

FROM THE CHAIRMAN OF THE INTERNATIONAL REGULATIONS COMMISSION.

This report covers the main points arising from the IR Commission meeting held on 07 Nov 15. The minutes will follow in due course.

1. Submissions

(a) To note submission 006-15 from the Hellenic Sailing Federation regarding the creation of a "Sustainability in Sailing Commission".

IR was unclear how the proposed Commission activities would impact on ISAF and Events or what form the proposed sustainability classification system for regattas, boats and equipment would take or how it would be facilitated and proliferated. Until this is made clear the IR could not support the submission.

(b) To note submissions 198-15 from the Chairman of the Racing Rules Committee regarding Racing Rule 48.1 – Fog Signals and Lights.

IR took the view that an interpretation in the rule that may be different from the IRPCAS was not desirable and supported the submission.

2. International Maritime Organization

In the reporting period ISAF together with other NGOs was asked to produce a report to justify its NGO status at IMO. ISAF was asked to state its interest in and contribution to the work of the relevant bodies of IMO in the past biennium and how it disseminates information on and promotes the work of the Organization to its membership and/or beyond.

The ISAF response which can be read in paper IR_4(a)_ISAF Report to IMO 2015 and was well received by IMO.

Reports from IMO meetings attended by the Chairman and ISAF representatives since the last meeting of the International Regulations Commission:

a) Marine Environment Protection Committee (MEPC) 67: 13 – 17 October 2014

MEPC continues to concern itself with the spread of harmful aquatic organisms in ballast water, reduction in greenhouse gas emissions from ships, air pollution and energy efficiency. These issues currently only concern convention shipping, but the spread of harmful aquatic organisms is becoming a matter of considerable concern at the moment in the European Community and this will continue to be monitored.

b) Maritime Safety Committee (MSC) 94: 12 – 21 November 2014

MSC continues to discuss measures to enhance maritime security and is concerned that the situation is not helped by the lack of proper implementation of IMO's maritime security measures, as contained in SOLAS chapter XI-2 and the ISPS Code.

Passenger ship safety continues to feature strongly on the agenda following the Costa Concordia incident and IMO agreed to delete the word "interim" when next revising the

circular *Interim measures for passenger ship companies to enhance the safety of passenger ships*.

Otherwise the work programme for MSC contains little of ISAF concern at the present.

c) Sub-Committee Navigation, Communications, Search and Rescue (NCSR) 2: 9 – 13 March 2015.

This was the second session of this new committee and is possibly of most interest to ISAF.

Agenda items included caveats on the recognition of Galileo as a component of the WWRNS, analysis of developments in maritime radiocommunication systems and technology, re-establishment of the Correspondence Group on the Review of the GMDSS, under the coordination of the United States and an analysis of information on developments in INMARSAT and COSPAS-SARSAT including the use of 121.5MHz as a homing signal which IMO is keen to protect.

NCSR3 has been had been tentatively scheduled to take place from 29 February to 4 March 2016. The proposed provisional agenda for NCSR 3 will include the following:

- SAR matters;
- Routeing measures and mandatory ship reporting systems;
- Recognition of Galileo as a component of the WWRNS;
- Updates to the LRIT system;
- Recognition of the Iridium mobile satellite system as a GMDSS service provider;
- Amend performance standards, as necessary, to allow for interconnection of NAVTEX and Inmarsat SafetyNET receivers and their display on Integrated Navigation Display Systems;
- GMDSS Review;
- Revision of the SafetyNET and NAVTEX Manuals;

d) Marine Environment Protection Committee (MEPC) 68: 11 – 15 May 2015

The only additional agenda item for this session of MEPC was a review of nitrogen and phosphorous removal standards in the 2012 Guidelines on the implementation of effluent standards and performance tests for sewage treatment plants

This is of interest as the treatment and discharge prevention of sewage from small craft is now included in the European Recreational Craft Directive.

e) Maritime Safety Committee (MSC) 94: 03 – 12 June 2015.

The only new agenda item for this session was the periodic servicing and maintenance of lifeboats and rescue boats, launching appliances and release gear and the development of requirements for onboard lifting appliances and winches. This attracted considerable discussion but it was finally agreed that no specific action or amendment was needed on the scope of application of the LSA Code.

3. Piracy.

The most recent published ISAF Guidance is at: www.sailing.org/piracy

Chairman IR met with the Maritime Security Centre for the Horn of Africa (MSCHOA) in early September 2015 to receive a briefing on the current situation in order to update the guidance document, MSCHOA have agreed to do that and it is hoped to receive the updated guidance imminently. However, the fundamental advice has not changed i.e. do not voyage through the Gulf of Aden or Somali Basin.

4. International Standards Organization Technical Committee 188

ISO TC 188 is the recreational boating industry's main forum to develop standards for small craft to 24m length of hull. In addition to developing new standards, there is an increasing trend to revise published standards. The OSR invoke several International Standards relating to safety equipment on-board a yacht, personal equipment and yacht structure and stability. For reference, the following ISO and EN standards (or draft standards) are referenced in OSR:

ISO standard	Subject	Special Regulation No.
8729-1	marine radar reflectors	4.10
8729-2	marine radar reflectors	4.10
9650	liferafts	Appendix A Part II
11812	watertight & quick draining cockpits	3.09
12401	deck safety harness (also published as EN 1095)	5.02
12402	Personal Flotation Devices	5.01
12215	hull construction standards	3.03
12217-2	assessment of stability and buoyancy	3.04.4, 3.05
15085	guardlines (lifelines) trampolines, nets, stanchions, hooking points	3.14, 3.15
17339	sea anchors	4.27

EN standard	Subject	Special Regulation No.
394,399	lifejacket accessories	5.01
396	lifejackets	5.01
1095	deck safety harness (also published as ISO 12401)	5.02
1913-1-3	immersion suits	5.07

Part 2 of the stability standard – ISO 12217 – has now been amended to remove errors that were identified following publication and it has been harmonised for compliance with the EU Recreational Craft Directive.

The scantling standard series – ISO 12215 – consist of 10 parts most are due for systematic review during 2017. Part 7: Scantling determination of multihulls and Part 10: Rig loads and attachments are still in draft and are now behind the drafting schedule. Chairman IR is attending a Working Group meeting for these two standards in the early part of Nov 15. ISAF use of ISO12215 and the

requirement for plan review of offshore yachts by notified bodies, it is important therefore that the quality of these standards is maintained and attempts to dumb them down must be resisted.

ISO 15085:2003 – The redraft of the man overboard prevention and recovery has been abandoned in favour of an amendment to include the requirement for a means of reboarding shall be accessible to or deployable by a person in the water unaided.

The following additional ISO standards are also worth noting:

- ISO 12402–6. ISAF has successfully argued its case for an Offshore Sailing Lifejacket to be recognised as an enhanced use lifejacket and to be included in Part 6 of the lifejacket standard. This remains but the review of this part is now behind schedule.
- ISO 19009 is a new standard covering the performance of LED navigation lights; this will remove the uncertainty of compliance with the COLREGs.

5. EU Recreational Craft Directive.

The new RCD (Directive 2013/53/EC) was published on 28 December 2013 and must be transposed into EU member state legislation by 18 January 2016. ISO (TC) 188 is responsible for a number of standards that will have to be reviewed to meet the changes in the new RCD Legal Requirements which must be met if a watercraft is to be put into service in the EU. The major changes are:

a) **View from the helm.** The new RCD now states that the main steering position on all craft including sailing craft shall give the operator, under normal conditions of use (speed and load), good all-round visibility on all craft. Previously this was restricted to engine driven craft.

The Revision of ISO 11591 is proving difficult to accommodate this change and work to redraft something that is sensible and pragmatic is still under way.

b) **Man overboard.** The new RCD now requires that a means of reboarding shall be accessible to or deployable by a person in the water unaided.

This was going to be implemented through a complete revision of ISO 15085 but that has now been abandoned. As an alternative an amendment has been submitted for enquiry that deals simply with amending clause 16 of the current standard which deals with means of reboarding.

d) **Boat design categories.** It is clear now that the amendments to wind force for Category A which now excludes abnormal conditions from F10 upwards was as the result of deliberate consideration by the committee responsible for progressing the RCD through the European Parliament. However, significant wave height exceeding 4 metres remains unchanged and is possibly the dominant factor in calculating stability and structural requirements. ISO 12217 still sets the significant wave height at 7m for the purposes of calculation.

e) **Buoyancy and flotation of multihulls.** All habitable multihull recreational craft susceptible of inversion must have sufficient buoyancy to remain afloat in the inverted position.

f) **Escape from inverted multihulls.** All habitable multihull recreational craft susceptible of inversion must be provided with viable means of escape in the event of inversion. Where there is a means of escape provided for use in the inverted position, it must not compromise the structure, the stability or buoyancy whether the recreational craft is upright or inverted.

6. Regulatory Information from EU

There are a number of Directives and Regulations in the EU that have an impact recreational boating.

The EU Invasive Alien Species Regulation is designed to identify a number of particularly harmful invasive species and ensure that EU member states take action to eradicate them. Clearly one of the ways that recreational boats can assist in preventing the spread of invasive species is to apply effective antifouling or to wash boats off thoroughly at the end of their use (trailer craft for example). However, the biocide directive is making it difficult to formulate effective antifouling coatings as the biocides are under threat of being banned, and the Water Framework Directive is imposing considerable restrictions on boat wash down because of contaminated run off.

There are plans for extensive Wind Farms in the North Sea. However, as yet each European country sets its own rules for sailing through them. This is both confusing and dangerous and the European Boating Association is trying to reach consensus on the issue.

Stuart Carruthers

09 Nov 15