Special Regulations Sub-committee Minutes

The Special Regulations Sub-committee met at 09:30 – 13:30 hours on Monday 29 and 14:30-15:40 hours on Tuesday 30 October 2018 at the Hyatt Regency, Sarasota, Florida, USA

Please refer to the World Sailing website www.sailing.org for the details of the submissions and supporting papers on this agenda.

1. Opening of the Meeting
2. Conference Forums
3. Minutes of the Previous Meeting
4. Special Regulations –Submissions
5. World Sailing Structural Plan Review
6. OSR Working Party Reports
7. Incident Reports
8. Guide to Offshore Personal Safety
9. International Regulations Commission
10. Any Other Business

Submissions with the prefix ‘SR’, the final decisions on these will be made by the Oceanic and Offshore Committee held on the 1 November 2018 which, on behalf of Council, approves changes to the Offshore Special Regulations.

Present:
Will APOLD (CAN) – Chairman
Per BØYMO (NOR) – ORC Representative
Glen STANAWAY (AUS)

James DADD (GBR)

Apologies:
Christophe GAUMONT (FRA) – Vice Chairman
Boris HEPP (GER)
Sally HONEY (USA)
Roy van ALLER (NED)

Others Present:
Simon FORBES (Offshore Technical Manager)
Gary Jobson (USA) Vice-President
Carlos DE BELTRAN (Head of Technical and Offshore) (part)
Stuart CARRUTHERS (GBR) Chairman Int. Regs
Matt Allen (Vice Chairman - Oceanic and Offshore Committee)
Hasso Hoffmeister - DNVGL

1. Opening of the Meeting

The Chairman welcomed members and observers to the meeting.

2. Conference Forums

A Safety in Sailing Forum was held at 14:30 on Monday 29 October.

3. Minutes of the Previous Meeting

(a) Minutes

The minutes of the Special Regulation Sub-committee meeting of 7 November 2017 were noted as a true record.

(b) Minutes Matters Arising

There were no matters arising not otherwise on the agenda.
4. Special Regulations –Submissions

(a) OSR 3.08 Hatches & Companionways

Submission SR01-18 from Australian Sailing was received regarding opening hatches. The submission highlighted that many production boats have hatches or ports which do not conform with OSR 3.08.

The restrictions on hatches placed in OSR 3.08 are more stringent than the EU Recreational Craft Directive and related ISO Standards.

The Committee noted that the ISO Standard 12216 (Windows, portlights, hatches) does not limit the number of ISO standard ‘opening appliances’. ISO12217 Stability Standard specifically excludes ‘openings’ from being considered down-flooding points if they are marked “KEEP SHUT WHEN UNDER WAY”.

Noting that there are discrepancies between EU RCD / ISO Standards and OSR Section 3, it was agreed to form a working party chaired by James Dadd to review the variations, and consider if any amendments to OSR could be considered.

On a proposal by Glen Stanaway, seconded by Per Bøymo and a vote of 3 in favour, 0 against and 1 abstention, SR01-18 was agreed to be effective 1 January 2019.

Recommendation to the Oceanic and Offshore Committee: Approve

Oceanic and Offshore Committee Decision: Approve

(b) OSR 3.23 Bilge Pumps and Buckets

Submission SR02-18 from the Chairman regarding Emergency Pumps was received.

It was noted that the principle was to try and make the boat a safe haven in the case of a leak which was beyond the capacity of typical bilge pumps which are intended for the removal of normal accumulation of bilge water.

The working party had debated issues including the pump capacity required and the suitability of collapsible hoses.

Glen Stanaway noted that the issue had been prompted by several yachts sinking following rudder damage. As an observer, Hasso Hoffmeister (Senior Principal Engineer – DNV GL) noted that for racing yachts, DNV_GL will be specifying that rudder stocks are stronger between the top and bottom rudder bearings, and that classification rules require a bulkhead in front of the rudder.

James Dadd highlighted that Volvo Ocean Race boats had on 8 or 9 occasions used their emergency pumps, rudder failure is not the sole reason.

Feedback on the submission had raised concerns regarding the high flow capacity specified and the electrical power available. It was proposed that practical tests were needed to demonstrate the effectiveness of the specifications.

The submission was withdrawn for further consideration, noting concerns raised and that it should be re-presented under a new OSR section number for Emergency Pumps.

(c) OSR 3.29.13 Communication Equipment, GPS, Radar, AIS

Submission SR03-18 from Roy van Aller was received regarding extending the requirement for an AIS Transponder down to Category 3.

James Dadd noted that compared with Category 1 & 2 Races, there are many more Category 3 Races
The Committee noted the reasons given for the submission:

i. “racing in congested waters with heavy commercial traffic”
   The Committee observed that a commercial ship may choose to switch off AIS Class B transmissions if the display screen becomes too over-burdened with many AIS Class B transmissions.

ii. “In case of emergency without proper communication, AIS [transponder] helps to find the track and last position of the boat in distress”
   The Committee observed that an AIS transponder is not primarily a distress alerting device. The anticipation that someone else would maintain a watch on the AIS position reports and raise an alert is slim. A race organiser reported that failure of a competitor’s AIS transponder due to a battery failure would appear to be the same as a distress situation in which the boat sinks or capsizes.

iii. “AIS MOB personal location devices are only of use if the boat has been equipped with an AIS on board.”
   It was noted that in this situation the on-board need for location of MOB AIS alerts was for an AIS receiver, not an AIS transponder.

On a vote of 1 in favour, 2 against and 1 abstention, SR03-18 was rejected.

Recommendation to the Oceanic and Offshore Committee: Reject

Oceanic and Offshore Committee Decision: Reject

(d) OSR 4.20.3 b) Liferaft Stowage
Submission SR04-18 from Roy van Aller was received to remove allowance for liferaft stowage below deck.

The submission proposed to delete 4.20.3(b):

“In a boat with primary launch before June 2001, a liferaft may be packed in a valise not exceeding 40 kg securely stowed below deck adjacent to a companionway.”

The Committee noted that the EU Recreational Craft Directive (RCD) specifies the provision of a dedicated stowage space for a liferaft on deck or in locker opening to the deck. The introduction of the RCD and a phasing-in time period for other new designs not built to the RCD was the reason for the OSR allowance for boats built prior to June 2001.

There was concern that the number of boats which would be affected had not been quantified. It was noted that RORC require all boats competing in the Fastnet race to submit a photo of their liferaft in its stowage position and that this would be a useful resource to assess the number of boats that would be affected by the deletion of 4.20.3(b).

On the Tuesday meeting it was agreed to review the initial position taken at the Monday meeting to approve. At the Tuesday meeting it was agreed to defer the submission to the 2019 meeting.

Recommendation to the Oceanic and Offshore Committee: Defer

Oceanic and Offshore Committee Decision: Defer
(e) OSR 4.21 Grab Bags
Submission SR05-18 was received from Roy van Aller to require a Grab Bag in Category 3 Monohull.

Currently OSR 4.21 applies to Multihull Category 3 and 4 and specifies a watertight compartment or grab bag, readily accessible, whether or not the boat is inverted, with specified minimum contents. The submission proposes to extend the application of OSR 4.21 to Monohulls in Category 3.

The reason given is that: “not only multihulls, but also keel yachts can capsize suddenly and crew in the cabin have to orientate and evacuate very quickly without time to grab any essentials.”

*On a vote of 3 in favour, 0 against and 1 abstention, SR05-18 was approved to be effective 1 January 2019.*

Oceanic and Offshore Committee Decision: Approve

(f) OSR 5.02 Safety Harness and Tethers

i. RORC Tether Guidance for Competitors was noted.

ii. Submission SR06-18 was received from the Chairman, International Regulations Commission to clarify tether requirements.

The Committee noted that some questions had arisen because ISO 12401 only specifies a tether of maximum 2m, whilst OSR 5.02 requires a tether of maximum 2m and in addition a tether arrangement of not more than 1m (which is not specified in ISO 12401).

It had been observed that that two 1m tethers might meet the OSR requirement which only specifies maximum lengths (2m and 1m).

The Committee concluded that OSR General Requirements 2.04(e) that: “all equipment required by the OSR should be of a type, size and capacity suitable and adequate for the intended use.” On this basis the Committee concluded that the existing text of OSR 5.02 adequately conveys the intention of a 2m tether and a tether arrangement of 1m.

An item should be fit for purpose and that over-prescriptive text should be avoided.

*On a vote of 0 in favour, 3 against and 1 abstention, SR06-18 was rejected.*

Oceanic and Offshore Committee Decision: Reject

(g) OSR Appendix G - Training
Submission SR07-18 was received from Sally Honey on behalf of the Training Working Party.

[Subsequent to the meeting Sally Honey clarified that the amendments were only to parts A, B and C. Part D remains]

*On a vote of 3 in favour, 0 against and 1 abstention, SR07-18 was approved to be effective 1 January 2019.*

Oceanic and Offshore Committee Decision: Approve
**Oceanic and Offshore Committee Decision: Approve**

(h) OSR Omissions and Amendments
Submission SR08-18 was received from Sail Canada regarding omissions and amendments was withdrawn.

5. **World Sailing Structural Plan Review**
   (a) It was noted that 165 certificates of structural plan review have been registered. A list of one-off yachts and the certificates for series-produced yachts can be found at [http://www.sailing.org/classesandequipment/offshore/plan_review.php](http://www.sailing.org/classesandequipment/offshore/plan_review.php)
   (b) The minutes were noted of a meeting held by World Sailing with some Recognised Notified Bodies undertaking Plan Review for this scheme.

6. **OSR Working Party Reports**
   (a) Emergency Bilge Pumping
   The report from the Working party of Will Apold, James Dadd, Chuck Hawley, Christophe Gaumont and Per BØymo is Submission SR01-18. The Working Party should continue to get some testing undertaken to better define the specifications.
   (b) Model Training Course Offshore Personal Safety–OSR Section 6 and Appendix G
   A report was received from the working party of Sally Honey(Chairman), Glen Stanaway(AUS), Chuck Hawley(USA), Jean-Bertrand Mothes-Masse (FRA), David Sutcliffe(CAN) and Christophe Gaumont (FRA). The working party was given two tasks this year: first to revise the existing Appendix G Model Training Course and second to investigate possibilities for enhanced Train the Trainers course approaches that might be shared among MNAs around the world
   
   i. **Appendix G Model Training Course**
      The existing Appendix G Model
      Training Course was first published in 2002 and had many incremental changes tacked onto it since then. The approach taken by the training group was to start with the existing 6.02 Training Topics and specify overall Learning Objectives for each topic. We felt this more closely met the objective of a model course and allowed each MNA the latitude to specifically meet the Learning Objectives in keeping with its own area needs. Our intent is that the itemized points included in the previous model will be available on the World Sailing website for those MNAs that desired more specific direction.

   ii. **Train the Trainers**
      The Train the Trainers efforts have produced less specific results. Three MNAs have shared their current Train the Trainer programs which are in various stages of development. I have attached those outlines from Sail Canada, Australian Sailing and US Sailing.

      Some of questions that have risen are:
      1. Q1: do we want to, and how best can we, speed up the dissemination of new information and share best practices?
      2. Q2: do we want to, and how best can we, increase the number of MNA’s
offering offshore personal survival training?

• Q3: do any MNA’s want help increasing their pool of accredited instructors, without having to build a train-the-trainer program from scratch?

• Q4: how do we reconcile the desire to have a uniform world training standard (and certificate portability) with the existence of regional differences?

Further discussion points revolve around the relative isolation of specific MNAs in their course developments, the consequent limited sharing of information, and what if anything World Sailing can do to encourage more sharing of best practices. For instance, the 2014 Offshore Personal Survival training workshop in Poole successfully convened twenty training experts from around the world to meet with World Sailing (ISAF) and industry representatives to share knowledge and develop resources for MNA Training Providers. Should a similar workshop be organized by World Sailing?

Further questions: Should World Sailing develop a model training course based on input from existing MNA programs, such as RYA, Australian Sailing, Sail Canada, US Sailing and others? We might also encourage participation between the various MNAs’ training programs to accelerate sharing between MNAs. MNAs without the resources for their own train the trainer courses might send instructor candidates to another MNA’s course, if suitable.

While the development of a World Sailing model course might be ideal, it must be remembered that there are regional differences that might be relevant to content, delivery, and local conditions that would affect how the course is taught. We should share those specifics as well as anything that can be generalized.

Other questions/comments from Australian Sailing and US Sailing include the following:

• How much time is required to properly meet training requirements?

• What is the best method for assessing individual participants: exams, instructor evaluations, demonstrations of techniques?

• How and how often should trainers-in-training be assessed?

• How to handle risk management during practical, hands-on exercises? Insurance requirements?

• How to assess level of Instruction abilities in the prospective trainer? US Sailing now has a Training Fundamentals course that is required for all trainers.

• What written material should accompany the in-person instruction? US Sailing requires passing its 10-unit online course.

• How to maintain instructor currency?

(c) Keel failure – In Build Validation

A paper was received by the Technical and Offshore Director regarding the implementation of In-Build Validation.

i. Part of Plan Review, focus on the design, manufacturing attachment and maintenance of keels. Natural that IBV becomes a subsection of Plan Review.
ii. Notified Bodies (who undertake Plan Review e.g. DNVGL, ICNN, IMCI) are the key stakeholders, their involvement and direction is paramount to a cost effective approach.

iii. IBV Process
   - Additional documentation
     - Approved Documentation by Notified Bodies, instructing test requirements
     - Inspections or evidence of Production to satisfaction of Notified Body.
     - Installation to satisfaction of Notified Body
   - Certificate of Plan Review with In Build Validation

iv. At the Notified Body meeting (Item 5(b)), the Notified Bodies (NB) had proposed a matrix of keel types and their different requirements to be checked. The NBs had recommended that the majority of fixed keels which have a high safety factor, would only require additional documentation (cast iron, cast lead, cast or forged steel keel). However welded keels, canting keels and composite keels would all require additional checks such as hold points in manufacture for inspection, material tests or non-destructive testing.

Comments from the keel failure working party of Glen Stanaway (Chairman), Will Apold, James Dadd, Christophe Gaumont, Boris Hepp, Roy van Aller and Nicola Sironi,

   How will the boat building industry respond? The builders in the plan review process should be consulted. It was hoped that where a manufacturer is already undertaking material testing or NDT to the satisfaction of the NB, then there would not be a need for duplication and this would result in cost savings.

   More detail needs to be specified including a detailed cost estimate and further discussion between the working party and Notified Bodies. A completed document would need to be produced for consideration at the 2019 Annual Conference and possible implementation into the Plan Review process in 2020. The timeline is uncertain at this moment due to staff changes. It was felt that to achieve these goals a budget for a contractor to undertake this work would be required.

7. Incident Reports

   (a) GBR-MAIB-Grounding and Loss of CV24 – Cape of Good Hope – 31 October 2017

   The investigation report was noted by the UK Marine Accident Investigation Branch into the loss of Clipper Ventures yacht CV24.

   It was noted that this primarily raised issues of designated crew roles particularly that of navigation.

   (b) GBR-MAIB-Fatal man overboard from CV30 – Indian Ocean – 18 November 2017

   The safety bulletin published by the UK Marine Accident Investigation Branch into a fatal incident regarding Clipper Ventures yacht CV30.

   The safety bulletin highlighted the hazard of terminating a jackstay on a mooring
cleat, whereby the safety tether hook was caught, deformed and released under the cleat. Publication of the full report is anticipated at the end of 2018.

(c) GBR-MAIB-Keel failure led to yacht ‘Tyger of London’ capsizing off Tenerife, Canary Islands – 7 December 2017
The safety bulletin was noted published by the UK Marine Accident Investigation Branch into the urgent safety lesson issued after keel failure led to yacht ‘Tyger of London’ capsizing off Tenerife, Canary Islands.
Publication of the full report is anticipated at the end of 2018.

(d) BEL-FEBIMA-Capsizing of ‘Capella’ off Belgium and loss of three lives -1 July 2017
A report was noted by FEBIMA on the loss of three crew following the capsize due to keel failure of the 35ft yacht ‘Capella’.
Submissions SR03-18, SR04-18 and SR05-18 relate to this incident.

(e) A report was received from RORC on the capsize of the 53ft catamaran ‘Fujian’ – RORC Caribbean 600 Race - February 2018
The primary lessons learnt relate to the loss of the grab bag during the capsize and that the distress alert was raised by 4 of the crew’s man overboard AIS devices.

(f) Ocean racing at night in areas of high vessel traffic density
It was noted that Volvo Ocean Race commissioned an independent report into ocean racing at night in areas of high vessel traffic density, to establish what steps race organisers may take to mitigate risk going forward.
Although this report was not available at the time of the meeting, one of the authors, Chuck Hawley gave a presentation on the related subject of navigation lights.

(g) A report was received from the Executive Office highlighting known incidents that have occurred during races in the past year.
The Committee requested that future reports should summarise how the distress alert was made and a review be compiled of this issue in previous incident summaries.

8. Guide to Offshore Personal Safety
Plans to produce the updated GTOPS publication had been further delayed.
Following the rewrite of Appendix G approved at this meeting, the Executive Office is urged to provide a proposed outline and budget for an external contractor to urgently produce a new Guide to Offshore Personal Safety Book.

9. International Regulations Commission
A verbal report was received from the Chairman of the International Regulation Commission. (see minutes of International Regulations Commission).

10. Any Other Business
(a) Electric Propulsion

A discussion paper from Boris Hepp and Patrick Lindqvist was circulated.

James Dadd advised he had undertaken a study last year on this topic. There should be more focus on the propulsion unit. The issue is not just a concern about the storage of electric power. A hybrid arrangement involving a 20hp generator which could recharge the battery bank powering an electric propulsion unit seems a more practical solution.

Boris Hepp was requested to progress the work and produce a Submission for consideration in 2019.

There being no further business the meeting concluded at 1540.