with multiple vessels would struggle to meet a two-year phase in. Furthermore, with the number of vessels affected constraints such as yard time, surveyor time and MCA resources could be a limiting factor. MCA acknowledges that phase-in period must be achievable from a regulator perspective and is seeking internal feedback on what time period would be feasible.

Categorisation of waters – concerns were raised in both sessions around the categorisation of waters and, in particular, the variety of environments that are covered under Category C waters. MCA stated that this project would not look at an overhaul of the system or indeed the re-categorisation of waters. It was noted that there is an official procedure to follow to apply for re-categorisation of a particular area. It was, however, reinforced by the MCA that without re-defining the categories of water there may be

scope within this review to have more fine-grained differentiation between requirements within the existing categories.

Equipment standards – many of the equipment discussions centred around the appropriate standards for equipment and whether MED was required. It was noted that there is potentially more scope to consider alternative standards within the implementation of this review but that it would be necessary to mandate a standard of some sort to ensure equipment performed as expected and also that surveyors could verify fitting on board. Attendees were encouraged to feedback on standards and available equipment during the consultation.

Non-monetised costs – the capture of non-monetised costs in the IA was discussed. For example, counting the cost of dry-docking vessel for modifications, cost of loss of business for each day vessel is out of service. Consultees were encouraged to feedback as much detail as possible.

Damage stability (28-30) – this area formed a large part of discussions at both sessions and represented the area of highest concern amongst attendees. Many concerns around feasibility and cost of compliance were raised and particularly around the potential for vessels being unable to meet revised requirements and consequent potential for loss of maritime heritage. The proposed risk assessment facility for non-tidal category C vessels was discussed and it was raised that it might be possible for operators in a particular area to join together to prepare a submission. Discussion was also had as to whether the proposed risk-based approach could be extended to tidal areas. Some attendees felt that the impact assessment under-estimated costs and all were encouraged to submit any comments and feedback on costings – even if full evidence could not be gathered before the consultation close. The need for proper consideration of feasibility of phase-in timescales from the MCA side was noted.

Lifejackets (14,15) – the discussion centred around the cost of provision of lifejackets – particularly if the stowage requirements result in loss of passenger capacity. The operational area and evacuation philosophy of Category B ships was also discussed. Certain attendees favoured an operational area risk-based approach.

Liferafts (12,13) – It was clarified that liferafts could be of the open reversible type. The utility of buoyant apparatus that can float free from the vessel was discussed in the context of a catastrophic and rapid sinking event where there would be no time to launch liferafts. The current evacuation philosophy of vessels with a mix of buoyant apparatus and liferafts was discussed along with the control of liferaft boarding in an emergency to ensure no overloading. Concerns also raised around evacuation time for large numbers of passengers, placement of liferafts on smaller vessels and crew requirements for muster stations. Cost of hydrostatic releases was also raised along

with the potential cost and space implications of fitting liferaft capacity to passenger numbers. Certain attendees favoured an operational area risk-based approach.

Lifejacket Lights (16,17) – many comments centred around the cost, both the initial purchase cost and the fact that lights need to be replaced every five years. It was also raised that this cost would be difficult to budget for with a two-year phase-in.

Fire detection (18,19) – it was raised that many operators already have fire detection in their machinery spaces and it was requested that details of these systems be submitted as part of the feedback to the consultation. Vessels with continuously manned engine rooms were discussed and it was reminded that these are already mentioned in the consultation document. Some attendees felt that detection should also be required in non-sleeping passenger areas – although it was noted that this would go beyond requirements for new ships.

Fixed firefighting systems (20,21) – it was requested that details of any systems fitted already be fed back, including standard of equipment fitted. It was noted that costs and impact may be dependent on the required standard and whether non-MED equipment will be allowed. It was noted that the use of Stat-X for domestic passenger vessels is currently being investigated.

Structural fire protection (22-24) – some attendees felt that if fixed firefighting and fire detection for the machinery space are implemented then there may be less of a need for machinery space insulation. Concerns were raised about the cost of achieving A30 standards. Concerns were also raised about wooden vessels and heat dissipation.

Mechanical pumps (25,26) – concerns were raised about arrangements for smaller vessels. Concerns were also raised around available DC power capacity and potential for increased costs associated with increased power requirements.

Bilge alarms (27) – many attendees already have alarms fitted, it was requested that details of these be fed back.