



BSS Advisory Committee – Confirmed Notes

BSSAC #84, 5 DECEMBER 2013, CRT OFFICES, HATTON

Present:

Chair
TBA
EA
CRT
YDSA
RBOA
RYA2 Yacht Clubs and Users
BSSTC Chair
ABSE
NABO
IIMS
Broads Authority
BMF1
RYA1 Executive Interests

IWA
BMF3 - Canal-based Comm. Interests
IMarEST
BMF2 – River-based Comm Interests
BSS Quality & Technical Manager
AWCC

Co-opted & Others:

BSS Manager
MCA
TBA

Apologies:

NABO
AINA

84.1 Apologies and introductions

84.1.1 Apologies were noted as listed above. Members welcomed new BMF1 rep replacement BMF2 rep and stand-in NABO rep, and observers from the TBA and MCA.

84.2 Notes of BSSAC meeting #83

84.2.1 **Accuracy of the Confirmed notes of the BSSAC meeting #83** - confirmed notes [Doc L2, BSSAC #83] were accepted as an accurate record.

The RYA rep was unhappy that post meeting comments he had made were not included in the confirmed notes, but accepted the notes as adequate.

84.2.2 **Matters arising from the unconfirmed notes of BSSAC meeting #83 [Not covered on the agenda] –**

83.1.3 – YDSA concerns about the published guidance for examiners concerning the BSS Examiner Conditions of Registration. The BSS Manager reported that the YDSA rep had emailed a document outlining concerns with the published guidance two days before BSSAC meeting #83 for tabling at BSSAC.

The BSSAC Chair's decision not to introduce YDSA comments at a forthcoming meeting, unless the examiner bodies on BSSAC agree a position outwith the meeting, was communicated to the YDSA rep a few weeks after meeting #83. The BSSAC Chair's decision is intended to ensure a uniformity of examiner body approach and to ensure a productive agenda item. No unified practitioner position paper has yet been received. It remains open for the YDSA rep to lead the subject to establish a joint examiner body view.

84.2.3 *83.2.2 - 'hard to reach' boaters* – The BSS Manager reported that the action to engage with Manchester Fire and Rescue Service, on dealing with 'hard to reach' communities is yet to be completed but the action should be complete by the end of February.

BSS
Manager

- 84.2.4 *83.2.4 - hirer safety review and the 'no barrier to trade' rule of the RCD* – the BMF1 rep requested that Trading Standards be asked to clarify their interpretation of the '*structure of the vessel*' in the context of the ability of the BSS to impose additional requirements beyond those of the RCD. BSS Manager
- 84.2.5 *83.2.5 - the committee members' website* - The BSS Manager reported that the committee members website was up and running and was being used in support of the hirer safety review project. The engagement with BSSAC volunteers to support the more general use of the site is delayed and is awaiting the development of a progress-charting tool. It is hoped to have the facility available to trial by the volunteers at the end of February, the aim remains to keep the web facility simple to use. BSS Manager
- 84.2.6 *83.4.6 – Hirer Safety Review committee Sub-group* – the BSS Manager reported that the following actions were all achieved: a) amalgamate a joint BSSAC/TC Sub-group, b) for the BSSTC and BSSAC Chairs to agree the Terms of Reference of the Sub-group, c) for all BSSTC and BSSAC committees will have full access to reports and risk-review papers being developed and published on the sub-group's web-based facility and d) to put back the BSSAC meeting from Tuesday 26 November to Thursday 5 December.
- 84.2.7 *83.10.4 - Boat Fire Safety Week* - the BSS Manager reported that the suggestion for posters to be displayed at locks to generate interest has yet to be taken forward with DCLG. The RBOA rep said she had spoken to members of Leics. FRS at various events, but the promised follow-up had never happened.
- 84.2.8 *83.13.1 - Accuracy of the BSS web-text referring to boats with LPG*. The BSS Manager said that he had checked the accuracy of the text which refers to boats subject to the Gas Safety (Installation & Use) Regulations and how the boat's use will influence whether a non Gas Safe registered BSS Examiner can undertake a tightness-test using a manometer. He confirmed the text is accurate and is based on the words of the regulations.

84.3 To note actions arising from the BSSMC

- 84.3.1 The BSSAC Chair reported that the last meeting of BSSMC in July was by proxy conducted through the issue of reports. As no actions from BSSMC arose from the reports there is nothing to consider at this agenda item.

84.4 The navigation authority hirer safety review – the draft report to BSSMC

- 84.4.1 *Supporting Document Subject: - The Navigation Authority Hirer Safety Review – Initial Recommendations – (consultant's Report)*
- 84.4.2 *Context – BSSMC have agreed the navigation authority hirer safety review should be delivered through full and proper risk review and that the review is to be administered through the BSS committees prior to going out for public consultation.*
- 84.4.3 The BSSAC Chair introduced the item by pledging to do his utmost to be a chairman and not to take part in the debate about opinions from the industry, but to ensure rigorous debate of anything that may be deemed a failing in the process, or otherwise.
- The BSSAC Chair emphasised that the consultant's report was received only three days before the BSSAC meeting and BSSAC member's initial views on first reading were sought. Printed copies were distributed.
- It was re-iterated that the review is a navigation authority review being facilitated by the BSS Office and through the BSS committees and is 'work in progress'.
- It was noted that BSSAC and BSSTC were well represented at the two-day hirer safety review group meeting and that all BSSAC members had access to the dedicated website facilitating the review since August.
- An extended and constructive discussion took place and the overall reaction to the report can be described as neutral. The following summary of the key points was recorded for consideration by BSSMC:

84.4.3
cont/

- a) The BMF1 rep emphasised that the ISO stability standard, available to be used by builders of new boats, has been updated since the Breakaway V incident and now reflects the work carried out to support the publication of the Hire Boat Code. He said that CE marking to the Recreational Craft Directive (RCD) should be considered the absolute baseline of design and construction and other requirements, possibly complemented by handover procedures and audits. He did not see a role for a suite of additional BSS requirements for new hire boats.
- b) There was general support to further clarify the impact and status of the RCD concerning the suggested risk controls outlined in the consultant's report i.e. implementation of BSS certification for new-build hire craft. Part of this assessment will be a more full understanding of the extent to which the recommended new risk controls align with the RCD and its supporting standards relevant to construction standards. The aim should be for alignment with the RCD's construction standards. The ABSE rep said that his members were still finding RCD non-compliances on new CE marked boats.
- c) The BMF2 rep said that he thought the hire trade would endorse the development of a simplified set of key safety measures for hirers and he referred to the new Drifters DVD being produced and based upon the current Boater's Handbook (he distributed a copy of the DVD for members). He said that he presumed the process of audit and enforcement of compliance with licence and regulation conditions was already being done. He said that reliable details of accidents and near misses, etc., should be introduced and suggested Data Protection Act issues may be a barrier and he said the definition of accident needs to be clarified.
- d) At the meeting, the BMF3 rep referred to an email he had circulated to members the day before the meeting sent from the Chairman of APCO. It was generally accepted that the contents of this email set down the views of APCO's represented hire industry members. (attached as an Annex to these notes).
- e) The BMF3 rep said he was disappointed that the consultant's report had not got much new in it and a lot is based on 2008 research or is based on asking people their opinion. He also said that at one point it said there were four deaths, at one point it says there are five deaths and one death he thought to be of a tree hitting a boat. He went on to say that the need is to make sure that the technical bits and the operating bits are clearly separated between the BSS and the navigation authorities. He also emphasised the need to research the potential for diesel engines and appliances to present a risk of CO as there is a weak foundation to the review on this point.
- f) The RBOA rep said that her organisation recommended people buying new boats to have a BSS examination done to prevent future problems achieving BSS certification. The RBOA also recommends that anyone purchasing a second-hand boat should request that it is sold with a new BSS certificate, even if the existing one still has some time before its expiry date. She was concerned that the recommendation for tiller arc markings on hired narrowboats should not be transposed to private boats.
- g) The IWA rep said that he had surveyed a number of IWA members who had experience of hiring. Hard issues raised included equipment such as CO and smoke alarms and quantity and quality of ropes, mooring pins, etc. Soft issues included hire boat handover etc.
- h) The RYA rep said that the consultant's report has not recognised that the RCD is European directive given effect in UK law by being transposed into the Recreational Craft Regulations. He said this will limit the ability of the navigation authorities to impose construction standards as a pre-condition of licensing craft.
- i) The BSSTC Chair said the risk-review through the autumn was as good as it gets and offered the opportunity to gather expertise and thoughts together. He went on to say that it's very difficult to benchmark whether the approach and outcome is good enough. He reported that BSSTC last week had a very similar debate and now the job is to decide things like how to rank hire boats versus private boats and what are we trying to achieve? He said that BSSTC were generally fairly relaxed about the private boat ECPs and introducing that into the hire boat environment, because that's the work we've done over the years.
- j) The BSSTC Chair went on to say that, concerning the new items that are identified in the report, BSSTC had a very preliminary debate and some work is going on in the background to flesh out some draft Examination Checking Procedures and complete the associated risk review papers to support this and the next stage.

84.4.3
cont/

At the BSSTC meeting there was clear challenge concerning how near miss and accident reporting can be improved.

- k) It was generally accepted that hire boat handover remains critical to hirer safety and members supported BMF continuing to lead on this subject in terms of handover procedures.
- l) There was general support for the installation of solid fuel stoves on hire boats to be to the relevant code of practice and in conjunction with CO and smoke alarm protection.
- m) The shortfall in EA and CRT enforcement activity was again highlighted and the EA and CRT reps explained how resources are diminishing and affecting this area. It was generally recognised that policing of navigation authority controls needs to be assured and consistently applied. The BA rep explained how enforcement was taking place on the Broads. It is clear that BSSAC members regard this challenge as one that all navigation authorities, other than the Broads Authority, must have an unequivocal answer to as part of their reaction to the consultant's report. Taking into account previous discussion at BSSAC meetings, disappointment was expressed that an answer had not been developed in time for the meeting. There was general support for the concept that the hire operators should fund policing, although the BMF 2 rep pointed out that its members were of the opinion that their licence and operator charges already paid for this.
- n) There was general agreement that the Hire Boat Code needs updating and there was a commitment from BMF to engage with MCA and the navigation authorities to continue the ownership and evolution of the Hire Boat Code. It was recognised that Part 2 of the Hire Boat Code (unpowered craft) needs developing.
- o) There was general agreement that BSS should continue to focus on boat-specific 'technical' issues and the remit should not be expanded to cover operational issues, such as handover. The 'operational' issues should be matters for the navigation authorities to continue to cover, as the duty-holder in this respect. It was however accepted that the risk picture is made up of a combination of issues for which the BSS are well placed to monitor.
- p) The importance of better incident data to support the next hirer safety review was stressed; it was recognised that this issue is owned by all interested parties.

84.4.4 Members were requested to read through the report a second time and make known any significant concerns or disagreements about the recommended risk controls before the BSSMC meeting on 19 December.

Organisational views are sought and any contentions requested to be made clear by the end of March.

[Post meeting note to members – BSSMC meet on 17 March 2014 – it would be useful for any significant further comments to be made known by then or they may have to come through the planned formal consultation stage. Also note that BSSAC meet on 25 February 2014 and an indication of any organisational positions on the consultant's report would help the meeting].

All

84.5. BSS Strategy 2014-18 for comment

84.5.1 *Support paper - Draft BSS Strategy 2014-18 – for comment [Doc D1, BSSAC #84]*

84.5.2 *Context – The BSSAC has an opportunity to influence how the BSS continues to support the navigation authorities' interests into the future and meet accepted aspirations, enjoy further efficiencies and address known threats to the business.*

84.5.3 The BSS Manager emphasised that the opportunity for BSSAC input into the next 4-year BSS strategy will close shortly because the strategy document is supported by the business plan and the business plan will need to be signed-off by February 2014. The BSS Manager reminded members that at the last meeting it was decided to form a BSSAC sub-group to help consider future BSS strategy and BSSAC input to it. Membership of the sub-group included the RBOA, NABO reps and an ABSE rep.

84.5.3 cont/ The Sub-group met on 22 October and considered a draft BSS strategy document as presented to all BSSMC/AC/TC navigation authority reps during late September. Significant improvements to the document were made as a result of the sub-group input and a revised draft BSS strategy document developed and circulated to members on 1 November [Doc D1, BSSAC #84]

Upon receipt of *Doc D1*, members were invited to contribute views on how the BSS continues to support the navigation authorities' interests into the future and meet accepted aspirations, enjoy further efficiencies and address known threats to the success of meeting the purpose of the BSS.

84.5.4 The Chair asked if all members had received *Doc D1* and had considered it. All confirmed they had. He asked for a reaction to it.

The RYA rep said that when he first read the document he was concerned that BSS might be going off in a direction that might be assuming some of the operational roles more correctly attributed to the navigation authorities, but that he was re-assured by a reply to his email from the BSS Manager and with the earlier debate during the hirer safety review agenda item.

Members' reaction was to generally support the strategic direction for the BSS as outlined in *Doc D1* and the members of the Sub-group were thanked for their good work.

The Chair said he would take the positive reaction into the forthcoming BSSMC meeting.

84.6 Report from BSSTC Chair

84.6.1 *Support paper - Report from BSSTC Chair for BSSAC [Doc G1, BSSAC #84]*

84.6.2 *Context – standing item – a report of BSSTC*

84.6.3 Referring to *Doc G1 (distributed in hard copy at the meeting – to be provided as an electronic copy post-meeting)*, the BSSTC Chair said that there had been a full committee meeting on 26 November and that the hirer safety review dominated. He reported on the following other matters:

BSS
Secretariat

- *BSSTC Terms of Reference (ToR)* – He reported that BSSMC had tasked BSSTC with reviewing and revising its ToR, with a completion date by March 2014. The BSSAC Chair suggested that BSSAC's review of its ToR will likely follow within a year.
- *LPG issues* were discussed in the context of testing work planned by BSS but on hold due to the standstill at BSI concerning the revision of PD 5482-3 because of the protocol that says that the existence of an international standard (ISO 10239) covering the same subject prevents the development of national standard. The BSSTC Chair said that his inclination was to go ahead with the testing and that he had asked the BSS Manager is to construct a paper setting out the implications for the BSS of further standstill, and suggesting options for consideration by BSSAC. The BMF1 rep said that the issue could be mostly addressed by UK comments into the revision of the ISO 10239 standard and the RYA1 rep said that he was hopeful that most UK comments will be accepted by the ISO working group. The BMF1 rep added that the ISO revision process is bureaucratic and is likely to take a further 6-12 months.
- *Prioritising BSS Office technical work* – the BSSTC Chair said that the BSS Office has a programme of technical work, which is prioritised by BSSTC. *Doc G1* refers to five items and a report on each one.
- *Impact of the introduction of the new private boat BSS checks* – the BSSTC Chair drew attention to the table in *Doc F1, BSSAC #84* indicting failure rates for the seven new checks introduced for private boats from January.
- *BSSTC membership* – BSSTC reported a replacement BMF rep on BSSTC and new IWA and RYA reps. BSSTC membership is now complete.

84.7 Quarterly update on the progress of the BSS IT project

84.7.1 *Support paper – Quarterly IT Update [Doc E1, BSSAC #84]*

- 84.7.2 *Context – standing item – a routine quarterly report by the BSS Quality and Technical Manager.*
- 84.7.3 The Chair introduced quarterly report *Doc E1* and requested any comments.
The ABSE rep was concerned that BSS postal charges were about to be passed on to BSS Examiners.
- 84.7.3 cont/ The BSS Quality & Technical Manager made it clear that further postal cost saving plans included BSS Examiners receiving a year's worth of examination paperwork in one delivery at the start of the registration year, the plan is to only charge for repeat orders of paperwork. He emphasised that repeat orders of safety-critical material such as BSS Warning Notices and safety leaflets would continue to be posted free of charge to examiners.
- 84.7.4 The AWCC rep challenged the BSS Quality & Technical Manager to report on the cost savings associated with the IT project implementation. The BSS Quality & Technical Manager agreed to report at the next meeting concerning the BSS operating cost savings relevant to IT project implementation. The BSS Manager stressed that the benefits of the IT project are not only pure cost savings, they include improvements in risk management. *BSS Q&T Manager*
- 84.7.5 The RBOA rep raised her AOB item about the interaction between the BSS's online examination recording system and the navigation authorities' capability of licensing boats and said that it doesn't seem to be working correctly.

The BSS Quality & Technical Manager said that problems were isolated issues likely to be to do with rolling the system out and such things like changes in licensing staff. He reported that staff from three of the licensing authorities attended for a one-day seminar in Leeds on the BSS Salesforce system and a further seminar for licensing authority staff in the south of the country is planned. His view was that problems may well be historic.

User groups were asked by the Chair to monitor how the shift to online recording of BSS certification is aligning with the navigation authorities craft licensing/registration administration. The EA rep added that if problems are encountered to provide details of the problem and the point of contact used, so that the complaint can be taken forward.
- 84.7.6 The RYA2 rep (*in his BSS examiner capacity*) said that in some cases examiners will not have reported examinations on Salesforce because they are waiting to be paid and bad debts can be a problem and suggested that there should be a facility to cancel the boat safety examination if payment was not made within a certain time. The BSS Manager said that, as before the introduction of online reporting, examiners cannot delay certification and that examiners that do so are in breach of their conditions of registration and are probably in breach of contract to their clients. The solution is for examiners who feel there is a problem is to insist upon individual contract terms ensuring payment on the day or up-front, and it's a matter for the practitioner bodies to guide their members. The Chair said that if practitioner bodies feel it's an issue collectively then bring it back to the table jointly.
- 84.7.7 The TBA rep sought an assurance that the planned move to IT3 (hand-held devices) would not add certification costs to boat owners. The BSS Quality & Technical Manager replied that any work on IT3 is 18 months away and that there are no plans to make examiners pay for any such devices or the applications associated with them and that the move to IT3 would have to be justified on a net cost saving to the BSS.
- 84.7.8 The YDSA rep said that some examiners have difficulty with going online to identify invoices for payment and that he waits for a threatening letter before sending a cheque for payment. The BSS Quality & Technical Manager replied that this is a matter for individual examiners to manage and that BSS provide the tools, he went on to say that the Salesforce invoicing system continues to improve with direct links for examiners to the parent CRT account soon and then online credit card payments facility in due course.

84.7.9 The RBOA rep asked about migration of boat data on to the BSS Salesforce system from CRT data as she had been told that a lot of the information is out of date. The BSS Quality & Technical Manager reported that the BSS boat data has been updated twice and from April onwards the two big databases of the boats will be better aligned but that this is a continuously improving issue rather than a one-time fix issue,

84.7.10 The RBOA rep also wished to make it known that the paperwork that goes out upon licence renewal with CRT still has all the original wording about the old blue certificate. She went on to say that there have also been instances, apparently, of people trying to re-license their boats who have been told that CRT will not relicense it until they get a new boat safety certificate, when that certificate has still got two or three weeks to run after the licence started. She said that she is taking these issues up with CRT. The Chair said that both issues are for CRT to comment upon outside of BSSAC.

84.8 Quarterly update on BSS quality management

84.8.1 *Support paper – Quarterly quality management report [Doc F1 BSSAC #84]*

84.8.2 *Context – quarterly report is a standing item. BSS core processes are crucial to ensure that the BSS is effective at meeting its purpose and can be used to better support BSSAC in assessing BSS performance.*

84.8.3 The BSS Quality & Technical Manager referring to *Doc F1* (page 4) drew members attention to the BSS examination ‘fail’ data associated with the seven new checks introduced in January 2013.

Further to *Doc F1*, he reported that examiners now have an additional field to complete when reporting BSS examinations on Salesforce. If the examination is the boat’s first ever BSS examination, examiners select the relevant value from the drop down menu in the new ‘First BSS?’ field – Non-BSS Inland, Coast, Annex XV Complete or Annex IIIa Part-built. If the boat has had previous examinations, examiners ignore this field altogether. The intention is to monitor any risk trends associated with a boat’s history.

84.9 Report from the BSS Manager

84.9.1 *Supporting Document - Report of incidents and accidents recorded for the year so far 2013 and inferences drawn and BSS risk-activity update [Doc C1, BSSAC #84]*

84.9.2 *Context – standing item*

84.9.3 The Chair, referring to *Doc C1*, drew attention to the fact that solid fuel stoves represent the single largest cause figure in the table.

The Chair asked if members were happy for the quarterly report to contain incidents that have not yet had a cause fully explained and that the alleged cause may be the subject of contention. The general reaction was that these incidents can be included in the report provided the status of the information is made clear.

The Chair suggested that it is sensible for the quarterly report to have a separate total for hire craft incidents to help members with monitoring the hire boat risk. It was agreed that hire incidents should be reported in a separate table by way of a trial in future quarterly and annual incident reports. The BSS Manager said that with the BSS shortly to be using National Water Safety Forum’s WAID database there could be more data to call upon but challenged the hire industry to collect, act upon and report near miss and incident data.

BSS
Manager

84.9.4 The reference to the DUKW incidents in the quarterly report was questioned. The BSS Manager said that this subject may be of interest to the navigation authority reps who may wish to take note of the action of the London Assembly in reviewing passenger safety on the tidal Thames, notwithstanding the existing roles and responsibilities of MCA, MAIB and PLA in this area. The MCA rep requested details of the Windsor duck tour operation.

BSS
Manager

84.9.5 The Chair asked whether the meeting would be supportive of BSS and BMF jointly working up a project to properly understand the risks CO posed by emissions from both engine and diesel heater exhausts in view of recent incidents. There was unanimous support for this, a project which would in future fall under the ambit of BSSTC.

BSS
Secretariat/
BMF1
Rep/BSSTC
Chair

84.10 Items for BSSMC

84.10.1 No specific items beyond those matters covered by these notes.

84.11 Provisional dates for the 2014 BSSAC meetings, all at Hatton

84.11.1 The following dates of 2014 BSSAC meetings were all confirmed:

#85 - Tuesday 25 February, #86 - Tuesday 10 June, #87 - Tuesday 18 November

84.12 Any other business [AOB]

84.12.1 The EA rep described the restructuring currently affecting the EA following several strategic reviews which will lead to significant budget savings. The main outcome is to remove the regional tier of staff, moving to a two-tier structure: a national 'deliver once' team with local service delivery through area teams. He reported this is the biggest challenge affecting EA since it formed in 1996 and the impact on its navigation function will become clearer from next Spring onwards. His prediction is that the resource level currently deployed providing a navigation service is likely to change and that a feature will be the speed of change as the cuts are implemented.

Annex A - APCO Chair's email as circulated by BMF3 Rep

From: BMF representative

Sent: 04 December 2013 16:47

To: BSS secretariat

Cc: BSS AC and TC committee members

Subject: Re: Final meeting support paper - BSSAC #84

Good afternoon all,

Apologies for the lateness of this e-mail, with regard to the meeting tomorrow, but I thought it might be useful for committee members to receive the comments of the APCO chairman.

(APCO: the Association of Pleasure Craft Operators is the main trade body for Inland Waterway Businesses, representing over 140 independent companies offering River and Canal Holidays on Hire Boats, Day Boats, Hotelboats, Passenger Trip Boats and Business Services on the 3500 miles of navigable canals and rivers in the UK.)

The comments relate to the Navigation Authority Hirer Safety Review document received on Monday.

1. The Report recognises that data collection is inadequate and/or variable. A priority must be ensuring that the BSS adopts a fit-for-purpose, transparent, robust data collection and analysis system specific to hire craft, upon which future reviews may be more easily based.
2. The separation of technical standards and operating standards and procedures needs to be very clearly defined as being wither the BSS responsibility or the Navigation Authorities' (NA's) responsibility.
3. The policing of the safe operation, and operating procedures, of any hire operator needs to be firmly emphasised as being the NAs' responsibility, and a transparent actionable system needs to be standardised across the country to ensure a safe, level playing field for the hire industry. Onus firmly on NAs – and needs to be strongly emphasised.
4. Regardless of review of any individual technical standard (or ECP as BSS would form these) there needs to be widespread publicity that not only is boating provably (? assuming you accept any of the BSS research!!?) one of the safest DiY leisure pursuits, but hire-boating is the safest form of DiY holiday making in this country. (Perhaps all, especially BMF, should be making huge publicity out of this review!!)
5. The industry is deeply concerned that the solid fuel stoves standards are not to be tightened up (to meet the heavily promoted Code of Practice) to become mandatory on hirecraft in the same way that gas systems are. The industry would strongly support the requirement for fire alarms and CO detectors (once both have been appropriately certificated for marine use) in such craft ONLY.
6. The industry seeks clarification from proper scientific research, resulting in a BSS briefing nte to ALL boat owners, about the safe operation and risks associated with use of diesel heaters. This briefing not to be prejudged until the research data has been circulated and debated both within the industry and BSS committees. It might also be a good idea for proper research to look at all diesel engines and CO. Whilst diesel engines are outboard on narrowboats, they are inboard on plastics.

End of comments.

Regards

BMF representative on BSSAC