

CONSULTATION OUTCOME 2022

MSN 1870 (M+F) Personal Protective Equipment (PPE) Regulation 1999

Company / Organisation	Consultation Question & Number	Section	Comment	Proposal	MCA Action Taken / Comment
JPEL/18 Institute of Engineering and Technology		4.2	The word 'should' is a recommendation and not desirable for requirements. <i>'Seafarers and other workers should receive appropriate training on the risks against which the PPE is designed.....'</i>	Review the use of the word 'should' with 'shall', where appropriate.	Agreed but adjusted to 'must'
		Section 5	The word 'should' is a recommendation and not desirable for requirements. <i>Standards, design and manufacture i.e. '...equipment and clothing should comply....'</i> <i>ANNEX 1 A, 'All protective clothing should conform to BS EN 13688:2013 'Protective Clothing General Requirements'.'</i> <i>'Hearing protection should be provided....'</i> <i>'..following items should be selected and maintained according to'</i>	Review the use of the word 'should' with 'shall', where appropriate.	Agreed but adjusted to 'must'
Scottish Fishing Federation (SFF)	1. How often do you feel is the appropriate frequency in updating MSN 1870 to provide guidance on the standards?		SFF would be content with the MSN being updated every 3 years however, would support the MCA if the situation arose that an amendment was needed within this timeline.	MSN being updated every 3 years	Public consultation of MSN 1870 (PPE) will be held once every three years, with a yearly review of Annex 1 standards
	2. Are there any types of personal protective equipment required on board ship that are not covered in MSN 1870?	Section 12	For inherent PFD's is there not a standard for the foam used within this product. After an onboard risk assessment many FV's crews would use an inherent buoyancy PFD. There are lots of products on the market but some have a bad name due to the speed the buoyancy inside the jacket appears to lose its bulk.		No adjustment to MSN 1870 (M+F) PPE
National Federation of Fishermen's Organisations (NFFO)	1. How often do you feel is the appropriate frequency in updating MSN 1870 to provide guidance on the standards?		We feel that an annual update is an appropriate frequency to keep this document updated. We agree that consultation should be on a three yearly basis except when major changes are being considered which would have an impact of the vessel owners we represent.	Annual update and three yearly consultation	Public consultation of MSN 1870 (PPE) will be held once every three years, with a yearly review of Annex 1 standards
	2. Are there any types of personal protective equipment required on board ship that are not covered in MSN 1870?	Section 12	Within the fishing industry, we are seeing an increasing use of alternative PFD designs to suit specific fishing activities. These are often impact vests with at least 50N of buoyancy (originating from the recreational industry such as wind surfing etc) being utilised for certain fishing activities where conventional inflatable PFDs pose a safety hazard in their own right; such as snagging on ropes, lines and damage to the piece of equipment from hooks and abrasion. We are working hard to increase the uptake of PFDs by commercial fishermen and we are keen to ensure that a variety of options remain available to fishermen, considering the risk assessment of that activity and the pros and cons of various PFD designs.		No adjustment to MSN 1870 (M+F) PPE Reference to MGN 588 (F) outlined for fishing industry specific guidance