

## Responses to Consultation Code of Safe Working Practice for Merchant Seafarers (COSWP)

CSWP	Company / Organisation	Comment	Actions Approved by COSWP Working Group
Chapter 3	MCA Surveyor	<p>Ref E Cigarettes Para 3.3.5. Consider adding the text below. This is reinforced by Para 3.12.11 “No personal electrical appliance should be connected to the ship’s electrical supply without approval from a responsible officer.”</p> <p>“In accordance with Para 3.12.11 of the COSWP or where companies have introduced policies regarding the vetting / Portable Appliance Testing (PAT) of electrical appliances being brought on board for personal use, e-cigarettes and their chargers may fall under the scope of these requirements and approval should be sought from a responsible officer before use.”</p>	Agreed: addition of the txt for 3.3.5.2
Chapter 10	MCA Surveyor	<p>Ref Rigging of Accommodation / Pilot Ladders Para 10.5. Consider adding text as a reminder of the dangers and that this should be considered as working over side requiring a PTW and the use of control measures such as a safety line / fall prevention device / safety harness and wearing of lifejackets as per the COSWP Ch 17.2.6. See also COSWP Para 22.5.5</p> <p>Furthermore, I haven’t been able to locate any guidance on how rigging and stowing of accommodation ladders / combination pilot ladders should be treated in respect of safe working practices. Whilst an accommodation is swung outboard and the ladder is not fully rigged with stanchions and side ropes, any work activity on this should be considered as working over side and these procedures applied. See MIAB alert/ Flag state investigation on NABUCCO <a href="https://aet.gouvernement.lu/dam-assets/l-administration/transports-maritimes/AET-Marine-Safety-investigation-Nabucco-final.pdf">https://aet.gouvernement.lu/dam-assets/l-administration/transports-maritimes/AET-Marine-Safety-investigation-Nabucco-final.pdf</a></p>	<p>Agreed: new section 10.5.2</p> <p>Add outcome of Second consultation ques - rigging stowing of accommodation ladders / combination pilot ladders</p> <p>Post Meeting; established that Chapter 22.9.2 covers stowage as the Masters’ responsibility – no action taken.</p>
Chapter 13	Maritime Labour Convention: Tripartite Working Group	<p>Felt that the suggest amendment to para 3.8 was appropriate but that the others were not.</p> <p>Noted that the proposal was outside the scope of the safety officer’s role and should not be added to it. The reporting for bullying and harassment should be linear or to a separate “hotline” ashore.</p> <p>A further comment noted that issues relating to bullying and harassment are normally dealt with ashore.</p>	<p>Agreed: Keep changes 13.8</p> <p>Agreed to remove changes in Annex 13.1 and bullet point on bullying and harassment in 13.3.2.2</p>
Chapter 13	UK Chamber of Shipping	<p>Reiterated comment given at the Maritime Labour Convention Tripartite Working Group; that the statement “Recognition of the symptoms of bullying and harassment” should be removed from 13.3.2.2 as this does not fall into the duties of the Safety Officer exclusively and should therefore not be included in their training.</p>	<p>Agreed: Keep changes 13.8</p> <p>Agreed to remove changes in Annex 13.1 and bullet point on bullying and harassment in 13.3.2.2</p>

Chapter 14 Annex 14.1.	MCA Surveyor	Ref PTW for the use of Gas/Testing Equipment. I don't think the amendment adds the clarity being intended. I personally don't know what type of activity is being considered here and if a do a word search in the COSWP for "Gas Test", the only returns are in this annex and the actual PTW.	Agreed: WG added wording 'any work requiring 'prior to 'use of'.
Chapter 17	MCA Surveyor	Ref Working at Height. Para 17.7.4 Should we not consider include something in this paragraph with regard to moving mobile scaffolding towers, in that such towers should never be moved whilst person/s or tools are still on it. See HSE guidance <a href="http://www.hse.gov.uk/construction/safetytopics/scaffold.htm">http://www.hse.gov.uk/construction/safetytopics/scaffold.htm</a>	Agreed: WG agreed to 17.7.4 and reviewed 17.7.2 felt reference to testing needed make clear, a 'competent person' is required
Chapter 20	MCA Surveyor	<p>a. Para 20.3.6. The Merchant Shipping (Prevention of Oil Pollution) 1996 Regulations have been revoked by The Merchant Shipping (Prevention of Oil Pollution) 2019 Regulations. With the introduction of the various convention Ambulatory Reference Regulations (Load Line, Noxious Liquid Substance and Oil pollution) , it is possible that other obsolete regulation reference may now exist.</p> <p>b. Para 20.12.3, Sentences 4 &amp; 5 may imply that an electrical permit to work is only required for work activity involving voltages in excess of 1000 V. I assume this is not the intent and perhaps the order of these sentences should be reversed.</p> <p>c. 20.12.7 Consider adding the highlighted additional text as follows "Any test meters used and their associated leads/probes, should be rated for the voltage and / or current being tested with meter probes having only minimum amounts ....."</p>	<p>20.3.6 will be reviewed via our Legal Services branch to determine whether further updates are required.</p> <p>Agreed: WG amended wording 20.12.7 following consultation comment.</p> <p>Agreed: WG concurred that the sentences in 20.12.3 to be rearranged.</p>
Chapter 22	UK Marine Pilots Association	<p>The UKMPA would like to make the following points.</p> <p>22.6.4 'the proper fixed point' should be a certified fixed point.</p> <p>22.9.2 - ISO 799 2019 (not 2004).</p> <p>22.9.3 - mention of safety harness and like. This is not a SOLAS requirement for transfers, it's a requirement for the seamen rigging the ladder etc.</p>	<p>Agreed: 22.6.4 to change wording to 'certified fix point'</p> <p>22.9.2 Reference to ISO Standard corrected.</p> <p>Agreed: 22.9.3 to add after harness 'for those rigging the pilot ladder'.</p>
Chapter 22	Port Skills Safety Ltd	<p>We are in receipt of an alarming number of defective ladder reports which we receive from our Harbour Masters and Pilots.</p> <p>A common theme amongst these reports are occasions where the whole weight of a pilot ladder has been secured to the handrails, or the spreader or step is seen as taking all the weight whilst jammed against the deck coaming.</p> <p>For this reason, could we suggest the following additional bullet point be inserted under section 22.10;</p> <p>"the top of the pilot ladder should be secured to the approved deck securing strong points and not to handrails. Ladder steps or spacers should not be rigged in a position where they are taking the weight of the ladder".</p>	Agreed: 22.10 amended with the addition of a further point concerning entrapment.