Annexes

Section	Observation/Comments	Suggested Changes	Action	Explanation
General	Lay out differs from code, e.g. in 'definitions'	Harmonise lay out of different documents	Yes	As suggested
A1	Why are only batteries for the propulsion system covered? Other battery installations on board or in systems carried on board comprise a risk as well. Should be amended accordingly.	These guidelines shall also apply to batteries for other applications like submersibles, electrical cars etc., dependent on the outcome of a risk assessment which shall be carried out as a first step. Proposal for wording of A1 - Summary: *The intent of this Annex is to provide guidance on best practice to facilitate safe solutions for vessels utilising batteries as part of a hybrid power system, the sole source of propulsion power or other uses such as battery powered vehicles.*	Yes	As suggested
B	Should references to "Approved Surveyor" be replaced by RO?		None	Allowing for more flexibility
B	In Pt A and Pt B there is no reference to Annex B	At an appropriate place a reference to Annex B to be made.	Yes	As suggested
B3 –B4	We understand and encourage the need for good regulations with regards to 'over-side' working systems. The safety factors taken into account are to our opinion very high.	Compare with other industry practices and adjust where possible.	None	EN standards used
B9	Reference is made to MGN 422. This contains outdated and/or different information (e.g. static test load 10 kN instead of 12 kN). Expect MGN is superseded by Annex (B)	delete reference to MGN 422	Yes	As suggested
B9	Reference is made to MGN 422. This contains outdated and/or different information (e.g. static test load 10 kN instead of 12 kN).	Delete reference to MGN 422	Yes	As suggested
C.1	Includes reference to fire drills, this should be in C-2		None	As per SOLAS Chapter III & II-2 split
C1(2) & (3)	(3) seems to contradict final paragraph in (2).		None	Not considered contradictory
C.1(12) footnote 2	IMO resolution A 624 does not exist anymore	Refer to the Guidelines on training for the purpose of launching lifeboats and rescue boats from ships making headway through the water adopted by the IMO by Resolution ~~A.624(15).~~A921(22)	Yes	Reference removed
C.1(16)(c)	No mention of familiarisation on air		None	As per SOLAS
C.1(20)(a) & (b)	2 weeks seems excessive		None	As per SOLAS
C1 (24) to (29)	The requirement for a training manual and its contents is described in paras 24 to 29. Paras 24, 25 and 29 are repeated on page 21 and 22 as paras 10, 11 and 12.	Add para 13 page 22 to the bottom of the list in para 27 page 20 this will reduce some duplication and then has info on training manuals under the training manual heading.	None	As per SOLAS
C2	Battery installations on board should be explicitly highlighted also in this Annex due to the fact that special firefighting instructions/trainings are needed, esp. for lithium ion batteries. Add new item (18).	If battery systems acc. to Annex A are on board additional firefighting instructions/trainings have to be implemented.	None	As per SOLAS
C2(1)	This does not make sense. The purpose of this paragraph is to mitigate the consequences of fire by means of proper instructions for training and drills of persons on board in correct procedures under emergency conditions and for this purpose, the crew shall have the necessary knowledge and skills to handle fire emergency cases, including passenger care.	The purpose of this ~~paragraph~~ section is to mitigate the consequences of fire by means of proper instructions for training ~~and drills~~ of persons on board in correct procedures under emergency conditions, ~~and for this purpose, the crew shall have the necessary knowledge and skills~~ then using drills or exercises allowing persons to demonstrate their knowledge, understanding and practical skills required to handle fire emergency cases, including passenger care.	Yes	As per SOLAS with "Paragraph" changed to "Section"
C2(7)	Training is not a method of evaluation. Training is the imparting of knowledge needed to carry out a role. Exercises / drills are carried out to allow crew to demonstrate they have acquired the knowledge, understanding and skills prove they are competent in their role.	Performance of crew members' assigned firefighting duties shall be periodically evaluated by conducting on-board ~~training and~~ drills and exercises. These will ~~to~~ identify whether competence and training needs of the individual ~~areas in need of improvement, to ensure competency~~ in firefighting skills ~~is~~ are maintained and to ensure the operational readiness of the firefighting organisation.	None	As per SOLAS
C2(8) & (9)	(8) refers to 7.17(17) this reference does not exist. (8) and (9) state that they should be carried out in accordance with 7.17. 7.17 states 'See Annex (C) for requirements'.	(8) should read Part B 7.17(1)	Yes	References corrected
C.2(8) & (9)	Sentence references 7.17(17) – where is this? Is this a IMO resolution reference?		Yes	References corrected
C.2(16)	As above referencing 7.17 & 7.18		Yes	References corrected

C(12)	footnote 2 refers to IMO A.624(15), this resolution has been revoked by A.921(22)	refer to relevant STCW text	Yes	Reference removed
D2(2),(3)&(4)	Paragraphs (3) and (4) disregard any effects of insulation	Clearance from any hot surfaces to combustible materials shall be sufficient to avoid heating combustible material to a temperature in excess of 90°F (32°C) above ambient and shall as a minimum be in accordance with the manufacturers recommendations but for non-insulated surfaces shall be at least:	None	Prescriptive figure for guidance, insulation may affect final figures
D2(2), (3) & (4)	paragraphs (3) and (4) disregard any effects of insulation, seem to cover a non-insulated exhaust duct.	Change par (2) “shall be at least” into “for a non-insulated duct shall be at least”	None	Prescriptive figure for guidance, insulation may affect final figures
D2(3)		Insert: Shall be “in accordance with the requirements / recommendations of the Manufacturer. Where no such details are available, this distance shall be” at least 230mm…	Yes	As suggested
D2(4)		Insert: material “shall be in accordance with the requirements / recommendations of the Manufacturer. Where no such details are available, this distance shall be” (delete 'being')	Yes	As suggested
D2(5)	A Carbon Monoxide (CO) Alarm shall be provided in any internal space in which a RFA is located.	Source of Power supply not specified. Main/Em.Power, and not a battery powered detector/alarm?	Yes	As suggested
D2(8)	“fuel” should in this case refer to liquid or gaseous fuels only. Solid fuels present a much lower risk of fire. Solid fuel safety measures stated in D5(2) are sufficient	The space in which any additional liquid or gaseous fuel is stored shall be treated as a Service Spaces (high risk) and shall be enclosed by ‘A’ Class fire rated boundaries as per the Structural Fire Protection Tables in the relevant part of the Code	None	Check fuel storage for wood? Nowhere else so best location
D2(8)	“fuel” should in this case refer to liquid or gaseous fuels only, solid fuels present a much lower risk of fire (comparable to the wooden interior of Pt A vessels). Solid fuel safety measures stated in D5(2) are sufficient.	Insert “liquid or gaseous” before “fuel”	None	Increased fire load would place solid fuels in same high risk category
D2(8)		Delete “s” on end of spaces	Yes	As suggested
D2(13)	“The combined amount of Bioethanol and any Petrol that may be carried onboard shall not exceed 150 litres, unless formal agreement to carry larger quantities has been obtained directly from the Administration.” This does not match the wording in Part A 14.1 (2) page 99. See right	The quantity of <u>spare</u> petrol and/or other highly flammable liquids carried shall be kept to a minimum, generally up to 150 litres maximum. Greater quantities may be specially considered by the Administration ~~on receipt of a reasoned case made by the master~~ <u>when the storage location, ventilation, containers, fire suppression and space fire protection and detection are considered adequate for the given increase.</u>	None	Same arrangements as currently in place for LY3 14.1.2
D7(2)	There is no limitation on the quantity of LPG that can be carried on board.	Due to the high risk of LPG cylinders when involved in fire I would suggest a maximum of one 13kg cylinder that is in use and one spare.	None	No limitation but would be considered under general approval
D7(6)(c)	LPG Gas Detection	Same as above: suggest Power supply required.	None	Covered by D2(5)
D8, D9 and D10 (3) (a)	Fuel storage shall be as per this annex according to the fuel type.	Add at end of sentence Annex (D) D2 general requirements Para (8)	Yes	As suggested
D7(2)(b)	On large yachts, where the locker is a significant distance to the waterline on upper decks, we have used a dedicated low level EX rated extraction system (considered on the hazardous zone plane). Can we keep the options open here?	Add ‘Alternative arrangements may be considered on a case by case basis’	None	Not required as Annex D is guidelines only as per D1(1)
D4(3)		Insert: Shall be “suitably located and” kept to…	Yes	As suggested
D4(10)		Insert at end of paragraph: “Where CO2 is used as an extinguishing medium, the quantity of medium provided shall take into account the anticipated leakage rate associated with the outboard end of the chimney being open. Where dampers are provided to close the upper end of the chimney, means shall be provided to prevent over pressure on the duct boundaries.”	Yes	As suggested
D8(1)(d)	New paragraph	“CO (Carbon Monoxide) Detector to be provided in all cases where such appliances are installed in enclosed spaces.”	Yes	As suggested
E	Med fitness and safety training should be defined to avoid dilution, i.e. STCW basic and ENG 1.		None	Alternatives allowed intentionally for shore based personnel
E1(1)(B)	Reference to Pt B Section 1.3 is wrong	“Seafarers” as defined in Part A Chapter 2 and Part B-Chapter 2 ~~Section 1.3;~~	Yes	As suggested
E2(1)(c)	The reference of the word “They” is ambiguous. To be clear it relates to the berths , access to mess areas and sanitary facilities.	See new text in app 1 (below)	None	
E(2)	No definition of short period – is this on purpose?		None	Intentional loose text

E2(1)(l)	The reference of the word "They" is ambiguous. To be clear it relates to the berths , access to mess areas and sanitary facilities.	Change "they" in "the berths and access to mess areas and sanitary facilities"	None	Text considered adequate
F2(14)(l)	Is I required? Leads to confusion. The requirement of (a), to be in a cofferdam or pipe means the pipe will never pass through accommodation or machinery spaces. Should this be (a) and (b), OR (c)?? Intention not clear.	Reword to mean Option 1 (a)(b)(d). Or Option 2 (c)(d).	Yes	"and" inserted
G	5) Solely engaged in pleasure should be 'not engaged in trade'		Noted	Text considered adequate inline with current practice
H	It is not explained that the certification of the HLA has two parts. 1: the facility and 2: the operation. Yards are often faced with the fact that only one certificate is issued after the operational part is finished, which is after delivery.	Add at a suitable location an explanatory note for yards, operators and AIBs that two certificates are to be issued.	Yes	As suggested
H	During the discussions in the workgroup, it was agreed to have a separation of certification. Yards are responsible for the platform, the owner for the operation. This separation is not clearly expressed in this ANNEX		Yes	Now clearly listed in H1(1)(b)
H	This annex specifically refers to jet A1 fuel in many places. Jet A fuel is also in widespread use on yacht projects.	Definition of jet fuel to include A and A1?	Yes	Replaced by "Aviation Fuel"
H1 (b)	Please explain that the Shipboard Heliport Landing Area certificate is indeed the hardware certificate which can be provided by a shipyard.		Yes	Now clearly listed in H1(1)(b)
H2 Table H.1	Heli types may be outdated (e.g. "Eurocopter Ecxxx" types are now called Airbus Hxxx. Values are not maximum values, e.g. the weight may be higher for specific optional versions at the different types.	Delete table (preferred), update table or put in disclaimer	Yes	Updated table included
H2 Table H.1	Heli types may be outdated (e.g. "Eurocopter ECxxx" types are now called Airbus Hxxx. Values are not maximum values, e.g. the weight may be higher for specific optional versions at the different types.	Delete table 1 (preferred), update table or put in disclaimer	Yes	Updated table included
H1(2)	Definition of Jet A1 Fuel Change kerosene into aviation fuel. Kerosene is lamp oil.	*Jet A1 Fuel'* means it is used as a fuel for modern jet and turboprop engines. It consists primarily of hydrocarbon compounds, but other additives are present to increase safety. International regulations stipulate uniform standards for the quality and composition of ~~kerosene~~ aviation fuel.	Yes	Replaced by "Aviation Fuel"
H2	inconsistent numbering of tables, table 1 is followed by table 6.3	renumber tables and check references	Yes	As suggested
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H2(1)(d)(iv)	Not every boat has a hangar	Hangar general arrangement (if applicable) (showing dimensions and structural considerations).	None	If not hanger then requirements are not applicable
H2(1)(d)(vi)	The AIB has no knowledge of the fire protection of area's he is not responsible for.	Structural fire protection of the helipad area, hangar area and fuel storage area (whatever is appropriate)	None	AIB are not responsible for area outside of HLA
H2(1)(d)(vii)		Fire detection and extinguishing arrangements of the helipad area, hangar area and fuel storage area (whatever is (appropriate)	None	AIB are not responsible for area outside of HLA
H2(3)	The blanket reference to ICAO Annex 14 will make life for super yacht builders much harder than under LY2 Annex 6 and PYC annex 2. It will require mutual agreements with AIBs to get to common interpretations. It will certainly give a more inclined playing field which is not wanted. Certificates for helidecks will not be without non-compliances, exemptions and restrictions(perimeter netting, colours etcetera). This will be more difficult to sell to clients. . The argument that the current annexes have very limited legal coverage is not solved by the change. I.e. we understand that a HCA certificate referring to ICAO Annex 14 with perimeter netting and colour exemptions has the same legal validity as a certificate referring to LY2 Annex 6 without mentioning of exemptions. We understand the necessity to alter the legal situation but do not see that the current changes achieve this. We feel abandoned by the REG on this issue.	Give clear guidance on the legal status of plan approval and certification. What is the current situation and what is the new situation? REG to be prepared to accept exemptions. Issue Notice indicating the common interpretations as discussed during the WG Halo.	Noted	Red Ensign Group HLA guidance doc to be issued.
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H2(3)(b)(ii)	Bow is the forward half and Stern is the aft half of the vessel. So there is not mid part. I.e. a helideck can be placed anyware w.r.t. the length of the vessel given the other requirements made.	Check if H3(3)(b)(i) adds anything of merit, otherwise delete.	None	Added flexibility for bow and stern for 0.83D. if we delete then full D required
H2(3)(b)(ii)	Bow is the forward half and Stern is the aft half of the vessel. So there is not mid part. I.e. a helideck can be placed anywhere over the length of the vessel given the other requirements made.	check if H3(3)(b)(i) adds anything of merit, otherwise delete.	None	Added flexibility for bow and stern for 0.83D. if we delete then full D required
H2(3)(c)	The Certificate of Compliance is only a part of the Shipboard Heliport Landing Area certificate (= hardware certificate)	Add sentence : This Certificate of Compliance will be an adjunct to the Shipboard Heliport Landing Area certificate	Yes	Now clearly listed in H1(1)(b)
H2(5)(a)(ii)	Fire in a BBQ should not lead to a complete structural analysis	after any fire on the ship ~~or on~~ affecting the platform, the platform shall undergo a structural analysis to determine its suitability for further use; and	None	As per SOLAS II-2/18.3.2. unrelated fires would not warrent analysis
H2(6)(a)	Paragraph is identical with present SOLAS II-2/ Reg. 18.5. In order to cover the new SOLAS requirements for ships constructed on or after 2020-01-01, it is proposed to implement the following item: *(vi) in lieu of the requirements of paragraphs (iii) through (v), on ships constructed on or after 1 January 2020 having a helideck, foam firefighting appliances which comply with the provisions of the Fire Safety Systems Code Chapter 17;* (present paragraphs (vi) and (vii) to be renumbered to (vii) and (viii) accordingly then)	Apply new/ latest SOLAS requirements.	Yes	As suggested
H2(6)(iii)		Insert: Branch pipes “or Deck Integrated Pop-up Nozzles (DIFFS)” capable…	Yes	As suggested
H2(7)	When any spill of oil has to go overboard, we will violate MARPOL		None	
H2(8)(d)	Handrails “shall be painted in a contrasting colour”. The most common applications are polished stainless steel and clear carbon stanchions which are not painted but do have contrasting colour. Furthermore, if handrails are retractable, collapsible or removable they are not relevant for the pilot when the helicopter is approaching, so there is no need to have them painted in a contrasting colour, unless the owner likes contrasting coloured handrails. This paragraph is not relevant	Delete paragraph H2 (8)(d)	Yes	Deleted sentence on colour
H2(8(d)	Handrails “shall be painted in a contrasting colour”. The most common applications are polished stainless steel and clear carbon stanchions which are not painted but do have contrasting colour.	Delete “painted in”, leaves “shall be in a contrasting colour”	Yes	Deleted sentence on colour
H2(9)(b)	The influence of local rules and regulations was one of the reasons for REG to modify the helicopter rules. Consequently references to “local” publications should be deleted.	Delete H2 (9) (b)	Yes	Guidance only. Moved to end of Annex under “other references”
H3(1)(b)	Confusion is created here. Naming of certificates should be harmonised.	The maximum helicopter weight and ‘D’ value for which the helicopter landing area has been designed and the maximum size and weight of helicopter for which the vessel is certificated shall be included in the Helicopter Landing Area Operations Manual and ~~Landing Area Certificate~~ Shipboard Heliport Landing Area certificate.	Yes	Harmonised with certificates listed in H1(1)(b)
H3(1)(d)	Operational issues are useless in this code, which deals with the construction of vessels.	Delete H3 (1) (d)	None	As per H1(1)(a), operational issues are included
H3(1)(e)	Operational issues are useless in this code, which deals with the construction of vessels.	Delete H3 (1) (e)	None	As per H1(1)(a), operational issues are included
H3(2)(a)	The influence of local rules and regulations was one of the reasons for REG to modify the helicopter rules. Consequently references to “local” publications should be deleted.	~~Guidance on helicopter landing area location and how to assess the impact of the resulting motion on operability is presented in UK CAA Paper 2004/02 “Helideck Landing Area Design Considerations – Environmental Effects”, as may be amended from time to time and which is available on the Publications section of the UK CAA website at www.caa.co.uk. Designers of helicopter landing areas shall consult this paper at the earliest possible stage of the design process.~~	None	Useful guidance only. No change
H3(3)(b)	During the discussions we discussed the procedure, that the basic helideck will be designed in the pre-contract period, during which no third parties are involved. After contract signing AIB’s can be consulted about the fine-tuning and the holding-down hooks. It is absolute necessary, that a proper guidance for shipyards and AIB’s is produced with clear instructions about the basic helipad design. An example of such “instructions” can be found in App2 (below) During the workgroup discussions it was agreed that wind direction and speed shall be provided visually with the aid of flags and that a 5 m ICAO windsock is not needed on a yacht. Delete “nice to have, but not needed” items. This is a Code, not a brochure what is available.	Air temperature and barometric pressure shall be measured by conventional instruments approved to ICAO standards. An indication of wind speed and direction shall be provided visually to the pilot by the provision ordinary flags ~~of a windsock coloured so as to give maximum contrast with the background.~~ However, fFor recording purposes, an anemometer positioned in an unrestricted airflow is required. ~~A second anemometer, located at a suitable height and position can give useful information on wind velocity at hover height over the helicopter landing area in the event of turbulent or deflected airflows over the deck.~~ Visibility, cloud conditions, and sea state shall normally be assessed by visual observations.	None	Prescriptive requirements are clear in ICAO Annex 14 for “pre-contract period”, deviations from which are to be approved by an AIB issuing the certificates. Helicopter Operating Guide (yet to be published) may provide some guidance.
H3(5)(b)	Delete operational requirements	Delete H3 (5) (b)	None	As per H1(1)(a), operational issues are included

H3(7)	Delete operational requirements	Delete H3 (7)	None	As per H1(1)(a), operational issues are included
H4(1)(b) and (c)	paragraphs contain references to Pt B, not Pt A	include references to Pt A Ch 14 where applicable	Yes	As suggested
H4(1) (b) and (c)	These paragraphs contain references to Pt B, not Pt A	include references to Pt A Ch. 14 where applicable	Yes	As suggested
H4(1)(d)	reference to “Section 3.2.3” not clear.	Clear up reference	Yes	As suggested
H4(1)(d)	reference to “Section 3.2.3” not clear.	clear up reference	Yes	As suggested
H4(1)(e)	Clearance around helicopter to be a minimum of 0,5 m at any point around helicopter and rotors. The required rotor clearance will lead to unnecessary cost increase and storage space requirements.	Remove clearance requirement in way of rotors	Yes	Wording clarified and not prescriptive
H5(2)(a)(xii) and (xiii)	paragraphs contain references to Pt B, not Pt A	include references to Pt A Ch 14 where applicable	Yes	As suggested
H5(2)(a)(xii) and (xiii)	paragraphs contain references to Pt B, not Pt A	include references to Pt A Ch. 14 where applicable	Yes	As suggested
H5 (6)(b)	Delete operational requirements	Delete H5 (6)(b)	None	As per H1(1)(a), operational issues are included
H5(8)	The 20 airchanges per hour is historically for a tanker pump room, that is only ventilated before entry and when in operation. It should be clear that this is an alternative to continuous ventilation of 6x per hour as required by ch 14.1	Add: If ventilation is not continuous with 6 airchnages per hour as in 14.1, then as an alternative the following may be done:	Yes	Reference to ventilation already in H5(2)(xii) & (xiii). H5(8) deleted
I1(6)	typo “and need shall be”		Yes	As suggested
I1(6)	Secretarial error	Spares and repair equipment shall be provided for life-saving appliances and their components which are subject to excessive wear or ~~consumption and~~ need ~~shall be~~ replaced regularly.	None	As per SOLAS
I1(8)	specific reference to lifeboat should be to survival craft	change “lifeboat” to “survival craft”	None	As per SOLAS
I1(9)	Reference to lifeboat to be changed in survival craft, same as in I1(8)	all engines in survival craft ~~lifeboats~~ and rescue boats shall be run for a total period of not less than 3 minutes, provided the ambient temperature is above the minimum temperature required for starting and running the engine and during this period of time it shall be demonstrated that the gear box and gear box train are engaging satisfactorily	None	As per SOLAS
I2	numbering starts at (23), inconsistent with structure	renumber I2 subparagraphs from (1)	Yes	As suggested
I2	Numbering system is continued from para I1.	Start numbering with (1) in paragraph I2	Yes	As suggested
I2(24)	reference to PtB which in turn references to AnnexI	change reference to PtB into reference to Annex I	Yes	As suggested
I2(24)	Wrong reference. Para 6.12(1)(a) does not exist. But Para 6.12(1) refers to Annex C For that reason it is better to refer to Annex [C] directly.	At all times while the ship is in service, the requirements of Annex [C] ~~subsection 6.12(1)(a)~~ shall be complied with and a ship is not in service when-	Yes	As suggested
K	“Tenders remaining within 3nm of mother ship can operate as tenders under this section. Tenders going beyond 3nm require their own SCV code certification” REG code technical decision not included.		None	To be covered by REG member National Annex
K4(8)	Where can the “National Annex” be found?	To be clarified.	Yes	Reference to Administration requirements deleted
K4(8)(b)	Verification of the suitability of the supporting equipment for the intended purpose is essential for a safe operation. Therefore, also the interfaces have to be checked for compliance and surveyed accordingly. Add sentence.	Suitability of the supporting equipment and interfaces to the parent vessel shall be surveyed by the Recognized Organisation of the submersible craft.	Yes	As suggested
K1(6) (New)	Requirements for a kill chord		Yes	As suggested
L	Whole of Annex L provides no actual additional information to the Code, and only hints at further regulations. In its current form, Annex L provides no value and serves just as a disclaimer.	Delete Annex L, add disclaimer in Code preamble.	None	Required for those new to the code to understand the other conventions to be applied
L	Whole of Annex L provides no actual additional information to the Code, and only hints at further regulations. In its current form, Annex L provides no value and serves just as a disclaimer.	Copy Foreword 1.3 of LY3 in Pt A in Chapter 1 Copy Preamble para 2 of PYC6 in Pt B in Chapter 1 This means that everybody knows which other international conventions need to be adhered to. Delete Annex [L]	None	Required for those new to the code to understand the other conventions to be applied
M1	typo, comma missing	insert comma between “include as a guide, but not necessarily limited to” and “those limited in this Annex”.	Yes	As suggested

M2	typo, onbaord		Yes	As suggested
M2	(8) introducing a requirement for a SMD on all vessel regardless of size	This would be a UK policy decision	Noted	Guidance only to be covered by UK National Annex
M2	(7) onboard		Yes	As suggested
M2	(10) For each engine >130 kW built after 1/1/2000		Yes	As suggested
M2	(12) if applicable		None	No change. All as applicable as per M1(1)
M2(7)	Secretarial error	Certificate or Statement of Sewage Pollution Prevention (when more than 15 persons are carried ~~onboard~~ on board~~)~~	Yes	As suggested
M4	International Sewage Pollution Prevention Certificate >400 GT or carrying over 15 persons.		None	Covered in M2(7)
O4(1)	refers to Pt A only, Pt B reference missing	add reference to relevant PtB regulations	Yes	As suggested
O4(1)	References (chapter 13 and Chapter 2) are unclear.	Create clear, straight forward references.	Yes	As suggested
Annex P	Annex P was developed for PYC vessels. Not for LYC vessels There is a serious shockwave trough the sailing boat shipyards that feel bombarded by these requirements. Implementation of (parts of) annex P into PtA can only be done after careful study.	Integrate Annex P in part B, or make annex P applicable to Part B only.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P5(4)	Excluding asymmetrical ballast for Part B vessels obviously excludes the use of canting keels and ballasting systems to increase stability. According to current developments it cannot be ruled out that in the future large yachts falling in the range of Part B will intend to utilize this technology. There are studies around dealing with stability criteria for unsymmetrically ballasted yachts (e.g. HISWA Symposium 2004).	To be (re)considered.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P5(4)	Asymmetric ballasting needs explanation, fixed or fluid, both? Water ballast? We recommend water ballast for larger sailing vessels for small heel reduction (+- 3 deg) and comfort, whilst they still comply with stability reg's when filled on the "wrong" side	Asymmetric ballasting is allowed but needs to be approved by CISR on an individual basis.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P5(6)	Superstructure doors according ILLC requires weathertight steel equivalent	Allow for aluminium or composite weathertight doors	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P6(2) & (3)	subparagraphs (2) and (3) should be either / or, not based on Sail Area Displacement Ration. In principle, 90 degree range of positive stability should be attained, if not the 38 knot calculation as per (3) can be used.	Delete sail area ratio	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P6(2)&(3)	All our sailing yachts have sail area/displacement ratio far bigger than 10, more around 20, Motor sailors have around 15 Below graph shows a selection of our designs, including Rainbow Warrior 3 (Motor sailor) and Stad Amsterdam. The blue line represents the SA/DISPL ratio of 10	The GZ curves required by .1 should have a positive range of not less than 90o. For vessels of more than 45m, a range of less than 90o may be considered but may be subject to agreed operational criteria. Where a range of less than 90º exists, the wind speed required to capsize shall be calculated to be more than 38 knots as follows:	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P6(2)	Annex P6 (2) omits the possibility for yachts > 45 m to have a stability range less than 90 degrees, although from an operational perspective, heel on large sized yachts is considerably less, wind strengths have to be dramatic to achieve these heel angles The GZ curves required by (1) shall have a positive range of not less than 90º, where the 'Sail Area Displacement Ratio' is greater than 10 calculated as follows: $\frac{A_{sails}}{\nabla^{\left(\frac{2}{3}\right)}} = Sail\ Area\ Displacement\ Ratio$ $\nabla =$ *Vessel displacement in meters cubed* (m^3) $A_{sails} =$ *is the area of the full upwind sail plan, including sail overlaps in square meters* $(m)^2$	Return to original text, including reference for vessels > 45m. The GZ curves required by .1 should have a positive range of not less than 90º.For vessels of more than 45m, a range of less than 90º may be considered but may be subject to agreed operational criteria.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(1)	It is totally unrealistic to require emergency lighting that will lit the rig, but not impair the watchkeepers.	Get rid of requirement.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(2)	Is this a realistic requirement? What can current SY do in these conditions? In these winds one will probably bear away instead of going straight into the wind.	Revise	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(3) & (4)	SY <500GT often do not even have a bridge		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(3)	"failure", what type of failure is meant? Failure of the winch, sheet, source of power?		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(3)	emergency release of sheets from bridge can be dangerous. Sheets on drum winches can not be controlled from the bridge. Stored power needed? Vessel can always head into the wind	The sail handling facilities shall be equipped to allow a controlled emergency release of the sheets that are fitted on reel winches.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(4)	Such a control system is totally unrealistic and unnecessary for performance and cruising SY with conventional Bermuda rig, both <500 and > 500GT.		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.

P10(4)	Sail setting should not be necessarily be done from the bridge. It might be a lot safer to set sail locally at the mast, being able to see much better the hoist. Automated setting and trimming is dangerous in our opinion.	Delete	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10(5)	Unclear what should be considered as the main source of power and the back-up source of power. In RH case the main source of hydraulic power are the generators and the main engine can be seen as a backup source. However, they are located in the same compartment (the engine room) There is a AC hydraulic pump located elsewhere, but it will have very little power, and taking the down the sails with it will take much more time, if not impossible. It is not reasonable to ask for a generator in another space on SY <500GT.	Increase the allowed time for taking down sails in emergency.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11(1)	How can a composite mast be insulated A-class? Then one would also need a steel bulkhead around. This will take up far too much space in the interior. It will be very hard to convey the constraints of the sailplan to the interior GA and vice versa.		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11(1)	Except for Part A vessels under 500 GT, within the interior of the vessel, the mast shall be either insulated directly to A-60 class requirements or contained within a space dedicated to the protection of the mast only, and insulated as follows: 'A-30' when adjacent to: (aa) For Part A vessels greater than 500 GT, category (1),(2),(3),(4) and (9) spaces as per 14B.2(2)(b); or (ii) For Part B vessels, category (1),(2),(3),(4) and (10) spaces as per 6.7(10)(b)(vi). 'A-60' when adjacent to: (i) For Part A vessels, category (5),(6),(7),(8) spaces as per 14B.2(2)(b); (i) For Part B vessels, category (5),(6),(7),(9) spaces as per 6.7(10)(b)(vi). This means any mast has to be A30 rated where connected with the open deck/outside.	Review P11.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11(1)	A-60 might be difficult to achieve, to be investigated.		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11(2)	Sheets on reel winches are by definition ending in a winch room, classed service space or machinery space		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11(2)	Is the end point meant, or also the attached hull structure?		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11(2)	Standing and running rigging shall not be located or terminated in: For Part A vessels, category (8), (7), (6) or (5) spaces. Where this is not possible, the (a) rigging shall be locally protected to A-60 Class. In large yachts, running rigging is expected to terminate in a winch room (category (7)). The rules make it impossible to have a winch room.	Remove	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P12(2)	See are comment at P19 (1)		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P12(3)	Equipment …..	Add as far as practical	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P14B.5(2)	We had a lot of discussion on a 81m Schooner about the definitions of these categories. For example, the steering gear needed to be in a separate space according to flag. However, steering gear is nowhere defined as a technical space. Also cabinets of <1m2 located in/adjacent to a corridor containing cutlery being categorized (5) seems overdone. There is no clear procedure how to go about electrical lockers (up to 230VDC) that are normally also accessible from the corridor. An electrical locker Is not mentioned explicitly and Cat. 5 seems overdone. In order to prepare for the future I might be an idea to consider battery rooms.		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.

P15(1)	The spars & rigging manual is already part of the Class Society's rig approval certificate.		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18(3) & (4)	Items listed are normally not type approved.	Skip word type approved	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18(3) & (4)	Running rigging, blocks, shackles, rigging screws, cleats and associated fittings shall be Type approved and sized as per the Recognised Organisation's satisfaction. Sails controls (sheets, Halyards), blocks and attachments shall be Type approved and sized as per the Recognised Organisation's satisfaction In large yachts, deck equipment and running rigging is fully custom and geared to each individual project. Type approval for individual blocks, attachments, shackles, is counterproductive.	Remove	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18(3) & (4)	We believe that these two paragraphs may cause a large burden for the equipment suppliers of modern yachts, as this equipment industry is to a large degree unregulated (yet), e.g. compared with the tall ship industry. The latter one orients itself on lifting appliances, yet being regulated per se. For modern yacht equipment, such as the items listed, to our knowledge no international standards are available, nor any class rules or guidelines (apart from the type approval standard for carbon fibre standing rigging).	To be (re)considered.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18(3)	Type approval might be difficult to achieve in custum designed fittings	Replace Type approved by Approved or tested	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18(4)	Type approval might be difficult to achieve in custum designed fittings	Replace Type approved by Approved or tested	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P19(1)	To get rid of all sails in emergency within 10 minutes. In emergency we normally have less power and with a three mast schooner having as much as 7 sails it doesn't seem to be realistic to get it away in 10 minutes	Allowable time per sail like 1 minute for headsails and like 4 minutes for furling boom sails under normal power. In case of failure of the main source of power, this might even be a factor 3x longer.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P19(1)	10 minutes is unfeasible for most large sailing yachts, especially square riggers.	delete	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P19, in combination with P10(5) & (6)	Within the proposed rules, any given sail combination (including full sail) shall be able to be furled/dropped + stowed within 10 minutes, without using the emergency generator set, as at 60 degrees it is not expected to function any more. This means stored power or by hand, an unfeasible situation. Furthermore, the required speed of dropping could especially cause dangerous situations when lowering gaffs, booms or flailing sheets. P10 (5) Lowering or furling of any combination of the sails shall be operational from a source of power other than the main source of power. These controls shall be operational at the down flooding angle or 60º whichever is least. P10 (6) The Emergency Generator, fire pump and bilge pumps shall operate at 22.5degrees or greater depending on the vessels specific operating conditions. P19 – Sails In order to eliminate the wind heeling moment in case of damage, all the sails for any (1) given sail combination (as per the vessel's Sailing Operations Manual) shall be able to be dropped/stowed or furled within 10 minutes under the conditions described in Sub-section P.10(5).	Modify P10 (5) with: "Easing the sheets shall be operational from a source of power other than the main source of power. These controls shall be operational at the down flooding angle or 60º whichever is least." Modify P19: In order to eliminate the wind heeling moment in case of damage, all the sails for the storm sail combination (as per the vessel's Sailing Operations Manual) shall be able to be dropped/stowed or furled within 10 minutes under 22.5 degrees. This enables safe reduction of heel, and stowing and dropping of sails in the storm combination.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P6 (2)	Annex P6 (2) overrules the possibility for yachts > 45 m to have a stability range less than 90 degrees(see LY3 par 11.2.2.1), although from an operational perspective, heel on large sized yachts is considerably less, wind strengths have to be dramatic to achieve these heel angles The GZ curves required by (1) shall have a positive range of not less than 90º, where the 'Sail Area Displacement Ratio' is greater than 10 calculated as follows:	Return to original text, including reference for vessels > 45m. The GZ curves required by .1 should have a positive range of not less than 90º. For vessels of more than 45m, a range of less than 90º may be considered but shall be subject to agreed operational criteria.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P11 (1)	The intent of this paragraph is not clear.	Make clear which part of the mast has to be insulated (whole mast, below deck part of mast, deck penetration part of mast)	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.

P11 (2)	In large yachts, running rigging is expected to terminate in a winch room (category (7)). The rules make it impossible to have a winch room.	Delete P11 (2)	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18 (3)	In large yachts, deck equipment and running rigging is fully custom built and geared to each individual project. Type approval for individual blocks, attachments, shackles, is counterproductive.	Running rigging, blocks, shackles, rigging screws, cleats and associated fittings shall be ~~Type~~ approved and sized as per the Recognised Organisation's satisfaction.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P18 (4)	In large yachts, deck equipment and running rigging is fully custom built and geared to each individual project. Type approval for individual blocks, attachments, shackles, is counterproductive.	Sails controls (sheets, Halyards), blocks and attachments shall be ~~Type~~ approved and sized as per the Recognised Organisation's satisfaction.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P19	Within the proposed rules, any given sail combination (including full sail) shall be able to be furled/dropped + stowed within 10 minutes, without using the emergency generator set, as at 60 degrees it is expected that the EG does not function any more. This means stored power or by hand: an unfeasible situation. Furthermore, the required speed of dropping could especially cause dangerous situations when lowering gaffs, booms or flailing sheets. It is a challenge to drop sails in 10 minutes. Dropping and storing is impossible.	In order to eliminate the wind heeling moment in case of damage, all the sails for the storm sail combination (as per the vessel's Sailing Operations Manual) shall be able to be dropped/stowed or furled within 10 minutes under a 22.5 degrees heel condition.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P10 (5)	See P19	Easing the sheets shall be operational from a source of power other than the main source of power. These controls shall be operational at the down flooding angle or 60º whichever is least.	Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P(6) (3)	No explanation of what V is this used for?		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P(8)	Damage stability missing a number of paragraphs see comments section 11. Stability for sailing vessels is split between section 11 and annex P leading to possible confusion		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.
P(8) (2) &(3)	References do not make sense		Noted	Annex P reintegrated into Code with original scopes of LY3 Chapter 4 & PYC Chapter 14.