

## Boat Safety Scheme

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## Collation of the responses to the BSS Consultation on the outcomes of the Interim Review of the BSS Examination Checking Procedures (ECP)

The consultation considered proposals to introduce two increased BSS Requirements. The consultation also set out proposals to relax further BSS Requirements through 20 adjustments resulting in lowering stipulations or expanding compliance options.

The consultation ran for a 12-week period from Monday 7 March to Monday 30 May 2022.

There were 22 responses in total. The responses and any material comments, to the questions asked, are provided below.

The BSS Office has answered individual concerns where appropriate, or has forwarded technical/risk comments to the BSS Technical Committee, where relevant.

<b>Q1 – Do you agree that the increased BSS Requirement requiring evidence of servicing for any Wilderness Boats conversion of an Electrolux RM 212 LPG refrigerator is supportable?</b>	<b>Agree</b>	<b>Agree, with suggestions</b>	<b>Disagree</b>
	20	1 Providing it has been fully risk assessed and the risk assessments are made available on request.	1 I strongly disagree with this proposal unless there is at least one appointed Gas Safety Engineer in the North West who is willing to undertake the required service of the appliance as Wilderness boats is too far away.

<b>Q2 – Do you agree that clarifying the disallowance of ferrous/cast iron fittings, joints and components used in LPG pipework is supportable?</b>	<b>Agree</b>	<b>Agree, with suggestion</b>	<b>Disagree</b>
	20	1 Are galvanised malleable steel fitting OK? Providing it has been fully risk assessed and the risk assessments are made available on request.	1 Should only require changing if after visual inspection there is concerns that deem the need for replacement

### **Q3 – Do you have any comments to make concerning the relaxation of 20 BSS Requirements by lowering stipulations or expanding compliance options?**

14 made no comment

These are the comments of the remaining responses

- Yes
- Agree with the relaxation
- Over the top
- These should be welcomed.
- They all seem reasonable
- Providing it has been fully risk assessed and the risk assessments are made available on request.

- Agree in all but 3.2.2R - Battery Cables. This seems to allow arbitrarily thin wires of any length to run from a battery without up-stream fuses or circuit breakers. This can't be acceptable practice, and is probably not what's proposed, so some clarification is required.
- Yes, will email an observation about CO alarms.
- Are there any other areas where the BSS is at variance with ISO standards? What would be very helpful for boatbuilders who necessarily follow ISO standards for Recreational Craft Regulations compliance, would be a table showing all variances to ISO standards in the BSS.

**Q4 – Can you see any further unintended consequences concerning introducing the proposals beyond those already mentioned in this consultation?**

16 – Could not foresee further consequences

4 – Responded Don't Know

2 – Could foresee further consequences and made the following comments:

- Should "sealant" be stipulated as INTUMESCENT?
- If not properly risk assessed i.e. risk assessments carried out then liability issues could follow in negligence, or a negligence claim.

**Q5 – All efforts have been made to make the BSS Examination Checking Procedures document as error free as we can, however, should you spot any typographical or grammatical mistakes we welcome any observations leading to potential corrections to the final version.**

No material comments received.

**Q6 – Do you have any comments to make about this consultation? Have we been clear? Have we given you the proper opportunity and adequate means to contribute your views?**

No material comments received.

**Q7 – Background of responders**

All specified interests are recorded

12 – Boat Users on canals	3 - Boat clubs and associations
2 – Boat Users on rivers	1 – Canal society
1 – Boat User on rivers and canals	1 – Academic institution
1 – BSS Examiner	1 – Boat designer
1 – Gas Safe registered engineer	1 – Unspecified

The Boat Safety Scheme is a public safety initiative owned by the Canal & River Trust and the Environment Agency. The Scheme is administered by the Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address National Waterways Museum Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW.