

FORMAL SUBMISSION TO BOAT SAFETY SCHEME REVIEW**3 Introduction**

The National Association of Boat Owners (NABO) wishes to stress that this submission has
 5 been compiled in response to an invitation circulated by the Boat Safety Scheme Review
 Team by letter dated 1 August 2000. In view of the time period for consultation coinciding
 7 with the peak of the holiday season and absence of meetings of the NABO Council, we have
 been constrained in the presentation and content of this submission. In order to do justice to
 9 the review, and to address the detailed concerns of our members and boat owners in general,
 we would have wished to produce a point-by-point critique of the entire Boat Safety Scheme
 11 and its accompanying standards. This approach was not possible in the time available to us,
 and we reserve the right to submit further views and comments at a later stage in the review
 13 process.

Overview

15 NABO has never opposed the principle of a boat safety scheme designed to create a safe
 boating environment, but it must be applied in a manner commensurate with the known risks
 17 and should not impose unreasonable excessive costs on boat owners. (See Appendix for
 NABO Policy Statement dated 1996).

19

The Boat Safety Scheme as developed by BW / EA has proved to be a cumbersome and
 21 expensive scheme since its formal introduction in 1997. NABO is the only organisation to
 have canvassed its members to ascertain precisely what compliance with the BSS actually
 23 cost in individual cases. This has indicated that some boat owners have had to expend
 considerable amounts of money to modify their craft in order to comply with the many
 25 requirements of the scheme.

<i>Year of BSC Examination</i>	<i>Average Cost to Comply £</i>
27 1995	194
1996	378
29 1997	432
1998	446
31 1999	481

Our records indicate that a considerable number of owners have had to expend sums
 33 exceeding £1000 in order to render their craft compliant with the scheme.

The BSS 'spin doctors' stress that 45,000 Pass certificates have been issued, but they play
 35 down the fact that nearly 20,000 Failure certificates have been issued to date.

37 The above costs and statistics refute the assertions of the promoters of the BSS who stated
39 that few boats were expected to fail the examination. Furthermore, the overall failure rate in
excess of 40%, as reported by the scheme manager, demonstrates that the scheme cannot be
readily complied with.

41 The complexity and cost of the BSS is the overwhelming reason stated by our members for
giving up boating or selling their craft. No other subject has angered boat owners to such an
extent and this has culminated in the request from all the major boating associations and
43 bodies for the current review.

NABO is concerned about the apparent lack of consistency between individual BSS
45 examiners and surveyors. The scheme has now been in operation for more than 4 years and
many craft are now facing their 4-yearly re-examination - and our experience to date
47 demonstrates that many boats which passed 4 years ago will fail when next examined despite
having no modifications carried out, notwithstanding changes to some of the standards.

49 When the BW General Powers Bill (now the BW Act 1995) was passing through Parliament
it was stated by BW that the proposed Boat Safety Scheme would be like an MOT test for
51 boats. The BSS examination is not like an MOT Test; it requires owners to prepare their craft
for examination; it takes considerably longer than an MOT test; it costs a lot more; and is
53 applied to craft of diverse designs and specifications, unlike cars which are constructed to
uniform construction regulations.

55 Also (most importantly), unlike the MOT Test, the BSS is retrospective. This means that
many older craft cannot pass without (expensive) modifications. The MOT test is not
57 retrospective (apart from exceptional rear light and seat belt requirements) and a car of any
age can pass the test without undue difficulty.

59 The result of 4 years' application of the BSS has revealed that the scheme is unsatisfactory in
a number of important respects and that all the major boating organisations have formed the
61 joint view that the scheme cannot continue in its present format.

- 63 ♦ The scheme should set out, in a simple format, the consolidated expectations of the
navigation authorities relating to boats.
- 65 ♦ The existing standards are NOT "standards" since they rely in turn on other published
technical documents.
- 67 ♦ Furthermore, the booklet given to boat owners requires the examination of a massive
and unwieldy Technical Manual in order to make sense of the requirements. This is a
fundamental flaw of the scheme. it is far too complex and not readily understood by the
69 average boat owner.
- 71 ♦ From our experience of the results of examinations, examiners do not apply the
complex rules in a uniform manner and surveyors who have greater experience tend to
use more judgement when examining craft. A BSS examination is a matter of chance
73 for many owners who do not know if their craft will pass before the event.

The review team should investigate what rules and regulations other countries apply to
75 pleasure craft. The regime in the USA is not harsh - the US Coastguard apply a few simple
regulations to regulate the millions of pleasure craft in use. The Irish Republic is positively
77 encouraging more pleasure craft on its inland waterways but does not have or intend to have

a Boat Safety Scheme. To our knowledge, no such scheme exists anywhere else in the world
79 and it is unwarranted in the UK.

The present scheme has proved to be too complex, far too bureaucratic and is threatening to
81 become a financial burden to boat owners, not to mention BW and the EA who are each
faced with subsidising the scheme for the foreseeable future. (Refer to Business Plan).

83 Whilst NABO takes the view that little can be achieved by raking over the past problems
which arose as the scheme developed, we are equally convinced that the scheme will have to
85 be extensively modified if it is to be acceptable to boat owners.

Risk Assessment

87 One of the major failings of the BSS is that it was introduced without statistical information
being available to identify the true level of dangers which existed in the pleasure boating
89 arena.

True, there were recorded incidents of fires, explosions, etc - many of them involving hire
91 craft which, theoretically, had complied with earlier construction standards for many years!

Other incidents had involved petrol engines and LPG installations but the "problem" was so
93 insignificant that the Home Office had no meaningful statistics on the subject. Even BW
struggled during the House of Lords Select Committee and produced vivid pictures of a
95 boatyard fire which had taken place on the River Thames in the 1930's and another image of
an offshore power boat ablaze in the Solent. Evocative images, but not representative of the
97 perils of boating on inland waterways.

The BSS should not be based on assumptions of risk or the application of existing domestic
99 or automotive legislation. The scheme should be based on the application of recognised Risk
Management techniques - using the principle of ALARP - applying rules which ensure that
101 risk is **As Low As Reasonably Practicable**.

Any scheme must be reasonable and not require extensive or expensive alterations to existing
103 boats because of a theoretical, but as yet unproven, risk.

The administrators and architects of the BSS need to understand that boats are not built to a
105 common design. The variety is part of their appeal. If they were all identical our waterways
would be a dull and boring sight. Not all craft were built to the same degree of refinement or
107 specification. Many older craft were built before modern day standards were the norm.

The BSS should recognise that older craft are not inherently less safe simply because they
109 have been built to a different, sometimes lower build standard, than would be acceptable
today.

111 The degree of risk which boats present to the safety of their users and the public at large
should be reflected in the insurance premiums charged by marine insurers. Most boat owners
113 insure their craft on a comprehensive basis and premiums of approximately 0.5 per cent of
insured value are typical. The premiums rarely, if ever, increase although craft used at sea are
115 usually more expensive to insure due to external marine hazards.

NABO is not aware of any general trend towards lower insurance premiums, as a result of the 117 BSS, which would reflect improved safety and fewer claims from owners of pleasure boats.

We also understand that coastal craft have not suffered from increased premiums as a result 119 of inland craft becoming a lower risk for insurers. We also know of no request by insurers for coastal craft to become subject to BSS examinations despite there being many thousands of 121 craft berthed in close proximity in marinas around the coast.

NABO considers that the opinion (with evidence) of marine insurers and Fire Service and 123 RoSPA forensic experts should be sought regarding risks prior to amending the present scheme with a view to reducing the scope of its requirements. A comprehensive risk 125 assessment should be carried out relating to each & every item covered by the BSS.

Recreational Craft Directive

127 NABO has become aware over recent years that there are two classes of boat on our inland waterways - those older craft which pre-date the introduction of the RCD, and more modern 129 craft which bear "CE" marks indicating compliance with the RCD since June 1998.

A cursory examination of RCD-compliant craft reveals various construction techniques and 131 specifications of equipment which would represent failures if examined on older craft.

The RCD imposes 10 Essential Safety Requirements (ESR's) and few of these have mandated 133 Standards. On the contrary, it is the responsibility of boat builders to demonstrate that the ESRs have been complied with. This approach is not dissimilar to UK safety practice where 135 legislation generally specifies WHAT is to be achieved rather than HOW something must be done. The BSS standards are prescriptive and seek to impose uniformity of construction 137 instead of principles of safety. They preclude the introduction of innovative developments such as LPG conversions of petrol engines. These dual fuel systems have gained in popularity 139 around the coast but are not permitted under the BSS regime.

NABO considers that it is fundamental to the operation of any boat safety scheme, which is 141 based on published standards, that all craft must be able to comply and be seen to be complying with the BSS. When RCD-compliant craft fall due for a 4-yearly BSS 143 examination, NABO can foresee problems arising when these craft are "failed" under the BSS despite still complying with the RCD.

145 The lack of harmonisation between the BSS and the RCD must be addressed as a priority and the BSS should be re-drafted to conform with European legislation on the basis of 147 subsidiarity.

Non-safety related standards

149 Not all the items within the BSS relate to "safety" - some concern themselves with bilge pumping arrangements and sanitation systems. **These items should be excluded from the 151 BSS.**

Quite perversely, other desirable safety-related items are absent from the BSS. e.g. integrity of the hull, navigation lights, first aid kits, life-jackets, distress signalling, etc. Boat owners are allowed to exercise discretion and are ultimately responsible for the safety of their vessels and their crews. This philosophy should be applied to the scheme as a whole.

Appeals Procedure

The Appeals procedure is intimidating and does not serve the purpose intended. There has been only one completed Appeal to date (concluded in early 1998) and boat owners are discouraged from appealing against specific standards applicable to their craft because they consider that the odds are stacked against them.

The constitution of the Appeals Panel does not instil confidence because its appointed members are not entirely independent of the scheme.

Examiners

When the BSS was launched in 1996 the total number of examiners and surveyors stood at 138. This figure rose to 356 at its peak in 1997. Since then, the total has dropped to a reported 233 in September 2000.

The above statistics indicate that the number of accredited examiners and surveyors has decreased dramatically since its peak after the scheme was introduced. NABO has concerns that the choice of examiners has been reduced and that costs of examinations will increase in future years due to the uneconomic foundation of the scheme. Furthermore, only 2 of the original 7 training establishments continue to offer examiner-training courses due to lack of demand.

Examiners cannot make a living from the scheme and many have already resigned from the scheme, whilst others have been removed by the scheme itself. This does not give boat owners confidence in the operation of the BSS.

It is interesting to note that, of those previous examiners who gave a reason, the greatest number cited the cost of the scheme as the reason for leaving. These costs are ultimately borne by the boat owner.

Boat Safety Certificates

Owners of craft having a current BSC frequently find that their boats fail an examination when they try to sell them or after the new owner has taken possession. This has led to claims against owners from purchasers. NABO knows that the BSC has a warning printed on the reverse but this situation highlights the unsatisfactory nature of the scheme and the inconsistent approach between examiner and surveyors.

185 **Specific problems**

NABO is aware of many problems faced by boat owners wishing to obtain a BSC. Our own 187 questionnaires reveal a wide range of difficulties which owners have faced over the years.

The major topics requiring urgent consideration by the Review Team include the following:-

189 **Diesel spill racks**

Whilst NABO welcomes the recent decision to permit flexible fuel leak off pipework on 191 diesel engines (albeit with an endorsement to the Boat Safety Certificate) this topic epitomises the problems which the BSS has created for boat owners. The real problems faced 193 by owners have been constantly met with intransigence and uncaring bureaucratic responses from the staff at the BSS office. For years no flexibility in their attitude has been forthcoming 195 - no concession for the fact that older engines (and some present day engines) do not comply with the written standards created by the BSS. Boat owners have been put to considerable 197 expense and inconvenience and exposed to the added risk of pipework fracturing, now only to find that the previous rigid ruling has been relaxed, and not before time. A similar attitude 199 existed when the scheme was first introduced in respect of solid conductors and as a result of the arrogance of the administrators of the BSS some boat owners incurred great expense 201 having their vessels re-wired. Thankfully, those who appealed against the standard won their case - at the expense of BW and its licence-paying customers.

203 **LPG Installations**

The recent introduction of revisions to Part 7 of the BSS has caused further consternation to 205 boat owners. Previously acceptable installations are now considered to be "unsafe".

This situation defies comprehension. How can something be considered "safe" in December 207 1999 and yet become "unsafe" in January 2000 on the basis of a form of words?

The involvement of the Health & Safety Executive and application of gas safety rules 209 applicable to other spheres of life should play no part in the BSS. Private boats are not subject to the control of the HSE and do not require CORGI-registered technicians to carry 211 out work on them. NABO deplores the interference of outside bodies with no remit in leisure boating, who seek to exercise control over matters which should not concern them.

213 **Room-sealed LPG appliances**

This is allied to the previous item and has similarly caused great concern to owners of 215 existing craft fitted with appliances such as instantaneous water heaters and gas fridges. It is totally unacceptable for them to be told that they will be unable to replace these items on a 217 like-for-like basis in future. To add insult to injury, the ruling was made in January 2000, at a time when no suitable fridges were even manufactured. Furthermore, alternative types of 219 water heater may be unsuitable for particular boats and require expensive modifications to install them.

221 Householders do NOT have to update gas appliances on a regular basis just because new equipment to a different standard becomes available.

223 **River & sea-going boats on Commercial Waterways**

Commercial boats operating on "Commercial Waterways" are exempt from the provisions of 225 the BSS. NABO considers that all private boats using such waterways should be similarly excluded from the requirements of the scheme.

227 Vessels used on the coast do not require BSS certificates and it is unnecessary for the BSS to apply to them when they are on safer inland waters. Furthermore, it should not be forgotten 229 that the BSS originated from the earlier Pleasure Craft Construction Standards which were based around narrow-boat designs.

231 Boats used exclusively on rivers and the sea are totally different from craft using narrow canals; they face more stressful conditions at sea and the master must always be 233 self-sufficient and totally responsible for the safety of his vessel and crew. Moreover, help is frequently not close at hand and the master of a vessel does not wish to find that BSS 235 requirements have made his vessel less sea-worthy due to an ingress of water through ventilators or in an engine compartment in which he is not permitted to have a bilge pump.

237 The RNLI has established a Safety at Sea campaign with free examinations of boats resulting in recommendations being given to owners before they venture on to open waters. The 239 scheme is not compulsory but it is pragmatic and sensible. There are no complex rule books, sets of standards or a technical manual. Experienced sea-going experts use their own 241 common-sense and judgement to decide whether a boat is safe and fit for the purpose. In general, these points should be taken in context and be adopted in their broadest sense as the 243 base-line for the way in which all boats on rivers should be judged.

NABO's Suggestions for a revised Boat Safety Scheme

245 1. Visiting craft have only to undergo a free "dangerous boat" examination at the point of entry to the waterways. This examines the boat to see that there is no leaking fuel or gas; no 247 damage to electrical cables; and that the boat is not in imminent danger of capsize or sinking. **This simple test should apply to all craft.**

249 2. Other requirements within the published boat safety standards should be **optional**; recommended as good practice but not items on which a boat could fail.

251 3. The BSS should **NOT be retrospective** in its application and should NOT impose new legislation or specifications on existing craft. Any exemptions within the original scheme 253 should apply in perpetuity.

4. If a craft has previously passed a BSS inspection it should not be necessary to have it fully
255 examined unless modified or altered. It should be acceptable for an owner to indicate what, if
any, modifications have been carried out to the craft since it last passed the examination.
257 Thus an unmodified craft would then readily obtain a new pass certificate.

5. The BSS should be entirely independent of vested interests such as BW, EA, etc.

259 6. The administration of the scheme is poor, inconsistent, slow to react, defensive and not
pro-active. It is not answerable to its masters. The scheme has become self-serving and the
261 underlying reason for its establishment has been overshadowed by the way in which it has
grown and developed out of effective control.

263 7. The sponsors must recognise that the BSS will never be self-financing and that its
bureaucracy and staff must be cut down to the bare minimum. Boat owners cannot be
265 expected to subsidise the highly paid officers of the scheme via higher inspection costs,
increased prices of certificates, etc.

267 **8. The Review panel should resolve to re-draft the scope and purpose of the BSS by
setting out the principles and parameters of the scheme.**

269 9. No aspect of the BSS should incur any VAT charge. Safety-related matters are ordinarily
exempt from the imposition of VAT.

271 10. The BSS should be based on a "level playing field" and boat owners should not be faced
with having to carry out modifications to craft simply because the "goal posts have moved".

273 11. The BSS should only address critical proven risks and must be simplified to make it
cost-effective. Consistency with European regulations must be paramount.

275 12. There has been an increasing trend for legislation and practices being imposed which
were primarily written for applications not related to the marine environment, and are not
277 desirable or appropriate for craft based on inland waterways.

13. The involvement of outside bodies and agencies involved with safety-related matters or
279 concerned with setting standards in other fields must be precluded by the scheme managers.
If such involvement is unavoidable this points to flaws in the scheme which has developed in
281 an uncontrolled manner to the detriment of its customers.

14. The **Appeals Panel** should be entirely independent of the Boat Safety Scheme. None of
283 its members should hold any position within the scheme or derive any financial benefit from
involvement such as acting as a surveyor or examiner under the scheme.

285 National Association of Boat Owners
September 2000

287

Appendix

289 NABO Policy Statement dated January 1996

"Boat Safety Scheme

291 ***NABO's Council believes that a Boat Safety Scheme has the potential to make the***
waterways a safer place for all users. We therefore fully support the principle of the joint
293 ***BW/NRA scheme. However, in order to deliver its potential benefits the scheme must:***

Be based on clear, precise and reasonable standards which can be understood by all
295 ***boaters.***

Be available to boaters at reasonable cost.

297 ***Be introduced only after adequate information is available about all aspects of the scheme.***

Recognise the differences between new boats and existing craft and allow for the effects of
299 ***differing design criteria.***

Our input to the Boat Safety Scheme Advisory Group and the Technical Committee has
301 ***been based on these principles. We think it particularly important to strike a balance***
between the costs to the boater and improvements in safety which are achieved and will
303 ***continue to work for our members in this way."***

Agreed by Council 27th January 1996



NATIONAL ASSOCIATION OF BOAT OWNERS

Please reply to:



25 Sep 99

David Allison
British Waterways
Willow Grange
Church Road
Watford WD1 3QA

Dear Mr Allison,

Thank you for the opportunity to comment on your proposals for amendment to the Boat Safety Scheme Standards parts 7,8 and 11.

Before making specific comment there are some general points:

We complain that you have not provided any proposed dates for the coming into force of Section 11 as would be required in accordance with British Waterways Consultation principles. I am aware that others have already asked for your proposals on this matter but have received no reply. We also believe that the first CPD training course will run before the comments received during consultation can be properly considered. This cannot represent proper consultation. We ask that you delay CPD training until consultation is properly complete.

We deplore your proposals as retrospective regulation. This is contrary to good practice, Government and EU policy, except in the most exceptional circumstances. In view of the complete lack of evidence for change and your admission that the urgent change procedure cannot be justified, we do not accept that there is a need for retrospective regulation.

It is not at present possible to comply with the Standards you propose. You are aware that there are, for example, no cookers marketed which the manufacturers recommend for marine use and which comply with the new requirements for flame supervision devices. The HSE has also recently indicated to ACOP trained fitters that, in the absence of room sealed instantaneous water heaters they may be replaced with non-

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room sealed equipment until such time as room sealed items become available.

The Standards are not to be applied equitably to boats which are CE marked and those which are not. In the absence of a Harmonised European Standard requiring room sealed appliances only the essential safety requirements of the Recreational Craft Directive (94/25/EC) can be required of CE marked craft. Annex A, Section 5 of the Directive makes no mention of the need for room sealed gas appliances (only of vapour withdrawal), no mention of many of the other requirements introduced by the proposed revision and gas appliances are not covered at Annex B. You have also stated that any CE marked craft will be issued with a Boat Safety Certificate provided it has been maintained in its original condition as shown by the Certificate of Conformity and the Owners Manual. A boat complying with the current version of the BSS Standards may not comply with the proposed versions. We do not believe that in these circumstances the proposed Standards should be enforced until this anomaly has been resolved.

Many of the proposed changes have been copied verbatim from BS 5482 Part 3 (1998) without sufficient thought as to whether the elements of that Code of Practice should not have been refined for the particular requirements of Inland waterways use. We suggest that proper consideration is required, not mere plagiarism.

Detailed Comments:

Standard 7.3

'Cylinders...shall not form an obstruction.' Obstruction to what? This Standard needs to state clearly what it means.

7.13

The common form of pre-assembled flexible hose marketed by many chandlers and readily accepted by examiners and surveyors does not have 'integral threaded metallic ends' but is designed to be inserted into a compression fitting. We suggest that this sentence is re-worded so that that which is presently acceptable continues to be so by adding 'or metallic ends designed for insertion into a compression fitting' after '...metallic ends.'

7.21

In order to allow a proper plug or cap to be fitted to an isolation valve when a portable appliance is removed the last sentence of this Standard should be re-worded to 'Isolation valves alone shall not be used for this purpose.' The present wording requires a separate plug or cap which merely adds unnecessary joints.

Part 8 preamble. Note 1

Marine Standard appliances are not always necessary. A marine standard appliance would be appropriate for a sea-going or river/estuary cruiser but is wholly unnecessary for, say, a Midlands based narrow boat which never sees anything other than an inland environment. There is a substantial body of evidence that the caravan and domestic products which have been fitted over the last 20 years are neither unsafe nor unsuitable. This requirement represents a substantial change from the current Standards and there is at present no corresponding exemption in Section 11. We therefore request that this section be re-worded and propose 'Appliances shall be suitable for the use to which they are to be put. Sea going craft shall only have appliances recommended by the manufacturer as suitable for use in a marine environment.'

8.3

There are many existing appliances where the manufacturers do not provide information on installation in vessels. There is no evidence that these are in any way unsafe provided they are properly connected, adequately ventilated and secured against movement. We suggest that this be re-worded to 'Appliances shall be properly installed and, where they are available, in accordance with the manufacturer's recommendations for installation in vessels.' Additionally, in the last sentence delete the words 'as instructed by the manufacturer,' as the space required will depend on the circumstances of installation and the surrounding material.

8.7

See comments above on manufacturers recommendations.

8.7

The flue to opening distance quoted is excessively restrictive and cannot be achieved on many craft. Can exemption 11.23 (v) be clarified as applying to the whole of Standard 8.7?

11.23 i

Amend to read '.... shall where practicable be room sealed and installed...' See comments on 8.7 and on the absence of room sealed instantaneous water heaters to replace any damaged by frost this winter.

11.23 ii

' in accordance with the manufacturers recommendations.' It is unclear whether this refers to the manufacturer of the boat, the manufacturer of the pipe and fittings being used, the manufacturer of a new appliance or the original system installer. It needs to be clarified. In any event how is the inspector to know whether the advice has been heeded?

We request that you provide both your summary of the comments received once it is available, and a complete copy of all responses received as part of this consultation. We further request that you explain why requests or suggestions made as part of the consultation process are not acted upon.

Yours sincerely

Nigel Parkinson

DRAFT FOR COMMENT A.S.A.P

10/12/99

[REDACTED]

[REDACTED]

14 December 1999

Boat Safety Scheme
Willow Grange
Church Road
Watford WD1 3QA

Dear Sirs,

Changes to BSS Requirements

We refer to the Notice of Introduction of Revised Standards issued by yourselves in accordance with Part II of Schedule 2 of the British Waterways Act 1995.

We have examined the proposed revised standards Parts 7 & 8 and comment as follows:

Part 7 LPG (Liquefied Petroleum Gas) Installations

Introduction

Reference to the Technical manual is a serious flaw in the entire Boat Safety Scheme standards booklet.

If the scheme is to prescribe standards they should be in the published booklet upon which users have been consulted - not contained within other subsidiary documents (such as the Technical Manual) which do not form part of the standards and on which users have not been consulted.

We object to the need for boat owners to have to purchase the Manual at great expense if they are to fully understand the requirements of the BSS.

Generally

Part 7 should clearly specify that this Part does not apply to LPG-fuelled engine installations (most of which are currently not permitted under the BSS because they utilise "dual-fuel" technology whereby petrol is used as a start up / shut down / reserve fuel supply.

7.4

There was previously an exemption in respect of the 30 minute fire resistance requirement for gas lockers. This exemption appears to no longer apply. Existing vessels cannot comply without excessive cost and modifications.

We request an exemption for existing vessels.

7.9

Some vessels have an electrically operated main shut-off valve which is "fail-safe". These are not necessarily readily accessible nor do they need to be.

We request a relaxation of this requirement and an exemption for such vessels.

7.10

Many existing vessels have a dual cylinder installation connecting to a manifold without non-return valves. They have operated safely for many years. Existing vessels cannot comply without excessive cost and modifications.

We request an exemption for existing vessels.

High pressure hoses are not readily available with integral threaded ends. Calor Gas outlets recommend and still sell flexible hoses fixed with hose clips to a nozzle fitting with a compression joint to the component. This has been standard industry custom and practice for many years and most existing vessels are thus equipped.

Existing vessels cannot comply without excessive cost and modifications.

We request an exemption for existing vessels.

7.20

Many vessels have cookers connected with a flexible hose but without an appliance isolation valve. This requirement is another example of additional and unnecessary expense being imposed on boat owners and requires another component to be fitted with increased chance of leakage from the additional joints.

7.22

iii) A bubble tester is not suitable when an instantaneous hot water heater is installed. Owners of existing vessels thus equipped have no alternative but to install a gas test point - another component to be fitted with increased chance of leakage from the additional joints.

**Part 8 Appliances,
flueing and
ventilation**

Introduction

Note 1 fails to recognise that many vessels are equipped with appliances that are not specifically manufactured for use in boats. Marine appliances are very expensive and limited in their availability and functionality.

8.2

All LPG appliances except cookers are required to be room sealed. However, this statement fails to recognise that such appliances are not generally available in the market-place although we understand that some manufacturers are working on prototypes. When such appliances are introduced they will be very expensive. Furthermore, boats do not have "rooms" and the openings required in future for room-sealed appliances may render sea-going vessels unseaworthy. **We object to this requirement and request that its introduction be delayed until such appliances are manufactured and widely available and they have been proven in use over a period of time.**

8.5

Gas appliances with flame supervision devices on all burners to meet these requirements are not available. When such appliances are introduced they will be very expensive. **We object to this requirement and request that its introduction be delayed until such appliances are manufactured and widely available and they have been proven in use over a period of time.**

8.8

We note that flue spillage tests will be carried out when vessels are examined. This has not been a requirement to date and we fear that many existing vessels will fail on this point. Existing vessels may not be able to comply without excessive cost and modifications or the fitting of new and presently unavailable appliances. **We request an exemption for existing vessels.**

8.9

We welcome the belated recognition that sea-going vessels are a class of vessel that have different requirements.

Application of the new standards

We note that the BSS booklet paragraph 5 page 5 states "It is your responsibility to maintain your boat so that it complies with the Boat Safety Scheme requirements between examinations". The implications of the revised Parts 7 & 8 taken together with the above will mean that virtually every existing vessel will require expensive modifications as from the date of introduction of the revisions. This is clearly impractical and most unfair. It imposes an unacceptable financial burden on boat owners and we object most strongly.

We deplore the retrospective nature of the new BSS requirements which will be a disincentive to ownership of a boat and will prejudice the sale of many existing vessels.

Yours faithfully,

Stephen R. Peters B.Sc., FRICS, FFB
Technical Officer & River Users' Co-ordinator