

**REG-YC Stakeholder Engagement Exercise
Consolidated Feedback**

Part A

Section	Observation/Comments	Suggested Changes	Action	Explanation
General	new text parts are not always indicated, risk of changes being missed	republish with ALL changes indicated	None	Not possible given number of changes and formatting. Only major or technical changes were shown in consultation documents.
General	Text for “alternative design and arrangements” is copied at nearly every chapter.	could be integrated in definitions and referenced at chapters.	None	Differing requirements for each chapter depending on SOLAS II-1, II-2 or III origin.
General	many uses of the text “requirements of Annex (...) and those of the administration”. Not clear what “those of the Administration” are, REGYC should contain or clearly reference them.	delete every occurrence of “and those of the Administration”	None	REG members have differing legislation and therefore must have this included.
General	many references to (parts of) ISO standards, which are not freely available.	refrain as much as possible to refer to ISO standards or explicitly make it “guidance”.	None	Guidance only. Refer to international recognised standards of which ISO could be used.
General	Annex 1 to Part B tells only part of the impact related to max persons and enhancements.	It is proposed to update the table annex 1 of Part B to a common annex. Modify the table to include both part A and part B and make reference to enhancements related to >120 persons.	None	Part B Chapter 10 only applicable to Part B
General	The modified parts of the rules are supposed to be red, while black letters indicate unchanged rules. Unfortunately large parts of changed rules are not red (i.e. Chapter 10 of Pt B). This creates the risk that changes will be missed	The rules should be re-published with red marked modifications and another public hearing shall be organised before 01-01-2018	None	Not possible given number of changes and formatting. Only major or technical changes were shown in consultation documents. Code is under constant review and so any further comment are welcome.
General	Many Chapters start with the sentence “Vessels shall comply with the requirements of Annex [XXX] and those of the Administration.” It is not clear what “and those of the Administration” means. If it is something else then the rules in the REGYC, then add to the REGYC, because REGYC should be the “rules of the Administration”.	Delete “and those of the Administration”	None	REG members have differing legislation and therefore must have this included
General	It should be noted throughout that UK still require all safety equipment to be MED approved.		None	Not within the scope of the Code. For UK national annex or guidance
1.1	‘here after’ and ‘thie’	‘hereafter’ and ‘the’	Yes	As suggested
1.1 (1)	Secretarial error	The criteria are largely aligned to the Conventions and Instruments referred to in the preamble to the Code, but have been modified to create an equivalence where deemed appropriate to ensure their suitability for application to yachts.	Yes	As suggested
1.2	Not totally clear what is meant by those new paragraphs. This text is in contradiction with other paragraphs (1.2.5 and 1.7) and suggests that any existing ship should meet full REGYC-Requirements for new vessels when it sails under this code. This is not always realistic for existing vessels.	Please provide a better text that is not prone to multiple interpretations. Reference to 1.7 may be an idea.	Yes	As suggested
1.2(4)	the words “... or substantially increase the ship’s service life” are quite subjective. Does a new Tier III engine result in necessity to comply with updated code for fire insulation in the interior or redefined construction rules?	delete “... or substantially increase the ship’s service life” or include words that only the newly fitted parts / materials should be as per code.	None	Desired amount of flexibility in paragraph.
1.2.(4)	No explanation of the extent of the word “substantially”. Repairs do not alter main dimensions, modifications do. If a new generator is installed what happens?? A more clear explanation is needed	Any ship, whenever built, which is converted to a yacht, or undergoes repairs, alterations modifications which substantially alter the dimensions of the ship, or undergoes alterations that substantially increase the ship’s service life, shall be treated as a new vessel constructed on the date on which such repairs conversion, alterations or modifications commenced. For any ship, whenever built, which undergoes repairs, alterations and modifications which substantially increase the ship’s service life, those parts, that substantially increase the service life shall be treated as a new and should be made according the code on the date on which such conversion, repairs, alterations or modifications commenced.	None	Desired amount of flexibility in paragraph
1.2(2)&(4)	Not totally clear what is meant by these new paragraphs. This text is in contradiction with other paragraphs (1.2.5 and 1.7) and suggests that any existing ship should meet full LYC(2019) requirements for new vessels	Please explain text more clearly. Maybe refer to paragraph 1.7?	Yes	Text clarified further

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	when it sails under this code. So including MLC2006 and construction requirements? This is not always realistic for existing vessels.			
1.2(6)	The International Sailing Federation (ISAF) has been rebranded World Sailing	Replace "International Sailing Federation (ISAF)" with "World Sailing (previously ISAF)"	Ok	As suggested
1.3(1)	"from time to time" very vague expression	refer to SOLAS four-yearly update cycle	Noted	Text clarified further
1.3 (1)	"from time to time" is too vague	A proper updating schedule has to be created with ample time for the industry to adapt to the updated rules. Please refer in this paragraph to this REG updating procedure.	Noted	Text clarified further
1.4	(2)	(1)	Yes	As suggested
1.4 (1)	Please confirm, that REG will keep a public record of IMO amendments that are applicable		None	Not within the scope of the Code
1.5	conventions, instruments	Conventions and Instruments capitalised throughout	Yes	Text harmonised
1.5(2)	Polar Code Certification is possible without icing considerations, with operational (climate) restrictions. Therefore, requiring icing conditions within REG Code is incorrect. The insertion of the word "adopting" does not make it any clearer.	Delete "stability conditions shall include those adopting for icing"	Yes	As Suggested
1.6	(2) Stability conditions shall include thoseaccounting for icing.	Yes	As Suggested
1.6.(2)	Polar Code Certification is possible without icing considerations, with operational (climate) restrictions. Therefore, requiring icing conditions within REG Code is incorrect. The insertion of the word "adopting" does not make it any clearer.	Yachts which intend to operate in Polar Regions shall meet requirements of the Code, The IMO Polar Code (see Annex [L]) and those a Recognised Organisation appropriate to the intended area of operation. Stability conditions shall include those adopting for icing.	Yes	As Suggested
1.7		(2) Vessels,	Yes	As suggested
1.7(1)	retroactive requirements are made to significant items of hardware / structure of vessels in (c), (t) and indirectly (u).	delete (c), (t) and (u)	Yes	Delete (c) & (t) but retain (u)
1.7(1)	new par 15A.7(4) refers to existing vessels, should be referenced here	include "15A.7(4) for CO2 extinguishing systems"	Yes	As suggested
1.7(1)	We have to obey grandfather clauses, especially with complicated hardware. This has implications on the paperwork as well.	Delete 1.7(1) (c), (t), (u)	Yes	Delete (c) & (t) but retain (u)
1.7(1)	The new paragraph 15A.7(4) refers to existing vessels and consequently, should be referenced here	Add Section 15A.7(4) for CO2 extinguisher systems	Yes	As suggested
1.7(1) g	Secretarial error Wrong reference	Maybe 14A.2(4)(i)	Check reference	As suggested
1.7(1)(g)	incorrect reference 14A.2(i)	check reference. Possibly 14A.2(4)(i)	Check reference	As suggested
1.9(1)	typo "meet" should be "meets"		Yes	As suggested
1.9 (1) (c)	Secretarial error	meets the intent of the requirements concerned and the objectives of the chapter;	Yes	As suggested
Footnote 2	Secretarial error	Refer to the Guidelines on alternative design and arrangements for SOLAS chapters II-1 and III (MSC.1/Circ.1212) and SOLAS chapters II-1 and III (MSC.1/Circ.1212)	Check reference	As suggested
1.10		(1)(a) ...Conventions... for consistency	Yes	Text harmonised
2.1(3)	Definition of 'Design waterline' refers to all seasons load line assigned. Next definition 'deepest subdivision draft' refers to summer load line. This is confusing because designers often refer to 'design draught as a 50% stores and fuel average.	Use one consistent definition of draught (draft?): All season's load line for everything.	Yes	Text harmonised
2.1(3)	blanking plate Is not mentioned anywhere else in the code and is same as deadlight or storm shutter.	Remove this definition.	Yes	As suggested
2.1(3)	Definition of Blanking Plate Not used in text, so not relevant	Delete	Yes	As suggested
2.1(3)	Storm Covers We believe storm shutter is more widely used, also used in ISO_11336 as referred to in the code.	Change "Storm Cover" in : "Storm shutter"	None	As suggested
2.1 (3)	Definition "Storm Covers"	Please change text in the Code to storm shutter. This harmonises the text with ISO_11336	None	As suggested

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2.1(3)	Definition of "Embarkation station" is missing	Include definition of "Embarkation station"	Yes	As suggested
2.1(3)	Definition of "Escape route" is missing	Include definition of "Escape route"	None	Not defined in SOLAS
2.1(3)	garage spaces definition: should not include those with recreational dive systems. These are very different spaces on board, and categorizing a dive center as a garage will cause confusion.	delete"and recreational dive systems"	None	Intentional inclusion
2.1(3)	Man-riding definition: Embarkation or disembarkation of a tender hanging just clear above the water surface (more stable, more safe than tender bouncing on little waves) should not fall under man-riding. We propose a maximum of a half metre clearance of the keel to waterlevel. See attached document	add" where the keel of the tender rises above 0.5m above the water line"	None	MAIB incidents for very small drops. To be covered operationally where compliance with the Code cannot be met.
2.1(3)	the definition of recreational diving system is vague and will for example include emptied air bottles or spare regulators. Assuming the problem being addressed is fire and the excess of oxygen because of the recreational dive system, the regulation should address storage vessels and emergency shutoffs for distribution piping.	change "using, creating and storing" to "containing". Further see 14.1	None	Original text captures the intent
2.1(3)	Definition of "A" class divisions not complete, see SOLAS II-2/ Reg. 3.2.3 for reference.	Class "A-60" 60 min, class "A-30" 30 min, class "A-15" 15 min and class "A-0" 0 min to be added accordingly, similar to class "B-15" and class "B-0" for "B" class divisions.	Yes	As suggested
2.1		(3) "A" Class divisions (d) 'do not permit the passage of...'	Yes	As suggested
2.1(3)	The definition "Recreational Diving System" would include submersibles as well as diver pressure chambers. Is this intended?	To be clarified.	None	This is the intention
2.1(3)	Definition of Garage space: should not include those with recreational dive systems. These are very different spaces on board, and categorizing a dive centre as a garage will cause confusion	means those enclosed spaces above and below the bulkhead deck used for the storage of pleasure craft, vehicles, jet skis or any other such engine driven units <i>and recreational dive systems</i>	None	Intentional inclusion
2.1 (3)	Definition Least moulded depth ICLL 1966 does not have chapters and regulations, only articles and annexes	Maybe you want to refer to ICLL 1966/1988 Annex 1 Ch. 1 Reg 3 It is easier to write down what you want than referring to other documents.	Yes	Definition copied from ICLL
2.1	Deepest subdivision draught	Should be same as design waterline definition and should always be deepest load draught.	Yes	Deleted
2.1	Draught or D	Vertical distance at mid length	Yes	As suggested
2.1 (3)	Definition "Over-side working systems" Secretarial error	means the securing, anchoring or track and rail <u>systems</u> used to access external portions of the vessel for maintenance and wash down. This can include but not limited to track and car systems or static harness points	Yes	
2.1 (3)	Over-side working systems are mentioned only once in Pt A (in the definitions) Also no reference is made to Annex [B]		Yes	New reference added
2.1 (3)	Definition "Recreational Diving system" the definition as stated will include emptied air bottles or spare regulators. In Chapter 14 the problem of fire is addressed. The excess of oxygen because of the recreational dive system may be a problem to be solved. This Code should address storage vessels and emergency shutoffs for distribution piping.	means any system or equipment containing using, creating or storing compressed gas of any type to aid or facilitate recreational underwater activities.	None	Original text captures the intent
2.1 (3)	Definition "SOLAS" Secretarial error Be consistent in referencing IMO documents	means the International Convention for the safety of Life at Sea, 1974 as amended by the IMO	Yes	As suggested
2.1 (3)	Definition "SOLAS 90" Secretarial error Be consistent in referencing IMO documents. This MSC resolution is not publicly available anymore. Furthermore we are confronted with multiple interpretations by surveyors and Classes. For that reason the relevant text with unified interpretations to be included in a new Annex	means the International Convention for the safety of Life at Sea, 1974 as amended by the IMO October 1988 amendments, which were adopted by resolution MSC.12(56) and entered into force on 29 April 1990 as can be found in Annex XXX	None	Not available to be placed in an annex at this stage
2.1 (3)	Definition "STCW" Secretarial error Be consistent in referencing IMO documents	means the International Convention on Standards of Training, Certification and Watch keeping for Seafarers, 1978, as amended by the IMO	Yes	As suggested
2.1 (3)	Definition "The Organisation"	means the International Maritime Organisation (IMO)	Yes	Deleted and reference to it in Code removed

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	Secretarial error Be consistent in referencing IMO documents			
2.1	(2) "yacht"	(2) "yacht"	Yes	As suggested
2.1	Atrium	Means a public space	Yes	As suggested
2.1	'B' Class	Minimum time for which temperature of unexposed...	Yes	As suggested
2.1	'B' Class	(c) smoke and flame	None	As per SOLAS definition
2.1	'C' Class divisions	Requirements of Chapter 14A ~ 14B	Yes	As suggested
2.1	Commercial Vessel	A yacht which is not private. All yachts whether private or commercial are in use for Pleasure.	Yes	Deleted as not used in Code
2.1	General Alarm	Ch VII, 7.2.1 of the LSA Code	Yes	Definition removed as requirements contained in 13.10
2.1	Glazed Opening	Glazed means glass – are we intending to incorporate plastic here also?	None	Covered by Section 5.4
2.1	L1 should this be ... all seasons load line L2 should this be ... all seasons load line		Yes	"design waterline" used
2.1	Position 1 and 2 have been redefined.	Can this still be accepted as equivalent to Load Line Convention?	None	As per IMO UI
4	Introduction Secretarial error	Objective: The purpose of this Chapter is to ensure that all vessels are constructed to a consistent standard in respect of strength and watertight integrity. New Vessels shall be built to the requirements of a Recognised Organisation and issued with a commercial Certificate of Classification.	Yes	As suggested
4	Recognised Organisations new definition permitting Class Societies or other organisations so authorised by the Administration to class yachts.	Does this permit Administrations to authorise any organisation to Class their vessels? Only Classification Societies maintain and develop robust Classification construction rules, a fact which is relied upon by Administrations to assume that the vessel is properly constructed. This is an unacceptable relaxation.	None	Terminology as per IMO "III Code". (Only Class be recognised)
4.1(6)	" over 80m" assumed in Length	add " in Length"	Yes	As suggested
4.1(6)	Secretarial error Be more specific about dimensions Too much text	Where there are no Recognised Organisation requirements for the fitting of double bottoms, SOLAS II-1/9 shall be applied to vessels over 80m length as per SOLAS II-1/4.1.	Yes	As suggested
4.3 (e)	By definition watertight doors are not always sliding. There are also other type of watertight doors.	Watertight doors shall be normally closed, with the exception of sliding watertight doors providing the normal access to frequently used living and working spaces.	None	Sliding are the exception as can be closed remotely.
4.3(2)(e)	Suggest adding note to ensure that such tests are documented.		None	Too much detail for code
4.3(2) e	Too much text deleted. Especially the design and operation should be subject to open dialogue between administration and shipyard.	Procedures for the operation of watertight doors shall be agreed with the Administration and posted in suitable locations. Watertight doors shall be normally closed, with the exception of sliding watertight doors providing the normal access to frequently used living and working spaces.	None	Covered during surveys and Audits
4.4	No equivalency chapter for chapter 4.4 is given. For small ships with low depth a high sill height for the tender garage is impossible otherwise the tender simply can't be launched. Also a high sill height for the door between tendergarage and engine room is very un-safe. The door becomes a little hatch close to the ceiling and is therefore not optimal for use as emergency exit and everyday use.	Add an equivalency chapter.	None	Equivalence Section exists (4.6). No AD&A provisions as per SOLAS
4.4 (1)	The text of this paragraph is confusing because it says CompartmentsHAVING openings in the hull, shall be bounded by watertight divisions WITHOUT any opening. Further clarification should be made that this rule also applies for the special case where the 'lower deck accepted is as freeboard deck' means that openings above the lower deck are consequently considered as openings above the freeboard deck.	Clarification or rephrasing of this paragraph is needed.	None	Existing text that has not caused confusion to date
4.4(4)(b)	For all yachts except short range yachts the effect of flooding on stability must already be considered according to chapter 11.3.	Add the text: "for short range yachts"	None	Applicable to all vessels
4.4(2)(f)	Suggest adding a note stating that in such cases, enhanced bilge pumping is to be provided.		None	Would be considered by Administration during evaluation but no need for reference in Code

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4.4(2)(f)	Secretarial error	where the sill height of the internal door is not higher above the deepest loaded waterline than the sill height of the shell opening, then 4.4(4)(b) and 4.4(4)(c) shall also be considered to the satisfaction of the Administration	Yes	As suggested
4.4(3)	This text is not practical. REGYC is equivalent to SOLAS so we want remote control in the wheelhouse. SOLIP (Safety of life in Port) is not yet written and a continuously manned station in port does not exist.	Means shall be provided to prevent the unauthorised use of the doors locally through provision of secondary or remote control in the wheelhouse at a continuously manned station , through an interlock, dual control process or procedure	Yes	As suggested
4.4(5)	Too complicated sentence and reference to IEC is not needed. Wikipedia also gives this explanation.	Protection of safety critical systems such as systems securing the hull openings and other systems as provided in Chapter 14 shall have a liquid ingress protection of level 5 (e.g. IP 25, IP55, IP 65)	None	This is the correct IEC reference for IP
4.4(5)		Such as those for...	Yes	As suggested
4.5	Application of asbestos has nothing to do with Construction and Strength (asbestos is normally hidden in steam line packings) I understand the intention, but how is flag state enforce and check this requirement?????	Move to Chapter 2 (general requirements)	None	Located as per SOLAS Chapter
5.2(1)(c)	Suggest adding a note stating that in cases where external handles are of the removable type, they are to be stored local to the hatch, their positions clearly marked and indicated on the Fire Control Plan.		Yes	Footnote added for MSC/Circ.847
5.2 (1) (c) iii bb	Positioning all the information at the navigating position is not realistic. On the navigation position you should have navigation information. Other information in the wheelhouse.	the hatch shall be closed at sea and marked accordingly and shall be provided with open/close indication at the navigating position wheelhouse.	None	Navigation Position used throughout Code
5.2(1)(c)	A <u>fundamental mistake is made here</u> . Escape hatches are to escape. If they are not openable from the outside they still function as an escape. So escape hatches should NOT be able to open from outside, by definition. It should be a choice of the designer whether a hatch may be openable by intruders. I do not want that Flagstate instructs me to create a free entrance for pirates.	Hatches which are designated for escape purposes shall: (i) be provided with covers which shall be openable in the escape direction from either side and in the direction of escape they shall be openable without a key. All handles on the inside shall be non-removable; and.	None	Required as per MSC/Circ.847
5.2(1)(c)(iii)	Secretarial error	not be required to have a coaming provided:	Yes	As suggested
5.3(1)(a) Footnote 4	ISO 14884 is used as reference for weathertightness. It should not be necessary to require buying a standard for the definition of weathertightness, testing methods are also given in IACS interpretations, which are free for download.	Unless this is not about the simple definition of how weathertightness is tested, we recommend referring to IACS UR S14 (4.4.3).	Yes	As suggested
5.3(1)(a)	Delete reference 4. There are sufficient open “free of charge” sources (i.e. IMO or Class documents) where customers can learn about the definition of “weather tightness”.	Delete footnote 4	Yes	Expand to include reference to IACS UR S14 (4.4.3).
5.3(1)(a)	Alternatively, where the Rules of the Vessels Classification Society include such requirement these may be applied in lieu.		None	Sill heights to be equivariant to SOLAS and not just in line with Class
5.3(1)(a)	“direct” access means, cabin and B-class doors are accepted in lieu of sill heights?	Please clarify.	None	Not deemed necessary
5.3(1)(d)	Secretarial error	may be considered individually. These doors do not need to meet the coaming heights of Coaming heights need not meet 5.3(1)(a)	Yes	As suggested
5.3(1)(e)	Secretarial error	heights required by 5.3(1)(a) and 5.3(1)(c) shall be	Yes	As suggested
5.4	It is not understood why ISO 11336-1 (as a standard specifically developed for large yachts) cannot be clearly referenced as a requirement for strength, particularly with respect to glazing below the freeboard deck or storm protection. We do not see the need to reference ISO 5780 or indeed ‘pressure head Rules of a Recognised organisation’.	Mandatory use of ISO 11336-1	None	May also use Class rules
5.4 (1)	b) Summer Load Line should read All seasons LL or deepest load draught. We should be consistent throughout with this.		Yes	See also definition comments Changed to Design Waterline
5.4(1)(a)	thermally toughened glass does not need to be laminated NB: what about acrylic??	Change “thermally or chemically toughened safety glass of the laminated type” in “thermally toughened glass or chemically toughened laminated glass”.	Yes	Simplified to “toughened safety glass”
5.4(2)(a)	Currently the sealants commonly used are in most cases accepted on the basis of satisfactory service experience. When drafting this requirement was a particular standard, practice or method envisaged?	Further detail and guidance is required to assist with the assessment of this requirement.	None	To be established with Administration and Class Society
5.4(2)(b)	text glazed openings “cannot fall from their mounting should the bond line fail” is more onerous than text in Pt B (“cannot fall into the vessel should the bond line fail”) – which has not been changed from PYC 2016	use same wording as Pt B	Yes	Included text “Where required to be fire rated”
5.4(2)(b)	This is a new requirement, not included in any previous LY Code versions. Cargo vessels below 500GT do not have this SOLAS requirement and it will be hard to achieve for yachts below 500GT, especially composite	5.4 (2)(b) should be deleted.	Yes	Included text “Where required to be fire rated” to clarify

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5.4(1)(b)	The text is repeating the definition in Ch. 2	not be fitted in such a position that their sills are below L1 a line drawn parallel to the freeboard deck at side and having its lowest point 2.5% of the breadth (B), or 500 millimetres, whichever is the greatest distance, above the Summer Load Line;	None	In definitions of Levels. Repeated here as the requirement
5.4(2)(b)	The general fire safety is not discussed in Pt A, so reference to fire in relation with glass constructions is not relevant. Bonding is an accepted method in glass constructions; additional mechanical retainers on top of the bonding are not needed (remember, additional mechanical retainers are not in use in the hull of a vessel where metal plates are bonded by means of welding)	Delete 5.4.2(b)	Yes	Included text "Where required to be fire rated"
5.4(2)(c)	Have calculations been undertaken to assess the typical tensile stresses in the bonded area ? When drafting this requirement was a particular standard, practice or method envisaged ? How are mechanical properties of the sealant to be determines ? What factors of safety against tensile failure are required ?	Further detail and guidance is required to assist with the assessment of this requirement.	Yes	Reference to 5kPa deleted
5.4(2)(c)	An additional load of 5kPa is high!! Loads on bonded glazed openings are described in ISO 11336-2 which will be published soon.	bond design shall account for accidental internal loads as described in ISO 11336-2 of 5kPa plus self weight for glazed openings in the buoyant part of the hull;	Yes	Reference to 5kPa deleted
5.4(2)(c)	This is a new requirement that was never considered for previous LY Code editions. 5kPa is very high.	To introduce considerations of accidental internal loads, we recommend to refer to ISO 11336-2, which is soon to be published.	Noted	
5.4(1)(d)	Navigation position is small part of wheelhouse. All windows of wheelhouse should follow Ch. 18	follow the requirements of Chapter 18 where they are for glazed openings in the wheelhouse navigating position ;	None	Text remains for consistency with the rest of the Code
5.4(3)	ISO 5780 results in excessive design pressures for buoyant superstructures, especially compared to design pressures of the superstructure/deckhouse around the windows. Beside that, it takes not properly into account NiS failures of glass. We should not be punished for preventing NiS failures. We feel a non buoyant superstructure with large windows and large staircases to below are not extra safe compared to the same superstructure but then buoyant. We prefer to take the superstructure as buoyant since this is beneficiary in the 30 to 40° heeling in intact stability. Without this benefit we have to increase GM what results in higher accelerations on board. High accelerations results in crew being more tired, and there is more hazard of MOB due to more people discharging themselves outside. Often a buoyant superstructure results in a possibility to have a lower GM and therefore smaller accelerations on board. Window has to be as strong as the superstructure/deckhouse around it	Add: Alternatively the windows after failure of any single layer of the laminate need to have an ultimate strength as the design pressure of the superstructure/deckhouse around it according class regulations. If the windows are properly treated to minimize NiS failure the intact window laminate may be used	Yes	Both ISO standards referenced for guidance
5.4(3)	Please note that ISO 5780 is not very useful for smaller vessels. Minimum requirements of IACS UR S3 are referred to in the standard. For this reason, the LY Code always stated that Type B side scuttles are acceptable as portlights, which is the case for vessels below 90m.	Using ISO 11336-1 for determination of the loads up to 90m and Class Rules/ ISO 5780 above 90m ship's length would cover the load requirements more thoroughly. It could be stated that "whatever is the highest" shall be used.	Yes	Both ISO standards referenced for guidance
5.4(3)	Please refer to ISO 11336-1 i.s.o. ISO 5780	Where glazed openings protect buoyant volumes, they shall be designed using the pressure heads derived from ISO 11336-1 5780 .	Yes	Both ISO standards referenced for guidance
5.4(4)	Enhanced survivability standards of Chapter 4	...Chapter 11	Noted	As suggested
5.4(4)	reference is made to Pt B requirements (enhanced survivability)	delete 5.4(4)	Yes	Deleted as not required in Part A
5.4(4)	Chapter 4 of the Code is not the correct location of the enhanced survivability standard.	I assume we need to refer to the correct section in Part B?	Yes	Deleted as not required in Part A
5.4(4)	This requirement seems sensible when compared to Loadline. But it is an enhancement of safety when compared to ISO11336. ISO section 3.22 allows 0.85m2 without an enhancement in stability. Just making sure the point is known and considered.		Yes	Deleted as not required in Part A
5.4(4)	The reference to Chapter 4 is not correct. There is no enhanced survivability standard for LY coded vessels.	Assuming this was copied from the PYC by mistake, this paragraph should be deleted.	Noted	Deleted as not required in Part A
5.4(4)	Reference to Chapter 4 is not relevant, as Chapter 4 is about Strength. Enhanced survivability is not discussed in Pt A	Delete paragraph 5.4(4)	Noted	Deleted as not required in Part A

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5.4.5	There should be consistency in the Code. No jumping between different Rulesets.	Where glazed openings do not protect buoyant volumes, they shall be designed using the pressure heads of ISO 11336-1.	Yes	As suggested
5.4(6)(b)	this paragraph requires a deadlight (= secondary watertight closure) to a structure which doesn't need to be watertight but is weather tight	delete 5.4(6)(b)	Yes	As suggested
5.4(6)(b)	This part is related to damaged stability and that is not an issue in Pt A	delete 5.4(6)(b)	Yes	As suggested
5.4 (7)	Relaxation on fitting permanently attached deadlights. Should there be a time limit on how long it takes to fit the portable ones?	If they are in the hull below the freeboard deck they should be permanently attached.	None	Not required as deadlights are a preventative measure
5.4 (9)	Blanking Plate not needed	What is the situation if a window is broken at sea? The vessel may remain stable but there is still a hole in the side.	None	Reference to "blinking Plates" has been removed
5.4 (10)	This is a very confusing statement and incorrect	An A or B Class bulkhead is not necessarily watertight.	None	Reference not correct, cannot trace comment
5.4(10)(a)	When referring to Level 1 and Level 2 be consistent and use capital L	in Levels 1 and 2 when above the buoyant part of the hull and separating side glazed openings from a direct access leading below; and	Yes	As suggested
5.4(11)	There is no reference for the issue of walkable glass. Walkable glass should be laminated and with the protection from mechanical damage under (b), the resulting laminate should consist of at least 3 layers, 2 layers bearing the load and 1 for protection.	Extend (b) to cover this issue or add a paragraph for walkable glass, which should at least be to the satisfaction of the RO, to make sure residual load bearing capacity after breakage is considered.	None	Reference to strength made
5.4(11)(e)	(e) refers to (e), which is in the 6 th edition of the PYC the possibility to accept portable covers.	As portable covers are already allowed here, the reference to 5.4 (11)(e) should be deleted, or (12) should be changed to 5.4 (11)(e) for better clarity.	Yes	As suggested
5.4(11)(b)	The "walking over it" loads are not covered for overhead glazing		None	No known standards to refer to
5.4(13)	For better consistency in the industry, the reference should be to ISO 11336, instead of RO, as it covers all these details.	To be considered.	None	International standard also references as acceptable
5.4(13)	There should be consistency in the Code. No jumping between different Rulesets. For that reason delete the rules of Recognised Organisations but consistently refer to ISO 11336 Footnote 5 to be removed.	Glazed openings, together with their frames, deadlights and storm covers, if fitted, shall meet the requirements of ISO 11336 an appropriate national or international standard or the rules regarding side scuttles and windows of a Recognised Organisation ⁵ . Delete footnote 5	None	Existing text covers all eventualities
5.4(14)		Renumber footnote 6 and 7 to 5 and 6	None	Automatic numbering after editing
5.4(14)(b)	There is no definition of an approved test facility, so in order to avoid confusion, delete it.	the testing shall be witnessed by an independent third party such as a Recognised Organisation.	Yes	To the satisfaction of the RO (only)
5.5	Removing the requirement for watertight closure – is there an equivalence here to Load Line?	What about protected location etc? ISO standard for weathertightness? Do we use this?	Yes	IACS UI to be used
5.5(1)	This text is not practical. REGYC is equivalent to SOLAS so we want remote control in the wheelhouse. SOLIP (Safety of life in Port) is not yet written and a continuously manned station in port does not exist.	Adequate ventilation shall be provided throughout the vessel. The accommodation shall be protected from the entry of gas and/or vapour fumes from machinery, exhaust and fuel systems, where machinery exhaust systems pass though accommodation they shall be fitted in a gas tight trunk or each space shall be fitted with a carbon monoxide detector, having an alarm provided locally and in the wheelhouse at a continuously manned station .	None	Vessels required to have continuously manned control stations unless th
5.5(6)	Current amended text might be interpreted to mean that a non-permanently attached means of closure IS required.	Delete "permanently attached" for clarity.	None	Text deemed appropriate
5.5(6)	ISO 14884 is used as reference for weathertightness. It should not be necessary to require buying a standard for the definition of weathertightness, testing methods are also given in IACS interpretations, which are free for download.	Unless this is not about the simple definition of how weathertightness is tested, we recommend referring to IACS UR S14 (4.4.3).	Yes	IACS UI to also be referenced
5.5(6)	The "permanently attached" requirement comes from ICLL for vessels of less than 100m, and is not in line with current industry practise for yachts.	We recommend specifying the conditions under which the closing appliances may be portable, to avoid case-by-case considerations for almost every project.	None	Permissive text allows portable under the stated conditions
5.6(6)	To provide ventilators with permanently attached weather tight closing is often impossible for aesthetic reasons.	To store weather tight closings in a nearby deck locker	None	Storage locations of means of closure not dictated
5.5(6)	Current amended text might be interpreted to mean that a non-permanently attached means of closure IS required.	Ventilators shall be provided with permanently attached means of weathertight ⁸ closure. Where the full coaming heights of 5.5(2) are met, permanently attached	None	Text deemed appropriate

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		means of closure may be omitted if it can be shown that the open end of a ventilator is afforded adequate protection by other structure(s) which shall prevent the ingress of water		
Footnote 8	There are enough open source media where we can learn what “weathertight” is. No need to refer to a GBP 45,26 ISO standard	Delete footnote 8	Yes	IACS UI also referenced (free source)
5.6(1)	It is misleading to state that air pipes are to be provided with means of weathertight closure. Automatic air pipe heads are not weathertight per definition and ICLL (Reg. 20 (3)) only requires automatic closing devices, not weathertight covers.	Change “permanently attached means of weathertight closure” to “automatic closing devices” as per convention text.	Yes	As suggested
5.8(3)		Insert: The use of plastic pipes shall be “Specially” considered	Yes	As suggested
5.8(3)		and any applicable requirements of the vessels Classification Society.	None	This would always be the case for chapters requiring Class rule adherence
5.9(1)	The deleted introduction statement should remain for clarity	Where vessels cannot fully comply with the requirements of this section, equivalent arrangements may be considered by the Administration. Such proposals should take into account the following, although this should not be considered as an exhaustive list:	None	Covered by new Section 1.9
6.2 & 6.3	Swimming Pools not being recesses?	It is insufficient to simple comment in the stability booklet. If the vessel fails in the arrival condition but passes in Dep – at what stage in the voyage does it fail and need the pool emptying? For the swimming pool to remain full on passage it must pass in all conditions.	None	No Change. Stability book to address safe use
6.3	A pool in the weather deck, susceptible to taking in significant amounts of water in adverse conditions, should in our opinion always be treated as a recess. Any water remaining after 3 minutes to be included in all loading conditions of the stability calculations. Pools on higher decks may fall under the proposed provisions of (new) par 6.4. Some observations: - Very large pools recessed in the aft main deck tend to have a positive effect on stability, it should be clear that the worst case is checked. - The main parameters for the captain to decide whether the pool could be filled should be keeping within the limits of the Load line mark and Max KG, not any specific load case (see also our comments on ch 11 below). Therefore, the effect on KG of filling the pool should be specified in the SIB.		None	Covered by consideration as a recess (6.2(1)) and a pool (6.3)
6.3	A pool in the weather deck, susceptible to taking in significant amounts of water in adverse conditions, should in our opinion always be treated as a recess. Any water remaining after 3 minutes to be included in all loading conditions and the stability calculations. Pools on higher decks may fall under the proposed provisions of (new) par 6.4. Some observations: - Very large pools recessed in the aft main deck tend to have a positive effect on stability, it should be clear that the worst case is checked. - The main parameters for the captain to decide whether the pool could be filled should be keeping within the limits of the Load line mark and Max KG, not any specific load case (see also our comments on Ch. 11 below). Therefore, the effect on KG of filling the pool should be specified in the Stability Information Book.		None	Covered by consideration as a recess (6.2(1)) and a pool (6.3)
6.3 (1)	Avoid unnecessary administrative burden	Effect of stability to be considered for pools over 1500 l only	None	Any pool with free surface effect could adversely affect stability
6.3(2)	Footnote 9 is not clear and will lead to un clarities and different interpretations. If spill out need to be considered it should be clarified in which angle and for which criteria	Delete Footnote 9 or write clear conditions.	None	Text deemed appropriate
6.3(2)	It may very well be, that swimming pools have to be emptied to comply with damaged stability	If there are loading conditions where swimming pools shall be emptied in order to comply with intact and/or damaged stability requirements ⁹ of Chapter 11, these loading conditions shall	Yes	“intact” deleted
6.3 (2)	Scattered through this code are requirements to be informed to the master. This makes reading the code unclear. It would be appreciated that a proper guideline to shipyards and surveyors will be created stating all the guidance’s to the Master (how to handle swimming pools/ whirlpools, loading conditions etc)		None	Text deemed appropriate. Code is both operational and construction standards.

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6.3(3)	For unclear reasons Class regularly asks for non-seagoing loading conditions, not fulfilling damaged stability.	Either instruct Class properly or delete 6.3(3)	None	Not for Code
6.4(2)		suggest adding 'For Existing Vessels'	Yes	As suggested
7A Objective	<i>The wording in the objective box does not make sense.</i> Objective: This Chapter outlines the minimum requirements for machinery, which shall be in accordance with the requirements a Recognised Organisation of one of the Classification Societies defined in the National Annex and shall cover the minimum aspects defined below, even if the machinery is not considered the primary means of propulsion. Existing Vessels which are not already Classed shall be taken into Class, however alternative arrangements for Short Range operation may be agreed by the Administration.	<i>Needs 'of' inserted after second requirements</i> “...which shall be in accordance with the requirements of a Recognised Organisation....”	Yes	As suggested
7A	Secretarial error	Objective: This Chapter outlines the minimum requirements for machinery, which shall be in accordance with the requirements <u>of</u> a Recognised Organisation	Yes	As suggested
7B.1(4)	Also for yachts with normal powered engines daytanks are not sized for 24 hours operation. SOLAS II-1 reg26 was never applied and can't be met.	Relax to “8 hours @cruising speed of propulsion engines + normal operation of generators” for all sizes of engines.	None	Noted but to be one a case by case basis
7B.1	. required after 'to do so.'		Yes	As suggested
7B.1 (3)	High-speed Craft Code	IMO High-speed Craft Code, (as currently in LY3)	Yes	As suggested
7B.1(4)	Addition for clarity	For vessels installed with high powered engines designed for short sprint speeds, the Administration may relax SOLAS II-1/26-11 to accommodate day tanks sized for maximum continuous rating, and the vessel's cruising speed may be used on a case by case basis.	Yes	As suggested
7B.1(4)	The expression “High power engines” is rather vague	For vessels installed designed to cruise at less than 50% of their installed power with high powered engines designed for short sprint speeds, the Administration may relax SOLAS II-1/26-11 to accommodate day tanks sized for maximum continuous rating, and the vessel's cruising speed may be used on a case by case basis.	None	Noted but to be one a case by case basis
8A.3 (2)	There is a discrepancy between 8A.3 (2) and the intent of annex A (see Annex A1(1) To harmonise, the text of 8A.3(2) has to be changed.	Where batteries are used for propulsion and/or electric power supply purposes during ship operations, the Battery System design and operation shall consider the guidelines provided in Annex [A]	Yes	Annex renamed as not just for propulsion.
8B	Secretarial error	Objective: This Chapter outlines the minimum requirements for electrical, installations which shall be in accordance with the requirements of a Recognised Organisation,	Yes	As suggested
8.B.1 (2)	This is a nasty modification and has a lot of impact. Is there any reason why this has to be changed. Are there multiple accidents??	Delete modification	None	Upgrade in safety/clarification deemed necessary. Very few builders not already compliant
8B.1(2)(a)	Damage extent into an emergency generator room below the bulkhead deck should not matter, since in that case the main generators will be able to power emergency services. However, it should be clear this implies the (more logical) requirement that the provision of power to the emergency services should not be interrupted by the flooding of the emergency generator room or the main generator room.	Not affected in its functionality by flooding of any compartment other than the emergency generator compartment itself by flooding if the vessel sustains damage within one fifth of the breadth of the ship, as defined in Chapter 2, such distance being measured at right angles to the centreline at the level of the deepest subdivision draught; and	None	Upgrade in safety/clarification deemed necessary. Very few builders not already compliant
8B.1(2)(a)	Damage extent into an emergency generator room below the bulkhead deck should not matter, since in that case the main generators will be able to power emergency services. However, it should be clear this implies the (more logical) requirement that the provision of power to the emergency services should not be interrupted by the flooding of the emergency generator room or the main generator room.	reword for example “(a) Not affected in its functionality by flooding of any compartment other than the emergency generator compartment itself”	None	Upgrade in safety/clarification deemed necessary. Very few builders not already compliant
9A.1 (3)		Suggestion: To include Rudder angle and heading indication at emergency steering position? (Similar to >500gt). Unless already covered by 9A.1 (1) in that Class Societies include in their requirements for <500gt?	Yes	As suggested
10A.1(7)	We see these changes as an issue regarding petrol and helifuel spaces. Typically, these spaces are able to bilge straight overboard to avoid major fire hazard. The changes in this paragraph seem to be favouring pollution rather than safety. There could also be conflict with 14.1(5)(a).		None	Safety of the vessel may at times cause environmental impact that is at the discretion of the master

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10A.1(7)	Pumping and piping arrangements for bilges into which fuel or other oils of similar or (7)higher fire risk could collect, under either normal or fault conditions, shall be kept clear of accommodation spaces and separate from accommodation bilge systems not contravene MARPOL requirements	Potential for fuel or other oils to cross contaminate into accommodation bilges areas/spaces causing smells/gaseous effects? E.g if bilge suction left open for accom bilge, and NRV passing whilst system not in operation?	None	Text deemed appropriate.
10B	Secretarial error	Objective: This Chapter outlines the minimum requirements for bilge pumping, which shall be in accordance with the requirements of a Recognised Organisation	Yes	As suggested
10B.1 (1)	Secretarial error	For all vessels, the bilge pumping and its installation shall as a minimum meet the cargo vessel standards of SOLAS II-1/Part C - Bilge pumping arrangements Regulation 35-1	None	Text correct
11.2.1.1.6	Has this sentence removed on purpose?		None	Not removed, drafting error deleted number not paragraph
11.2.1.4	Why has this been removed?		Yes	Drafting error, replace with original
11	Stability for Sailing vessels have been moved to Annex P, however only part of this has been moved. There are still references to sailing vessels in section 11. Suggest either move the whole lot or not at all, to prevent confusion		Yes	To be put back in with Annex P moving back to Part B Chapter 14
11.5	<p>11.5 Stability Documents</p> <p>We have noted that stability information on board of yachts is not always suitable for use in emergency situations by the captain and crew on board. There have also been a number of incidents where it became apparent that watertight bulkheads and decks had been modified resulting in a loss of watertightness.</p> <p>I believe it could be of significant aid to have a relatively simple to understand and clear document like a watertight integrity plan providing the information as requested in MSC Circ. 1245. This will provide the master with information useful during emergency situations. I am always hesitant when it comes to the information to be provided in the damage control booklet as any guidance therein could influence the decision of the master. The situation the yacht might be in at the time of needing to control damage might require a different action than what is specified in the booklet. This information should therefore be very generic and leave the responsibilities to the master.</p> <p>In addition, LY3 code states in Section 28.1 that: Vessels over 500GT are required to be surveyed and certificated under the construction and safety equipment requirements of the SOLAS Convention.</p> <p>Unless determined otherwise, the yacht must comply to all relevant requirements of SOLAS Cargo Ship Rules (where applicable to the type of vessel). Therefore I would advice to follow the requirements of Regulation 19 in Chapter II-1. The Damage Control Information as per MSC.1/Circular.1245 (Guidelines for Damage Control Plans and Information to the Master) is required to be onboard.</p>	<p>Add paragraph requiring the following:-</p> <p>Approved Damage Control Information as per MSC.1/Circular.1245 (Guidelines for Damage Control Plans and Information to the Master) is required to be onboard.</p>	None	Noted for future code changes
11.5	<p>The use of strict predefined load cases is not the best way to show the capabilities and risks of a design. This method is rather "old school". The operational use of the yacht does not follow the linear line between full (100% fuel, 100% water, 0% grey/black) and light (10% fuel, 10% water, 100% grey/black) due to the fact that water tanks will stay topped off with water makers and grey/black is treated and put overboard.</p> <p>The stability booklet should contain MaxKG curves for various trims, and mutually decided "typical" load cases should be indicated in the curves to show that the vessel complies (this is the MCA standard approach). The Captain is then free to load the vessel as he wants, for instance offsetting a negative effect of a top deck pool on stability in light fuel condition with extra water or grey/black effluents.</p> <p>The naval architect should identify load cases which would result in non-compliance with the requirements (either intact or damage). We use the term "not a sea-going condition" in the Stability Information Book to identify specific load cases which do not comply. See also 6.3.</p>		Noted	Not for the Code
12	Why are we not using the latest version of ICLL		None	Intentional as more applicable to Yachts.
13.1 (16)	Not clear how this will be verified by the Authority. If a real drill will be performed, this will have a very high impact on the delivery schedule and costs.	Add that this will be verified by analysis, not an actual drill.	None	To be surveyed or reviewed by plan approval
13, Table 1	References to sections are not in the table anymore as was the case in LY3.	Please restore references to the applicable sections in the table.	None	Cross references not deemed required

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13.1 (8)	Should there be a comma between liferaft and marine?		Yes	As suggested
13.1 (16)	It is impossible to check this rule, so it this rule is useless. This new rule creates false safety.	Delete 13.1 (16)	None	Text as per SOLAS and required for safety
13.2(3)(c)(ii)	'Up to and including the worst intended conditions'. This is a vague statement. Are there intended criteria here to be assessed? Trim, heel, sea state, wind etc.	Clarify if possible what needs to be assessed.	Yes	Added heel and trim criteria & MES design criteria
13.2(c)(ii)	Make clear than this is intended to be an embarkation ladder		Yes	Added "an embarkation ladder at the launching station" fulfils this requirement
13.3 (3)	Not permanently attached – should be attached via a weak link – very important.		None	As per SOLAS (does not change weak link/hydrostatic release requirements)
13.3(5)	Unclear if this refers to a scenario with a sinking ship or the manual deployment. In case of the first, replace "Fall clear" by "Float free". In case of the second, there should be referred to throw over board life rafts.		None	Text refers to falling free and is therefore deemed appropriate
13.3(7)(d)	Replace "any"	By "all life raft"	Yes	As suggested
13.3(9)	This rule is not discussed and has no background	Delete 13.3 (9)	None	Raised at final WG meeting and represents a significant step forward in safety
13.4	Ref Chapter 13, Section 13.2 – Lifeboats (Required for vessel over 85m in length) – (3) (b) allows for the substitution of Lifeboats by a sufficient number of DLLR's and the provision of an additional approved Rescue Boat. Noting that the Rescue Boat is intended for the marshalling of the Liferrafts, I would suggest that we should highlight the LSA Code requirement for the Rescue Boat to be capable of towing the fully loaded Liferaft at a speed of at least 2 Knots The reason why I suggest this is based on my experience of reviewing DLLR Arrangements on Large Motor Yachts whereby the 11additional Rescue Boats are very small (<4m long) and are expected to tow fully loaded 35 Person Liferrafts, which I doubt they would be capable of. The Certificates of Type Approval for the Rescue Boats will state either the Maximum Bollard Pull or the largest Liferaft that the Rescue Boat is capable of towing at this speed. I feel we should be highlighting this in the Code in order to put Designers on otice that they need to ensure that the adidtonal Rescue Boat is powerful enough to fullfit this requirement.	Suggest New paragraph as per LSA Code Chapter V, Section 5.1.1.7: "Rescue boats shall have sufficient mobility and manoeuvrability in a seaway to enable persons to be retrieved from the water, marshal Liferrafts and tow the largest liferaft carried on the ship when loaded with its full complement of persons and equipment or its equivalent at a speed of at least 2 knots."	Yes	As suggested
13.4(1)(b)	How will this be verified? By means of drawings?		None	Not a code issue. To be verified by plan approval
13.4(1)(b)	Trim conditions of 10degrees trim are very unlikely. No pinhole damage case (except a sinking ship) will come close to this.	Change 10 degrees to "worst case damage trim".	None	May be considered on case by case but requirement remains
13.4(1) (b)	Where rescue boats are fitted on both sides, or can be launched on both sides, the '20 degrees list either way' requirement could be lifted Furthermore, trim conditions of 10 degrees are very unlikely	Additionally, rescue boats need not be capable of being launched on both sides of the vessel, but shall be capable of being launched under unfavourable conditions of "worst case damage trim" of up to 10° and a list of up to 20° either way, and means to lower the boat from within the boat is not required. The '20 degrees list either way' requirement is not applicable for vessels equipped with rescue boats on both sides.	None	May be considered on case by case but requirement remains
13.4(1)(f)	empty paragraph	delete 13.4(1)(f)	Yes	Drafting editorial
13.4(1)(f)	Secretarial error This is an empty paragraph	Delete	Yes	Drafting editorial
13.4 (1)(f)	Any text??		Yes	Drafting editorial
13.4(2)(a)	Noted: "White" is not a highly visible colour, but here on exceptional basis considered acceptable for rescue boats. Question: What does this acceptance mean for totally "white" coloured rescue boats? Are these coloured "covers or patches" specified in the last sentence are required, or not?	Clear statement whether coloured "covers or patches" specified in the last sentence are required for "all" non-highly visible coloured rescue boats, except "white" or including "white".	Yes	"where white shall also be considered acceptable" Delete and "such colour" replaced with "highly visible"
13.4 (2) (c)	Larger rescue boats can carry much more persons than normally would be used during rescue operations. This heavily affects required Working Load Limits for rescue boat lifting appliances.	Suggest "dual certification" where the launching appliances are certified for the weight of the rescue boat equipment and the rescue crew only. Another certificate shall indicate the amount of persons on board while the boat is used as a tender.	None	Tender use not a statutory item and therefore not for Code but to covered by Safety Management System.
13.4(2)(b) & (3)b	2b refers to LSA and 3b to SOLAS for launching appliances.	Refer to the same	Yes	As suggested
13.4(3)(b)	"highly visible colour"	Refer to footnote 20 here also.	None	Defined earlier in Code with footnote
13.4(b)	10o trim combined with 20o list is not realistic. On many yachts the rescue boat storage location will already be	7o list combined with worst damage trim for yachts under 500GT. For larger yachts	None	10 & 20 degrees as per LSA Code

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	submerged in this case.	10o list and worst damaged trim+3o is possible.		
13.4(3)(b)(ii)	No reference made to the application of dyneema lines, which is very well fit for SY and marine applications.	Dyneema lines should be added and reasonable safety factors applied. This was discussed in a CISR notice.	None	Covered under 13.1(7)
13.4(3)(ii)	Unclear what rules will be applied for certification by the RO.		None	Intentionally loose text as currently no appropriate standards. Statement of fact expected
13.4(3)(iii)	Unclear why a risk assessment should be performed when the appliance is already certified by a recognized organisation.		None	Use of the equipment in its location should be assessed
13.4(3)(f)	".. and administration requirements"	To which requirements is referred to?	None	REG members have differing legislation so this is required to cover individual requirements
13.5	<p>There is increasing confusion with in the Yacht market regarding SOLAS approved Lifejacket and ISO approved. It is completely proper that vessels should have the minimum requirement of SOLAS approved Life Jackets in fixed foam or Inflatable on board for abandonment purposes as currently mandated in the Code.</p> <p>It should be made clear that Life Jackets approved ISO-12402 can also be used for daily work tasks where it is deemed necessary to wear a Life jacket i.e. driving a tender, works with risk to falling over the side etc.. These ISO12402 Lifejackets would be carried in addition to the minimum requirement SOLAS Lifejackets already mandated.</p> <p>Although 13.1(3) covers additional life-saving equipment carrying additional Lifejackets for use when deemed necessary should be defined and encouraged. Often a lifejacket should be worn, but a SOLAS lifejacket unsuitable for the task due to weight and bulk.</p>	<p>1) Additional paragraph to 13.5 stating that in addition to the mandatory SOLAS lifejacket requirement it is permissible to have extra life jackets on board built as a minimum to ISO12402-3 standard for works that have been identified requiring a life jacket to be worn.</p>	None	Non LSA lifejackets not covered by Code but rather risk assessment and Safety Management System.
13.14(1) Footnote 22	Secretarial error	Refer to the Guidelines for the development of plans and procedures for recovery of persons from the water (MSC.1/Circ.1447)	Yes	As suggested
13.15(1)(b)	Why shall the MES embarkation station not be higher than the bulkhead deck? Printing error? If not, further explanation needed to avoid misunderstandings. (In the unexpected case that "MES embarkation station" does not mean "upper" access to MES slide or chute, the term "MES embarkation station" should be defined.)	The MES embarkation station shall be above the bulkhead deck.	None	To avoid increased risk of complex systems. Intentional text
13.15 3(f)	iii) not permanently attached		None	As per SOLAS (does not change weak link/hydrostatic release requirements)
14.1	there is no clear purpose to the addition of recreational diving systems to this paragraph. Only visible changes which could be associated with these systems are gas detection, which would be nitrogen and oxygen? Already abundant gasses in normal conditions. Since the annex on diving systems is no longer included, what is the purpose of the inclusion of diving systems?	purpose of including diving systems should be clear from requirements, or definition and title should be removed.	None	Space deemed appropriate for storage of such equipment
14.1	Dive systems are added.	Please explain further when dive systems are considered unsafe. Do both enriched air (nitrox) and compressed air systems fall under this category? Does this include compressors or only diving bottles?	None	As per definitions
14.1	This chapter includes now recreational diving systems, but the chapter itself mentions such a system only twice. One reference is about gas detection systems. But diving systems use normally available gasses		None	Space deemed appropriate for storage of such equipment
14.1	Recreational dive systems are added	A further explanation is needed when dive systems are unsafe. Do enriched air (nitrox) and ordinary compressed air fall under this category? Does it include compressors or only diving bottles? And what about empty bottles?	None	As per definitions
14.1(2)	I consider, that this paragraph deals with spare patrol IN CONTAINERS.	The quantity of spare petrol and/or other highly flammable liquids carried in containers shall be kept to a minimum, generally up to 150 litres maximum. Greater quantities may be specially considered by the Administration when the storage location, ventilation, containers, fire suppression and space fire protection and detection are considered adequate for the given increase.	None	Text deemed appropriate.
14.1(5)(a)	Instead of a drencher of 3.5 l/min/m2 we prefer watermist as for engineroom or Roro spaces	Add "or an (equivalent) sprinkler system as approved for engineroom cat A, or special category spaces, or roro spaces.	None	Text deemed appropriate. Could be addressed on a case by case basis in accordance with 1.9
14.1(5)(a)(c)(i)	Air changes are now based on gross empty space.	Not gross empty space but net air volume must be mentioned. Or use same permeability's as used for damaged stability.	None	Text intentionally based on empty space. Permeabilities could be considered on a case

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				by case basis in accordance with 1.9
14.1(5)(h)	First sentence suggests that fuel water/ mix can be drained to the bilge system. This seems to contradict Part A page 99 5 (a) final sentence: 'This shall not lead to machinery or other spaces where a source of ignition may exist.' Bilges can run through the engine spaces.		None	Text as per SOLAS
14.4(2)	For fryers of up to 15 litres cooking oil, capacity, the provision of a suitably sized Class F extinguisher (BS7937:2000) together with manual isolation of the electrical power supply is acceptable.	BS5306-8 2012 table 2 states that the number of extinguishers required for a deep fat fryer fire is calculated on the surface area of the deep fat fryer not the capacity.	None	Long established practice to measure in volume
14.4(2)	The reference (BS7937:2000) has been superseded.	New reference should be BSEN 3-7:2004 and A1:2004	Yes	As suggested
14.4(2)	It has class F for wet chemical deep fat fryer extinguisher. In USA this is a class K extinguisher.	Refer to Class F and K (USA)	None	Cannot reference all other Administrations standards
14A.2(2)(b)	No definition of steel equivalent in 14A.	Refer to definition in 14B.2.3c	Noted	Steel equivalent a SOLAS concept
14A.2(3)(a) & (b)	Does the wording "totally enclosed" also include the deck (floor)?	To be clarified.	None	List of included items already in text (not including floor)
14A.2(3)(a)	Requirement to insulate the side shell to class A-30 standard is stricter than in 14B where only steel equivalence needs to be provided.	To be clarified.	None	Text intentional to simplify builds
14A.2(3)(a)	Clarify if insulation is needed on side shell of steel vessel		None	Under SOLAS Steel = A0
14A.2(4)(f)	'including open decks' is removed, this however leaves a grey area.	In stead, say 'excluding open decks'.	Yes	As suggested
14A.2(4)(i)	"they may meet", this could lead to the interpretation that it is not mandatory to meet the equivalent requirements.	"they shall meet"	None	Text deemed appropriate
14A.2(4)(i) (ii)	I have a complaint about the spelling of the word compliant	Vessel shall have installed a sprinkler or equivalent fixed fire extinguishing system, that is complaint compliant with the Fire Safety Systems Code	Yes	As suggested
14A.2(4)(i) (i)	Confusing text. Better to write down what is needed. Therefore delete reference to SOLAS	Vessel shall have installed a sprinkler or equivalent fixed fire extinguishing system, that is compliant with the Fire Safety Systems Code in all aspects except they may be exempt from Fire Safety Systems Code Chapter 8 section 2.2.2 requirement for 2 sources of power. Or for sprinkler systems equivalent to that referred to in SOLAS II-2/12, Section 3.8 of the Annex to Resolution A.800. The system shall be designed to enable simultaneous operation of all sprinklers fitted in the most hydraulically demanding area. The minimum area for simultaneous operation may be taken as the largest enclosed accommodation space protected; or	None	Text deemed appropriate
14A.4(9) 14B.15(2)(c)	All fire dampers should be operable from both sides. That is not possible for all fire dampers.	Manually operable one side. You could indicate in the rules in what cases two sides is a must and/or on which side it should be for single sided operation.	None	SOLAS text to remain
14A.4(7)	Add sentence.	The ventilation shall be monitored or suitable gas sensors with alarm shall be installed.	Noted	Noted for future editions
14A.4	Add new item (13).	Sufficient ventilation shall be provided in rooms where oxygen is stored or handled. The ventilation shall be monitored or suitable gas sensors with alarm shall be installed.	Noted	Noted for future editions
14A.4(2)	Here a thickness of 3 millimetre is prescribed, while in Appendix D (D4(1) a thickness of 2 millimetre is prescribed and 0.8 millimetre is the industry standard.	Harmonise thicknesses to 0.8 mm and double wall pipes where necessary.	Noted	D4(1) harmonised to be 3mm
14A.4(10)	Fire safety plan should also include the fire damper identification number	The fire damper identification number shall also be marked on any remote controls provided and Fire Safety plan	None	Text deemed appropriate
14A.4(11)	The industry practice is to use flexible AC piping also for connection of rigid piping or fan coils to supply plenums	Use same wording as in 14B.15(1)	Yes	As suggested
14A.4(11)	Standard size spiro ventilation ducts are most of the cases not suitable for the confined space on board SY <500GT, and in some cases also for SY >500GT	Remove the requirement on non-combustible ducts, or only 'as far as practical'	Yes	Same wording used as 14B.15(1)
14A.4(11)	industry practice using flexible AC piping also for connection of rigid piping or fan coils to supply plenums. Current text too restrictive	use same wording as 14B.15(1)	Yes	As suggested
14B	At times says 600mm other 600 mm. Choose a consistent approach.		Yes	As suggested
14B	Area written as 4m2, should be 4m ²		Yes	As suggested
14B.5 Fire Integrity of Bulkheads	Accommodation spaces Cabins, dining rooms, lounges, offices, pantries containing no cooking appliances ²⁹ (other than equipment such as microwave cookers and toasters), and similar spaces.	Not sure what the 29 is related to.	Yes	Editing error, footnote made superscript

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and Decks (2) (b) (3)				
14B.5(2)(b)	Cat (5) Spaces	Spaces containing Marine Evacuation Systems (MES)	Yes	As suggested
14B.5 Notes to Tables	Symbol "*" apparently deleted by mistake in front of relevant note (between e and f).	To be added accordingly again.	Yes	As suggested
14B.2(4)	This rule is no useful. For a yard it can hardly be applied as it requires a fire test. It is not specified what is 'the specified fire exposure' for division that are not A or B class, i.e. the divisions that are marked with an asterisk. It is better to refer to tested and certified solutions. HSC code provides a good alternative. In general: it is nearly impossible to build a composite yacht <500GT under LY3.	Allow insulation systems that are tested according to 30 minutes HSC code, given that the temperature of deflection of the applied resin is higher than the tested resin. An Engine room on a <500GT composite SY should be allowed to have HSC30 or HSC60 insulation. (A-class is not possible by definition, as A-class implies a steel or aluminium structure)	None	Fire tests are requires and have been successfully achieved across a wide range of builders
14B.2(3)(c)	Steel equivalent: What is considered with equivalent? First of all the requirement of having 25mm in 100kg/m3 does not say anything about the performance. What are 'other insulation types' and how could equivalence be demonstrated if there is nothing about the performance mentioned as a baseline?	Preferably this requirement should be performance based and referring to a tested system. E.g. 'half the thickness of a certified A60 bulkhead insulation.' (e.g. Isover Ultimate is A60 alu bulkhead certified by applying 2x30mm of 66kg/m3, as steel equivalent may then be considered 30mm of 66kg/m3.)	Noted	Already in Code under 14A.2(2)(d) & 14B.2(3)(a)
14B.2(3)(c)	This rule is TOO specific. What to do with material of 99 kg/,3 or 101 kg/m3	Aluminium alloy components of divisions that are required to be equivalent to steel (identified by an * in tables 1 and 2) shall be insulated with 25 millimetres of 100kg/m3 of mineral wool with a minimum of 90 kg/m3 or equivalent for other insulation types, approved for use in "A" class divisions or with an equivalent insulation acceptable to the Administration.	None	Other options can be fire tested or made equiveillance
14B.5(3)	Secretarial error Reference is made to a footnote. That is with superscript. Furthermore it is strange that in panties no microwave or toaster is allowed. So delete strikethrough text	Cabins, dining rooms, lounges, offices, pantries containing no cooking appliances ²⁹ (other than equipment such as microwave cookers and toasters), and similar spaces.	Yes	Foot note made superscript
14B.5 (3)	Various often used spaces missing in the overview	Add sauna's , AC rooms etc.	None	List are not designed to be all inclusive but indicative of spaces
14B.6(1)	A steel framed stair in an aluminium superstructure is as safe as a steel stair	Add: an aluminium stair is accepted only in an aluminium hull or superstructure/deckhouse.	None	Text deemed appropriate
14B.7	A gap is not permitted beneath an A-class door. How can it prevent the passage of smoke or flame if there is a gap?		None	As per SOLAS II-1/9.4.1.1.2
14B.7(2)(b)	With watermist it does not matter if the sill is ready ignitable or not.	Add Except in spaces protected by an automatic sprinkler system and fully addressable fire (1)detection system in accordance with 14B.2.14,	None	As per SOLAS
14B.9(2)	Passenger ships allow the use of A-class approved glass partitions. Why restrict this on yachts where designers are looking forward to introducing more and more glass?	Glass is not to be installed as an interior main vertical zone, stairway enclosure bulkhead, or within machinery space boundaries. unless of tested and approved A0 or A60 construction'	Yes	As suggested
14B.11	What about toilets in the wheelhouse???		None	What about them?
14B.11(2)	Also hot water pipes need insulation, and hard shelled non combustible insulation is not practical and therefore omitted. As a result nearby materials and equipment may suffer from overheating with increased fire hazard. Also it is rather strange that wooden grounds are allowed, and electric cabling is allowed, but low flame spread insulation of limited amounts around pipes is not allowed.	Change to: Insulation materials shall be non-combustible, however core insulation of refrigerator (2)and cold rooms need not be. Vapour barriers and adhesives used in conjunction with insulation, as well as insulation of pipe fittings for cold service systems need not be non-combustible, but they shall be kept to the minimum quantity practicable and their exposed surfaces shall have low flame spread characteristics.	Yes	Expanded to include domestic water
14B.11(2)	Clear definition of "cold service" would be useful to provide industry common understanding. i.e. Freon only, chilled water, cold potable water, etc	Clarify if possible	Yes	Expanded to include domestic water
14B.11(3) & (4)	Reason for complete deletion of (3) unclear/ may not be followed.	Subsection (3) to be added accordingly again as not requiring low flame-spread surfaces at all does decrease the level of safety. Proposal from safety perspective: Only deletion of 14B.11 (4)(b) instead.	None	Not required as all spaces require automatic fire fighting and addressable fire detection as per 14B.16(2)
14B.12(6)	Heading "(6)" deleted.	Most probably typo. To be added accordingly again.	Yes	Editing
14B.1(7)	Often wooden floors wth an airgap below them are used. The airgap results in protection from a fire on a lower deck, and in general there is not enough air to have a serious fire below the floor. If there would be a starting	Add in front: Except in spaces protected by an automatic sprinkler system and fully addressable fire	None	Miss numbered comment could not be traced

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	fire this would be detected by smoke detectors, and if neglected extinguished by watermist. This is not consistent with the use of wood for groundings.	detection system in accordance with 14B.2.14,		
14B.12 (3)(d)	Better definition of what is a 'main workshop in a machinery space' required. Some yachts feature combined tech spaces with workshop areas.	Can we say 'main workshop in a machinery space of Category A'	None	Text as per SOLAS
14B.13	On board of vessels we also have vertical escape ladders. So please explain the scope of this paragraph.		None	Text deemed appropriate. Ladders are not staircases
14B.13	FSS Code requires 900mm for stairs and 700mm for corridors. Suggest same is used. There could be a differentiation between different sized yachts (eg widths for above 85m length, apply passenger-ship requirements 900mm clear width. Also a 600x600 clear width hatch in bulkhead will not be sufficient to escape through.	Corridors used as means of escape shall be not less than 700 millimetres (1)in clear width and shall have a handrail on one side. Stairs used as a means of escape shall not be less than 900mm in clear width and shall have a handrail on one side. Stairways and corridors with a clear width of 1,800 millimetres and over shall have handrails on both sides. "Clear width" is considered the distance between the handrail and the bulkhead on the other side or between the handrails. The angle of inclination of stairways shall be, in general, 45°, but not greater than 50°, (2)and in machinery spaces and small spaces not more than 60°. (2) Doorways which give access to a stairway shall be of the same size as the stairway. (3) Hatches in both bulkheads and decks shall be not less than 600 x 600 millimetres in (4)clear width. Hatches in bulkheads shall not be less than 600 width and 900 in height	None	To be considered for future editions
14B.13 (2)	Does this include vertical escape ladders?	Please explain more clearly what is included and what not?	None	Text deemed appropriate
14B.13(3)	the text " same size as the stairway" results in penalizing extra wide stairways.	Doorways which give access to a stairway shall be of the same size as the stairway. shall have at least the minimal required width for the stairway being served	Yes	As suggested
14B.13(3)	the text " same size as the stairway" results in penalizing extra wide stairways.	Change to "shall be at least the minimal required width for the stairway being served"	Yes	As suggested
14B.15	Is it possible to make a definition of a 'duct'? In our experience we see significant confusion between what is a duct and what is a casing. In our experience the requirements for ducts come from the fact that they can't be accessed or insulated on the inside. Unlike a casing which can be.	Add definition of a duct to section 2.1. Or clarification in Section 14B.15	None	
14B.15(5)	paragraph contains (a) and (b) twice. Also, the reference to SOLAS II-2/9.2.2.3.2.2 means that an engine room ventilation duct (casing) could pass without any insulation through a pantry or AC room. Although this would make life easier, we think this should not be incorporated.	delete " either" , " or" and second occurrence of (a) and (b). retain only (a) to (d).	Yes	Numbering updated. Text intentional as per SOLAS
14B.15(5)	The reference to SOLAS II-2/9.2.2.3.2.2 means that an engine room ventilation duct (casing) could pass without any insulation through a pantry or AC room. Although this would make life easier, we think this should not be incorporated.	Delete the either-or issue in this paragraph. Retain first (a), (b) (c) (d)	Yes	Text intentional as per SOLAS
14B.15(20)	text should refer to dryers instead of laundry spaces, as is the case in 14A.4(8)	use exact wording of 14A.4(8)	None	Text intentional as intended to be for whole space for 14B vessels
14B.15(20)	This should be exhaust ducts from tumble dryers, same as in 14A.4(8)	Ducts provided for tumble driers shall be fitted with filters readily removable for cleaning purposes and suitably located cleaning and inspection openings.	None	Intended to be for whole space for 14B vessels
14B.15(27)	not clear where the words " such an" refer to	delete "such an"	None	SOLAS text
14B.15(27)	Secretarial error	Where a ventilation room serves only such an adjacent machinery space and there is no fire division between the ventilation room and the machinery space, the.....	None	SOLAS text
14B.15(28)	not clear where the words " such a" refer to	delete "such a"	None	SOLAS text
14B.15(28)	Secretarial error	Where a ventilation room serves such a machinery space as well as other spaces	None	SOLAS text
14B.16(2)	Word "of" deleted by mistake.	To be added accordingly again.	Yes	As suggested
14B.16 (2)	Second paragraph addresses requirements for sprinkler systems, this is unclear and difficult to read / understand	Add wording 'For sprinkler systems' and give separate subchapter number	None	Text deemed appropriate
14B.16(3)	" ceiling void spaces containing combustible materials that could present a fire risk". This text encompasses all ceiling voids on board, since in most cases wood construction is used. We understand and agree that this text is meant to apply to concentrated amounts of equipment in the ceiling, but this wording makes it very open to surveyor interpretation.	change to " ceiling void spaces containing a significant amount of equipment that could present a fire risk"	Yes	Amended to read "ceiling void spaces containing equipment that could present a fire risk"

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14B.16 (3)	The text “ceiling void spaces containing combustible materials that could present a fire risk” is a very vague expression and will lead to a lot of discussions with surveyors. A more straightforward text would be appreciated. It would be appreciated that REG publishes a circular with instructions to shipyards and surveyors.	Ceiling void spaces containing a significant amount of equipment that could present a fire risk combustible materials that could present a fire risk shall be fitted with a fixed fire detection and fire alarm system.	Yes	Amended to read “ceiling void spaces containing equipment that could present a fire risk”
14B.23(1)	Word “shall” incorrect in this regard.	Replace “shall” by “may”.	None	Text intentional
14B.23 (1)	This 30% rule is going to give a lot of discussion. REG is invited to create a circular with sketches that will make this issue clear for shipyards and surveyors. Another solution is to NOT define covered deck space (i.e. no change to LY3) Open deck space is clear: It is an open deck. If it is enclosed, and this results in a fire risk, then it is no open deck space anymore and it is no category 9 space anymore.		Noted	Not for Code
14B.23(1)(c)	Secretarial error	ventilators and exhausts in accordance with section 5.5 shall not terminate in these <u>spaces</u> when serving Accommodation, Control Stations or Machinery Spaces.	Yes	
14B.23	typo “paces”	change to “spaces”	Yes	
14B.23	We agree covered deck spaces could need clarification. However, the current definition (30% communicating openings) is vague (30% volume or boundary area and where is this percentage based on?) and doesn’t account for the fire risk of the covered space. For example, do fixed furniture (bench, shoe locker, bar) a Jacuzzi, an enclosed mooring deck or enclosed topmast count as covered open deck space?	Don’t define the covered deck space (i.e. no change compared to LY3), the definition of open deck space is clear: If it is enclosed in a way a fire risk exists, then it is no open deck space anymore and falls under one of the other categories (1-8).	None	Text deemed appropriate . Well discussed during Working Groups
14B.23(1)(b)	This is in the chapter for yachts above 500 GT, so 500 GT can be removed.	Remove 500 GT (textual only)	Yes	As suggested
14B.23(1)(b)	The whole chapter 14B is applicable only to vessels over 500 GT. Why is this limit explicitly mentioned here again?	Wording to be updated accordingly.	Yes	As suggested
14B.23(1)(c)	Wording of reference to “section 5.5” may confuse a little bit.	It should be made clear(er) that the reference is to Chapter 5, Section ...	None	Consistent with Code cross reference protocol
14B.23(1)(c)	Word “paces” unclear (most probably typo).	Should be corrected to “spaces”.	Yes	As suggested
14B.23(1)(c)	It is unclear why ventilation openings for service spaces (which include e.g. also paint stores and garages spaces) are not prohibited.	Service spaces incl. garage spaces should be excluded as well.	Yes	“Garages” also added
Table 15A.1 Footnote 34	Text is not clear. It means that on each vessel no more than 4 CO2 / powder extinguishers are allowed. Text to be improved and expressing what you want.		Yes	Text Clarified
Footnote 35	Please refer to more cost effective reference	35 Fireman’s outfits provided for helideck crew shall be of FSS Code Ch. 3.2.1 standard EN 469 standard	None	Intentional Standard which was also referenced in LY3
15B.1 (5)	Please refer to more cost effective reference	Fireman’s outfits provided for helideck crew shall be of FSS Code Ch. 3.2.1 standard EN 469 standard or another suitable recognised national or international standard	None	Intentional Standard which was also referenced in LY3
16	No requirement for radio log as per SOLAS Chpt IV reg 17		Yes	As suggested
16.2 (1)	Text should be more clear	Table 16.1 illustrates the minimum radio installations which shall be carried by new vessels and on vessels subject to major conversion. This fulfils the distress and safety communication functions for voyages in <u>the GMDSS</u> Sea Areas A1, A2, A3 and A4.	Yes	New definition added in Section 2.1(3) for sea areas
17.1(3)	duplication is addressed differently in the header compared to subparagraph (c)	delete “ masthead lights and sidelights” in header, keep “ masthead lights, sidelights and stern lights” in par (c)	None	One requirement is for over 500GT & the other for over 50 m
17.1(3)	Text of 17.1(4)(c) clearly indicates what is needed. Text in 17.1(3) creates confusion.	With due regard to accessibility, The requirement for duplication for navigation lights required to be shown whilst underway (masthead lights and sidelights) may be satisfied by having spare bulbs that can be easily fitted within three minutes or by . However, on yachts over 500GT these shall be duplicate lights	None	One requirement is for over 500GT & the other for over 50 m
17.1 (3) and 17.1 (4)(c) and Annex L2 (1)(a)(ii)	Requirements for “Duplication of navigation lights” (mast head-, side- and stern lights) are clearly specified in MSC.253(83) Sec.4.1.3 for all ships of 50m or more in length. An additional “500 GT” limit should be not needed. “Duplication of navigation lights” is one subject and should be preferably covered by one single paragraph.	Delete REG YC Part A 17.1 (3) or join up “duplication requirements” at least in one paragraph.	None	requirement is for over 500GT & the other for over 50 m
17.1(4)(c)	Improve text	masthead light, sidelights and a stern light installed onboard vessels longer greater than 50m in length shall be duplicated or be fitted with duplicate lamps; Yachts over 500 GT shall be fitted with duplicate lamps	None	Use of “greeter than” consistent with Code protocol

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17.4	Has this sentence been removed on purpose?		None	Yes, replaced by 17.3 & 1.8
18.1	Make requirement practical. Emergency supply via batteries should be sufficient, because this power is ALWAYS available.	The magnetic compass or repeater shall be so positioned as to be clearly readable by the helmsman at the main steering position. It shall also be provided with an electric light, the electric power supply of which shall be on the main and emergency source of power.	None	Deviation from SOLAS not deemed appropriate
18(1) (a)	In the 21 st century it may be time to allow fluxgate compasses on battery power or SAT compass on battery power. When battery power is gone, a magnetic compass is not of any help anymore.	A properly adjusted standard magnetic compass or other means, independent of any power supply, to determine the ship's heading. Alternatively a double fluxgate compass on battery power or a SAT compass on battery power are allowed.	None	Deviation from SOLAS not deemed appropriate
18.5 (4)	I hope this is a secretarial error. Radars without connection to speed log and gyro are outdated in Europe	A 3 GHz radar or where considered appropriate by the Administration a second 9 GHz radar, or other means, to determine and display the range and bearing of other surface craft, obstructions, buoys, shorelines and navigational marks to assist in navigation and in collision avoidance, which are functionally independent of those referred to in paragraph 18.1(2)(f);	None	Requirements as per SOLAS V/2.7.2
18.6 (1)	Missing reference	Navigation bridge visibility shall comply with SOLAS V <u>Reg 22</u> . Vessels under 55 metres in length shall comply as far as reasonable and practicable.	Yes	As suggested
18.6.3	Sentence reference 5.5.8, which is no longer appropriate		Yes	Reference Deleted
18.7	A proper lookout should be possible from any position in the wheelhouse.	Windows in the wheelhouse to the navigating position shall not be of either polarised or tinted glass (see 5.5.8) Portable tinted screens may be provided for selected windows.	None	Consistent use of the term "navigating position" within the Code
19.1(2)(a)(ii)) 19.1(2)(b)(ii) i)	Refers to GPS	Amend to GNSS <i>(as there is more than one available Satellite positioning system available)</i>	Yes	As suggested
19.1, 19.2, 19.3 and 19.5	Proposal for improvement: Nautical Publications, Barometer, Anemometer, Signalling Lamp and Radar reflectors are not "miscellaneous equipment," but "navigational equipment" and might be thereof better listed under Chapter 18. (Even if then different from the previous LY3)	Shifting and collecting all "navigational equipment" requirements in Ch. 18.	None	Consistent chapters with LY3 decided
19.1(3)	Insert at end	Where paper charts are carried, in addition to the above sized chart table, sufficient draw space of minimum dimension 600 x 750 millimetres shall be provided to permit the charts to be stored on the bridge for immediate use.	None	Too much detail for Code
19 (2) (c) (iii) (bb)	No formal ECDIS ship specific training required. Is this acceptable?		None	Requirements as per referenced circular MSC.1/Circ.1503
20.1	(1) 'a' not 'an'		Yes	As suggested
21.8	21.8 introduction of new equivalence to MLC code.		None	No change from LY3 and outside of MLC application
21.8	Equivalence arrangements pre-date new code.		None	No change from LY3 and outside of MLC application
21.8	200-500GT Crew mess to have half the crew OR 6, whichever is greater. Agreed at REG meeting, not included in code	Technical decision not included in revised code.	None	Changes to ILO MLC equivalence outside of the scope of the Code review
21B.8.1(a)	extent of equivalences is up to 5000 GT instead of 3000 GT	change text into " up to 5000GT"	None	Changes to ILO MLC equivalence outside of the scope of the Code review
21B.8.1(a)	extent of equivalences is up to 5000 GT instead of 3000 GT	The sleeping accommodation shall meet 21B.8(2) (the requirements for sleeping accommodation of the MLC for vessels up to 5000 GT)	None	Changes to ILO MLC equivalence outside of the scope of the Code review
21B.8(5)& (6)	as per earlier correspondence, case is made to refer to passenger vessel requirements for vessels over 3000 GT. If not, 5000 GT is a hard ceiling for Pt A vessels (restricting design freedom) and PtB compliant vessels over 3000 GT will not be able to " downgrade" to Pt A compliance, i.e. for operational reasons.	delete 21B.8(5) and add " for passenger vessels" to text of 21B.8(6).	None	Changes to ILO MLC equivalence outside of the scope of the Code review
21B.8 (6) (a)	Pt A and Pt B vessels are used for recreational purposes. The work for the crew is the SAME, except that in Pt A the amount of pax is lower. There is no reason, that the lower amount of pax on board has to be compensated by larger crew cabins. Very awkward to see in Pt A stricter regulations than for pax vessels and Pt B vessels.	delete 21B.8(5) and add " for passenger vessels" to text of 21B.8(6).	None	Changes to ILO MLC equivalence outside of the scope of the Code review
22	a reference to Annex (B) is missing in Pt A, should be somewhere in Ch 22	add reference to Annex (B)	Yes	As suggested

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22	<i>The structural strength of any bulwarks or guardrails shall comply with the requirmenets of a Recognised Organisation. No need for the rest as it adds ambiguity.</i>		Yes	As suggested
22	<i>MSC.337(91) is archived</i>		Yes	Corrected to "as amended"
33	Sailing vessels: requirements formerly only applied for Pt B vessels are now also covering Pt A vessels. Since this was not addressed in the working group meetings and experience with Pt B vessels is limited to one or two vessels, how were effects of this change checked??	sailing yacht builders / designers to confirm applicability or issues, likely need to reconsider this change.	Yes	As suggested
33.1	Annex P was developed for PYC vessels. Not for LYC vessels.	Delete reference to Annex P until implications have been studied.	Yes	As suggested