

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

Part B

Section	Observation/Comments	Suggested Changes	Action	Explanation
1.6(2)	Polar Code Certification is possible without icing considerations, with operational (climate) restrictions. Therefore, requiring icing conditions within REG Code is incorrect.	Delete “stability conditions shall include those 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.	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(1)	retroactive requirements are made to significant items of hardware / structure of vessels in (e) and indirectly (l) and (m).	delete (e), (l) and (m)	Yes	Delete (e) and harmonised with Part A
1.7(1)	We have to obey grandfather clauses, especially with complicated hardware. This has implications on the paperwork as well.	delete (e), (l) and (m)	Yes	Delete (e) and harmonised with Part A
2.1	definition “garage spaces” includes spaces with recreational dive systems. This results in dive lounges being subjected to requirements originating from garage functionality, e.g. 5.1(3)	remove “and recreational dive systems”	None	This is the intention
2.1	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 and emergency shutoffs for distribution piping.	change “ using, creating and storing” to “ under pressure with”. Further see 6.15(22)	None	Original text captures the intent
2.1	Occasional worker is the only one that does not have the definition next to the subject. It refers to Annex (E), for continuity should the definition not be placed here.	Occasional Workers are additional staff who may be working in service for the owner or charterer for example, a nanny, masseuse or bodyguard. They are normally staff who work on shore and are on board for a short period of time, with no emergency duties. They may not fall within the definition of a “seafarer” for the purposes of the MLC.	None	Structure intentional, No change
2.1	The dependency of the Definitions of L2 and L3 on ships size is too strong and not limited. The Height of L2 will then be much higher than Position 2 according to freeboard regulations. For very large vessels this causes a problem with windows according to regulation 3.12(4) and enhanced survivability would be generally required.	L2: a virtual line drawn at a height of $h_{std} + 0.02L$ or $h_{std}+3m$, whichever is less, above the deepest seagoing waterline L3: a virtual line drawn at a height of $2 \times h_{std} + 0.02L$ or $2 \times h_{std}+3m$, whichever is less, above the deepest seagoing waterline	Yes	As suggested
2.1	“seafarer”	“As defined in Annex [E]”	None	Definition required to support Annex E
2.1(2)	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 (2)	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 (2)	Definition of “Seafarer” refers also to “Occasional Workers” but definition of “Occasional Worker” is missing in Part B.	To be updated accordingly.	None	Contained in Annex as referenced in definitions
2.1	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 and recreational dive systems	None	Intentional inclusion
2.1	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
3.6(1)	The following to be taken into consideration: Not on board every ship the bulkhead deck is equal/comparable with the freeboard deck. The impact would be irrelevant if the wording “below freeboard deck” would remain valid for Part B. The reference for shell openings shall be as per definition below the bulkhead deck . The bulkhead deck is in most of our cases above the freeboard deck.	• Shell Openings Below the Freeboard Bulkhead Deck: 3.6 (1): Garages and other compartment(s) below the freeboard bulkhead-deck , [...]	Yes	Title changed to “Bulkhead deck”
3.7(4)(f)	text not changed, but seems to infer that using a flush deck hatch would result in a requirement for two compartment stability???		None	Same text since PYC Edition 1 in 2010
3.7(4)(f)	It seems that using a flush deck hatch would result in a requirement for two compartment stability???	IS THIS WHAT YOU WANT???. I can hardly imagine	None	Same text since PYC Edition 1 in 2010

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3.7(4)(f) & 3.8	The wording space or spaces to be used OR In case of “watertight compartment” the amendment ...”below the bulkhead deck” to be added.	• Hatchways and Coamings 3.7 (f) the vessel can comply with the enhanced survivability standard as defined in Section 4.30 with the space or spaces / watertight compartment to which the hatch leads flooded below the bulkhead deck	None	Clarification not required
3.8(2)	same comment as 3.7(4)(f)		None	Same text since PYC Edition 1 in 2010
3.8(2)	Same as 3.7(4)(f)		None	Same text since PYC Edition 1 in 2010
3.9(6)	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 reference 4.	Yes	IACS reference added
3.9(6) 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
3.12	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
3.12(1)	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”
3.12(1)(d)	Reference to be corrected.	• Glazed Openings 3.12 (1) (d) follow the requirements of Chapter 18 8 where they are for glazed openings in the navigating position; and	Yes	As suggested
3.12(1)(d)	Reference to Chapter 18 is not correct.	Chapter 8 to be referenced?	Yes	As suggested
3.12(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
3.12(2)(b)	Bonding is an accepted method in glass constructions; additional mechanical retainers on top of the bonding are not needed	arrangements shall be such that glazed openings and doors cannot fall into the vessel should the bond line fail or due to the effects of fire;	None	No change needed to allow bonding
3.12(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
3.12(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
3.12(2)(c)	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.	Yes	Reference to 5kPa deleted
3.12(2)(d)(i)	Remark is overdone. A window will not be able to be certified as A class when it disintegrates during or after the FTP fire test.	Delete 3.12(2)(i)	Yes	As suggested
3.12(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
3.12(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
3.12(4)	seems to infer that using an enlarged porthole would result in a requirement for two compartment stability???	please clarify	None	Same text since PYC Edition 1 in 2010
3.12(4)	This text implies, that a window exceeding the size of a porthole can only be arranged, if enhanced survivability rules are used. This is overdone. We better consider the application of deadlights	Where glazed openings with an area exceeding 0.16 metre ² are fitted in the buoyant part of the hull within Level 1, they shall be provided with deadlights so arranged that they can be easily and effectively closed and secured watertight the vessel shall meet the enhanced survivability standard as set out in Chapter 4 of the Code, with the watertight compartment behind the glazed opening assumed flooded and in all such cases the arrangements shall comply with all other applicable provisions of this section.	None	Same text since PYC Edition 1 in 2010
3.12(5)	There should be consistency in the Code. No jumping between different Rulesets. Change reference from rules of Recognised Organisation towards ISO 11336-Part 1	Where glazed openings do not protect buoyant volumes, they shall be designed using the pressure heads of ISO 11336-1.	Yes	As suggested
3.12(6)(b)	this paragraph requires a deadlight (= secondary watertight closure) to a structure which doesn’t need to be	delete 3.12(6)(b)	Yes	As suggested

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	watertight but is weather tight			
3.12(6)(b)	<p>The definition for L2 - frequently placed above the main deck - will lead up to the problem that floor-to-ceiling windows (which are frequently used within the owners area; main deck aft) have to be equipped with deadlights, which is simply not feasible, especially for very large vessels.</p> <p>Deadlights are not feasible here due to their weight and size. As we are talking about owner's area, the windows are huge and the deadlights would be extremely heavy and not manageable by crew. Furthermore the deadlights couldn't be stored close by in the owner's area and also not be transported to other rooms due to their weight and size.</p> <p>Due to the above the following paragraph 3.12 (6 b) to be amended as listed within the right column.</p> <p>OR</p> <p>As an alternative to the above: To add an additional paragraph to allow the omission of deadlights if a factor of 1.5 is applied to the design pressure (e.g. same content as mentioned for Storm Covers see page 44, 3.12 (9))</p>	<ul style="list-style-type: none"> Deadlights 3.12 (6) (b): spaces above the buoyant part of the hull in Levels 1 and 2 both in the side shell and in side bulkheads set inboard from the side shell, which protect direct access to spaces leading to the buoyant part of the hull. Example for the additional paragraph for deadlights (page 43): Where required by subsection (6), if the glazed openings meet an enhanced structural standard, in accordance with Recognised Organisation rules, a recognized International Standard, or a factor of 1.5 applied to the design pressure of the glazed opening, then deadlights are not required. Storm Covers 3.12 (10): A- and B-Class cabin bulkheads and doors are accepted in place of deadlights or storm covers fitted to glazed openings in the following locations: (a) in levels 1 a n d 2 when above the buoyant part of the hull and separating side glazed openings from a direct access leading below; and (b) in level 1 and 2 when considered buoyant in the stability calculations. 	Noted	See new definition of L1 & L2
3.12(6)(b)	This paragraph requires a deadlight (= secondary watertight closure) to a structure which doesn't need to be watertight but is weather tight. We realise that down flooding protection is needed for the buoyant parts of the hull, but this sentence of the Code is not clear and needs careful reconsideration.	Reconsider	Yes	Deleted
3.12(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
3.12(11)(b)	The "walking over it " loads are not covered for overhead glazing		None	No known standards to refer to
3.12(11)(c)	reference to 3.12(11)(e) does not exist	check reference.	Yes	Reference corrected
3.12(11)(c)	Reference to be corrected.	(c) except where the arrangements comply with 3.12(11)(e) 3.12 (12) and where fitted in Level 1 or 2, be provided with deadlights or storm covers that can be easily and safely mounted in a seaway; and	Yes	Reference corrected
3.12(11)(c)	Reference to 3.12(11)(e) not possible		Yes	Reference corrected
3.12(11)(c)	Confusion arises as reference is made to a non-existing paragraph. Para 11.4.11.e does not exist.	where fitted in Level 1 or 2, be provided with deadlights or storm covers that can be easily and safely mounted in a seaway; and	Yes	Reference corrected
3.12(11)(c) 3.12(12)	Same as Part A 5.4 (11), it seems that subsection (12) should be subsection (11)(e) to validate the reference under (11)(c).	Please check.	Yes	Reference corrected
3.12(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	No known standards to refer to
3.12(13)	typo "organization9"	change 9 to superscript.	Yes	As suggested
3.12(13)	There should be consistency in the Code. No jumping between different Rulesets. For that reason delete the rules of the Recognised Organisations but consistently refer to ISO 11336 Footnote 9 to be removed.	Glazed openings, together with their frames, deadlights and storm covers, if fitted, shall meet an appropriate national or international standard (ISO 11336) or the rules regarding side scuttles and windows for Passenger Ships of a Recognised Organisation⁹.	None	Existing text covers all eventualities
3.12(14)		Renumber footnote 10 and 11 to 9 and 10	Yes	Footnote numbering amended
3.12(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)
3.16	a reference to Annex (B) is missing in Pt B, should be somewhere in 3.16	add reference to Annex (B)	Yes	As suggested
3.18(3)	It refers to Section 11, but should refer to enhanced survivability (4.30)? Section 11 reference was copied from LY3?	Please update.	Yes	As suggested
4.2(4)(b)	reference is made to 2020 amendments of SOLAS concerning WT doors (MSC98). Note that this regulation	delete 4.2(4)(b). This issue to be reviewed with REGYC working group and acceptable	Yes	Reference removed from this Edition

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	seriously impacts the arrangement of PtB vessels, is very recent and thus has not been discussed or reviewed in the working group.	wording to be integrated in 2020 update of REGYC.		
4.2(4)(b)	MSC.421(98) has a serious impact on the operation of superyachts.	delete 4.2(4)(b). This issue to be reviewed with REGYC working group and acceptable wording to be integrated in 2020 update of REGYC.	Yes	Reference removed from this Edition
4.7(9)	typo in (original PYC text) formula, minus should be equals	should read "G=..." instead of G- ..."	Yes	As suggested
4.7(9)	Secretarial error	Minus sign to be replaced by an equal sign (=)	Yes	As suggested
6.3 (12)	The text in this Code about low flame spread and non-toxic surfaces that should be used in the open deck areas and those combustible materials being acceptable when protected by direct jet of water is not in line with reality. This has been discussed over and over and the outcome is a complicated and ineffective rule that does not at all reflect the reality on-board a mega-yacht.	Delete the 'open deck'-phrase from 6.3 (12) and all related sub-paragraphs to the fire growth potential on open decks.	None	Text as per SOLAS intent and allowances are written in
6.3(18)	"use for the owner and guests" . flexibility should also be available for accommodation for occasional workers. For vessel with >120 persons this is restricted per 10.2 (1) (e).	Change to "use for the owner, guests and occasional workers"	None	Flexibility is not extended to occasional workers
6.3 (18)	We would like to have some more flexibility in the design of cabins, especially on vessels with < 120 persons. We foresee that some owners would like to have "upgraded" cabins for a limited amount of occasional workers. This flexibility on vessels > 120 persons is restricted in 10.2(1)(e)	<i>the Administration may relax the provisions of 6.3(17) in areas appropriated for the use of the owner, and guests and occasional workers, other than in relation to escape routes, stairway enclosures and corridors, provided that-</i>	None	Flexibility is not extended to occasional workers
6.5(14)(d)	<ul style="list-style-type: none"> Requirements for which fire doors exactly the paragraph applies to be more precisely by referring to 6.7 (35). 	<ul style="list-style-type: none"> [...] (d) the control panels in the central control station shall be capable of indicating open or closed positions of watertight and semi-watertight doors, fire doors if requested under 6.7 (35) on or off status of the detectors, manual call points, alarms and fans; 	Yes	As Suggested
6.7	Numbering is out of order: <ul style="list-style-type: none"> 6.7 (65)(ii)(br) is followed by 6.7(2) Furthermore para. 6.7(2) refers to "(65) (d)" and "(65) (f)"; 65 (f) does not exist. 	<ul style="list-style-type: none"> Numbering/References to be corrected 	Yes	As Suggested
6.7(1)(d)	Reason for complete deletion of 6.7 (1)(d) instead of relevant update of wording and deletion of "restricted fire risk" unclear.	Due to the fact that (more or less) on every PASSENGER YACHT escapes through spaces other than corridors and stairway enclosures are provided, relevant technical requirements (such as the ones in 6.7 (1)(d)) should be defined somewhere in Part B.	None	Not required as Pat B makes no reference to spaces of restricted fire risk.
6.7 table 6.1	column headed (12) is no longer valid, since category (12) has been deleted	delete column under (12)	Yes	As Suggested
6.7 table 6.2	column headed (12) is no longer valid, since category (12) has been deleted	delete column under (12)	Yes	As Suggested
6.7 table 6.2	When deleting row and column headed (12), notes g and h are not referenced in the tables.	delete footnotes g and h	Yes	As Suggested
6.7 table 6.1	column headed (12) is no longer valid, since category (12) has been deleted	delete column under (12)	Yes	As Suggested
6.7 table 6.2	column headed (12) is no longer valid, since category (12) has been deleted	delete column under (12)	Yes	As Suggested
6.7 table 6.2	After deleting row and column headed (12), notes g and h are not relevant anymore.	delete footnotes g and h	Yes	As Suggested
6.7.27 footnote (e)	Only part of footnote has been deleted	Delete the whole footnote	Yes	As Suggested
6.7 Notes to Tables 6.1 and 6.2	Note "*" (a) refers to note "(e)" which is deleted now.	Wording of note "*" (a) should be updated accordingly.	Yes	As Suggested
6.7(27) footnote * (e)	typo: (e) part of footnote deleted, "in accordance with" remains	delete "in accordance with"	Yes	As Suggested
6.7(32)	<ul style="list-style-type: none"> The following amendment to the permanently attached means of closing was evaluated as reasonable. Clear statement requested as listed on the right hand side. 	<ul style="list-style-type: none"> Openings shall be provided with permanently attached means of closing which shall be at least as effective for resisting fires as the divisions in which they are fitted. If not stated otherwise, doors must not be self-closing, nor indicated or have a remote release. 	None	Text as per SOLAS considered appropriate
6.7(41)	B class cabin doors need to be self closing, other B-class doors (e.g. lockers, cabinets, powder rooms) do not need to be self closing. Hence the necessity to have open/close indication and remotely releasable holdback hooks does not seem valid. Holdback hooks can be applied at these b classed cabin doors if they can be remotely be released upon firealarm and in the event of main power failure and have an open-close indication shown at the permanently manned control station. All in similar fashion to hinged A-class stairway door.	Change text "Other "B" class doors ..." in "B class cabin doors ..." & "in the event of main power failure" to "in the event of fire alarm or main power failure"	None	Text gives the required intent

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	This matter has been discussed in the September 2016 meeting and is not changed accordingly it seems.			
6.7(41)	No comments. Self-explanatory	<ul style="list-style-type: none"> (41) Cabin doors in "B" class divisions shall be of a self-closing type and Hold-back hooks are not permitted. Other "B" Class doors may have holdbacks that are released remotely at the bridge and in the event of main power failure. Such doors with holdbacks shall have indication provided at the fire door indicator panel in the continuously manned central control station showing whether each door is closed. 	None	Text gives the required intent
6.7 (41)	<p>B class cabin doors need to be self-closing. There are other B-class doors (e.g. lockers, cabinets, powder rooms) that do not need to be self-closing. Hence the necessity to have open/close indication and remotely releasable holdback hooks does not seem valid for all B-class doors.</p> <p>Holdbacks can be applied at these B classed cabin doors if they can be remotely be released upon fire-alarm and in the event of main power failure and have an open-close indication shown at the permanently manned control station. All in similar fashion to hinged A-class stairway door.</p> <p>This matter has been discussed in the September 2016 meeting and is not changed accordingly it seems.</p>	Cabin doors in "B" class divisions shall be of a self-closing type. Hold-back hooks are not permitted. B class cabin doors Other "B" Class doors may have holdbacks that are released remotely at the bridge and in the event of fire or main power failure. Such doors with holdbacks shall have indication provided at the fire door indicator panel in the continuously manned central control station wheelhouse showing whether each door is closed.	None	Text gives the required intent
6.7(45)	<p>Fire and weathertightness should not be mixed up. If a boundary is required to be A-classed and is partially constructed of glass, this indirectly defines that the window should not fall out.</p> <p>Requesting specific framing material or retainment in addition to requesting A class certification is excessive and confusing. Item 3.12 (d)(i) is more clear in this respect. The added value of 6.7(45) is unclear. There is only a mutual reference found between these two items.</p>	delete 6.7(45) and delete reference in 3.12 (d)(i).	Yes	As suggested
6.8(58)	SOLAS Reg. II/2 10.2.2.1 has been split by the Code in para (b) and (c). By this the number of personal equipment is no longer linked to criteria of "every 80 metres"	Shift the existing text under (b) from "additionally,..." to "... largest aggregate of such lengths" between (a) and (b).	Yes	Re-structured to clarify
6.7 (66) – (74)	These paragraphs are numbered (2) – (10) by mistake.	Enumeration to be corrected accordingly.	Yes	As suggested
6.15(22)	there is no clear purpose to the addition of recreational diving systems to this paragraph. 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	As per definitions, "Garage Spaces" include dive systems
6.15(22)	Apart from the definition chapter, this is the only place in Pt B where diving systems are mentioned. There is no clear purpose to the addition of recreational diving systems to this paragraph. 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	As per definitions, "Garage Spaces" include dive systems
6.15(22)	Secretarial error	Replace "relative motions" with "motions"	Yes	As suggested
6.15 (22)	Definition error	Change "relative motion" to "motions"	Yes	As suggested
8.2(2)	<p>Proposal for improvement: "Deviations from the requirements of SOLAS V/22.1.9 may be considered..." Rule reference and naming the subject (here: bridge front windows) might be useful.</p>	<p>Adding / setting in front: "Regarding bridge front windows, deviations from..."</p>	Yes	As suggested
8.2(2)	<p>"SOLAS V/22.1.9" contains four subjects: V/22.1.9.1 inclination of bridge windows V/22.1.9.2 framing between bridge windows V/22.1.9.3 no polarized and no tinted windows V/22.1.9.4 at least two windows with clear view Does this mean that Administrations may consider dispensations for all four a.m. provisions?</p>	In case that only dispensations in respect of "window inclination" are to be considered the rule reference should be more precise and replaced by "SOLAS V/22.1.9.1".	Yes	As suggested
9	Title of the chapter mentions "design and construction", section 9.1(1) also includes operation	delete "-design and construction" from title	None	Section is for "design and construction"
9	Title of the chapter mentions "design and construction", section 9.1(1) also includes operation	delete "-design and construction" from title	None	Section is for "design and construction"
10.1 (3) vs. Annex 1	The fact that the extension to carry more than 120 persons is limited to PY-P and PY-U yachts only is not reflected in the last row of table Annex 1.	Table Annex 1 should be updated accordingly to reflect this.	Yes	As suggested
10.2(2)	It reads like SRtP requirement is not limited for ships above 120m but for all yachts with more than 120 persons. This is over and above SOLAS passenger vessel requirements so not correct.	SRtP to be limited to vessels with Length over 120 m.	Yes	As suggested
10.2(2)	<p>Secretarial error During workgroup meeting we agreed that Safe Return to Port would be applicable for vessels > 120 m with > 120 persons while in commercial use. Here is stated that ships > 80 m and > 120 persons need to have Safe Return to Port.</p>	in addition to the requirements of (1), PY-U Vessels in commercial use and longer than 120 m wishing to operate outside the limitations specified in 10.2(1), certified to carry over 120 persons shall comply with the requirements of SOLAS II-1/8.1, II-2/21 and 22 for 'Safe Return to Port	Yes	As suggested
10.3(2)(a)	max 10% occasional workers was not discussed and will present problems. The higher number of persons on	To be discussed, what is origin of this number?	None	10% to reduce guests being certified as

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	board relates mainly to occasional workers.			occasional workers to circumvent regulations
Table 15.2	Wrong references	Replace reference 15.2 to 10.2 Replace reference 15.2(1) to 10.2(1) Replace reference 15.2(2) to 10.2(2) Replace reference 15.3 to 10.3 Replace reference 15.3(1) to 10.3(1) Replace reference 15.3(2) to 10.3(2)	Yes	As suggested
10.3(2)(a)	<p>We are surprised to see a limitation on occasional workers. This has not been discussed in the working group. The increase of persons on board was initiated to give the entourage of the passengers a certain status. Now we see, that not all passengers can bring a PA with them.</p> <p>We can solve this with a Safe Manning Certificate as described in IMO resolution A1047(27) where the flag state orders the minimum amount of persons on board to handle ordinary and emergency situations. The more OW, the more persons on the safe manning certificate. If an owner wants to make a vessel for 10 OW then the safe manning certificate should reflect that enough abled seamen are on board to handle a vessel with 36 pax and 10 OW.</p> <p>A vessel with 30 OW shall have more people on the Safe Manning Certificate.</p> <p>It will be impossible to have a vessel with 36 pax and 150 OW, because 14 persons according the Safe manning Certificate cannot handle 186 persons in an emergency situation.</p> <p>It is not needed to determine the maximum OW.</p> <p>It would be relevant to publish a list with a graph how many persons are needed on the Safe manning certificate based on the amount of OW</p>	Delete maximum on the amount occasional workers	None	10% to reduce guests being certified as occasional workers to circumvent regulations
Annex 1 to Pt B	Wrong reference (3 times) Bottom cell of 1 st column	<p>In accordance with Section 7.21 7.19</p> <p>>99 and <= 200 120</p> <p>Add 1 row at the bottom for vessels with >120 and <=200 PY-U Vessels >80m And PY-P vessels >80 m Shall have Lifeboats and a doctor.</p>	Yes	As suggested