



**BSS response to comments
made to its Consultation –
‘Proposed changes to Boat
Safety Scheme requirements
for hire boats’**

Section 1 - Introduction

The public consultation on proposed changes to the Boat Safety Scheme (BSS) requirements for hire boats ran from September to November 2015.

It followed a risk review on behalf of the UK's inland waterway navigation authorities that involved hire operators, navigation authorities, trade representatives and boating, including boat hiring representatives.

The responsibility for the safety of those people hiring boats and anyone in the close proximity of the hired boat rests jointly with the people aboard, the hire operators/boat owners and navigation authorities. All must take steps to ensure that the risks are reduced to as low as reasonably practicable.

The revisions can be put in three categories.

- a) the introduction of six new BSS hire boat requirements.
- b) the formal adoption of the private boat checking procedures for hire boats including the 23 additional, or wider scope requirements introduced in recent years.
- c) the introduction of clarifications or improvements to five existing BSS hire boat standards.

In the aforementioned three-way responsibility regarding safety we recognise that the hiring boaters will not be able to control the risks associated with the condition, equipping or construction of boats. So it follows that all relevant BSS requirements are mandatory for hire boats and this factor represents the key difference in looking at the requirements for hire craft and the mix of requirements and advice checks for privately-owned and privately managed boats.

The BSS is only one means by which the navigation authorities help keep hirers safe. The navigation authorities will separately be consulting on the introduction of the revised Hire Boat Code published jointly by the Maritime & Coastguard Agency / Association of Inland Navigation Authorities / British Marine, as a licensing condition, including the proposal to introduce stability testing of hire boats.

The respondents to the BSS consultation included the Association of Pleasure Craft Operators, now known as British Marine Inland Boating and the Broads Hire Boat Federation (BHBF). Between them, this represents over 120 companies and organisations, as such, a significant proportion of the fleet of hire craft. Other responses came from individual major hire companies, smaller operators, BSS examiners and hirers.

The BSS thanks all the contributors to the consultation for their interest and engagement which has added to and complimented the considerable hard work of all the volunteers and professionals involved with the BSS committees in the Hirer Safety Review and consultation preparations.

Your comments and views have been immensely valuable in refining and improving the existing out-dated BSS Standards.

Section 2 – The consultation questions and the associated comments made and the BSS responses.

Q1 Do you agree the proposal to introduce six new BSS hire boat requirements?

- I. suitable smoke alarm(s) on hire boats having overnight accommodation;
- II. suitable CO alarm(s) on hire boats having solid fuel stove installations;
- III. a visual indication concerning the risk of hirers being knocked overboard by the swing of the tiller arm on narrowboats;
- IV. a labels identifying secondary means of escape where these are not self-evident;
- V. a Crew Area and Access Limitation Label in view of all main helm positions on all hire boats;
- VI. slip-resistant surfaces on designated external Crew Areas and the slip-resistant surfaces to be in good condition.

#	Comment
1	No (further information below)
2	see further notes
3	we agree with introduction of 6 new BSS requirements
4-Q1	Crew access label to be able to be put in handbook otherwise the boat begins to look like label city, the more labels the less people read them.
5	See below
6	See Below Comments answers.
7-Q1	Difficult to police the 'crew areas' on Community Boats as children are not good at reading/understanding signs even after explanation/supervision by their carers/seniors. Prefer use of adequate footwear/rubber tread boots on potentially slippery surfaces.
8-Q1	In my view, 2 of them (nos 3 and 5 are meaningless) The marking of tiller movement to indicate a risk of being knocked overboard is ridiculous. It is akin to warning people that matches might burn. It should also be comprehensively covered in the handover "instruction". No 5 is unenforceable as the whole of the helm position will be accessed by all of the customers at any time.
9-Q1	Even though a review is necessary by BSS there is no evidence or facts to determine that current Hire Boat requirements need any amendment. There are no accidents or statistics to back up any need for change. Hire Boat requirements are much enhanced form present Private Boat requirements and therefore to impose Mandatory additional requirements to the present scheme are deemed unnecessary and put extra burden on the industry. Hire boats ARE safer than PRIVATE ones already. Why complicate it anymore. Would question if the additional requirements have been fully thought through or discussed by BSS Committees concerning implementation and Checking procedures have been finalised prior to this consultation.
10	These proposals offer good safety information, particularly for the novice or unwary hirers.
11-Q1	Point 5 refers to a crew area. Crews can be changing, drivers can be switching every 2

	minutes with some open boats
12	Freely driven boats 'hire boats' can be a menace
13-Q1	But the requirement for CO alarms on boats with solid-fuel heating appliances should be widened to boats with ANY flame-burning appliances
14-Q1	agree with 1 2 4 and 6 but not 3 and 5
15	Some good points tackled at last
16-Q1	We do not understand point five. It is not clear what the point of such a label would be. Further clarification would be appreciated.
17-Q1	We agree with this providing they are introduced over a period of time and not all 1/4/2016 when there will not be many newly qualified examiners available and we could not afford to have every craft re-inspected when BSSC would not have been due.
18-Q1	Only 1, 2 & 6 have any safety aspect value. 3 is not practical in all rear deck designs and the visual indication would not prevent accidents. 4.Front and rear door access is all that is required on a narrowboat. 5.No customer is going to consult a label before walking down the gunnels or going on the roof. The handover will impart this information.
BSS Responses	<p>The basis of the whole review process was a thorough risk-review by BSS committees. It followed the identification of the necessary additional risk controls using a robust 'bottom-up' progression that culminated in the published proposals. This underpinning concept should be noted for comments (4-Q1, 9-Q1, 11-Q1, 13-Q1, 14-Q1, 16-Q1, 18-Q1)</p> <p>The risks of, and associated with, 'over-labelling' (4-Q1, 7-Q1, 8-Q1, 11-Q1) alluded to in these comments were recognised by the review working groups. Even taking that into account, the conclusion was that the labels promoted in this consultation are regarded as essential by the earlier risk review and will be there to augment the handover and provide a visual reminder to hirers whilst the boat is on hire.</p> <p>Defining crew areas (4-Q1, 7-Q1, 11-Q1, 16-Q1, 18-Q1) is there to support and underpin to concept that all hirers accept and live up to their burden of responsibility. They do this by taking account both of the information at handover and of the information on the proposed signage. They should do this whether they are helming, or engaged in other activities and this should include the supervision of minors and others at risk</p> <p>Any specification for 'Crew Area and Limitation Label' is subject to the forthcoming AINA/BM/MCA consultation on the revised Hire Boat Code. Hire operators, in support of their self-assessment of stability/freeboard requirements will need to define 'Crew areas' for their craft as a part of the calculations. Crew areas are intended to limit the total numbers of persons on the hire boat and limit where hirers can go on the boat such as limiting the numbers of people on the cabin roof, side decks etc. (7-Q1, 16-Q1, 11-Q1)</p> <p>The risk of being knocked overboard by the tiller arm on a narrowboat (11-Q1, 18-Q1) is generally accepted and identified within the Hirer Safety Review.</p> <p>For those operators whose boats have escape routes through side windows, a label indicating which window to escape through, is supportable. Labels augment handover All hirers have responsibility to adhere to handover instructions. (4-Q1, 18-Q1)</p>

(13-Q1) The risk review outcome as it stands, supports the introduction of a mandatory requirement for CO alarms on those hire boats where solid fuel stoves are present. As for all boats; it is recommended for hire operators to choose to install CO alarms in other circumstances, namely where any fuel burning appliances are aboard or boats with an engine or generator.

(17-Q1) Implementation date responses are covered at Q16. All examiners who choose to examine hire craft will be trained prior to implementation.

Q2 Do you agree that the 2013 BSS private boat requirements should be the basis of BSS hire boat requirements?

This includes the 23 BSS private boat requirements introduced or amended since 2002, which are:-

1. any disused fuel filling points must be disabled.
2. fuel tank vent hose connections must be accessible for inspection.
3. petrol tank filler connections must enter the tank at the top of the tank.
4. the use of wooden bungs to terminate a fuel tank drain facility is disallowed.
5. high-pressure diesel fuel lines between injection pumps and injectors must be constructed of metallic pipe and not to be made of hose material
6. petrol engine flame traps are now visually inspected to see that any gauze or filter elements are complete.
7. structures and surfaces surrounding exhaust system components must be free of signs of heat damage.
8. any portable fuel system connection to an inboard engine must be located in the outboard well.
9. a check concerning the type, location and condition of 230V a.c. inlet connections.
10. a check for the type of 230V a.c. power source lead connections.
11. a check of the condition of 230V a.c. power source leads and connectors.
12. addressing the fire/electrocution risk associated with using un-synchronised 230V a.c. supplies simultaneously, a check that male pins on power source inlet connections are not 'live' when an alternative power source is connected to the 230V a.c. system.
13. a check for the presence of a consumer unit on 230V a.c. systems.
14. portable fuel tanks within inboard engine spaces connecting to fixed engines are not permitted.
15. spare fuel containers are to be in good condition.

16. a maximum capacity of individual portable petrol tanks must permit safe and convenient carrying and removal for refilling outside the vessel, i.e. be a maximum capacity of 27L.
17. portable fire extinguishers to be in open view, or their location clearly marked.
18. the check of gas locker condition has changed from an assessment of gas-tightness to a check for any path for leaked LPG to enter the interior of the vessel.

#	Comments
1	As the basis, yes. But some changes may be necessary.
2-Q2	The 23 additional or more comprehensive requirements listed are agreed but overall, in relation to the partial alignment of requirements for hire and private boats, we are concerned that the same standards are not proposed for private boats. They share the waterways, moorings and facilities and present many of the same third party risks as hire boats.
3	yes agree use 2013 private boat requirements as basis
4-Q2	Why have too different sets of rules this only leads to confusion
5-Q2	I believe that hire boats should be completely separate. There may be many common features, but the responsibility for safety rests in a completely different area for hired boats.
6-Q2	Private boats should and must be brought into line with Hire Boat requirements asap in order to make Private boats as safe as Hire craft.
7	The 2013 requirements have been developed over a 17 year period and form an excellent base on which to base these 'specialist' requirements.
8-Q2	Some of this doesn't seem relevant for small powered hire boats (say 4 seaters)
9-Q2	But there should also be behavioural constraints on the drivers... Drink...etc
10	Yes, but strengthened as noted in 1 above.
BSS responses	<p>(2-Q2, 4-Q2, 5-Q2, 6-Q2) The critical difference in having the additional and obligatory aspects applied to non-private craft, hinges on the people aboard and their ability/responsibility to control all the risks to which they could be subjected.</p> <p>On a private use boat, the owner has the responsibility and ability to control risks that anyone aboard potentially faces. Such boats are only regulated where such risks created within the boat can then affect people beyond the boat such as by explosion or fire spreading.</p> <p>Conversely, people on a boat they hire or work aboard, may not have the option to make changes and address some risks. So it follows that BSS requirements for such classes of boat will invariably be mandatory and the scope of such BSS requirements may be wider or different. Such risks and their controls will be exposed through the BSS Risk Management Process.</p> <p>(5-Q2) However many of the risks arise and develop from the same systems, appliances and fuels common to private and to hire boats. This means that for those common risks, the checks can be made to the same items and in the same way and with the same mitigation standard. That is why it is intended to have commonality in checks where the commonality in risks exist.</p> <p>(8-Q2) In regard to small craft applicability, the risk review considered all sizes of powered craft from hourly and day hire boats, to the largest extended holiday boats. So we would need specific information to allow a detailed response.</p> <p>(9-Q2) All hirers share of responsibilities includes adhering to handover instructions.</p>

Q3 Do you agree the proposal to remove three and amend a further five existing BSS hire boat requirements?

The three requirements that will be removed because they no longer meet the criteria applied to mandatory BSS checks are:-

- i. the existing BSS requirement 2002 ECP Check 2.21.3, for the stop control located as near to every steering position as practicable, is considered no longer appropriate or relevant to control the risks and should be removed
- ii. remove the 2002 BSS requirement for electrical equipment to be ignition protected in engine spaces.
- iii. not to take forward the proposal to retain the existing BSS requirement for the LPG cylinder locker openings and LPG main shut-off valves to be situated outside of accommodation spaces.

The five requirements to be amended are :-

- I. weed hatch requirements should also apply to those bow thruster hatches that can be opened by hirers;
- II. the requirement for a means of reversing, operable from every helm position, should include outboard motors, etc;
- III. handrail/guardrail requirement should be brought in-line with ISO 15085 standard; and include 'handholds' at designated crew areas;
- IV. lifebuoys should be in good condition; and have floating lines when the hire boat is used on MCA category C & D waters (tidal rivers and estuaries and large, deep lakes and lochs)
- V. fire blankets should be permanently fixed in open view

#	Comment
1	See further comments
2	See further comments
3	yes agree amend 5 existing BSS standards
4	See below
5	See below
6-Q3	Not sure what the 3 removals are????
7-Q3	Not required. As before no evidence or reported fatal accidents have been recorded aboard any Hire Boat in recent years that would have been avoided by these additional or removed requirements
8-Q3	The five amendments are good, but I am unaware of the 3 removals.
BSS responses	(6-Q3, 8-Q3) The proposals for removed BSS hire boat requirements because they no longer meet the criteria applied to mandatory BSS checks that are listed above. (7-Q3) Risk review is informed by incident data but is not dictated by it.

Q4 Do you support the changes in full, without needing to answer any further questions? If you have indicated the answer as 'no' to this question, you may note that questions 5 to 15 offer an opportunity to comment on specific proposed changes

#	Comment
1	No - some changes are necessary
2	See further comments
3	See further comments
4	See further comments
5	yes, with 4 comments provided
6	See below
7-Q4	In my view, it is not so much the standards that are in need of significant review or change and I see this as a backside covering exercise. I believe that the enforcement of current standards would be a huge contribution to safety. Annual BSS inspections and non notified inspections of handover procedures and boat serviceability would promote safety far more than simply re writing the paperwork.
8	Reading on!!
9	See comment made
10	Further comments on carbon monoxide protection to follow
11-Q4	The only proviso we have is that the changes are brought in as the current hire boat BSSC's finish and come up for renewal - rather than all at once on 1st April - we cannot afford to put in effect all the proposals and have every boat re-examined (Even if examiner were available for that) all at once and immediately when many of the BSSC would not yet be due.
12	See comments on question 1.
BSS responses	7-Q4 It is accepted that the effective verification/audit to other planned Hire Boat Code licensing condition aspects such as hire boat handover, is essential in support of hirer safety. 11-Q4 Implementation date responses are covered at Q16. The implementation date signifies the date by which boats must comply with the newly revised requirements. However any hire boat's existing non-private BSS certificate will continue to be able to support a licence/registration application until the certificate expires.

Q5 Do you agree that there should be a requirement for suitable smoke alarm provision on hire boats with overnight accommodation?

#	Comment
1-Q5	Smoke alarms would be a sensible requirement on most but not all boats. Traditional Norfolk Broads sailing cruisers often have cooking facilities in the well which is covered by an awning and is well ventilated. There is a requirement for the hirer to turn off the gas at the bottle when the cooker is not in use. A smoke alarm would only be necessary on boats which have gas heating appliances or where the gas supply is not turned off overnight.
2-Q5	The requirement for suitable smoke alarms is accepted on the basis that suitable reliable and tested units are available. Hirers would require guidance on handover on their reaction to activated smoke alarms to prevent unnecessary call out of emergency services or operators.
3-Q5	Based on approved and marked suitable Marine/Boat use only (not Domestic) and guidance recommendations on numbers to be fitted to craft and where in cabin. There is an additional cost to operators involved at least £50per alarm!
4-Q5	Seems a reasonable but not suitable for all boats and may be tricky to place successfully in any boat. Has there been any research into the placement of such alarms? A lot of boats are too small to have the alarm fitted far enough away from cookers to be successful. Should the alarms be placed in the saloon area? What are the fire risks within this area and would alarms help? If the alarms are to protect people from fires whilst they are asleep, the risk would not be from gas cookers, would the risk be electrical?
5-Q5	This should be Mandatory on both Hire and Private craft too.
6-Q5	Investment costs are relatively low for benefits. Hire company approach to local Fire Service could further reduce costs. (Kent Fire & Rescue offer free smoke alarms to boats).
7-Q5	We have had smoke alarms fitted for many years, they are often disabled by hirers when they sound during cooking etc.
BSS responses	<p>(1-Q5) Although good installation and maintenance of the boats systems will help prevent fire from those sources, the risk review identified 'behavioural' fire causes such as discarded cigarettes, knocked over candles and tea towels dried using gas grills, falling asleep while cooking, etc. as requiring the risk-mitigation offered by smoke alarms. Such risks are addressed in all alternative types of holiday accommodation.</p> <p>(2-Q5, 7-Q5) Guidance on the recommended smoke alarm type is provided on the BSS website, as endorsed by all smoke alarm makers; and specifically recommended models of alarm are also listed, list provided by the Fire Industries Association (FIA). http://www.boatsafetyscheme.org/stay-safe/fire-safety-for-boats/smoke-alarms-for-boats/ Optical alarms are recommended for boats as they are less prone to activate during cooking activities.</p> <p>(3-Q5) We have not identified any likely circumstances that would add £50 per alarm; the Partial Regulatory Impact Assessment found that £11.50 including VAT was the cheapest retail price of a recommended alarm from the FIA list referred to above.</p> <p>(4-Q5) Alarm placement should be in accordance with the alarm maker's instructions</p>

	<p>where they refer to boat use; or should follow the guidance on the BSS website as endorsed by all alarm makers, FIA and Fire Protection Association (FPA).</p> <p>(5-Q5) The risk review in support of hirer safety was not asked to consider the introduction of a BSS requirement for smoke alarms on private boats at this time.</p> <p>(6-Q5) In our experience the availability of free smoke alarms for fire services is dependent upon charitable grants and those small number of fire services offering free smoke alarms for boats are starting to limit the offer to vulnerable boaters.</p>
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Q6 Do you agree that there should be a requirement for suitable CO alarm provision on hire boats with solid fuel stoves?

#	Comment
1	No comment (not applicable to our boats)
2	CO alarm provision on boats with solid fuel stoves – accepted.
3-Q6	As previous answer comments but this MUST to extended to Private BSS Boats too!
4-Q6	Both Hire and Private boats with Solid Fuel Stoves
5	An obvious step in the right direction.
6-Q6	But it is disingenuous to single out solid-fuel appliances, when the risk of CO poisoning is just as high from any kind of flame-burning appliance. The recent boat CO fatalities have come from liquid or gaseous fuels, where no CO alarm was in use. DCLG has come in for criticism from the CO community and the House of Lords for limiting the rented sector requirements for CO alarm to solid-fuel, when the safety organisations were calling for ALL rented homes to be equipped with alarms. The boating industry could be accused of missing an obvious safety hazard if it continues with this disappointing approach.
7-Q6	They should be mandatory on all hire boats. All heating or cooking appliances have the potential for causing CO poisoning, we should not fixate on solid fuel stoves.
BSS responses	<p>(3-Q6, 4-Q6) The risk review in support of hirer safety was not asked to consider the introduction of a mandatory BSS requirement for CO alarms on private boats at this time.</p> <p>(6-Q6, 7-Q6) The risk review has determined that the BSS requirement for CO alarms on hire boats can be limited to those hire boats with solid fuel stoves.</p> <p>According to the risk review solid fuel stoves present an enhanced level of risk to hirers. They inherently produce high levels of CO in the flue gasses. This risk overlays with a possible unfamiliarity with stove operation. This combination means that hirers may inadvertently place themselves at enhanced risk and with the potential that the stoves may be operating at night when hirers would not be alert to any symptoms of CO poisoning, the review indicated it was important to use CO alarms to manage that risk.</p> <p>As for all boats; hire operators are recommended to choose to fit CO alarms in other circumstances. Indeed the BSS recommendation is to fit CO alarms where any fuel burning appliances, engines or generators are present.</p>

Q7 Do you agree on boats with tiller steering there should be a clear warning to people on a sign in sight of the helm position, or by marking the deck area, not to stand within the arc of the tiller arm whilst navigating?

#	Comment
1-Q7	Paras 3.1 (c) and 4.3 give this as a recommendation for narrow boats. It is not relevant for yachts and not necessary for them and the regulation should be specific for narrow boats.
2-Q7	My suggestion with this is to have a badge displayed in view of the helmsman showing a warning of the risk. I do not believe it is necessary to have any deck markings.
3-Q7	Deck marking are hard to maintain and mostly ignored. A diagram in the boat manual forming part of handover process. Boat manual drawings should be generic for consistency across boats and operators.
4-Q7	But dont agree to markings on the deck area
5-Q7	Clarification is required of the wording "On all hired narrowboats (and vessels of a similar type fitted with a tiller)" as this requirement is not appropriate or proposed for sailing dinghies or yachts.
6-Q7	Broads yachts and day sailing craft have tillers, so the wording of this check would have to make these craft exempt. The same would apply to small motor dinghies with tiller steering or just make this check for narrow boats only.
7-Q7	It is supported for Narrow boats which is detailed in the impact assessment and the detailed consultation document however this must be clear in the check that this requirement does not apply to sailing boats and other boats where there is a cockpit in which the tiller arcs as there is little chance of being knocked overboard in this type of vessel. It is strongly supported for narrow boats and the requirement is necessary and proportionate to the risk.
8-Q7	Deck marking has not been shown to be practical or proportionate. A diagram in the boat manual, pointed out during handover, would suffice. Failing that, any label should be displayed on the inside of the back doors (visible to steerer when under way) so that it is not degraded by weather and not in the way of annual repainting. Boat manual drawings or labels should be generic so that design can be controlled and so that printing volumes can be economic.
9-Q7	Deck Marking has been shown as to be not practical in its application would be unsightly and is disproportionate to the risk. A Diagram in boat manual backed up by verbal safety information on boat hand-over will suffice. This is part of QAB Scheme already. Risk to user is no greater on hire boat than private craft. A Sign visible to helmsman whilst underway would be both unsightly and at risk of delamination and would need to be so large it would be impracticable to fit anywhere on rear of Narrowboat. Generic sign in Boat Handover Manual will suffice

10-Q7	It should be obvious. if not, the person hiring the boat lacks the intelligence to operate it safely anyway.
11-Q7	Marking Decking is both impracticable and is completely unnecessary. All Hire craft have a personal hand-over by a approved hand-over operative who advises ALL hire boat Customers on the dangers of tiller arm swing and where required a deck label is already fitted to mark the correct position to stand especially on a semi-trad stern. it is covered in the Hire Manual. There are NO incidents recorded on persons being knocked overboard by a Hire Boat Tiller other than being backed into lock gates on the oxford Canal some years ago. This was not caused by using the Tiller in the correct manor to steer the craft.
12	A timely warning for the unwary.
13-Q7	Well yes. No further restrictions on boats with steering wheels then...Like only one person at the wheel at one time ... Responsible behaviour of drivers and hirers on the river...
14	I do not have relevant experience to comment
15-Q7	Not practical on some rear deck designs and would not prevent accidents
BSS responses	<p>(1-Q7, 5-Q7, 6-Q7, 7-Q7) The BSS agrees that the final version of the proposed new requirement will exclude tiller-steered yachts.</p> <p>(2-Q7, 4-Q7, 15-Q7) The proposals included the compliance options of deck marking as well as of a warning sign in sight of the helm position.</p> <p>(3-Q7, 8-Q7, 9-Q7, 10-Q7, 11-Q7) Deck marking or the warning sign would augment handover and provide a visual reminder to hirers whilst the boat is on hire.</p> <p>The risk of being knocked off a narrowboat by a tiller arm is generally accepted and the proposed new requirement is proportionate to the risk and considered a reasonable risk control.</p> <p>(13-Q7, 15-Q7) Hirers have responsibility to adhere to handover instructions, and any signs augmenting handover. Hirers must accept responsibility for the consequences of their actions.</p> <p>See also responses to Question 9 below</p>

Q8 Do you agree that each secondary means of escape should be labelled if it is not self-evident?

#	Comment
1-Q8	NOTE: The specification "suitable proprietary manufacture" is questioned. It is suggested that any necessary labels should be "of appropriate content and suitable material".
2-Q8	Some older Broads yachts built prior to 16th June 1998 do not have secondary means of escape because it was not practicable to fit as it would be necessary to cut through or remove structural members. An exemption was granted in the 2002 checks (exemption 11.17)
3	Yes If not self evident. Too many labels will confuse and treats customers like idiots!
4	Another obvious facility. Hirers would only need this information in an emergency and evacuation would be much smoother with direction notices.
BSS responses	<p>(1-Q8) Our intended requirement is based on the principle that the label would match accepted design, size and wording as would be expected to be found in all other types of holiday accommodation.</p> <p>(2-Q8) To be addressed separately with interested parties. It is certain that no BSS requirement will require structural members to be cut.</p>

Q9 Do you agree that (subject to further consultation on the revised Hire Boat Code) there should be a Crew Area and Access Limitation Label visible from each helm position on all hire boats, indicating the maximum number permitted on board and the permissible Crew Areas?

#	Comment
1-Q9	Access limitation labels are only necessary on larger boats. On smaller sailing yachts where access is not restricted there is no need to add more labels and plans of the boat. There is already a requirement to have a label showing the maximum number permitted on board. The current label shows maximum weight (which is the defining criteria) and the maximum number of people. This gives the hire company no discretion in allowing more people if the passengers consists of small children (or even very large adults). The current label should be reviewed.
2-Q9	With regards to this proposal, I feel it is totally unnecessary as the boat stability test will cover all the safety required on this. If the proposal is to support the navigation authorities' intention to 'manage the hire boat capsize risk', then I believe we should push forward with the stability testing and bring it on board instead. The only part I can agree with is for a badge

	stating the maximum number of people on board the boat, although this will also be covered by the boat stability test.
3-Q9	Include in the Boat Manual and handover process Generic diagrams should be developed probably combined with the tiller-sweep diagram. A maximum number of persons on deck areas is not required by the RCD. Deck marking is not practical. We non slip our gunwales and roof areas because although we advise against using them we are aware that in some situations they need to be used or advice is ignored so we make the surface as safe as possible to reflect this. Crew access limitation cannot be decided till the stability testing regime has been verified and established and the method of calculation for consistency identified.
4-Q9	To make this work each boat would have to be heel tested and as of yet there is no BSS standard for this. The boat hand over should cover permissible crew area
5-Q9	This requirement appears to have been drafted with narrowboats in mind, such craft generally being of a standard layout as far as external crew areas are concerned i.e. a forward cockpit and a rear deck with tiller steering, permitting production of widely applicable standard labels. For wide beam cruisers and day-boats on the Broads the maximum number of persons is already displayed as a licensing requirement and the layouts and crew area locations vary so widely that almost each boat would require an individual label. It is suggested that appropriately worded warning labels could identify restricted areas and/or the maximum number of persons permitted there.
6-Q9	Agreed A label showing the max number of people on the boat. If the stability of the craft is done to the worst case scenario why do we need these labels. The craft concerned are relatively small so most of the craft would be a crew area. It would make a lot more sense if we were dealing with the QE2 or similar as regards to access areas. It all seems a bit over kill.
7-Q9	The need for crew area information to be available to the examiner is understood in order that they may carry out inspection of anti slip areas and hand holds within these defined crew areas. However to have a "plan of the Boat" as a label may be difficult to present in an understandable form especially where boats have a variety of decks and deck levels, fly bridges etc. and it is thought that to have a complicated label may defeat the aim. Rather than have a label at the helm position which through experience is generally not supported by hire boat operators it is suggested that this crew area information could be included in the skippers manual on board and reference to the requirements could be covered in the hand over briefing and also be supported by prohibition notices in areas where crew were not allowed. This would be consistent with other warning notices and the general principal of prohibition signs.
8-Q9	It would suffice if guidance were in the Boat Manual and handover. Generic diagrams should be developed for common narrow boat types, probably combined with the tiller-sweep diagram. Individual deck areas should not be required to have a maximum number of persons, as this is not required by the RCD, is not a factor in stability testing, and any potential overcrowding of individual decks will be regulated by the limited seating/standing room of

	<p>such decks on a narrow boat. If the label must be displayed other than in the Boat Manual, it should be within the cabin or on the inside of the back doors (visible to steerer) so that it is not degraded by weather and not in the way of annual repainting. There should be further consultation over whether narrow boat roofs can be designated as working deck, given the possibility of falls from height and the impact on stability calculations. It must be recognised that boaters often use the roof, and some operators provide anti-slip surfaces whilst not actually authorising access. In the same way, narrow boat operators generally put an anti-slip surface on the gunwale but advise against its use while the boat is under way. Neither designating this as working deck, nor excluding it, seems quite right. This matter (crew area labels) cannot be decided till the stability testing regime has been verified and established.</p>
9-Q9	<p>it would suffice Boat Manual and Hand-over verbal one to one Instruction during QAB Any Generic signs should be based on agreed presentation by the Trade and BSS and should be standardised and used Nationally. Information contained on any such agreed sign should come only from Stability testing information which to our knowledge has still not been agreed nor formalised as part of Hire Boat Code as yet so CANNOT be mandatory at this time or used by operators. It is NOT an RCD requirement. Agreed working areas on all craft should be agreed nationally by Committees for all types of craft and then Nationally added to the scheme at a later date but not ready at this time. Crew area labelling again would be unsightly and may create ambiguity and a feeling of unsafe areas which have no record at this time of being unsafe areas being used. Stability needs to be agreed before this can go any further.</p>
10-Q9	<p>BA already have the vessels marked with number of people allowable on board. Would like to see examples of the proposed schematic. A lot of boats don't have the room for a large diagram. Would suggest that this is something which should be included in cruiser manuals and specified during hand over. Would like to see examples of access limitation labels and examples of where these could be effectively placed.</p>
11-Q9	<p>Maximum carrying capacity, yes, but crew area..... please!!!. All customers will be in all area of canal hire boats, especially cruiser sterns..... they are deliberately designed for congregations of passengers.</p>
12-Q9	<p>On narrow boats defining the crew area with maximum numbers on a sign is unassay and does not effect or increase capsize risk. Narrow boats are proven to NOT capsize. Until Stability testing has been agreed and has been finalised by Hire Boat Code it is impossible for operators to calculate the numbers in each area and it is NOT a requirement of RCD. Control of customers on any defined area (if ever agreed) is impossible to police. Advise is given to hire customers on hand-over of what you should do and where you should do it. But it is common sense. The majority of customers will adhere to your requests if put over in a professional manner. A pictorial sign will NOT replace verbal demonstration and discussion advise. This is impossible to implement at this time due to incompleteness of Hire Boat Code.</p>
13	<p>I believe that the 'hirer' is responsible for their crew's wellbeing, additionally I believe general narrowboat insurance specifies a max of 12 crew. It would be good to have a responsibility reminder in sight of the helmsperson</p>

14-Q9	It is up to the crew of the boat to establish how many people can be on the rear deck so as not to make steering the boat difficult for the helmsman. This depends on the size of crew members.
15-Q9	We are not sure what such a thing would look like. Perhaps an example would help.
16-Q9	Customers will not consult a label before walking down the gunnel or roof. Label is of no value as a safety aide.
BSS responses	<p>In responding to all comments made to Question 9 (Crew Area and Access Limitation Label visible from each helm position), it is accepted that the consultation question Q9 may not have been as clearly worded as it could have been. We will also pass on all comments made about Q9 to the AINA-led group developing the Hire Boat Code about which it will be consulting on later in 2016.</p> <p>The intended BSS requirement would see BSS examiners simply confirming the existence of a 'Crew Area and Access Limitation Label' and that its condition is good.</p> <p>The need for a label and its wording would be determined by the proposed revised Hire Boat Code and its forthcoming consultation. The need for a label is associated with the outcome of hire boat stability/freeboard testing, however the hire operator determining the extent of the permissible 'crew area' will also determine the areas where slip-resistant surfaces need to be applied and where handrail requirements apply.</p> <p>(7-Q9, 8-Q9, 9-Q9, 11-Q9, 12-Q9, 14-Q9, 16-Q9) Comments on the potential complexities concerning the representation of the plan of the boat are captured for review.</p> <p>Hirers share part of the responsibility for safety by acting on instructions provided. Labels augment the information at handover and provide a visual reminder to hirers whilst the boat is on hire.</p>

Q10 Do you agree that there should be slip- resistant surfaces in good condition on external Crew Areas where hirers are allowed to go?

#	Comment
1-Q10	If non-slip areas are required, why only where hirers go? Should they not be universal? Our boats have traditional linoleum decks which I understand is an approved non-slip surface.
2-Q10	Unless anyone can tell me different, I am not aware of any official standard as how to test slip resistant surfaces on boats. Implementing this would be extremely difficult if the decision on a slippery surface was left to be determined by each boatyard, it would leave the whole process open to abuse. Until such time a method to do this can be found, I would suggest this proposal is removed.
3-Q10	We already provide slip-resistant decks, gunwales and roof areas with proprietary paint. There does not appear to be a standard for slip-resistance, so testing is not possible. Deterioration occurs throughout the hire season and it is impossible to paint these areas on turnaround. The proposed BSS standard appears to go beyond ISO 15085 in requiring boarding planks and internal steps to be slip-resistant and permitted gaps are differently specified.

4-Q10	At the moment there is no formal definition or British standard, or checking process in place for suitable slip resistant surfaces. Until such time that there is we feel this cannot go forward.
5-Q10	Almost all external crew areas on Broads cruisers have slip resistant surfaces and the limited number of such areas without could be coated appropriately. However, it appears that there is currently no clear definition or checking process which examiners can refer to or use.
6-Q10	Operators already provide slip-resistant decks, but there is no standard for slip-resistance, so objective testing is not possible. The proposed assessment method must be consulted on before operators can form a view. The proposed BSS test is to look for areas where the treatment has worn or degraded. There are major concerns about deterioration in mid-season and between certification dates. The proposed BSS standard appears to go beyond ISO 15085 in requiring boarding planks and internal steps to be slip-resistant. Permitted gaps are differently specified by BSS and ISO, which does not seem sensible.
7-Q10	Not until an agreed test method has been agreed with the trade nationally and operators know what they can and cant do and are advised of a British Standard is agreed for non slip that they can work to. Until such a standard is agreed and agreed method of application for all types of vessels is agreed this cannot go forward as a mandatory requirement. BSS should not go anywhere near ISO implementation as part of BSS checks. Mixing standards does not seem sensible or gives the operator any clear clarification. ISO 15058 is still in DRAFT!
8-Q10	Agreed that surfaces should be slip resistant. However, fail to see how a visual check will distinguish between a non slip and a 'slipable' surface. Some types of non-slip surfaces mentioned above, for example embossed metal plate and moulded FRP, is not always slip resistant. Signing off areas as OK, just because they look clean and tidy, does not help make them safe. If the point is to really reduce slips, then there needs to be a way of ensuring the areas really are non slip.
9-Q10	BUT, this cannot simply be left from one 4 year inspection to the next. They are some appalingly maintained hire boats on the system where enforcement needs to be addressed
10-Q10	Does depend on checking procedure implementation. Define NON SLIP?? Is there a British Standard for it if so advise operators on what this is and then maybe they can comply? Define the areas and method of application of surface treatment or deck boarding suitable. What is deemed to be Good Condition?? At this stage there are too many unanswered questions it will be impossible to get a definition for implementation prior to any proposed changes. Can I suggest that this could be advisory at this time?
11	Good practice.
12-Q10	Surfaces should not be so rough that they cannot be cleaned and in the case of cockpit seats rough to sit on
BSS responses	(1-Q10) Hire operators can choose where to designate permissible crew areas and these will largely be determined by the application of the proposed stability testing from the revised Hire Boat Code. The BSS requirement for slip-resistant surfaces will only apply to those designated crew areas, although hire operators can choose to apply the surfaces to other decks, etc. (2-Q10, 3-Q10, 4-Q10, 5-Q10, 6-Q10, 8-Q10, 7-Q10, 9-Q10, 10-Q10, 12-Q10) The risk review

	<p>determined the slip/trip risk as the most important risk to address. It is recognized that there is a challenge to provide BSS Examiners with a checking regime and hire operators with information as to how the proposed new requirement can be applied consistently. We are confident the approach adopted will be clear and supportable and will mostly rule out subjectivity. Full information supporting the proposed new BSS requirement will be published early in 2016.</p> <p>(6-Q10, 9-Q10) It is anticipated that the information to be published will promote a debate amongst the hire industry that will encourage a move towards 'best practice' surface coverings offering longer lasting compliance. It is hoped that this shift to more robust surface coverings will replace concerns about any mid-season surface deterioration.</p>
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Q11 Do you agree that weed hatch requirements should also apply to those bow thruster hatches or any other appliances that can be opened by hirers?

#	Comment
1	No comment (not applicable to our boats)
2	For those hatches that are designed to be opened by the hirer, ie no tools required.
3-Q11	Though this mustn't be seen as a 'get out of weeding' by the authorities action
4	Should they not comply we will bolt them shut.
BSS responses	The existing requirement and intended extension is purely a control measure to address a potential risk for the hire boat to sink as a result of authorised hirer interventions.

Q12 Do you agree that hire boat requirement for a means of reversing, operable from every helm position, should include outboard motors and all other power-driven propulsion systems?

#	Comment
1	No comment (not applicable to our boats)
2	Out board motors are not my field of expertise
3	Necessary to give the helm full control of the vessel.

Q13 Do you agree that the current hire boat handrail/guardrail requirement should be brought in-line with ISO 15085 standard; and include 'handholds' at designated Crew Areas?

#	Comment
1-Q13	Yes but not universally - It is impractical to provide designated hand hold at 1.2m intervals on the fore and aft decks of larger yachts.
2-Q13	BSS should not specify anything which is not in the ISO 15085. Care should be taken that the requirements for Design Category D boats are not exceeded by the BSS. Once specified if any boats require alteration, time should be given for this to be completed or have a build date when boats require this.
3-Q13	Don't know. Why refer to ISO 15085 when a clear specification of the requirement is included in Section 5.3?
4-Q13	Consideration for an exemption or how this check can be applied to historic traditional yachts with foredecks over the 1.5m limit. The forestay may be considered as a handhold in this situation as pull-pits and guardrails are not fitted to traditional broads yachts. Other than this particular issue the requirement is supported.
5-Q13	It would not be sensible for the BSS to specify anything which is not in the final version of the new ISO 15085. Until this is available, it is not possible to evaluate this requirement. The BSS should explain that handholds do not necessarily have to be purpose made or marked, but can include parts of the vessel structure or fixed equipment. Guard rails should be defined and described, and care should be taken that the requirements for Design Category D boats are not exceeded by the BSS. The detailed checking procedure for handrails, guardrails and handholds should be put out for consultation, with worked examples, including examples of BSS failure. If any boats require alteration, time should be given because it is already too late for significant works to be planned this winter.
6-Q13	ISO 15058 is still in draft and being consulted on at this time and therefore cannot be applied to BSS requirements due to it not being a National Standard. Until this is agreed and finalised it should not be a mandatory requirement as it cannot be adhered to by operators at this time . Major implications result in present consultation on ISO 15058 for narrow boat operators and users. Handrails and guard rails as built at new and are unable to be altered retrospectively.
7-Q13	Cruiser sterns do not lend themselves to having hand rails. I would not like to see high rails around the sterns so again, it is not my field of expertise.
8-Q13	ISO 15058 is not used in RCD practice to meet hand hold requirements. ISO 15058 needs to be defined and advised on its practicable implementation on a narrowboat. All narrowboats have some type of roof handrail fitted in its construction and again where is the evidence that a hire boat is any less safe than a private one in terms of getting on and off the craft? I suspect NONE. Do not start to impose ISO standards retrospectively to anything? RCD craft do already comply to present ISO 15058 or should do so do NOT add anything further.
BSS responses	(1-Q13, 4-Q13, 6-Q13, 7-Q13) According to the draft BSS examiner check, handholds can be any part of the boat that may be gripped by hand to reduce the risk of falling overboard, even if it is not its main function, providing it is secured against unintended movement and permanently available as a handhold. Examples include; yacht forestays, steering wheels,

	<p>permanently installed seats, and cleats.</p> <p>(2-Q13, 3-Q13, 5-Q13, 6-Q13, 8-Q13) The proposed change to the existing BSS requirements is purely an editorial change intended to ensure alignment with the ISO 15085, but without referring to it directly (3-Q13) and there is no intention to lose the clarity in the BSS requirement.</p> <p>(5-Q13, 6-Q13, 8-Q13) In December 2015, the British Standards Institution (BSI) re-issued a slightly revised ISO 15085, but without amending text covering 'working decks', or the gaps between handholds. Revisions of ISO standard can be taken account of in a future risk review of the BSS requirement.</p> <p>Concerns linked to implementation timescale of the requirement (5-Q13) are dealt with in Question 16 below</p>
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Q14 Do you agree that lifebuoys should be in good condition and have floating lines when the hire boat is used on MCA category C & D waters?

#	Comment
1	No comment (not applicable to our boats)
2-Q14	<p>The requirement for hire boats to have life buoys with floating lines when operating in MCA Category C and D waters - whilst based on published standards - completely ignores one of the drowning mechanisms for people falling into "flowing" water. The River Severn and the River Avon - which are in my area - are both "flowing" rivers. A common method of drowning in these waters is that a person's feet become entangled in an underwater obstruction such as a fallen willow or weed - once this happens there is no way of surviving drowning other than disentangling from the obstruction. This is because the flowing pressure of the water, even at summer flows, is too strong for even the best swimmer to counteract - the angular pressure exerted by the flow immerses the whole body and head of the victim, resulting in drowning. In addition to requiring life buoys with floating lines for all hire boats that may use "flowing" rivers I would suggest that automatic life jackets or buoyancy aids in sufficient quantity (one for each person on the boat) and appropriate size (children's Adult 150N and large adult 275N) be provided with appropriate advice and warning labels "Lifejackets useless unless worn" The use of lifejackets by Private boat owners has increased dramatically over the past few years on these two rivers. I believe that it is because there have been fatalities and many near misses and with education people are realising that accidents are not predictable.</p>
3-Q14	<p>We are no longer able to obtain the life rings with integral line that wraps around a slot in the outside of the ring. Therefore a separate line needs to be provided which has a greater opportunity to be lost, tangled up, or get caught round the propeller.</p>

4-Q14	All hire boats must be provided with at least one suitable lifebuoy or THROWING LINE/BAG which must be etc.”
5-Q14	18m Rope length seems excessive.(trip hazard). Smaller floatation devices such as torpedoes for smaller craft
6	Essential requirement for safe boating.
7-Q14	Separate throw lines are better
BSS responses	<p>2-Q14 The proposed BSS requirement change is to add a floating line to lifebuoys on hire boats operating on MCA category C & D waters, e.g. Loch Ness. The provision of buoyancy aids is to be covered by the proposed revised Hire Boat Code and is outside of the BSS.</p> <p>(3-Q14, 5-Q14) The risk review shows that lifebuoys without floating lines will likely be ineffective on Cat C & D waters in circumstances of predictable and extreme wind and wave conditions. The 18m line accords with accepted MCA rules.</p> <p>(4-Q14, 5-Q14, 7-Q14) The risk review ruled out throwing lines as a direct equivalent to lifebuoys, but can be deployed as an additional safety equipment item should hire operators choose to do so.</p>

Q15 Do you agree that the hire boat standard for fire blankets should be amended to include that fire blankets must be permanently fixed in open view?

#	Comment
1-Q15	The consultation should have mentioned the similar change for FEAs.
2	Essential requirement. In the event of a hob fire, there is little time to find which cupboard the fire blanket is in and then it has to be extracted from its holder and deployed!!
BSS responses	1-Q15 Comment not understood.

Q16 Do you agree with the intention to introduce the revised BSS hire boat requirements from April 2016?

#	Comment
1	Not Stated
2-Q16	We will not have time to make any required changes by the time the results of the review are known. A date should be set by when boats need to comply which should be 4 years hence for fairness so that those boats which have just had a BSS all have to comply at the same time.
3-Q16	There could be significant work on medium to large Broads hire fleets and enforcement should be delayed until April 2017 to coincide with planned introduction of revised Broads Authority Hire Fleet Licensing conditions.
4	agreed with [comment b - Q.6 unintended consequences] to be noted

5-Q16	A lead in period would be helpful bearing in mind if we have nearly all the boats to do in one winter this adds to our work load considerably
6-Q16	However the verification of the new requirements will not happen until existing hire boats current BSS examinations expire and it is unlikely that the national hire fleets will be able to implement the new requirements over the winter of 2015/16 even if the issues raised are successfully resolved .This needs to be recognised and either the requirements are implemented in Phases, ie. when boats are presented for their repeat examinations or a delay in the implementation until April 2017 to allow for all hire boats to be brought up to standard of the new requirements these requirements would then be verified during routine BSS examinations.
7-Q16	This consultation was supposed to have started many months earlier. As it is, decisions will not be known until late winter, giving operators an impossibly short time to alter boats before the 2016 season. It is essential that the timing of implementation be rethought. Boat Safety Certificates last for four years. Therefore the new rules will at first only apply to boats whose certificates expire just before the 2016 season, whereas other boats will presumably not need to comply for up to four years. However, if there were an accident on a boat which had not yet been due for certification, and had not been modified, the operator might be exposed to criticism by the authorities, or to litigation from customers. This issue should be addressed, for example by an explicit ruling that the authorities would look for compliance only from the first normal BSC renewal after the start date of the new regulations.
8-Q16	This consultation is already running months later than previously agreed. Its findings should in our opinion being implemented at the same time as The Hire Boat Code which is awaiting stability testing agreement to our knowledge. It is totally impracticable for operators to implement the proposed additional changes prior to next season. If however smoke and co alarms are agreed these can be done but all the other items if cannot be agreed on then they should be dropped from this review with immediate effect and should be re-looked at or formalised and consulted on with the trade before the next 5 yearly review. Boat safety certification normally on hire boats are done at the beginning of the season so therefore only boats expiring during 2016 are effected so an implementation date of April 2017 would be more acceptable
9-Q16	BUT, until the old ones are enforced the assessment of risk cannot be accurate.
10-Q16	This consultation was meant to have appeared with operators way back in the spring. It is woefully behind schedule and therefore the implementation date should also be put back to allow for this delay. Also it is my understanding that the review implementation was going to go hand in hand with Hire Boat Code review so when this is finalised and released then the BSS changes of which there will be very few given my previous answers should wait until at least 1 January 2017 before being mandatory giving all operators time to implement .
11	Yes and the sooner the better.

12-Q16	I think April 17 would be more realistic and give more time for training and changes to ensure compliance . If there is minimal current risk, what's the rush?
13-Q16	We agree but as previously mentioned only if it comes into effect for every boat as it comes up to it's BSSC renewal date for it's next exam. Not if it means having every boat untested before required, we can't afford to retest all our fleet at once and prior to their current BSSC expiring.
14-Q16	Once agreed the revised requirements may not be able to be implemented in such a short timescale and put too much pressure on hire fleets workloads.
BSS responses	(2-Q16, 3-Q16, 5-Q16, 6-Q16, 7-Q16, 8-Q16, 10-Q16, 12-Q16, 13-Q16, 14-Q16) Taking account of the weight and extent of the comments received it has been decided to introduce the revised BSS hire boat requirements from April 2017. Hire operators are recommended to adopt the new requirements in the year leading up to the implementation date and information will be available to aid this recommendation. The implementation date is the date from which compliance is required and is not linked to the date of any BSS examinations. BSS examinations are simply used to verify compliance. Any hire boat's existing non-private BSS certificate will continue to be able to support a licence/registration application until the certificate expires. (9-Q16) Comment not understood.

Q17 Do you agree that there are no unintended consequences concerning introducing a specific proposal or on the generality of these proposals?

#	Comment
1	Unintended consequences are not usually obvious until after the event.
2	Not stated
3-Q17	It will be impossible to comply for any boats which require significant alterations, and whose certificates fall due in the near future.
4-Q17	a) Has a cost impact assessment been undertaken from the view of private boat owners wanting to hire out their boats - and if not, could one be done? b) Private boat owners may want to join [a P2P 'hire-your-boat' scheme] when we launch - but will not be considering the impact of your proposals at the moment - as they do not know its possible to hire out their boat via a peer to peer scheme. This may inadvertently stop them hiring out their boat during the main boating season next year - impacting both their's and our revenue. So will there be any grace period for them to reach the new standards - as they are not getting the advanced warnings commercial operators now have? b) The definition of a private craft vs. a commercial craft will be 'blurred' by essentially private boats being occasionally hired out via P2P schemes. What is the thinking in making hire boats achieve a mandatory (enhanced) standard vs. a private boat - given that the fatalities have been occurring on

	private boats? Surely these standards should apply to all relevant types of boat - private and hire boats - and not just be recommendations for private boat owners to accept or ignore? In the car sector there is an MOT - this applies to all cars, regardless of the fact that they are hire cars or private cars. d) In terms of providing private owners with guidance and support, would it be possible for inspectors to provide labels and advice on the visit as to where to apply them in terms of crew area numbers and fire exits? We have concerns about the validity of leaving this up to individual owners.
5-Q17	The consultation document is not sufficiently detailed to portray the effect of the proposed implementation date and this impact may not have been understood by those consulted when considering their responses.
6-Q17	It will be impossible to comply for any boats which require significant alterations, and whose certificates fall due next year. Despite the amazingly verbose consultation paper, swathes of questions, as to how one is practically to comply, remain unanswered. Therefore unintended consequences cannot be foreseen. More generally, in the early years of the BSS, examiners' guidance notes were published so that boatyards might know what was acceptable. This ceased some time ago. The BSS has since become hugely more complicated, and guidance could now easily be published on the internet. It would be big gesture of goodwill towards the trade were the BSS now to make these notes available, please.
7-Q17	It will be totally impossible for any craft which require any major modifications alterations to comply before their certification expires this winter.
8-Q17	Generally effective policing signage and advice re non-slip treatment of crew area decking.
9-Q17	It is impossible for operators to comply for any boats whose certificates expire during 2016. There are consequences that Hire craft that do not comply by proposed implementation date will not be given licences by authorities until rectified and therefore will potentially render Hire Companies in financial pressure through no fault of their own. Hire Companies can and will be put at risk from untimely BSS implementation and two tiered regulations. Hire/Private
10-Q17	Prop access for weed clearance could be expensive.
11-Q17	Boaters and hire boat operators may believe there to be no CO risk if they do not have a solid-fuel appliance on board. This is a dangerous unintended consequence of only requiring CO alarms where there is a solid fuel appliance on board.
12-Q17	I believe that marking where the helm area is only required on the design of boat where an accident has occurred and this would have possibly helped prevent the accident.
13-Q17	I agree there are no intended unintended consequences but only time will tell if there are consequences of either sort. Should there be any, there needs to be an industry led body charged with sorting them out...without a massive hoo-har.
14-Q17	We agree with the proposals however we cannot bear the financial cost if all our fleet had to be retested on 1st April - we need it brought in at each boats next BSSC renewal date - then the costs of conforming will be spread out. We will be able to get an examiner and we will be able to comply with everything as indeed most of the proposals have already been adopted by us. We need to BSSC about 3-4 craft each year but could not bear the cost of the

	BSSC exam itself if we had to do 10-12 at once on top of the updated requirements costs.
15	Not possible to answer yes or no!
BSS responses	<p>(3-Q17, 4-Q17, 5-Q17, 6-Q17, 7-Q17, 9-Q17, 14-Q17) See response at 2-Q16 above pushing back the implementation date.</p> <p>(4-Q17) The proposed BSS hire boat requirements changes are equally applicable to private owners wishing to hire their boats out and this class of hire operator was taken into account during the review period. Concerning the last point, in view of the fact that boats generally differ from the next one it is unlikely that Crew Area and Access Limitation Labels will be available off the shelf, however pro-forma designs can be shared. Fire escape labels are available at hardware stores, health & safety equipment suppliers and online.</p> <p>(5-Q17) The Partial Regulatory Impact Assessment helps quantify the impact in the intended hire boat requirements. Only one other comment has been received to suggest the impact of the proposals is unclear.</p> <p>(6-Q17) Detailed information supporting the proposed requirement for slip-resistant surfaces is planned, see 2-Q10. The BSS examiners checking procedures will also be updated and re-published accordingly.</p> <p>(8-Q17) Comment not understood</p> <p>(9-Q17) Also see response 2-Q2 above concerning the differing requirements for boats in private and non-private use.</p> <p>(10-Q17) There is no change to the current BSS requirements for hire boats in regard to weed-hatches.</p> <p>(11-Q17) See response at 6-Q6 above regarding the BSS approach to carbon monoxide risks.</p> <p>(12-Q17) The risk review identified that the risk control is necessary on all types of tiller steered narrowboats.</p> <p>(13-Q17) Although we don't envisage any unintended consequences, we agree that the industry body and others can help monitor the impact of introducing the new requirements and indeed can help support the review with better incident and accident data.</p>

– ENDS –