



BSS Advisory Committee - Confirmed Notes

BSSAC #85, 25 FEBRUARY 2014, CRT OFFICES, HATTON

Present:

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

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

Co-opted & Others:

BSS Manager

Apologies:

AINA
BMF3 - Canal-based Comm. Interests
EA

85.1 Apologies and introductions

85.1.1 Apologies were noted as listed above. Members welcomed new CRT rep.

The Chair expressed disappointment at the lack of EA and AINA navigation authority reps at the meeting.

85.2 Notes of BSSAC meeting #84

85.2.1 **Accuracy of the Confirmed notes of the BSSAC meeting #84** - confirmed notes [*Doc H2, BSSAC #84*] were accepted as an accurate record, subject to one alteration as below:

84.7.8 (amend the first sentence as follows) – The YDSA rep said that on the examiner's Salesforce website 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 can't tell which BSS invoices are paid and which aren't and he requested that those invoices that are paid should be highlighted as such.

BSS
Secretariat

85.2.2 **Matters arising from the Confirmed notes of BSSAC meeting #84 [Not covered on the agenda] –**

84.2.3 – hard to reach' boaters – the RBOA rep reported that RBOA had a Benefits Officer. She reported that the planned meeting on the subject with CRT's Head of Boating had yet to take place and that she would raise it again at the next CRT Navigation Advisory Group (NAG) meeting. The context of the planned meeting is the concept of waterway staff supplying appropriate safety information to those 'vulnerable' and 'hard to reach' boaters who could be at risk from CO poisoning or boat fire.

The IWA and IIMS reps reported an increasing trend towards private boats being let out to tenants. It was reported that NABO had approached CRT with a challenge to formulate its procedures and policy relating to vulnerable boaters.

The Chair said that members have a general concern in this area but that it falls distinctly outside the remit of the BSS, albeit that it could reasonably form the subject matter of a BSS media release on the risks involved to those who are borrowing/renting boats.

- 85.2.3 *84.7.10 – ‘blue copy’ BSS certificates* - The RBOA rep reported that the CRT licensing paperwork that goes out with the out-of-date wording referring to the old blue-copy BSS certificate will be corrected from March, according to CRT’s Marketing Director.
- 85.2.4 *84.2.4 - hirer safety review and the ‘no barrier to trade’ rule of the RCD* – in response to the request for clarity from the BMF1 rep, the BSS Manager put up on the screen the advice received from Trading Standards; the context is the ability of the BSS to impose additional requirements beyond those of the RCD:
- The BSS Hire Scheme would be an in use measure. I cannot foresee any problems provided the BSS scheme for hire craft does not require changes to a craft which goes beyond the essential requirements laid down in the RCR.*
- In my view the main consideration is that hire operators supply a "safe product" to consumers under the General Product Safety Regulations 2005.*
- Not everyone will be a seasoned boater and the hire operator has a duty to protect a consumer against potential hazards and provide information and labelling.*
- There are other schemes which involve CE marked goods. The MCA scheme lays down safety equipment levels and information to be provided for Charter Craft in given operational areas.*
- Tool Hire Trade Associations operate a code of practice with regards the equipment maintenance, advice on how to use it and provision of PPE.*
- The RYA1 rep reported that the General Product Safety Regulations are going to be replaced at some point reasonably soon.
- 85.2.5 *84.2.5 - the committee members’ website* - The BSS Manager reported that no further progress had been made and that the planned engagement with BSSAC volunteers to support the general use of the site is delayed and is awaiting the development of a progress-charting tool. In the strategy document, the plan is to have the facility available to trial by the end of June; the aim remains to keep the web facility simple to use.
- 85.2.6 *84.7.4 - the benefits of Salesforce* – members were very happy with *Doc H2 – the benefits of implementing Salesforce* as a full answer to the query raised by the AWCC rep at the previous meeting.
- 85.2.7 *84.9.5 - understanding the risk from CO emissions from diesel appliances/engines* – The BMF1 rep reported that efforts to identify a consultant to help with the BSS/BMF task has identified relevant contacts, but confirmation is needed as to whether they are available to support the work and at what cost.

BSS
Manager

85.3 **To note actions arising from the BSSMC**

- 85.3.1 The BSS Manager reported the following as agreed at the BSSMC meeting:
- The price of BSS certification has been held and is planned to remain the same for a further four years - representing eight years without an increase.
 - The cost of BSS Examiner annual registration fee has been reduced from £152 to £102, reflecting a proportion of the benefits from efficiencies gained by examiners engaging with Salesforce V5.
- 85.3.2 The BSSAC Chair referred to the debate at the meeting concerning the hire industry’s strong feeling of being let down as far as the CRT and EA waterways are concerned, by the lack of operational policing of hire companies and the mixed messages coming out from various CRT staff on this subject in the context of the ongoing Hirer Safety Review, some of which indicating that no enforcement is planned. It was made clear at BSSMC that CRT would speak with one voice and that proportionate compliance measures would be an outcome of the review, albeit that individual navigation authorities may choose to adopt their own measures in support of their duties and they will publish their enforcement policy. Although the cost implications are still being debated, it was raised that the industry felt that it was already, paying for this service, within the current licence/registration fees.
- It is anticipated that at the next BSSMC meeting, a credible and proportionate enforcement plan will be presented.

- 85.3.3 A short debate was had concerning BSS finances where it was clarified that:
- concerning the planned surpluses over the coming 4 years of the business plan, these are not only premises and office cost savings but are relevant to around 60 sub-headings and reflect a cost reduction in in many areas.
 - it was also confirmed that any surpluses will be used to support inland waterways safety initiatives, however it is likely with subjects such as CO safety that the activity will have a positive safety impact for all UK boaters.
 - concerning the professional fees which represent about half of BSS overall costs, it was reported that these are made up of three elements, IT support fees, quality assurance items such as field assessments or re-examinations and support for technical projects.

85.4 Nominations for BSSAC Chair's position

85.4.1 *Supporting Document: - None - BSSAC Terms of Reference apply*

85.4.2 *Context – on an annual basis the election of the Chairman will be decided by those full members present at the BSSAC meeting*

85.4.3 The BSSAC Chair was thanked for his work in the past year. With the chairmanship temporarily resting with the BSS Manager, nominations for BSSAC Chair's position were sought and none were forthcoming. The position of the current Chair to remain in post for at least another year was ratified unanimously.

85.5. Review of BSSAC membership and membership types -

85.5.1 *Support paper - BSSAC Terms of Reference apply. Current BSSAC membership list provided [Doc I1, BSSAC #85]*

85.5.2 *Context – The BSSAC reviews the membership and membership types annually. This review is subject to ratification by the BSSMC.*

84.5.3 Members considered the membership of the committee in the context of its purpose, as defined in the committee's Terms of Reference. Members considered if anything had changed over the past year that may warrant a BSSAC membership change in support of the BSSAC terms of reference. They also considered if any factor concerning the existing membership organisations suggested that the membership type is no longer appropriate. In general terms members considered that committee membership was fit for purpose.

The following actions were agreed:

- the BMF are to consider their representation at BSSAC to see if it should reflect interests (e.g. boat building or hiring) rather than be based upon waterway classification (i.e. currently, rivers and canals);
- the Broads rep is to seek views from its trade and users as to whether any additional representation at BSSAC may be warranted.

The following recommendations are made to BSSMC:

- a) members did not identify any changed circumstances in the past year to warrant any alteration to the current membership or membership types;
- b) members re-iterated that they considered that the size of the committee is large enough and should not increase.

85.6 BSS Strategy 2014-18, actions affecting the Navigation Authority Agreement

85.6.1 *Support papers –*

- *Actions affecting the NAA agreement [Doc E1, BSSAC #85]*
- *Navigation Authority Agreement Version 1, Issue 1[Doc E2, BSSAC #85]*

85.6.2 *Context – This item seeks BSSAC agreement to the amendment of the Navigation Authority Agreement (NAA) as drawn from the document Draft BSS Strategy 2014-18*

85.6.3 The importance of the NAA was recognised and members had the opportunity to consider whether non-private classes of vessel needed a separate NAA or whether they could be incorporated into the existing NAA. *Doc E1* contained the suggestion that such classes could be incorporated into the NAA and provided suggested text to facilitate this.

Members considered *Docs E1 & E2, BSSMC #85* and agreed the suggestion along with very minor amends incorporated into the documents before both documents are accepted by BSSAC and presented to BSSMC.

BSS
Secretariat

The following amends were agreed:

The BSS requirements concerning non-private classes of boats (~~such as hire boats~~) take account of the users of such classes of boat (~~such as hirers~~) who may not be responsible for the full control of the risks to which they may be subjected. 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 than for privately-owned and privately managed boats, as determined by the application of the BSS Risk Management Process

85.7 Update on the Navigation Authority Hirer Safety Review

85.7.1 *Supporting Document: - verbal report only*

85.7.2 *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.*

- 85.7.3 Members received a verbal update of the status of the project along the following lines:
- Organisational views are sought and any contentions requested to be made clear by the end of March. The BMF1 rep reported some organisational concerns with some of the recommendations and said that these would be provided in advance of planned navigation authority meeting on 7 March.
 - We are at Stage 2 of the Hirer Safety Review whereby navigation authority proposals are being developed.
 - Some of Stage 1 (Risk review) is still being completed, in particular the supporting risk review and assessment papers are being finalised and these are important to support the final versions of any proposed amended BSS hire boat requirements for public consultation.
 - Following the agreement at BSSMC in December – it was decided that, through AINA, the BSS Office should facilitate bringing together the navigation authority reaction to the initial recommendations and formulating an action plan. The BSS consultant is managing the process.
 - The consultant made telephone contact to establish full NA contact list to ensure that they are familiar with the 'Initial Recommendations' report and to encourage them to respond to an imminent questionnaire designed to capture their feedback on each recommendation.
 - The consultant's survey went to 46 NA individual staff members representing 20 different navigation authorities (including 5 BA staff, 9 CRT staff and 4 EA staff but including the entire AINA list of members)
 - The reaction to the 'Initial Recommendations' was very favourable with nearly 100% support for each initial recommendation.
 - A meeting is planned for 7 March at which NA reps will draw out the actions associated against each recommendation and place a timescale against achieving each.
 - The outcomes of this meeting will be reported in brief at the forthcoming BSSMC meeting on 17 March.
 - It is likely that the ownership of the project and in particular the operational, stability & enforcement aspects will move to AINA. BSS committees will continue to refine the draft new BSS hire boat checks in readiness for public consultation.

85.7.4 The BSSTC Chair requested BSSTC members have sight of the draft amended hire boat Examination Checking Procedures (ECPs) and the associated finalised risk review and assessment papers as soon as possible. The papers supporting the seven new hire boat checks are being prioritised.

BSS
Manager

He said that he wouldn't want to see the draft ECPs going out for public consultation until both BSSTC and BSSAC had agreed them.

The BSS Manager said that these would be made available within the next 3 to 4 weeks to BSSTC members.

85.7.5 The RYA1 rep expressed some discomfort with the current definition of hire boat within the Hire Boat Code and wondered if the definition of pleasure vessels within MCA rules may be the way to go. He also referred to the influence of MCA document MGN 489, which sets out regulations for craft on categorised or non-categorised waters including what are referred to as Class X11 exemptions.

85.7.6 The BSSAC Chair said that he wished the June BSSAC meeting should be used to review the draft BSS hire boat ECPs.

The BSS Manager said that the new BSS hire boat checks must be seen in the context of the multi-faceted approach between licensing conditions that will influence policing, handover and stability requirements and may determine where/how BSS requirements interact. He said that he saw it all moving forward as quickly as it could be expected to appear.

85.7.7 Members were shown a table of hire boats incidents from the year 2013, in support of this agenda item and in lieu of the fact that the quarterly/annual incident report did not contain such a table as decided upon at the last meeting. It was appreciated that around 90% of the listed incidents appeared to be operating error as opposed to a failure of the equipment,

It was agreed that the paper will be attached to the notes for members to gain a detailed appreciation of the raw data.

BSS
Secretariat

85.7.8 The Chair invited the BMF1 rep to make comments. The following is a précis. The BSS Manager said that BMF comments would be taken account of during development work:

- a) The BMF1 rep said that by way of an update it was his intention to submit comments prior to this committee meeting but these were not quite ready in time. In general the BMF position regarding the initial recommendations report is that existing controls appear to be proportionate in managing the risk to hirers.
- b) Concerning the initial recommendations considered as refinements to existing controls, BMF believe to a certain degree they might already be covered in the existing frameworks such as RCD.
- c) Concerning the open forum discussions, some of our members found themselves unable to prepare. This is why the BMF letter will go into detail on some points in the initial recommendations.
- d) Concerning the conclusions from the Hirer Safety Review Group, regarding the suggestion for punchy key safety messages and the suggestion for airline style diagrams; BMF don't think these are relevant because airline passengers are in one place and always have these messages available within reach and this situation is not comparable to handover procedures in hire boat operation.
- e) Concerning the conclusions from the hire safety review group to collect better hire incident data. BMF consider that there are some issues that we have to clarify and at the moment we cannot agree to the conclusion. Operators already use visitor incident report forms and they are already part of the handover procedure, and there is a concern, should we require hirers to provide more data that the hirer could not assess what a 'near miss' is. BMF consider that the existing regime that informs the UK through mandatory reporting regulations is appropriate. As such we already have a system in place that identifies possible lapse of technical standards, etc. The final issue, which our members flagged up, is that there is a possibility of infringing data protection issues.

85.7.8
cont/

- f) Concerning the recommendation to have life jackets available in defined circumstances. BMF do not agree with the explanation because the handover scheme sets out requirements. They're already covered by the handover procedure.
- g) Concerning the recommendation to introduce a means of re-boarding in the event of man-overboard, BMF agree with that point, but again using new requirements as a benchmark, there is a man-overboard prevention standard.
- h) Concerning the recommendation to introduce tiller marking. Our committee members so far disagreed with this, because it's covered by the handover.
- i) Concerning the recommendation to introduce servicing of fire extinguishers as a licensing condition. We wouldn't agree that this is necessary as it is already covered to a certain degree by the duty of care requirement, then manufacturer's instructions are stated, and the expiration, and insurance requirements.
- j) Concerning the recommendation to introduce annual appliance and flue safety checks under the gas safety regulations as a licensing condition. The recommendation is in line with current landlord and tenant requirements, therefore BMF see this already covered by the latter.
- k) Concerning the recommendation to introduce alarms. There is agreement in principle, but BMF would require or ask for further clarification. Firstly, possibly it should be only a requirement where solid fuel stores are installed. If we use CO detectors they shall be suitable for a marine environment, and reliable.
- l) Concerning the recommendation to better control the risk of capsize and sinking. There is agreement in principle, however, we need to understand the software which is under discussion as demonstrated, that it will deliver accurate results for the boat in scope and accepted as a valid test and whether the software will be free of charge
- m) Concerning the recommendation for spot checks, BMF support would be for spot checks in the case of complaints. The question that has been asked in addition to that is, who would pay for spot checks.
- n) Concerning the requirement for the weed hatch cover to be at least 150 millimetres above the normal waterline, there appears to be a product or a manufacturer that has a watertight compartment up to deck level, however the weed hatch cover itself is at the waterline, and as such would infringe on this requirement but these arrangements should be allowed.
- o) Concerning the new seven BSS requirements the general feeling is that they are sensible, but again, should apply possibly to all boats including private boats.
- p) Concerning the recommendation for battery isolators, to label each isolator, for example starter and services. The BMF members ask a question as to what we want a hirer to do in an emergency, and possibly playing around with the switching even in the event of fire wouldn't be advisable as it could delay escape.
- q) Concerning the recommendation for emergency escapes to be labelled where they are not obvious, and for crew area decks to be provided with slip resistant surfaces, again, there is general agreement and BMF would wish to use the RCD compliance as a benchmark for new boats, and the requirement set in ISO 15085.
- r) Concerning the recommendation for providing a bilge pump and bucket or bailer, that is already possibly included in some licensing requirements, but we would ask the question whether we want to recommend to use those if the boat is sinking when we should be recommend hirers to get off the boat.
- s) Concerning the recommendation for the provision of crew area designation and displaying the maximum number of persons allowed on the roof, this requirement would be directly linked to the stability of freeboard test results. We would point to handover, which already includes guidance not to access the roof and so the label is not necessary.

85.7.9 The Chair referred to the apparent reluctance, where solid fuel stoves were fitted into hire craft, that they should be installed with immediate effect essentially, to the current code of practice.

The BSS Manager agreed that the question was equally relevant to private craft and the answer will be established over time and probably not in time for this review.

85.8 Report from BSSTC Chair

85.8.1 *Support paper –*

- *Report from BSSTC Chair for BSSAC [Doc G1, BSSAC #85]*
- *LPG Training and Assessment for BSS examiners [Doc G2, BSSAC #85]*

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

85.8.3 *BSSTC Terms of Reference (ToR)* – Referring to *Doc G1*, the BSSTC Chair reported that an initial draft of the BSSTC ToR is about to be shared with BSSTC members, together with a separate 'members' code' draft.

The approach is based upon initial discussions at the last BSSTC meeting and as developed through a Sub-group of BSSTC. The drafts reflect the approach taken by BSI concerning its committee members, specifically drawn from sections 7 & 8 of BS 0.

Members will confirm the recommended draft at the BSSTC meeting scheduled for 22 April 2014 for consideration by BSSMC.

85.8.4 *Hirer safety review* – the BSSTC Chair said that he had already raised his views but emphasised that he wanted to see the seven new BSS hire checks in draft form very soon. He recognised that the supporting risk review documents are important to ensure recommendations are made on a sound basis.

85.8.5 *LPG issues* - the BSSTC Chair referred to *Doc G2, BSSAC #85* on the agenda that sets out proposals for all examiners to undergo LPG training during 2015. The competing risk issues are complex and BSSAC members are asked to help determine the way forward.

85.8.6 *Amendment to the RCD* - the BSSTC Chair referred to the amended Directive that has transposition period of two years and includes a change to the exemption concerning boats built for own use, it was agreed to keep a watching brief to see if the changed words lead to actual changes in the UK enforcement policy through Trading Standards.

Also included is a requirement for boats to have a means of re-boarding that shall be accessible to or deployable by a person in the water unaided.

There is also a new "killcord" essential requirement for tiller steered outboard engines. The BMF1 Rep clarified that it is not only the RCD which covers this for outboard engines but also the machinery directive. Machinery directive has an emergency cut off requirement, which applies to all other types of boat engine.

85.8.7 The Chair invited the BSS Manager to present *Doc G2* concerning LPG Training and Assessment for BSS examiners. The BSS Manager introduced the subject by saying that *Doc G2* sets out the plan, and the threats to the plan. The intention was to offload the information to BSSAC so that members have an understanding of the situation, and support us in achieving what we intend to do, or comment otherwise.

In general the plan was received in a neutral way, the following comments were recorded:

- a) The IMarEST rep said there was a reluctance for Gas Safe registered examiners to go on the proposed training course next year. The ABSE rep endorsed the comment. The BSS Manager responded that there are likely to be new test procedures that need to be trained to and assessed to and although BSS Office haven't ruled out a lesser course for Gas Safe registered examiners, the likelihood is that there will be a requirement to go on it. The Chair said that the concerns are noted but that this was currently a matter between the practitioner bodies and the BSS Office and that it can come back to BSSAC if there is contention.
- b) The AWCC rep said that the comparative testing should look at the range of products from the range of manufacturers and not just focus on one product.

85.9 Quarterly update on the progress of the BSS IT project

85.9.1 *Support paper –*

- *Quarterly IT Update [Doc H1, BSSAC #85]*
- *The benefits of implementing Salesforce [Doc H2, BSSAC #85]*

85.9.2 *Context – standing item – a routine quarterly report by the BSS Quality and Technical Manager.*

85.9.3 The Chair introduced quarterly report *Doc H1* and requested it be taken as read unless there are any comments.

The BSS Quality and Technical Manager drew attention to the fact that this is the last meeting where the BSS Office will produce an IT and quality report separately. In future meetings there will be a report that will absorb the IT and quality into one document, which will be a core-process based report.

85.9.4 The BSS Manager, referring to page one of *Doc H1*, emphasised how keen the BSS Office were to reform the BSS IT 2 sub-group to conduct a review of the implementation of Salesforce V5, one year in. He said that we introduced something really significant last April and there are refinements, and collected ideas that we'd like to introduce. The group is made up of the RBOA rep, a stand-in for the ABSE rep and the BSS Quality and Technical Manager and the BSS Communications Manager. The RBOA rep agreed her involvement.

85.9.5 No further comments were made concerning the benefits of implementing Salesforce [*Doc H2, BSSAC #85*]- see 85.2.6 above

85.10 Quarterly update on BSS quality management

85.10.1 *Support paper – Quarterly quality management report [Doc J1 BSSAC #85]*

85.10.2 *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.*

85.10.3 The Chair introduced quarterly report *Doc J1* and requested it be taken as read unless there are any comments.

The BSS Manager pointed to the quality management plan end of the document. He said that this is the first time one of these quality improvements has been listed and as with the incident activity the list is quite demanding. One in particular is the plan to train, in a sense, committee members to the risk assessment process. The plan would be for a two hour presentation with Mike Barrett leading the presentation.

It was agreed that BSSAC members can self-select for the half a day training that can take place around the third week of September.

BSS
Secretariat

85.11 Report from the BSS Manager

85.11.1 Supporting Documents –

- *Annual report of incidents and accidents recorded, inferences drawn and planned BSS risk-activity for 2014 [Doc F1, BSSAC #85];*
- *Annual report against planned BSS risk-activity for 2013 [Doc F2, BSSAC #85].*

85.11.2 Context – standing item and annual reports for careful consideration

85.11.3 The BSS Chair invited the BSS Manager to introduce the reports. The BSS Manager indicated that it is pretty much the same pattern as previous years, albeit that the report has the highest number ever of reported incidents. That could be as a result of more incidents being reported. He said the report has the highest proportion where the cause is not known, which proves that we're not getting the quality of data that we need to draw conclusions from.

85.11.4 The AWCC rep said that as regards CO, he thought we are burying our heads in the sand and we should insist that CO alarms are fitted to every boat.

85.11.5 The BSS Manager referring to 3.4 [*Doc F1*] said the MAIB 'recommendations meeting' concerning the Lake Windermere double fatality last Easter is to take place with relevant organisations shortly. He said the published recommendations in the next few weeks will be bound to fuel interest in the CO on boats subject once again.

85.11.6 The Chair raised a question regarding the provision of ventilation through, around and on canopies or tarpaulins. It was generally agreed that spaces containing appliances requiring ventilation and covered by a canopy would need ventilation and that canopy makers are used to providing them. He asked if we have any recorded incidents concerning these circumstances and the RBOA rep said she knew of one involving fumes from the battery charging, which she reminded members she had reported to a previous meeting.

85.11.7 The BSS Chair invited the BSS Manager to introduce the *Doc F2*. The BSS Manager reported the BSS normally achieves around 80% of the activity it sets to achieve in any one year but that in 2013 we achieved around 70% of the plan. That could be down to a number of factors. Concerning some items on the plan, they were being led by the expectation of evidence that did not appear and so the activity is captured in this year's plan.

85.11.8 Recognising that it is not the only way we are trying to communicate, the AWCC rep pointed out that there are a lot of references in *Doc F2* to Twitter. He said that a good part of the boating community is over 60 and are not on Twitter and are not likely to be.

85.12 Items for BSSMC

85.12.1 No specific items beyond the Hirer Safety Review.

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

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

#86 - Tuesday 10 June, #87 - Tuesday 18 November

85.14 Any other business [AOB]

85.14.1 The RBOA rep suggested that BSS Office should test CRT concerning the potential benefit in terms of 'match-funding' and other charitable benefits that could be accrued through the voluntary hours given to BSSAC/TC/MC by non-staff members.

BSS
Secretariat

85.14.2 The ABSE rep raised concerns about a price war between two examiners, bringing down the cost of BSS examinations in the north Norfolk area to uneconomic levels and the potential that this may affect the quality of BSS examinations locally. It was re-iterated that it is the quality of BSS examinations that is the focus of the BSS and not pricing arrangements.