

Passenger Yacht Code – 13-36 Code
Table of comments received from the Informal Consultation Working Group –

Introduction,

Whilst the workshop that was scheduled for April was cancelled due to the volcanic ash cloud, the members of the ICWG were encouraged to submit their written comments to commence the first phase of public consultation for the 13-36 Code. The following table represents the comments received from the initial informal Consultation Working Group.


We would like to thank all participants for taking the time to review the code in detail and for the very constructive and pragmatic feedback and suggestions received. We appreciate that due to the size of the document this was not an easy task, but the exercise has proved invaluable and we are very pleased with the overall degree of acceptance the Code has received.

The various comments are grouped in batches with each batch representing a submission by a single respondent. There is a degree of commonality in the comments received and this is beneficial as it aids the identification of potential problem areas.

We have tried to respond to each comment individually with either support for the comment, partial support for the comment or comments that are not supported. Generally when the comments are not supported a reason has been offered and this is in the main due to philosophical discussions that have been previously agreed. This is not to say that these issues cannot be revisited in the future.

The table below refers to page number and section heading and should be read in conjunction with Distribution V3 of the Passenger Yacht Code.

	Code reference	Comment	MACI Response	Comment	Action
Batch 1					
Page no					
11	Preamble	Paragraph 13,14 identical to 15	agreed	none	Duplication to be removed.
14	Preamble	We do not see any difference in requirements for a passenger yacht with maximum 50 persons between a PY-U and PY1?	The difference between PY-U and PY-1 is that the latter is Commercial and hence the 50 person limit is justified	none	none
15	Preamble 17	Chapter 4 is additionally divided in Parts.	Agreed	none	MACI to draft a comment regarding Parts of Chapter 4
16	Preamble 20	(b) identical to (f)	Not identical but unnecessary duplication	none	MACI will address duplication
19	Table 1-1	Identical to Table P-1	Intentional duplication	none	none
22	1.3	New definition of Breadth. Is this necessary	The definition is derived from the LL Convention	As this is of no real consequence we can retain either definition	MACI to decide on the appropriate definition
26	1.3	A new definition of Garage Space is added which in itself is clear. However it might be more clear to use this consequently and complete delete the definition the wording special category space and vehicle space. Also: a garage housing only diesel tenders is not a "garage space". What category is that?	A valid comment but a garage space containing only diesel tenders would fall outside this definition and the requirements of the Code	none	MACI to consider if a separate definition is justified.
26 13-36 Code	1.3 ICWG Comments	Light weight definition includes tenders and spares, usually not the case.	Definition is taken from SOLAS	none	none
30	1.3	Definition "Yacht" includes commercial passenger ships, in contradiction to preamble par 2 (pg 9)	This definition has been developed to ensure the exclusion	This has been through several iterations and it	None – unless further objections are raised.

			of Small Commercial Passenger Ships	thought to be the best that can be derived for now									
34	2.3 (3)	The deck line is a horizontal line 300 millimetres in length... Request that deckline may be omitted as is the common practice on yachts.	This has been included to ensure a closer representation of the ICLL 66	MACI has no major objection to applying the LY2 interpretation to permit omission in appropriate circumstances.	Propose to include the LY2 interpretation to allow the deck line to be omitted when this location is easily discernable.								
33	2.2 (2)	Standard superstructure height is not defined, definition on pg42 is limited to section	Agreed, this is included in the windows section but this should also be included here	none	MACI will add the definition to this section.								
35	2.5	<p>Doors and Openings above the Weather Deck: Reference is made to reduced sill heights using excess freeboard, however no minimum freeboard height is given. Request reduced sill heights for second- and subsequent higher tiers. Diagram similar to Lloyd's SSC is a real chance to create clarity.</p>  <p>Figure 4.5.1 Arrangement of doors, sills and hatch coamings</p> <p>Table 4.5.1 Height of hatch coamings</p> <table border="1"> <thead> <tr> <th>Location/Access</th> <th>Height (mm) (see Note 2)</th> </tr> </thead> <tbody> <tr> <td>(a) Weather deck/machinery compartment</td> <td>460</td> </tr> <tr> <td>(b) Weather deck/lower deck accommodation</td> <td>150 230</td> </tr> <tr> <td>(c) Weather deck/cargo hold</td> <td>460</td> </tr> </tbody> </table> <p>NOTES 1. For locations (a) and (b), see Fig 4.5.1. 2. Reduced coaming heights will be specially considered based on a craft's service area restriction notation.</p>	Location/Access	Height (mm) (see Note 2)	(a) Weather deck/machinery compartment	460	(b) Weather deck/lower deck accommodation	150 230	(c) Weather deck/cargo hold	460	This provision is included in the LL Convention and the IACS interpretations to the Convention	none	MACI will consider the best way to cover this to ensure the appropriate heights are applied.
Location/Access	Height (mm) (see Note 2)												
(a) Weather deck/machinery compartment	460												
(b) Weather deck/lower deck accommodation	150 230												
(c) Weather deck/cargo hold	460												

35	2.5 (2)	No referral to standard use on board of yachts of glass sliding doors. See also 9.2.1.(b)pg 202	Doors will need to meet the Load Line Convention. Novel arrangements can be considered	none	none
37	2.6 (1) any opening (i.e. doors, manholes, ventilation ducts or any other opening) separating the compartment(s) from any other compartment below the freeboard deck, other than sliding watertight doors Not realistic. There is a need for essential systems, such as bilges, fuel lines etc. to pass through these spaces. Furthermore, these spaces need to be vented from. Watertight bulkhead fittings do the job well. Perhaps note when nature is such that use is infrequent and weather permitting, compartments below... .. Tender garages are becoming increasingly important for yachts and their use is solely in good weather. Increased sill height is better alternative.	MACI do not interpret this is the same way. This should not be a barrier to passing through by approved penetrations.	none	none
37	2.6 (2a)	Add that door may open inwards when fitted with strongbacks. Perhaps be more specific about allowing room for alternative design such as extra watertight boundary etc.	This would be covered under 'unless approved by the administration	none	none
42	2.12 (5)	Windows may not be fitted in stairway enclosures this is not a realistic requirement for yachts	Comments are noted by stairway enclosures present a significant downflooding risk	This applies to windows in locations where windows are not permitted under ICLL 66	None
43	2.12. (8)/(9)	Reference section 2.12.15.(c) does not exist	Agreed this should refer to 2.12.15		Remove the reference to (c)
43	2.12 (12)	Hinged deadlights not acceptable in second tier, refer to (9) increased strength	Agreed		MACI to review for consistency
45	2.12 (21)	Permanently attached deadlights not acceptable, refer to (9) increased strength	Agreed		MACI to review for consistency
47	2.15 (4)	Short Range Yachts, no definition	Agreed	Terminology change	MACI to review for consistency
48	2.15 (8)	Alternative safety measures may be proposed and effect on intact and damage stability of water shall be considered double requirement if water is included in the stability calculations no alternatives should need to be proposed and if alternative measures are	Comment not fully understood		None at this stage

		proposed the water should not be included in the stability calculations.			
48	2.16 (5)	Does not account for a combination of bulwark and guard rails	Do not agree that this prevents a combination of bulwark and guardrails	However this could benefit from clarification	MACI to consider some text to clarify this issue
52	3.2	Alternatives as in LY2 to be acceptable especially the requirement for the height of the forward masthead light	Do not agree that this type of flexibility should necessarily be applicable for these vessel types.		None at this stage
55	4.2	Obsolete because of note 23 and 24 on page 56. Reference to SOLAS 90 is vague. Need MSC number etc.	Necessary duplication	none	MACI to revise text for clarity and add appropriate reference.
56	4.3 (3b)	Include required regulation in text instead of note 24	Inclusion of MSC Circ 1158 not necessary	none	none
56	4.3 (4)	Remove section and or include in chapter II Loadline	This will be dealt with by cross reference	none	MACI to consider appropriate placement and cross reference
56	4.3 (5)	(5) and note 23 say the same thing. Please include note text in (5) Also, intact stability code includes wind load. How does current practice of reduced wind pressure fit into this. There does not seem to be room for this is the rule.	Agreed but feel this is necessary duplication to reinforce the message.	Interpretations that are applicable will apply	MACI to consider application of reduced wind pressure in conjunction with REG TF.
57	4.4	Note Why also refer to Guidelines. There is a chance here to make regulation complete and fitting.	Useful reference and it is not possible to replicate all guidelines	none	none
58	4.5 (2)	Add note that when enhanced survivability is relied upon, all persons are assumed to be in N1	Agreed	none	MACI to use appropriate form of words
66	4.8 (8)	Will a reduced wind pressure be acceptable?	Standard interpretations will apply	none	To be discussed at REG-TF
69	4.9 (1)	What could be considered as similar to dry cargo space	This is included to	none	MACI to provide

			ensure that larger storage spaces on yachts are covered.		explanatory note.
71	4.11 (1)	A double bottom shall be fitted extending from the collision bulkhead to the afterpeak bulkhead ... This can not be done for yachts <80m. Perhaps include a sliding scale based on L. L > 50m Forward of engine room, except fore peak L > 61m Forward and aft of engine room, except fore & aftpeak L > 76m Whole length, except fore & aftpeak Seek for coherence with classification society on this or simply refer to them. Make this section applicable to yachts > 76m	Agreed this may present an issue and will be considered		MACI to consider and to present to REG -TF
72	4.11 (8)	In case of large lower compartments in passenger ships... Explain lower compartments. This was originally intended for lower, full-width, car decks in ferries with large free surfaces when damaged. These yachts do not have car decks. Stores and Laundry's on lower decks could be mistaken for lower compartments. For guidance on this issue → Lloyd's London.	This issue is subject to further review by the UK. This is a reported issue with probabilistic damage	none	None at this stage, but we will consider this as the UK Considerations progress.
73	4.13 (2)	Forepeak shall be tested with water not practical	Consider Classification Society Requirements	none	MACI to consider using a form of words to indicate acceptability of Class Society Requirements
74	4.14 (4 & 5)	(4) and (5) contradict each other. Request to remove (4)	Do not agree, this covers different types of penetrations	none	none
74	4.14 (6)	Long superstructure is not taken into account when assessing stability. Remove (6) all together or replace superstructure with enclosed superstructure.	Do not agree, SOLAS wording	none	none
74	4.14 (8)	Re-write text. Does not read	Do not agree, SOLAS wording	none	none
75	4.15 (3)	Remove (3). This is a Yacht Code	Agreed	none	MACI to reword
75	4.15 (4)	Not more than one door may be fitted in each watertight bulkhead within spaces containing than main and auxiliary propulsion machinery Impractical and contradicts 4.15 (1) where it states ...the minimum compatible with the design and proper working of the ship...	Do not agree, SOLAS wording	none	none
76	4.15 (5) c	Positioning of watertight doors not within one fifth of the breadth Impractical, could be made equal to damage extend 0.1B and not less than 0.75m	Agreed this may need consideration	none	MACI to consider in conjunction REG TF

81	4.15 (9)	Exemption to 4.15 (4) ? Rules could do with simplification. All these chapter can be combined into a few paragraphs. For Watertight door execution refer to a standard and concentrate the rule around the placement of the doors.	Do not agree, SOLAS wording	none	none
82	4.16 (1)	Opening in the shell plating below the bulkhead deck are a normal provision on large yachts, reducing them to the minimum is not reasonable	Do not agree, SOLAS wording	none	none
82	4.16	Remove whole section and/or combine with Chapter II	Do not agree, SOLAS wording and justified duplication	none	none
89	Part V	Combine with	?	?	?
90	4.24 (1)	All watertight doors shall be kept closed during navigation unrealistic on yachts Also discussion within IMO Sub-committee on stability and Load lines and on fishing vessels Safety	Do not agree, SOLAS wording.	Guidelines to be followed	none
94	Part VI	Link to LY2 required. Rules are applicable to up to 85m. This is a chance to link the two. Also useful for existing yacht that get "grandfathered" into the rule.	Do not agree, this vessels are not LY2	none	none
106	4.30	Damage extend is not specified, to be two adjacent single compartments?	Agreed	none	This is still under review. Assistance from designers would be beneficial. MACI to seek guidance
106	4.31	Yachts need to comply with: -Probabilistic damage calculations (Regulations 6 & 7) -Double bottom damage -Enhanced survivability -Maximum Floodable Length Four ways to asses damage stability is overdone, for large yacht SOLAS should be sufficient and also enhanced survivability could be included for example by adjusting the damage extend on page 70.	Agree that this could benefit from some clearer defintion	none	MACI to consider reviewing this text to make this clearer.
107	5.3 (2)	unattended machinery space standards in accordance with subsection (1) <u>shall</u> also comply with the applicable requirements	Agreed	none	Typo to be corrected 'shall' to be inserted
112	6.2. (11) (a)	Sounding pipes not under crew or passenger floor will be hard to comply with	Do not agree, SOLAS wording	none	none
114	6.2 (26)	Usual arrangement of petrol locker must be replaced by arrangement as per heli fuelling requirements?	Comment not fully understood	none	None at this stage
117	6.3 (10)	Mail rooms, baggage room why exemption for these area's?	Do not agree, SOLAS wording	none	none

118	6.3 (13)	Combustible materials shall have a calorific value not exceeding 45 MJ/m ² This will seriously affect the quality of our product. We appreciate it is possible to produce a large cruise ship with an beautiful interior however we will not be able to create the Feadship quality our clients demand. We can accept the idea to build all base walls, floors and ceilings from non combustible material which will contain the fire in the compartment of origin as is one of the objectives. We need however be able to use wood and other materials in the finishing of the cabins. As combustible furniture is allowed in SOLAS this will only slightly increase the fire load. However the fixed fire detection and fighting system justifies this increase in our opinion. This also avoids the massive work of specifying and quantifying all interior materials.	Do not fully agree. This is a standard that has been achieved on yachts.	none	MACI to consider reference to interpretation to allow higher volumes of combustibles in guest and non escape areas.
118	6.3 (14)	Outside furniture on balconies. This requirements originated from fire which spread over balconies, so oke for balconies adjacent to private cabins but not for open aft decks adjacent to public spaces. The requirement in (18) will be sufficient	Agreed	none	MACI to consider rewording to assess the applicability to yacht designs
118	6.3 (16)(c)	This means exterior lacquer system to be low flame spread!	Do not agree, SOLAS requirement	none	None at this time
122	6.5 (11)	Not practical	Agreed	none	MACI to consider rewording to assess the applicability to yacht designs
122	6.5 (12)	How should this be achieved? Smoke detection in all void spaces?	Agreed	SOLAS requires inspection and fire patrols	MACI to consider an appropriate guidelines
122	6.5 (14)	Or manned crew mess / control station	Do not agree Crew mess may not be sufficient	none	none
122	6.5 (16)a	Continuously manned control station see (14)	Do not agree Crew mess may not be sufficient	none	none
124	6.6.(5)	Reference to section 6.7(45)??	Agreed	Incorrect reference	MACI to correct to 6.7(50)
124	6.6 (3)	Safety centre? Definition unclear	Agreed	none	MACI to provide definiton
128	6.7 (12)	If sprinkler is required we could limit the table to one value	Do not agree, SOLAS wording	none	none

128	6.7 (15-20)	Sauna is clear. What about steam rooms?	Agreed	Steam rooms usually treated differently to Saunas	MACI to provide interpretation
132	6.7.(28)(b)	Reference to (54) and (58) unclear	Agreed	Incorrect reference	MACI to correct reference to 56-58
136	6.7 (41)	Holdbacks on central release acceptable?	Do not agree, SOLAS wording	none	none at this time
136	6.7 (45)	Window frames steel or equivalent aluminum to be possible without excessive insulation	Do not agree, this does not prevent properly engineered solutions	none	none
137	6.7 (48)	Identical to 6.7.(33c)	Do not agree, helpful duplication	none	none
137	6.7 (51)	Skylights of steel in engine room	Do not agree, SOLAS wording	none	none
137	6.7 (53)	Reference to (49) unclear, should be (52)?	Agreed	none	MACI to correct reference
137	6.7 (55)	Windows from engine room corridors should be allowed	Do not agree, SOLAS wording	none	None at this time
139	6.7 (59)	Ducts are insulated 5 metres beyond fire damper insulation in mast impractical Also: definition of "hazardous areas"?	Do not agree, SOLAS wording	The 5m will be limited by size, once the exterior of the vessel is reached this will suffice	none
149	6.8 (52)	Delete repetition	Do not agree, cannot find repetition	none	none
150	6.8 (58) 6.8 (60)	The requirement for two fire-fighter's outfits / main vertical zone is always above the requirement of reg 58 (a) and (b)	Do not agree, SOLAS wording	none	none
160	6.13 (10)	Training manual also electronic version to be allowed	Do not agree, the training manual needs to be always available	Electronic version could be used subject to Administration requirements	none at this time
164	6.16 (4)	Reference to 6.4 unclear	Agreed		MACI to remove reference.

168	6.17 (8)	Permanent opening shall be so situated that a fire in the garage space does not endanger stowage and embarkation stations for survival craft stowage of survival craft above hatches can not be avoided	Do not agree as this should not prevent properly engineered solutions	none	none
169	6.17 (14)	Reference to (16) unclear	Agreed	none	MACI to identify correct reference
169	6.17 (14)	Garage spaces are not to give direct access to any space impractical, according to Solas they may even give access to public stairways	Agreed	none	MACI to examine this section for inconsistencies with SOLAS
169	6.17 (17)	Contradiction to table 6.1/6.2	Do not agree	none	none
172	7.3(1)b	Extreme demand since weather deck is usually quite high. Better to refer to damaged water line	Do not agree as either or clause. If weatherdeck is high then this will be limited	none	none
172	7.3 (4a)	Stowed with its painter permanently attached to the ship unacceptable on yachts	Do not agree, this does not prevent properly engineered solutions	none	none
175	7.7 (1)	"shortest possible time" : refer to 5 minutes as 7.4 (a)	Do not agree, SOLAS wording	none	none
179	7.10	Header above 7.10(12): "Ant-Exposure Suits" not much ants expected on board yachts.	Agreed, wording should be anti	none	MACI to change wording to Anti
194	Table 7.1	Which demands for <80m and <500 GT unlimited? PY1 damaged stab standards >80m shading in table to be removed.	Do not agree, philosophical issue that has been agreed	none	none
199	8.2	Reference to non existing Annex 3.	Agreed, annexes to be revised	none	none at this time
203	9.2 (5&6)	Fuel bunkers under accommodation is the only space available, see also pg1 12	Do not agree, closer conformity with crew accommodation requirements will be needed for this vessels	none	none

204	9.3 (9)	This paragraph precludes the possibilities for ensuite bathrooms, standard on yachts. Also in contradiction with 9.3 (8)c)	Agreed	none	MACI to propose wording to allow for ensuite facilities.
209	9.12 (4)	Please confirm a petty officer is not an officer when applying (20) and (22). Re cabin areas.	Agreed	none	MACI to provide necessary clarification
210	9.12 (5)	Separate sleeping rooms shall be provided FOR each officer Impractical and in contradiction with (23), even guests share a cabin!	Do not agree, as an MLC requirements reference to 23 not valid as this deals with shared day rooms not sleeping rooms	none	none
210	9.12(9)	This is a non compulsory guideline in MLC 2006, now makes it a requirement (and a very onerous one!)	Do not agree, noted this is a guideline but this requirement already exists in crew accommodation regs	none	None at this time
211	9.12(20)	Areas are mentioned in m3	Agreed, typo	none	MACI to correct typo
211	9.12 (20)	The minimum floor area's are specified for commercial ships and do not take into account the normal operation of yachts and the additional standards offered in crew cabins and will lead to four person cabins which are in the industry considered as a lower standard. A lower values of 6.0m ² for a two person cabin will be acceptable.	Do not agree, however this area is under discussion, between UK and ILO	none	None at this time
211	9.12 (23)	master and chief engineer and shall have	Agreed, typo	none	MACI to correct Typo
213	9.15 (14)	All sanitary spaces shall have ventilation to the open air, independently of any other part of the accommodation. All sanitary spaces have exhaust, to be confirmed that supply via the cabin is acceptable.	Do not agree, Crew Accommodation regs	none	None at this time
214	9.16 (1)	... separate hospital accommodation to be used exclusively for medical purposes... Not realistic on yachts due to space constraints. Request dual purpose spaces.	Do not agree as this only applies to voyages of more than 3 days. This is also an MLC requirement	none	none
221	11.4(3)	Reference to non existing annex 5	Agreed, annexes under review	none	MACI to revise annexes
227-230	Tables 12-1 to 12-4	Please indicate which functions are "officer" as per 9.12 (22), cabin area	Agreed	none	MACI to provide appropriate guidance.

233	13.1(3)	(b) identical to (d)	Agreed, duplication error	none	MACI to remove duplication.
Batch 2					
A	comment	A) Impact of the Code to the existing Regulation relevant to this matter in relation with other flags: It is to be pointed out that many flags still do not apply the definition of "passenger" given by SOLAS to yachts not engaged in trade, considering that a pleasure vessel not engaged in trade does not fall under SOLAS regulation at all; this means that under these flags a 60 m yacht in private service can carry on board 15 guests without complying with any requirements while under the REG the same boat will need to be classed as passenger ship and meet very strict statutory requirements.	noted	RINA comment is noted but at the current time this is the REG position and we will follow this until guided otherwise	none
27	Ch1.para 1.3	Which is the scope to introduce the definition of "machinery room"?	noted	none	MACI to provide clarification of origin
30	Ch.1 para 1.3	What does it mean "Yacht means a vessel.... provision of the Code"	This definition has been developed to ensure the exclusion of Small Commercial Passenger Ships	This has been through several iterations and it thought to be the best that can be derived for now	None – unless further objections are raised.
	Certification of Marine Equipment	MED Directive 96/98/CE as amended acceptable but NOT mandatory (as per Yachts complying to LY2). Correct?	Agreed	none	none
		It is understood that requirements of MSC 269(85) (gap below fire doors and new requirement for materials of ventilation ducts and second fire damper on galley hood) amendment to Ch.II-2 SOLAS has not been included in the Code but in acc. with para 1.7 of the Preamble it is applicable to vessels subject to this Code limited to the part for ships carrying up to 36 pax. Correct?	?	none	MACI to consider provision for inclusion
122	Ch6 pare 6.5 (14)	It is understood that the bridge is to be manned when the yacht is used under the provisions of the Code and more than 12 passenger are on board and not in other cases.	Agreed	none	none
150	Ch6 para	It is not understood if are to be applied the 2 paragraphs or they are	Agreed	none	MACI to review

	(58) and (60)	alternative.			section to remove any ambiguity
155	Ch6 para 6.11 (18) (d)	in the definition is defined "control station" and "continuously manned control station" but not "central control station"	Agreed	none	MACI to provide clarification
157	Ch6 para 6.11 (29)	It understood that no requirements for handrails strength are foreseen. Correct?	Do not understand comment	none	none
178	Ch7 Para 7.10.(1)	Why the Table for lifebuoys depends on GT and not on L as in SOLAS?	Agreed	This was included to make this more representative for yachts	none
35	2.3(6)	The possibility to paint the ring will be possible for Passenger Yachts and seem still non possible for vessels carrying up to 12 passengers.	Do not agree, this is not the intention of this clause	none	none
41	2.11	Scuppers, Inlets and Discharges: It would be better to specify the condition of acceptance of plastic piping.	Do not agree, Load Line Convention will dictate	Interpretations applied by Class will apply to these vessels	none
42	2.12.(6)(a)	Maybe better to specify what "equivalent level of safety" means.	Do not agree, this is for consideration by the administration	none	none
43	2.12.(12)	Windows and sidescuttles fitted in second tier are to have hinged deadlights and sidescuttles fitted below freeboard deck according to Ch.2 para. 2.12.(7) LL page 42 and for windows and sidescuttles in the first tier according to Ch.2 para. 2.12.(18)(c) LL page 43 the deadlights may be in easy accessible positions.	Agreed	none	MACI will review this section for consistency
43	2.12.(16)	Maybe better to specify the limits of tolerance in the dimensions and thickness of the test samples.	Do not agree, this is a detail that does not need to be in the Code as standard test protocols to be used	none	none
44	2.12.(19)	Also in side windows of second tier are required deadlight/storm shutters in acc to	Do not agree but this	none	None at this time

		2.12.(12) and (13)	section will be reviewed		subject to review
47	2.15.(2)	It would be better clarify that the formula for well area is applicable only to weather deck or also to first and second tier decks.	Do not agree, this would only apply to exposed decks	none	none
47	2.15.(4) (b)	May be better specify how and when the well is to be considered flooded (% of filling, only for Intact or also in Damage cases - e.g. well flooded plus 1 compartment flooded)	Do not agree this will be subject to interpretation	none	none
107	Ch 5.1 (1)	May be better specify Chapter II-1,Part C of SOLAS for Passenger (or Cargo?) ship	Do not agree, this Code is for Passenger Ships only	none	none
107	Ch 5.1 (2)	May be better specify Chapter II-1,Part D of SOLAS for Passenger (or Cargo?) ship	Do not agree, this Code is for Passenger Ships only	none	none
121/122	Ch 6.5(10) & (16)	It is understood that intentionally has been applied a requirement for ships carrying more than 36 pax.	Agreed, this is part of the enhanced standard for equivalence to lifeboats	none	none
137	Ch 6.7.(48)	Watertight door needs not to be insulated has been already written at para (33).(c). Here is to be insert last part of para 4.1.3.3 Ch.II-2 SOLAS relevant to windows on ship's sides in way of embarkation area that are to be at least A-0	Intentional duplication Agreed in respect of comment re windows	none	MACI to review for consistency with SOLAS requirements
138	Ch 6.7.(58)	It is understood that intentionally has been applied a relaxation acceptable by SOLAS only for cargo ships.	Do not agree as this requirement applies to Passenger ships less than 36	none	none
145	Ch 6.8 (25)	Maybe it is better to include "not less than 3" as indicated in SOLAS	Do not agree the not less than 3 requirement applies only to cargo ships	It is unlikely that a minimum of 3 will suffice for the purposes of the Code	none
154/155	Ch 6.11.(12) (b) &	May be it is better to specify which type of division is acceptable.	Do not understand comment	none	none

	6.11.(18) (b)				
157	Ch 6.11.(25)	It is understood that it has been intentionally done a relaxation from SOLAS Ch.II-2 13.4.1.3 for steering gear room applicable ships carrying up to 36 pax.	Agreed	This has been recast but this amounts to the same provision	none
179	Ch 7.10.(1) (12) and (13)	It is suggested to require immersion suites for every persons on board for all type of vessels when they do not carry lifeboats as already done for charter vessels carrying up to 12 pax in acc. with LY2.	Agreed	none	none
22	Ch.1 para 1.3	B class divisions, "BA0"	Agreed	none	MACI to correct typo in table
41	Ch.2 para 2.12.	in the in the	Agreed	none	MACI to delete the words 'in the' in 2,12 (b)
43	Ch.2 para 2.12.(8).(a)	"...requirement of 2.12.(45)(c)"	Agreed	none	MACI to correct typo
43	Ch.2 para 2.12.(9).(a)	defined in 2.12.(45)(c)"	Agreed	none	MACI to correct typo
44	Ch.2 para 2.12.(18) (c)	"..section 2.12(45).."	Agreed	none	MACI to correct typo
47	Ch.2 para 2.15.(4)	" For short range yacht .. but "PY-2" (or PY-1 and PY-2)	Agreed	none	MACI to correct terminology
148	Note 36	500m23	Agreed	none	MACI to correct typo
175	Ch.7 para 7.8.(1)	"On passenger ships...."	Agreed	none	MACI to correct typo

Batch 3					
9		Does this mean that HSC code must not or may not be used even if other conditions would suggest it?	Agreed	Vessels to which this Code applies are not high speed craft	none
13		If more than 99 persons on board but less than 36 passengers, boat has to be built according to SOLAS?	Agreed	This was introduced to eliminate the need to carry a doctor but this may be reviewed	MACI to consider this further on wider consultation
17	(4)	Refit, or conversion with >13 Passengers of private use LY1 or LY2 will be very difficult.	Agreed	The Code is primarily intended for new construction but existing vessels should not be precluded if they can comply	none
25	1.3	"Intakt Stability Code" : a reduction of windload (for the weather criterion) is only possible by evidence of wind tunnel tests	Agreed	All applicable interpretations will be applicable	none
33	(3)	Is IMO 749 (predecessor of Intakt Stability Code) with reduced windload still acceptable?,	Do not agree	New standards are to be adopted unless this is shown to be inappropriate.	None at this time
55	(2)	Is IMO 749 with reduced windload acceptable?	Do not agree	See above	None at this time
56	(2)c	...specified in subsection (5) to read as subsection (3)?	Do not agree	none	none
106		All yachts marked in the table P-1 with 2 compartment enhanced have to fulfill 2 compartment status and enhanced stability and probabilistic?	Agreed	none	none
225	(2)	Are staff without STCW training counted as passengers or crew?			
22	b	"BA-0" = "B-0" ?	Agreed	none	MACI to correct typo
211		m³ to read m² and values are high for smaller yachts	Agreed Typo, Do not agree on area	none	MACI to correct Typo

			requirements. These are MLC standards		
14	Footnote 8	If PY-U over 80 m and more than 50 persons has lifeboats then all other LSA as per SOLAS?	Agreed	This is primary philosophical issue and one that underpins the basis of the Code	none
14	Footnote 12	Chapter IV, part VII not part VI	Agreed	none	MACI to correct Typo
14	Footnote 9	What is Initial Port of departure one fix point or for each voyage a different point	Do not agree	This is not a nominated departure point	none
202	Ch 9 1.5	Crew accommodation in foreship is very common	Noted	MLC does not expressly prohibit this	None at this stage
235	CH 13.9	Isn't the code limited to 99 persons?	Agreed	Code has been revised to eliminate compulsory carriage of doctor	MACI to review this section for consistency
1		No more differentiation between private owned pleasure crafts and those being commercially engaged, if more than 12 passengers being carried or size exceeds 3000 gt ?	Do not agree	Categories of operation have been carefully derived based on risk	none
9		What about vessels carrying less than 13 passengers, but being above 3000 gt - does this code apply or the LY2 ?	Do not agree	This Code is essentially for passenger ships. The standard for vessels over 3000GT carrying less than 13 is SOLAS Cargo Ship	none
10	Preamble 7	Classification for structural layout of all vessels being build under this code as "Passenger Vessel" required? Problem of additional structural weight 10 - 12 %.	Do not agree	This is an important consideration but it does not follow that a general increase in structural weight	none

				will occur	
10	Preamble 8	Fire Detection and extinguishing system from the beginning, earlier as substitute to the use of combustible materials. Is the use of combustible material general permitted by general application of enhanced fire protection?	Do not agree	Enhanced fire protection is introduced to allow reduction in LSA	none
13/14	Table P-1	150% per side appears quite general, LY2 regulation (100% capacity per side, 1 spare, possibility for transfer of liferafts from one side to the other), even SOLAS requirements are less demanding and more flexible. What <u>exactly</u> is meant by "Dry Shot Evacuation" ? Limitation to 50 persons for vessels above 80 m and unrestricted service is a painful low number.	Do not agree, these vessels will follow SOLAS to a much greater extent. Dry Shod evacuation means evacuation by dry means	The 50 person limit applies to vessels over 80m on unrestricted Commercial voyages	none
16	Preamble 20	Ballast Water Management Convention become valid only if in force ??	Agreed	none	none
17	CH 1 1.2.1	General limitation to the number of people to 99 persons. What applies if this number will be exceeded (considering no more than 36 passengers are on board)?	Noted	If more than 100 persons then a doctor must be carried	MACI to consider wording to explain this.
21	CH 1.3.1	A-0 bulkheads needs to be insulated? Prototype test according Fire Test Procedure for A-0 steel bulkheads and Decks? If so, will respective certification be valid for an appropriate time period?	Do not agree	Standard procedures and interpretations will apply	none
22	CH 1.3.1	For what sake is an embarkation ladder, if all life rafts shall be davit-launched, or a MES shall be provided?	Do not agree	Standard Definition	none
28	CH 1.3.1	There are 4 different definitions for: "Passenger Pleasure Yacht" "Passenger Yacht" "Pleasure Vessel" "Pleasure Yacht" "Yacht" (page 30) which are really confusing	Do not agree.	These definitions are essential to the application of the Code	None at this stage, but MACI will consider if this needs clarification
35	CH 2.5.2	Restrictions for Door opening direction What about power-operated doors, e.g. sliding doors - any requirements?	Noted	See comment above	none

37		What about "virtual freeboard" ? Is that as per ILLC ?	Agreed	ILLC interpretations apply	none
43	CH 2.12	Also permanently attached deadlights or storm shutters in second tier (in case of possible down flooding) ? This chapter is a bit confusing.	Agreed	none	MACI will review this chapter to eliminate any confusion
43 & 44	CH 2.12 (16)	Even higher test pressure (5 times) then used to so far (4 times), or operational restrictions and additional compliance with classification of windows according Passenger vessels). Difficulty is to determine pressure heads derived from the BMSA / ISO standard scuttles for alternative designs, e.g. for windows. It this minimum requirement for the layout according formulas of the BMSA / ISO standard, or just another minimum requirement to be met.	Do not agree	The pressure head requirements are derived to deal with non standard glazing configurations.	none
44	CH 2.12 (18)	Chemical toughened glass is allowed, but it remains unclear if additional compliance with classification requirements shall be met, which may exclude this glass type.	Agreed	Windows must meet Classification Society requirements	none
44	CH 2.12 (18)	If windows in lieu of side scuttles will be fitted, and permanent attachment of storm shutters shall be avoided, is 130% to add to the 5 times higher pressure head?	Agreed	Two separate provisions but both must be met to achieve objective	none
45	CH 2.12 (22)	Retainers are back again !	Agreed	This should meet SOLAS and Class requirements	none
49	CH 2.16	Calculation and load test in lieu of every third stanchion being supported by a bracket or stay would be yachtlike	Agreed	Properly engineered solutions may be accepted as equivalent	none
117	CH 6.3 (12)	!!! Strictly use of non-combustible material on open deck should be avoided	Agreed	This may be subject to interpretation	MACI to consider these requirements as applicable to this vessel type
118	CH 6.3 (14)	!!! Strictly use of non-combustible material for deck furniture should be avoided. Problems will occur if open deck has no deck overhang (no possibility to fit sprinkler and fire detection system)	Agreed	This may be subject to interpretation	MACI to consider these requirements as applicable to this

					vessel type
122	CH 6.5 (11)	Please clarify if valid for the complete deck or in certain distance. Allowed if deck furniture comply with 6.3.14?	Agreed	May be subject to interpretation	MACI to consider these requirements as applicable to this vessel type
122	CH 6.5 (12)	How should be the detection of smoke to be performed, fire detectors required?	Agreed	none	MACI to consider appropriate guidance
135	CH 6.7 (38)	Outside doors to be A 0 in way of escape routes, embarkation stations, survival craft will cause use of new door types with additional costs and time for developing	Do not agree	SOLAS provision	none
155	CH 6.11 (12) (d)	Width of escape routes to be 900mm (not mandatory by classification societies) will cause extra needed space and volume	Do not agree	SOLAS provision but suitable interpretations apply	none
164	CH 6.16 (2)	Special requirements for openings and windows below aluminium helidecks is also acc. SOLAS an unrealistic demand	Do not agree, SOLAS provision	none	none
168	CH 6.17	Special requirements for positioning of garages in regard to other certain spaces, really necessary?	Agreed, these are high risk areas on higher risk vessels	none	none
204	CH 9.3 (7) (b)	What is the purpose of the gas and watertight bulkheads between crew accommodation and certain other rooms? It will cause additional cost and weight	Do not agree	This requirement is in the crew accommodation regs which are not fully enforced on large yachts	none
10	Preamble 7	Typing mistake: Under No. 7. Should be an "it" instead of "t"	Agreed	none	MACI to correct TYPO
51	CH 3.1 (f)	Why are ILO and MLC listed to be fulfilled plus chapter 9.	Agreed	Code has been designed with ILO/MLC requirements to avoid issues further down the line	none
53	CH 3.6	Why insurance items are part of this document?	Agreed	This is a reference Chapter	none
83	CH 4.16 (8)	!!classification society GL for example gives an time for flooding and not the general demand to enable every valve operation from above the weather deck!!!	Do not agree	LL Interpretations will apply	none

107	CH 5.3	!!!For passenger ships UMS is in general acceptable. Why here are restrictions described?!!!	Do not agree	Most administrations do not permit UMS on passenger ships	none
206	CH 9.7 (1)	"thermal oil or steam, exhaust pipes and winches" are mentioned. What is the intention of this para.?	Agreed	This para is to avoid crew coming into contact with potentially harmful services	none
248	Annex 2 (3.2.13)	!!! Normally the layout of the scupper system for a helicopter pad is done by the expected rain amount. We regard additional regulations for this case as overdone. If this shall be changed, values for calculation based on helicopter type and fuel volume etc. are needed!!!	Do not agree	This takes account of the higher risk for these vessels	none
267	Annex 2 (8.2.4)	!!! the written 2.3 m is a new demand. Up to now it doesn't exist, even not in the SOLAS-rules.!!! May have strong design impact.	Do not agree	This is standard helicopter provision	none
121	CH 6.5 (9)	Does this mean that all supply- and exhaust air channels shall be equipped with smoke detectors? Up to now only for engine room vents. HVAC channels closed by fire dampers.	Do not agree	The code requires only consideration. It would suggest only where risk exits	none
149	CH 6.8 (53)	There are 4 types of fire extinguishing systems. Between c and d there is an "or" between a and b and c not.	Agreed	none	MACI to check this clause and correct as appropriate
155	CH 6.10 (18)	Low Level Lighting (LLL) like full SOLAS. Would prefer not to install in Owner- and Guest areas.	Do not agree	Equivalence is provided for in 18(b)	none
176	CH 7 (1)	According IMO and GMDSS only 2 VHF telephones (instead of 3)	Do not agree, SOLAS provision	none	none
208	CH 9.10 (1)	500 lx is for working areas. For cabins and mess rooms it should be not more than 100 lx.(normal 50 - 75 lx as per BSH).	Do not agree	Crew Accommodation Regs	none
Batch 4					
		This code creates a world of difference with huge implications on lay out, designer flexibility, used materials, required safety equipment etc. between a current max. 12 person and a 14 passenger yacht. Is this really what the yacht industry and their clients are waiting for? We foresee higher cost, significant less space for the Owner, less design flexibility.	Noted	none	none

		It is unfortunate that this code does not follow the logic of existing codes such as Solas or LY2. The chosen format leads to overlap and inconsistency in various areas. Is it not possible to use LY2 as a starting point and make an overview of additional requirements, or the other way around, stay with Solas and add an overview of relaxations to these regulations aimed at ships with up to 3500 passengers and spaces up to 1600 m2. This ruling is fairly complete, however still references to Solas for certain aspects.	Noted, This Code is intended for Passenger Ships and hence a different philosophy is justified	none	none
		Would it be interesting to add wording with regards to the flagstates administrative proces? What kind of information is to be submitted in what format? How many surveys are required etc.	Noted	This will follow HSSC	none
1		also for private use?	Agreed	none	none
1		How about expedition yachts? What is definition of cargo? Add to definitions	Agreed	none	MACI to consider clarification
7	11	chapters seem to focus on crew (personnel) Are there no requirements with regards to safe operation/handling of 'passengers'?	Agreed	none	MACI to consider
9		is a 14 person 30 knots vessel a high speed yacht?	Do not agree, these vessels are not High Speed Craft	none	none
10	7.	it			
13		should read 'private use' instead 'not engaged in trade'?	Do not agree, definition is standard	none	none
13		Maximum persons 99 intention unclear, add 'passengers and crew'	Do not agree, persons on board is a standard definition	none	none
13		why? Is davit launched considered safer than boarding via the side?	Noted	The use of MES as a sole means of evacuation is not supported and hence davit launched life rafts are a key philosophical issue	none
19		see page 13 remarks, LY2 uses 85m as a step.	Do not agree	SOLAS and LL Definitions apply	none
23	1.3	Detection unclear. Definition is also used in e.g. 'fire detection'	Do not understand comment, this is a	none	none

			different definition		
25	1.3	we would prefer to have two kinds of garages; low risk and high risk garages. High risk garages assigned to storage spaces for vehicles using petrol (flash point < 60C)	Do not fully agree, low fire risk garage has not major compliance issues	none	None at this time
28	1.3	Private use add definition	Do not agree.	This is defined in MSL and may have a slightly different definition depending on flag state	none
29	1.3	is insulated composite material allowed? (example Mirabella V), 14A.2.1.2	Agreed, this would need to be steel or equivalent. However the code is not designed for composite materials	none	none
30		Yacht Definition is differently worded	Noted	This has been a difficult definition to derive and this may change	None at this time
31	1.4.3	RO meaning?	Do not agree see definitions	none	none
31	1.4	for builders it is very helpful to split certificates in build related and operational. Ship builders normally provide technical compliance. Owner normally take care of the management issues.	Noted, but do not feel this needs changing	none	none
31	1.4	Why is a noise test report mentioned?	Noted, this will be required under MLC	none	none
31	1.4	Bunkers convention certificate of insurance? Shipbuilders don't normally supply such thing.	Do not agree, this is not shipyard supply	none	none
31	1.5	how is casualty reporting regulated?	Noted, this is a flag state issue	none	none
33	2.1.2	What is the impact of 'class notation as a passenger ship required!! Ruling should not be double, class or flag.	Do not agree, this is to ensure that the relevant Class items for a passenger ship	none	none

			are taken into account in the Class notations		
34	2.3.3	is it really necessary to add a deck line?	Agreed	This comment has been dealt with previously	MACI to consider wording
34	2.3	add fwd and aft draft marks? Refer to 4.3?	Agreed	This is covered in section 4	none
	2.5	propose treshold 150mm. 380mm minus correction is vague	Do not agree	Provision for reduction is included	none
	2.6	where do the wt divisions go?	Do not understand comment	none	none
41	2.12	windows should be allowed in any position on the yacht if they are of appropriate strength and with a healthy safety factor and possible additional safety requirements. Glass is only another construction material.	Do not agree, the LL Convention is designed to prevent water ingress and windows will always have the potential to be a weak link.	none	none
43	2.12.11	underwater should be allowed	Do not agree, see above comment	none	none
43	2.12.16	4 x testpressure is currently the norm. Why 5 x?	Noted, the higher pressure to deal with protection for higher risk vessels	none	none
45	2.13	Should other items such as moonpools, float in docks, special hull penetrations for sonar tubes, cross over filter boxes or other special items be included here?	Do not agree, these would be considered on a case by case.	none	none
48	2.16	and passengers?	Noted, standard terminology is protection of crew	Applies equally to passengers	none
49	2.16.6	steel wire or equivalent?	Agreed	Equivalence is provided for	none
52	3.2	add definition 'underway', LED light remark not necessary/require wheelmark will there be possibility for exemptions on the height of the foremast as per LY2?	Noted,	Any acceptable interpretations can be applied	none

52	3.5	dated remark	Do not understand comment	none	none
53	3.6	this is not a technical requirement. Also assume this is not only insurance required, why is it mentioned?	Noted	This is included for completeness	none
	4.2.1	explain please	Do not agree	We believe this is clear	none
56	4.3	cross reference to 2.3?	Agreed	none	MACI to consider a cross reference
72	4.11.8	define lower compartment	Agreed	none	MACI to consider adding an appropriate definition
73	4.13.2	testing of forepeak etc. with water?? Testing acc. to classification society!	Agreed, see earlier comment	none	MACI to consider appropriate wording
73	4.13.3	Testing acc. to classification society!	Agreed see comment above	none	none
	4.14.6	does not work in some of our arrangements.	Do not agree, SOLAS provision	Standard interpretations will apply	none
76	4.15.6	incorrect wording	Do not Agree, SOLAS wording	none	none
82	4.16	see 2.12, a lot is typically Lloyds; chutes are already mentioned in 2.13	Do not agree necessary duplication	none	none
84	4.18	no hose testing please!	Do not agree	Class Society requirements will dictate	none
86	4.19.5	Duplication of information	Agreed, but SOLAS wording	none	none
87	4.20	Duplication of information	Do not agree SOLAS wording	none	none
87	4.20.1b	no cargo, what could this be used for?	Agreed.	This clause does not apply to these vessels	none
87	4.20.1b	confusing! PY1, P1 etc.	Do not understand comment	none	none
87	4.20.1b	2 x of this chapter	Do not understand	none	none

			comment		
92	4.24.8	provision doors, garage doors, beach platforms etc. are required to be opened when at anchor or in DP mode when the weather allows. Please also note that a normal tender store with diesel tenders is not called garage by the definition in 1.3	Agreed	none	MACI to consider clarification
92	4.24.9	not seen on PY yet?	Agreed, SOLAS wording	This clause is not relevant to these vessels	MACI to remove provision
92	4.24.10	could be drifting or in dp mode	Noted	none	none
92	4.24.11	sentence incomplete	Agreed	none	MACI to correct clause
93	4.24.16	no cargo is carried! (see definition)	Agreed	none	MACI to remove provision
93	4.24.17	rubbish chute again!, delete 2.13?	Agreed	none	none
107	5.1.1	consequences compared to LY2?	Do not agree, SOLAS requirements apply	none	none
107	5.1.2	change to: gas turbines as sole propulsors (yachts typically fit gasturbines as boosters to achieve higher top speeds)	Do not agree.	If gas turbines are fitted they must comply with requirements	none
107	5.2	consequences compared to LY2? Does this refer to passenger ships or cargo ships?	Do not agree, SOLAS requirements apply	none	none
117	6.3.11	the use of combustibile materials is more restricted than in LY2 due to a complete different way of describing what and where is allowed and is now so vaguely that it will create new 'solutions'. Facings will be replaced by furniture to obtain compliance.	Agreed, this is intentional	A closer alignment with SOLAS is required for these vessels	none
118	6.3.13	we advocate the free use of combustibile materials when watermist is fitted as per LY2.	Do not agree	A closer alignment with SOLAS is required for these vessels	none
119	6.3.17b	this seems to be very much based on typical lay out of ferries with their vending machines etc. Is this how we want yacht designers to work? We propose to specify a minimum clearance of 90cm in all locations and fixed fitting of any furniture or other objects.	Do not fully agree,	Agree scope may be limited but provision still applies	none

119	6.3.18	does this chapter apply to a passenger yacht?	Agreed	none	none
125	6.7	if pass. ships can have 1600m2 zones, than 2 zones should be enough on a smaller yacht	Agreed	none	none
136	6.7.41	self closing B-doors required. Can these be of releasable type?	Do not agree	none	none
136	6.7.40	non combustibile not required by LY2	Agreed,	A closer alignment with SOLAS is required for these vessels	none
136	6.7.45	bonding of windows not allowed?	Do not agree	Bonded windows are permitted with certain safeguards in place	none
137	6.7.47b	use of watermist? Instead of conventional sprinklers?	Agreed	none	none
138	6.7.59	central casing designs allowed? Text is confusing where initially something is not allowed unless administration permits a relaxation!	Agreed	none	none
139	6.7.60ai	Incorrect reference 53	Agreed	none	MACI to confirm correct reference (56?)
143	6.8.11	Incorrect reference subsection 5	Do not agree,	Subsection 6.8(5) is correct	none
143	6.8.12	remark does not make sense for 13-36 yacht. It will always be over 500GT?	Do not agree	none	none
149	6.8.53	= service space high risk with additional requirements? How much paint is determining a paint locker? Is this 'or' 'or'	Noted	No standard definition exists so If any quantity carried.	none
150	6.8.59	vague wording, require table overview as done in LY2.	Do not agree SOLAS wording	none	none
150	6.8.60a	2 sets required by .58!	Do not agree	Clause and 58 and 60 are separate provisions	none
150	6.8.60b	so a minimum of 4 fire fighter outfits is required! (6.7.3)	Do not agree	Depends on the vessel size and zones	none
162	6.15	How does administration's review and evaluation process work?	Noted	This is a flag state specific issue	none

169	6.17.14	current designs with aft peaks holding wave runners is no longer possible	Do not agree	none	MACI will consider clarification
169	6.17.17	inconsistent with tables of 6.7	Noted	none	MACI will cross check references.
171	7	shouldn't chapter start with clear description of the qty and type of required Isa's? See also table in LY2	Do not agree	Closer alignment with SOLAS requirements	none
	7.	why davit launched?	Noted	Key philosophical issue see above	none
201	9	is this in line with mlc req's? A lot of non luxury yacht like requirements! We advice to stay below MLC requirements.	Do not agree	Due to the tooling and design implications of MLC we have included in this version of the Code	None at this time, but we may be offer some flexibility should this be granted further down the line.
	9.2	why not sliding?	Do not agree	Alternative door design may be considered	none
203	9.2.6	to be explained.	Do not agree	The risk of fuel vapour in crew areas is to be eliminated	none
203	9.3.1	inconsistent with tables of 6.7 (B or C rated subdivisions required)	Do not agree	It is likely that Ch 6 will drive designs	none
204	9.3.7	requirements to avoid flooding? Nonsense	Do not agree	Requirements are not specific to flooding. These are hygiene and health and safety	none
205	9.5	rounded from floor to wall?	Do not understand comment	Provision does not prevent this type of arrangement	none
211	9.12.23	not possible below 1500 GT with more than 12 pax	Do not agree, MLC requirement	none	none
211	9.13.1	unnecessary, count beds!	Agreed	none	MACI to consider

						necessity of requirement
214	9.16.1	we envision a space that can be used for multiple purposes, such as massage, hair dressing, gymnasium that could be utilised as a hospital room in case of an emergency.		Agreed, but not on voyages of 3 days or more	MLC does not permit dual purpose spaces.	None at this time
223	12	required qty and type of crew tbd		Partially agree	This is an individual Administration issue and is included for a guide only	none
239	annex 2	who does the technical review? HCA?		Agreed	none	none
248	annex 2	is use of teak with rubber matting allowed?		Agreed	Surfaces to be nonslip	none
Batch 5						
43	2.12 (9)	Where the strength of the glazing system exceeds the strength requirements defined in 2.12(15)(c) deadlights may be portable provided these are stored in an easily accessible location and readily mountable in an seaway	Where the strength of the glazing system exceeds the strength requirements defined in 2.12(15)(c) deadlights may be portable provided these are stored in an easily accessible location and readily mountable in an seaway by the experienced and well trained crew.	Agreed	none	MACI to include text
44	2.12 (19)	(19) For all vessels, - (c) for PY-1 vessels, where deadlights or storm covers are not permanently attached they shall be stored in a readily accessible location and shall be readily montable in a seaway	(19) For all vessels, - (c) for PY-1 vessels, where deadlights or storm covers are not permanently attached they shall be stored in a readily accessible location and shall be readily montable in a seaway by the experienced and well trained crew.	Agreed	none	MACI to include text
45	2.12 (21)		(e) for PY-1 vessels, skylights shall meet the national or international standards of overhead glazing and / or walkable glazing (glass for flooring).	Agreed	none	MACI to include text
117	6.3 (8)	In practice access from open deck is not always possible.	Access from open deck should not be a must.	Do not agree, SOLAS provision	none	none

		Normally control position is arranged close to ECR.				
133	6.7 (35) b	In practice specially in smaller rooms due to an increasing room air pressure during closing we have to increase the closing force leading often to closing times less than 10 seconds.	Add sentence: For smaller rooms of <10 m ² the closing time may be less than 10 seconds in order to overcome an air cushion effect.	Do not agree, SOLAS provision	none	none
135	6.7 (38)	Hose ports in A-doors on a Yacht usually are not to the Designer's satisfaction. As they are not required on those Yachts which are not to be built according to SOLAS we would like to discuss the requirements which would allow a release.	No text proposal, but basic discussion about this item appreciated.	Noted	none	MACI to consider proposal
154	6.11 (12)d (14)	Fire integrity of horizontal enclosed stairways routed through an internal corridor shall be discussed regarding the requirements on the partition between cabin and corridor as per tables 6.1. and 6.2. Must there be a "Lobby" in between or will an A -or B - class fire rated door be sufficient as it is of the same integrity like defined insulation values in tables?	No text proposal, but basic discussion about this item appreciated.	Noted	none	MACI to consider proposal
201	9.1 (3)	The ceiling height in doorframes may be lower than 203 cm to allow installing standard doors.	Add sentence: Headroom in doorframes may be lower according to clearance height of a 200 centimeter standard door (which is about 1985 mm).	noted	none	MACI to consider proposal
207	9.8 (3)	How is "easy cleaning" defined?	Not precise definition as " <u>easy</u> cleaning" should be avoided.	Do not agree, easy is identifiable	none	none
213	9.15 (12)	LR: 63 °C except in cases of peak demand not less than 60 °C	Harmonisation of temperatures is recommended. Are there objections against 63°C ?	noted	none	MACI to consider proposal
267	Annex 2 8.2.1	Shape of aviation fuel tank should not be limited to cylindrical construction	delete cylindrical construction	Do not agree, Helicopter Annex is standard	none	none
Batch 6						

		Fall off gradients have been removed, as a general note we find this surprising. Whilst relaxation is welcome purely from a design perspective our understanding is that the fall off gradients, whilst linked to approach angle, are as much there for takeoff. If the helicopter experiences an engine failure on takeoff it needs a certain glide path to clear the vessel. To that end we can understand the fall off angles at the stern being relaxed but would have thought they must remain at the sides. Please note this is not our area of expertise but we question if the HCA have bought into this decision?	Noted, this is a standard	Chapter is subject to review by HCA	None at thi time
		We note the large section that deals with windows/side scuttles, positioning, size and design. As a general note, and there may be no place in the code for it, there is in general very little formally published documentation regarding the use of virtual freeboard. Trying to distil this from the Load Line Rules is near impossible and for those with little experience in its application it can be very difficult and full of pitfalls. We have seen the LR document on the application of freeboard to yachts, the industry needs something like this to be published in the public domain, ideally the code would reference such a document <u>to remove ambiguities</u> .	Noted	This chapter is based on various interpretation sources	none
		In our experience this is always one area where load line falls down with application to yachts. Having read the code we can see no further clarity; most large yachts seek to preclude the use of permanently attached closing appliances without positioning the ventilator 4.5 or 2.3m above the deck, both of these dimensions are totally unrealistic for yachts so why have them in the code? If for example we have a yacht where the ventilator is located well above the weather deck and set in from the ship side, with coamings compliant with section 2.9(1) how would the code propose to deal with the request to not have permanently fixed closures? It is clear that most will seek this course and the code should be clear from the outset how it can be achieved.	Noted	The Load Line Convention is included with appropriate interpretations	none
		There is no mention of Safe Return To Port, this will be a critical matter for yachts over approximately 110m.	Do not agree	Code is limited to number of persons to specifically avoid return to port requirements	none
		We welcome the various specific references to the tender garage that is a common feature on all large yachts. However we think the code should include guidance as to whether the doors can be opened when at anchor and if so under what conditions, ultimately this decides on whether we need to consider the space as buoyant for stability purposes. Consider the case where a yacht may be under DP in sheltered water and want to launch tenders, she is effectively at sea and opening the doors would now mean that the space is	Do not agree	This is an operational issue	none

		non buoyant? Needs clarification.			
		From the sliding scale of LSA and stability we are unclear if there is an advantage of a yacht not engaged in trade but carrying lifeboats.	Do not agree	The advantage is defined	MACI will review to assess if further clarification is needed
		For a yacht without lifeboats engaged in trade, why is it that over 80m the total number is restricted to 50 persons when for a yacht less than 80m it is 99? It does not seem logical that a 79m yacht can have 99 persons, and an 81m yacht only 50. It could be that the 80m transition is based on the SOLAS Cargo ship requirement to comply with SOLAS stability above 80m? (SOLAS Regulation 4 Ch II-1). However, this does not apply to passenger ships. In short, it is not understood why a distinction is made for the number of person between yachts over and under 80m.	Noted	This is a key philosophical issue. The objective of this clause is to encourage larger unrestricted vessels to carry lifeboats	none
		The deterministic enhanced stability appears a less onerous version of SOLAS 90. However the extent of damage is unclear, is this to be pin-prick damage, what is the factor of subdivision to consider. This is especially relevant where the code wants us to apply floodable lengths. In general we would question why we need to do this anyway (floodable lengths), it would indicate to us that there is insufficient confidence in the probabilistic method? Defining the extent of damage is critical, looking at the differences that existed between LY2 and SSC damaged stability criteria is a good example of why.	Noted, damage extents will be akin to SOLAS subdivision requirements.	This area is still under discussion and subject to verification	MACI will produce appropriate guidance in due course
47	2.5(9)	make reference to 2.9(10) but this reference does not exist.	Agreed	Should be 2.5 (10)	MACI to correct reference
		In general we note some text which is not in SOLAS, is not in italics in the code. For example P39 2.8(2)?	Agreed	MACI has tried to include as much as possible	MACI will review text in Italics for next revision for consistency
43	2.12(8)	makes a reference to 2.12(15)c – there is no such reference, should it be 2.12(18)c?	Agreed	Should be 12(15)	MACI to correct reference
Batch 7					
		1.1. Page 122: footnote 34 please be aware the Resolution A830 (19) has been revoked by Resolution A.1021(26) Code on Alerts and Indicators, 2009.	Agreed	none	MACI to include correct reference
		1.2. Page 149: Using SOLAS consolidated edition 2009 the Ch II-2, Reg. 10.6.4 footnote in SOLAS refers to ISO 15371:2009 <u>not</u> ISO 15371:2000 indicated in	Agreed	none	MACI to include correct reference

		footnote 38 of 13-36 code.			
		1.3. Page 169: footnote 48 refers to MSC/Circ 914 however; this is superseded by MSC.1/Circ 1272.	Agreed	none	MACI to include correct reference
		1.4. Page 169: Item 19 Attention is drawn to Resolution MSC.256 (84) and associated MSC.1/Circ 1320 paragraphs 1.1.2 & 3.1.1 especially with respect to drainage of spaces above bulkhead deck for passenger ships.	Agreed	none	MACI to include appropriate reference
Batch 8					
		<p>We however have grave concerns regarding the mandated use of davit launched life rafts on large passenger yachts. Aesthetic issues aside, we feel that ignoring the enormous recent developments in MESs as a viable (and sole) means of large scale evacuation is a backward step. MESs have a history of facilitating safe, efficient evacuations on a scale much greater than on 100-passenger yachts. They are also significantly less mechanically complex than any davit.</p> <p>CISR has in the past taken a very measured and pragmatic approach to assessing the safety requirements of these boats (Silver being a case in point), considering all the relevant factors such as size of the boats, operating regions, the number of passengers and the ratio of passengers to crew. We at Hanseatic would be keen to see this measured approach continue, rather than making unwarranted and unnecessary changes to the LSA requirements.</p>	Noted	none	none
		<p>While still studying the New Code, we have one major observation which we will develop below. This is not only about how to treat a problem from its technical point of view but also from its commercial aspect as it is related to the market we are addressing ourselves to.</p> <p>The new Code refers to yachts accommodating:</p> <ul style="list-style-type: none"> - up to 36 passengers - up to 99 persons on board (passengers – crew – staff) 	Noted	none	none

	<p>Our clients' requirements focus on the exploitation of areas such as the Aft Beach Club, the tender Garage, the Health and Beauty Center situated on the Lower Deck, immediately below the deck of the watertight bulkheads (Main Deck).</p> <p>The new Code, in order to have the possibility to replace the Lifeboats with MES / Life Rafts, requires a two – compartment vessel. When dealing with vessels smaller than 100-110 m, this requirement results in the creation of quite small watertight compartments which are unable to satisfy the clients' needs.</p> <p>It also leads to the raise (actually doubling) the required escape staircases, a fact that also affects unfavorably the decks above the Main Deck.</p> <p>The Engine Room (in combination with the adjacent compartments) will have to be divided in two areas and this will have negative consequences on the design due to ventilation, exhaust systems etc. Furthermore, there will be an increase in the construction cost.</p> <p>The alternative solution remains to design an one-compartment passenger vessel and to use Life Boats (SOLAS approved type).</p> <p>Taking under consideration that the Life Boat Manufacturers move towards new concepts compatible with the yacht design, I believe this market (the alternative solution of the "small" MCA vessel with 12 to 36 passengers) will extinct and the SOLAS passenger solution will prevail.</p> <p>I will agree with those who are favorable with the proposed New Code: it is true that the two – compartment solution is safer, but this will mean that it will have to be imposed respectively by SOLAS for the corresponding Passenger Ships (equipped with Lifeboats).</p> <p>In case we are discussing longer vessels (i.e. over 110 m – 120 m) it is a fact that the two - compartment solution is actually dictated by the probabilistic stability calculations (whether she is a SOLAS vessel or a yacht complying with the New Code). It is also a fact that the problems discussed above are drastically reduced and can be resolved.</p> <p>However, the clients' requirements for over 120 m yachts aim to transportation capacities of over 36 passenger or even over 99 persons on board, which leaves no other solution than SOLAS.</p>			
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		<p>I mean to say that the basic market to which we aim (the 60-120 m vessel) does not acquire a comparative advantage by means of the New Code, so there is actual danger that there will be no market at all.</p> <p>Another important parameter (related to what already mentioned) is service limitation: It is a fact that the majority of the yacht owners' (both private and charter) use the yacht on very limited and specific areas: the Mediterranean Sea, the Red Sea, the Maldives, the Caribbean or similar. (Very few of them will make use of the actual possibilities provided by an Unlimited Service or even an Ice Class – expedition - Vessel). On the other hand the voyage to and from these areas are always made by the crew only. I therefore believe that what we characterize as “Short International Voyages” (or “Prescribed International Voyage”, as stated in the new Code) should have at least the advantage of using alternative methods to the Lifeboats. In all respects, these voyages are much like the corresponding EUROSOLAS ones, which are offering many exemptions.</p> <p>The above briefly record my concerns, which I would like to present for further discussion and analysis.</p> <p>Finally, there is an essential boarder question, related to the above evaluations, which I cannot answer as I am not an expert in the field: I am aware that there have been many problems during rescue-evacuation procedures by using life boats. I know that even accidents have been reported during relevant drills. So, I was wondering which is the most reliable life saving means between the two i.e. the MES and the life-boats. Is there some statistical analysis? Are there any comments from experts?</p>			
Batch 9					
		<p>As a general approach, the Code has been examined in this way:</p> <ul style="list-style-type: none"> • SOLAS <36 is the starting point, to which a series of equivalent arrangements is being provided • a comparison has been made to <u>the level</u> of equivalences obtained by using LY2 against SOLAS Cargo (i.e. we are not expecting the same contents, but rather a similar philosophy and level of variations) 	Noted	none	none

		<p>Our conclusion is that the basic idea originating the code is well worth the effort in developing it, since it fills a “regulatory shortage” in a more and more growing sector of the shipbuilding market, however we hope that the contents in some parts can still to be revised and discussed since in some instances it seems that the Code is stricter than SOLAS <36, usually attaining the standards of SOLAS >36, without sometimes providing any remarkable trade-off. It is noted that among the biggest 'deviations' one regards the dispensation from carrying lifeboats, but this is at the cost of severe restrictions both in other areas of the code and on the operational profile of the Yachts (limited number of persons and/or restricted area of operation). The dispensation from the Safe Return to port is really appreciated.</p> <p>The following is a brief summary of the various main areas of the code which we feel could get an improvement. Where possible we are also trying to provide alternative suggestions, in the hope that you can find them useful. On a general note however we look forward to taking part in the workshop foreseen in the end of April and rescheduled due to unforeseen volcanic activity, since we believe that this would be the most efficient way of proactively discussing the various items and achieve the sharing of experiences necessary to obtain a comprehensive Code, mutually agreed between all the interested Parties.</p>			
		<p>APPLICATION & OTHER CONVENTIONS, DEFINITIONS</p> <p>While we understand that the Code is tailored on Passenger Yachts carrying 13-36 passengers without tonnage limits, some discrepancies have been found on the total number of persons that can be embarked: sometimes this is 99, sometimes it is 125 (see footnote Pag. 156) . The lower number can sometimes impair the effective application of the code (and, on a side note, we suggest to better define whether application is compulsory or by request).</p> <p>We do think that a limitation to 99 (or 50) persons on board can be very restrictive for a large yacht considering that on such kind of vessel only the crew is often more than 70-80.</p> <p>Additionally, clarification is requested on the application of other conventions: it is assumed that the conventions not yet into force will not be applicable until they enter into force and that the list is being provided as a reference only. Moreover, the Code states that IMO amendments are to be considered, but guidance should be provided on how these amendments are to be applied if they cover a section to which an equivalent arrangement is being provided.</p>	Noted	The number of persons is a key philosophical issue that underpins the entire Code.	none

		<p>FIRE PROTECTION</p> <p>We took note that a fully addressable system is being requested throughout all spaces, with the same approach that is being applied to Large Yachts, however we noted that this is not bringing any relaxation to either bulkhead ratings or, which would be most appreciated, the use of combustibile materials. This would be a requirement that is stricter than SOLAS <36. Our suggestion is the following: provided that fire load and materials certification is required for any kind of ships, cargo or passenger, it is noted that for Large Yachts the requirement is wholly superseded, therefore for Passenger Yachts we propose to keep certification and volume calculations for stairways, corridors and internal muster station, while a reasonable "free hand" should be provided in the private and public accommodation areas, service spaces and control stations.</p> <p>As regards to deck furniture, it is unclear whether the requirements of restricted fire risk are applicable to all deck furniture or only to furniture in private balconies. In the former case this would be a restriction even more severe than SOLAS >36 and would also bring problems in defining a valid survival craft launching station, ref. p.122 item 11.</p> <p>On the same p.122 para.12 clarification is requested on the implicit requirement of inspection hatches in ceilings, a feature usually required only on larger passenger ships and with a heavy impact on the design.</p> <p>For Garage spaces, it is understood that this category applies to spaces used for the storage of petrol tenders / jet skis, but nothing is clearly defined for diesel tender spaces. It is assumed that these spaces are standard "high risk service spaces" without additional safety features. It is also understood that the restriction "not to give access to" (ref. p.169 para.14) means "they are not the only means of access to". We also suggest that a section is added to define requirements of fixed refuelling systems for tenders (only helicopter refuelling is considered in the Code)</p>	Noted	The enhanced fire protection is used to offset the requirements for life boats and hence this is an important philosophical issue.	none
		<p>LIFESAVING APPLIANCES</p> <p>We take note that a great emphasis is being placed on the provision of liferafts and additional safety features instead of the carriage of lifeboats, nonetheless provision is made for carrying lifeboats and operate with less restrictions or in higher category areas. In particular, it is noted that for unrestricted navigation the maximum person on board limit has been lowered to 50 persons which is de facto a reduction on guest capacity to about 12 guests or even less, i.e. the same limit of Large Yachts (except for tonnage of course). This appears to be a very heavy restriction which may severely impair the willingness of Owners to request the application of the Code, especially considering that it is applied to L>80m Yachts only and not to the shorter ones (i.e. the ones which are built to have a</p>	Noted see previous comments	The 50 person limit is intended to encourage larger unrestricted vessels engaged in trade to carry life boats.	none

		larger number of guests) clarification is also required on the “category” of the Passenger Yachts, i.e.: is it possible for a 130m Yacht to operate as PY-1 with 36 guests on a prescribed international voyage, then switch to PY-U and have only 12 guests while crossing the Ocean, without having to change any fitting, if enough LSA are provided for the highest foreseen number of persons on board?			
		Moreover it is noted that from table 7.1 a >80m PYU with >50 person falls outside the field of applicability of the code. We believe that the concept detailed in table 1.1 (i.e. code is still applicable subject to the provision of lifeboat) may be a better choice.	Agreed, but these vessels would general fall outside of the Code	none	none
10		Item 10: Please clarify the meaning of "higher category or less restricted operational area", especially for a PY-U.	Noted, this applies to SOLAS Ships generally not subject to this Code	none	none
11		Item 15 appears to be a repetition of items 13 and 14	Agreed	none	MACI to review for duplication
15		Item 16 appears to be a repetition of items 13 and 14	Agreed	none	MACI to review for duplication
17		Please clarify whether applicability of the code is compulsory or optional (i.e. standard SOLAS can still be applied).	Agreed, Standard SOLAS can be applied	none	none
13		Table 1-1: From this table it is clear that a PYU>80m with more than 50 person is covered by the code subject to the provision of LifeBoat. This is not consistent with note 68 page 194 table 7.1 where it is stated 'not applicable'. We would expect that such vessel category is covered by the Code.	Partially Agree	There may be reasons why such a vessel would want to benefit from Code provisions	none
17-19-20		Item 1.2 - Table 1-1: we suggest to increase the limit on the total number of persons on board for yacht >80 m; please consider that on vessel of this size only the crew can easily be more than 70-80 persons	Do not agree	See note above, restriction applies to larger vessels for which a lifeboat can be readily accommodated	none
20		Table 1-1. Understand that a Passenger Yacht PY-U over 80 m is considered less safe	See note above	none	none

		than a PY-U < 80 m in length (max number of persons is reduced to 50), even if Yachts longer than 80 m have a more severe damage stability requirement (the probabilistic approach) and a more severe 2 compartment enhanced survivability (also the requirements for floodable length need to be complied with). Based on that, and on the fact that a bigger ship is intrinsically safer than a shorter one, we would expect that the maximum number of person on board of PY-U over 80 m is increased to a value greater to the one of the yachts < 80 m.			
20		Table 1-1. Passenger Yacht PY-U <80 m in length and Passenger Yacht PY1 <80 m have the same LSA and Enhanced survivability requirements. Why is not foreseen a relaxation for the limited navigation (PY1)?	Do not agree	The areas of operation have been carefully discussed and agreed within the REG group members	none
19		Table 1-1. Does note 15 also apply to L > 80m ?	Agreed	This will apply to all vessels operating in POLAR regions	none
20		Note 5 is missing, does it refer to page 13?	Do not understand comment	Footnotes are sequential	none
19-20		Table 1-1, note 18: Suggest the definition of "prescribed international voyage" is removed from the notes and kept only in section 1.3 "Definitions".	Do not agree, necessary duplication	none	none
19-20		Table 1-1: This table is repeated with small inconsistency at least 3 times in the code. We suggest to have only one table through all the code.	Noted	This has been purposely repeated to reinforce the message	MACI will review the 3 tables for consistency
24		Is "the Convention" the SOLAS Convention?	Agreed	none	none
28		Definition of "passenger spaces": in accordance with SOLAS 74, we suggest to reword the sentence "for the purpose of section 4.27(5)" with "for the purpose of sections 4.26(3) and 4.27(5)"	Agreed	none	MACI to check wording for consistency
30		Def. of "yacht": please clarify the reason of "may include commercial passenger ships"; please clarify the meaning of "limited extent" of international voyages especially in relation to PY-U notation; please clarify the meaning of "or otherwise".	Noted	Definition has been carefully derived after discussions within the REG group	none
32		Item 1.7: Please clarify the extent of the applicability of an IMO amendment to a part of a convention which a "standard equivalent arrangement" is being substituted to.	Noted	Catchall statement	none

32		Item 1.7: suggest to add at the end of the sentence: "as may be appropriate with due cognisance to the general guiding principles of the Code".	Agreed, this may be beneficial	none	MACI to consider proposed wording
34		Load line mark: suggest make a clearer drawing as the dimension lines seem to pass through the centre of the deck line and LL mark instead of through the upper edge.	Agreed	none	MACI to correct drawing
39		Section 2.7 (4) (f). Requirement on flush hatches: we suggest to revise this requirement because can lead to hardly manageable scenarios i.e. is it to be applied one hatch at a time, all together ore any possible combination? Even in LL66/88 reg 14-1(2) a reduction/omission of the coaming is foreseen without dedicated damage stability calculations.	Partially agreed	none	MACI will consider wording for consistency
39		Section 2.8 (2) - Requirements for openings on freeboard and superstructure decks: the requirement of enhanced survivability with the spaces to which the openings leads will involve several compartments. For example, if on the bulkhead deck of a yacht an external door to a public room has not the 380mm sill (!!) requested by the rule, then the enhanced survivability standard would be required; since over the Bulkhead deck generally there are no watertight bulkheads/wt doors then the spaces to which the opening leads can be many watertight compartments of the vessel. We suggest that an approach similar to the one used for windows will be considered (see page 43 item (14) extended to public spaces) to limit the flooded compartments. As an alternative, cosideration should be given to intact stability calculation to demonstrate that no downflooding will occur.	Partially agreed	none	MACI will re-examine to ensure workable solutions.
41		Section 2.11 (1): please clarify the reference to section 4.31	Noted	none	MACI will check reference
42		Item (7) (a). This statement seems to be in conflict with 4.16 (5) on which reference is made to the margin line (instead the freeboard deck). Please clarify and modify sections 2.12 (7) (a) and 4.16 (5) accordingly	Noted	none	MACI will review for consistency of wording
43		Item (8): understand the correct reference should be to section 2.15(5) (c)	Agreed	none	MACI to correct reference
43		Item (9): understand the correct reference should be to section 2.15(5) (c)	Agreed	none	MACI to correct reference
43		Item (10). Topics discussed in Reg. 23 of the ILLC are treated in other paragraphs of Section 2.12. Suggest to replace item (10) with the statement of ILCC Reg. 23 paragraph 6.	Do not agree, general comment	none	none
43		Item (11): This statement seems to be in conflict with 4.16 (3) on which reference is made to the bulkhead deck (instead the freeboard deck). Please clarify and modify sections 2.12	Noted	none	MACI will review for consistency of

		(11) and 4.16 (3) accordingly			wording
43		Item (14): according to ICLL Reg 23 paragraph 10, suggest to add the words "and above " after the words "second tier"	Agreed	noted	MACI to add words "and above"
43		Item (16) (a): to align the requirements of the passenger yacht code to other recognised Regulations (i.e. Lloyd's Register Rules), suggest to reduce the test pressure to 4 times the required design pressure.	Do not agree	This reflects the higher risk and greater uncertainty	none
44		Item 17) (c): to align the requirements of the passenger yacht code to other recognised Regulations (i.e. Lloyd's Register Rules), suggest to apply a Rule that allow for a design pressure reduction from 1.5m to the wind pressure (0.25 m) when the tier order increases	Do not agree	The Code cannot accommodate individual Class Society requirements	none
44		Item (18) (b): in order to allow the use of more efficient technology in the future, suggest to eliminate the reference to the 30 microns. The only one criteria should be the resistance to the design loads	Do not agree	This is an important criteria for chemically strengthened glass	none
45		item (21) (c): as foreseen for windows, we suggest to give the possibility to replace the permanently attached deadlignths or storm covers with portable covers provided that glasses are designed with a greater load. In our opinion, the same philosophy used in section 2.12 (18) (c) should be applied.	Agreed	none	MACI to consider wording for consistency of approach
45		Item (22): please clarify if this paragraph is applicable only for windows described on section 2.12(5) or for all windows.	Noted	Only applies to windows in upper tiers. Cannot be used in main hull or first tier.	MACI to clarify this requirement
49		the requirement of the bracket every 3 stanchions seems to be not in line with the standard of yacht design, definition of equivalent level of safety solution should be foreseen for a yacht code.	Noted	Equivalent design can be considered as appropriate	none
51		BWM convention has not yet been ratified. Please confirm its present applicability.	Agreed	This will only apply when ratified and in force	none
52		Item 3.4: please clarify the applicability of AFS convention (not yet ratified by UK).	Do not agree	Will be ratified by the time comes into force	none
52		Item 3.5: please clarify the applicability of BWM convention (not yet into force and not yet	See comment above	none	none

		ratified by UK).			
56 and following		All along section II and III, reference is always made to "passenger ships", while reference should be to "Passenger Yachts"	Agreed	none	MACI to review the wording in the Code for consistency
82		Section 4.16: Opening in the shell plating below the bulkhead deck. We suggest to clarify that this section does not refer to Shell Doors.	Do not agree	This section may apply to shell doors	MACI to consider for consistency
83		Item (10): according to SOLAS (Reg. 15 , Section 8.3), "in manned machinery spaces the valves may be controlled locally". Suggest to include this relaxation in the Passenger Yacht Code.	Agreed	SOLAS requirement	MACI to reword section
94 and following		The title and content of Part VI is not in accordance with table 1-1, where it is stated that passenger yachts < 80m in length should comply with deterministic approach to damage stability. Part VI reads like the deterministic is only a second choice.	Noted	none	MACI to ensure that this reads consistently
95		Item 3: definition of "a", suggest to add the sentence "as defined in section 1.3"	Noted	none	none
95		Item 6: according to SOLAS 74, understand reference should be to section 4.27(6) (instead of section 4.6.4). According to SOLAS 74 (Reg 5, section 4.1), formula for calculation of the uniform average permeability should be $95+35*b/v$ and not $63+35*b/v$	Agreed	none	MACI to correct reference and formula
98		Item 16: understand the correct reference should be to section 4.26(6)	Noted	none	This Section will be removed as not needed
101		Item 5: according to SOLAS 74, understand the correct reference should be to subsections (1), (2), (3) and (4) in the first line, and to subsections (11), (12) and (14) in the second line	Agreed	none	MACI to make corrections
106		Section 4.3: from table 1.1, we understand that Enhanced Survivability can be requested also for Yacht with length less than 80 m on which the deterministic damage standard is applicable. At the second line and after the words "Part II", we suggest to add "or Part VI where applicable"	Agreed	none	MACI to consider for consistency
106		Section 4.3: understand that the minor damage methodology is adopted. Please confirm that no requirement on damage extension are to be satisfied	Do not agree	This area is still under discussion and subject to verification	None at this time
106		Section (a) (i): limitation of the positive range of the GZ curve to the immersion of the margin line is considered to be too much restrictive. According with SOLAS and LY2 philosophy the range should be limited only to downflooding (e.g. openings definition).	Partially agree	The usual mechanism to deal with margin line immersion can be adopted.	MACI to consider some appropriate wording to facilitate margin line immersion when no risk ensues.

116		Chapter 6.3 FIRE PROTECTION We took note that a fully addressable system is being requested throughout all spaces, with the same approach that is being applied to Large Yachts, however we noted that this is not bringing any relaxation to either bulkhead ratings or, which would be most appreciated, the use of combustibile materials. This would be a requirement that is stricter than SOLAS <36. Our suggestion is the following: provided that fire load and materials certification is required for any kind of ships, cargo or passenger, it is noted that for Large Yachts the requirement is wholly superseded, therefore for Passenger Yachts we propose to keep certification and volume calculations for stairways, corridors and internal muster station, while a reasonable "free hand" should be provided in the private and public accommodation areas, service spaces and control stations.	Noted,	The fully addressable system is introduced to support the ship as its own best life boat. Hence the trade of for combustibles in not supported as an underlying philosophy in the Code	None at this time
118		Please clarify whether restrictions on open decks furniture is applicable to balconies only or to any open deck.	Agreed	This applies to balconies and areas on yachts that are akin to balconies.	MACI to consider whether this is fully applicable in all cases
118		Suggest that the provision of a fully addressable fire fighting system allows for a reduction of the requirements in accommodation areas (except for corridors, stairways, internal muster stations), with the same relaxations as per LY2 (but with limited applicability).	Agreed	Flexibility for combustibles in low risk areas may be retained	none
121		Item (10): please clarify if the "accommodation spaces" are as per 1.3 (definitions) or as per space category (i.e. are corridors included in spaces to be actively protected?)	Agreed	Accommodation space is as per the definition in 1.3	none
122		Item (11): suggest the requirement is relaxed or removed altogether: a fire limited to furniture only may be dealt with swiftly and efficiently, bigger fires are not foreseen, as per 7.3(1)(e).	Partially agree	none	MACI to consider whether this is fully applicable in all cases
122		Please clarify the foreseen construction methodology for ceilings. Is provision being implicitly made for inspection hatches? Please also clarify the criteria for a space behind ceiling to be considered without risk of starting a fire.	Noted	This has been raised by several consultees	MACI to consider providing appropriate guidance to make this provision clearer
123		Item (16)(e): please confirm the standby power supply being referred to can be the ship's transitional power supply.	Noted	This will need to be in accordance with FSS Code and Class requirements	none
124		Item 3: no provision is being made, throughout the code, for a dedicated safety centre.	Partially agreed	Safety Centre is a	MACI to consider

		Understand the provision is optional.		new requirement.	guidance as appropriate to this type of vessel
124		Item (5): noted that 6.7(45) refers to windows and sidescuttles which, in general, are not allowed on machinery spaces boundaries, ref. 6.7(55). Please confirm the correct reference is to skylights as per 6.7(50).	Agreed	none	MACI to correct reference
126		Item (7)(a): suggest this item is removed since the provision of an automatic sprinkler system is not optional, therefore case "(a)" is never possible.	Agreed	none	MACI to review section for accuracy
127		Please confirm that vehicle spaces for diesel vehicles (flashpoint >60°C) are cat.9 spaces and not cat.11 spaces.	Do not Agree, see definitions	none	none
128		Items 11 and 12: suggest references to accommodation spaces not protected by sprinkler system are removed.	Agreed	none	none
130		Items (26) and (27): understand atriums are categorized as public spaces. Understand their vertical boundaries are at least A-0 unless cat.3 vs. other adjoining space requires higher rating. Understand intermediate decks are to be equivalent to steel but without any fire rating.	Partially Agree, fire rating to be obtained from the table	none	none
131		Please explain the reference to subsections (8), (9), (22) and (27).	Agreed	none	MACI to review and identify correct subsection reference
131		Note "c": no provision is being made, throughout the code, for a dedicated safety centre. Understand the provision is optional.	Partially agreed	See comment re Safety Centre above	MACI to consider guidance as appropriate to this type of vessel
131		Note "d": understand the correct reference should be subsections (11) and (12).	Agreed	none	MACI to review and identify correct subsection reference
132		Item (28): please clarify the reference to subsections (34) (should read 36?), (54) and (58) (should read 57, 61 and 62?).	Agreed	none	MACI to review and identify correct subsection reference
132		Item (29): please clarify the reference to subsection (59) (should read 63?)	Agreed	none	MACI to review and identify correct subsection reference
134		Item 37: in general no provision is made from tables 6.1 and 6.2 for external A-class boundaries. Possibly this requirement, brought in from SOLAS, refers only to pax>36?	Agreed	none	MACI will review for consistency for vessels <36

					passengers
135		Item (37)(a): subsection (44) never requires external glass to be fire rated. Should read (46)?	Agreed	none	MACI to review and identify correct subsection reference
135		Item (39)(c): please clarify reference to subsection (26). Should read (28)?	Agreed	none	MACI to review and identify correct subsection reference
136		Item (42): please clarify the applicability of B-class integrity to outer boundaries, never required in tables 6.1 and 6.2.	Noted	none	MACI will review for consistency for vessels <36
136		Item (43)(b): suggest the paragraph is reworded since an automatic sprinkler system is always required.	Agreed	none	MACI will review for consistency with sprinkler philosophy
136		Item (46): this is a SOLAS requirement for pax>36 which, on a standard design of yacht, would be applied to all windows. Please consider relaxation or removal of this requirement.	Agreed	none	MACI will review for consistency for vessels <36
137		Item (47)(c): please clarify if the provision of water mist in the space is sufficient or if dedicated heads are to be provided and applicable criteria if any.	Agreed	System to be in accordance with FSS Code	none
137		Item (49): understand the correct reference should read "subsections (50) to (55)".	Agreed	none	MACI to review and identify correct subsection reference
137		Item (53): understand the correct reference should read "(52)".	Agreed	none	MACI to review and identify correct subsection reference
138		Item (59); please clarify which are the "hazardous spaces" (if any other than those mentioned).	Agreed	none	MACI to consider providing appropriate guidance.
139		Item (59)(e): understand the reference is to subsection (39).	Agreed	none	MACI to review and identify correct subsection reference
139		Item (60): understand the reference is to subsection (59) and (39).	Agreed	none	MACI to review and identify correct subsection reference
146		Item (36): understand reference to (34) should read (35).	Agreed	none	MACI to review and

					identify correct subsection reference
149		Item (52): Understand references 3.40.x are to SOLAS II-2.	Agreed	none	MACI to consider SOLAS reference
149		Item (56) suggest requirements for external deep fat cooking equipments are revised, at least for those of capacity <15 litres (LY2 could offer a good alternative).	Do not agree, SOLAS provision	none	none
151		Item (4): suggest also materials equivalent to steel are allowed for crowns and casings.	Agreed	none	MACI to consider appropriate wording
152		Item (6): suggest that equivalent arrangements (e.g. non return valves for scuppers) are taken into account.	Do not agree	none	none
154		Item (12): please clarify the category of "main laundries" (no distinction in laundry definitions).	Partially agree	none	MACI to consider removing the word main and leaving the word 'laundry'
154		Item (12)(c): suggest the restrictions are slightly relaxed.	Do not agree, SOLAS provision	none	none
155		Item (13)(c): tables 6.1 and 6.2 have no requirements for open decks.	Agreed	none	MACI to review for consistency
155		Item (18)(a): please clarify the bold "or".	Noted	This was a correction	MACI to ensure correct SOLAS wording.
156		Item (20): Suggest that due to the limited number of persons on board, the requirement is relaxed or removed.	Agreed	This is covered in footnote 40	none
156		Item (20): note 4 states up to 125 persons on board. The code applies up to 99. Please clarify.	Agreed	The 99 person limit is a late revision	MACI to check document for consistency to 99 person limit
158		Item (2): understand correct reference should read 6.12(1)(a).	Agreed	none	MACI to review and identify correct subsection reference
168		Item (7): Aluminium may be used for ducts, dampers to be in steel, detail of connection to bulkheads to be approved	Agreed, we need to deal with non steel construction	none	MACI to consider appropriate wording
169		Item (14): please clarify the reference to subsection 16.	Agreed	none	MACI to review and identify correct

					subsection reference
169		Item (14): please clarify the meaning of the access restriction. Understand it means "only fuel lockers can have their single access to the garage".	Agreed	none	none
169		Item (17): please clarify if A-60 standard is applicable also to external boundaries.	Partially agree	Depending on whether adjacent to escape routes or LSA provisions	MACI to consider clarification.
172		Item (5): understand the word "failure" is missing at the end of the sentence.	Agreed	none	MACI to add missing word 'failure'
175		Item (2): reference is made to Regulations 11 and 12 of SOLAS. These Regulations are substantially equal to Sections 7.14 and 7.15. Suggest to replace the reference to SOLAS with a reference to Sections 7.14 and 7.15.	Agreed	none	MACI to review and identify correct reference
175		Item (3): reference is made both to section 7.6 and Reg. 16 of Chapter III B of SOLAS. Noted that section 7.6 is substantially equal to Reg. 16 of SOLAS. Suggest to delete the reference to the SOLAS.	Agreed	none	MACI to review and identify correct reference
176		Item (2) (b): understand reference is made to SOLAS Chapter IV; suggest to indicate explicitly the reference to a SOLAS Rule	Agreed	none	MACI to clarify reference which is already included
179		Item (8): understand correct reference should be to subsection (7)	Agreed	none	MACI to review and identify correct reference
179		Item (9): understand correct reference should be to subsection (7)	Agreed	none	MACI to review and identify correct reference
179		Item (10): understand correct reference should be to subsection (9)	Agreed	none	MACI to review and identify correct reference
179		Item (11): in the Passenger Yacht Code, as well as in the SOLAS for passenger ships, free fall lifeboats are not permitted. Suggest to remove the words "except free-fall lifeboats"	Agreed	none	MACI to revise provision accordingly
179		Item (13): please clarify the note '43'	Agreed	This should be note 53	MACI to correct footnote reference.
180		Item (2): understand correct reference should be to subsections (4), (5), (6), (7), (8) and (9).	Partially Agree	This should refer to LSA Code	MACI to review and identify correct reference

182		Section 7.13 (6): from a comparison with the equivalent section of SOLAS, understand that the correct reference should be to subsections (1), (2) and (3).	Agreed	none	MACI to review and identify correct reference
184		Section 7.17 (3) (c): understand correct reference should be to section 7.17(2)	Agreed	none	MACI to review and identify correct reference
185		Item (8): understand correct reference should be to subsection (7), paragraph (e)	Agreed	none	MACI to review and identify correct reference
185		Item (9): understand correct reference should be to subsections (10) and (11)	Agreed	Also note the comment re free fall life boats	MACI to review and identify correct reference. Also to consider consistency in respect of free fall lifeboats.
185		Item (11): in the Passenger Yacht Code, as well as in the SOLAS for passenger ships, free fall lifeboats are not permitted. Suggest to remove paragraph (11)	Agreed	none	See comment directly above
186		Item (14) (b): from a comparison with the equivalent section of SOLAS (REG 19., paragraph 3.3.8), understand that the words "for launching from within the survival craft" shall be replaced by the words "in the use of the system"	Agreed	none	MACI to review wording for consistency to SOLAS
192		Item (15): in the Passenger Yacht Code, as well as in the SOLAS for passenger ships, free fall lifeboats are not permitted. Suggest to remove the words "including free-fall lifeboat release"	Agreed	none	MACI to reword to remove reference to free fall lifeboats
193		Section 7.21 (1): understand that in case a Passenger Yacht 1 doesn't comply with the enhanced survivability standard, the Yacht shall carry lifeboats and liferafts as indicated in the following lines. Therefore we understand that the correct reference should be to Part VII of Chapter 4 (instead of Parts II and VI)	Agreed	none	MACI to review and identify correct reference
194		Table 7.1 note 68: The statement that the code is not applicable to a PYU>80m and >50 person is not consistent with note 17 page 20 table 1.1 where we understand that the code is applicable subject to the provision of Lifeboat.	Partially Agree	none	MACI to consider wording of this provision to remove ambiguity
195		Table 7.1. Please clarify the damage stability standard to be applied and LSA requirements in case the Yacht is equipped with lifeboats.	Noted	This will be as per SOLAS requirements	none

194		Footnote 65: understand correct reference should be to Part VII	Agreed	none	MACI to correct reference
195		Item (5): suggest the total number of persons is corrected in accordance with Table 7.1	Do not agree.	SOLAS provision and these vessels would not entirely be subject to Code standard	none
201		General: please clarify whether this chapter will be superseded when MLC 2006 will enter into force, or whether the strictest requirements will be applied.	Agreed	The code has been drafted to reflect the MLC standards and hence there should be no need to replace with MLC text. This is subject to any revisions or interpretation agreed with ILO etc	none
201		General: suggest the former is chose, so the chapter should be renamed "provisional regulations for..." and a short explanation provided at the beginning of the chapter.	Do not agree, See comment directly above	none	none
203		Item 9.2(b): suggest the restriction on external doors to crew areas to be hinged is relaxed.	Agreed	none	MACI to consider appropriate wording.
204		Item 9.2.2: please clarify the meaning of "gastight". For the concerned spaces is usually required anyway, except for store rooms (depending on their size).	Do not agree	Standard definition of gastight	none
205		Item 9.2.6: suggest the requirement for the manholes to fuel tanks in crew accommodation is removed.	Do not agree	This provision exists in most crew accommodation regs, but has been relaxed for yachts	none
204		Item 9.3.7(b): please clarify whether this means that a fixed internal sill with a 100mm clear height is to be provided.	Agreed	none	none
205		Item 9.5.3: Suggest the fire requirement for carpets in accommodations is removed, to comply with the relevant section in Fire Protection chapter, which has no requirement for flooring systems except stairways and corridors, also considering the extra fire fighting systems.	Do not agree, useful duplication	none	none

210		Item 9.12.8: Please confirm that the area can be included also when the projected area falls on the ship's side (e.g. in lower decks) at deck level.	noted	none	MACI to consider providing appropriate guidance.
212		Item 9.12.9: Suggest the requirement of single tier beds in way of portholes is revised, due to the heavy impact on the standard arrangement found on board. Noted in MLC 2006 this is a recommendation, not a strict requirement.	noted	none	MACI may give consideration to reviewing this requirement in the Code as MLC guidance.
211		Item 9.12.20: Suggest the floor areas are revised, since it seems that they have been increased from CISR'88 standards to MLC standards, except for single berth cabins above 10.000 GRT, which has undergone a further increase even compared with MLC 2006.	Partially agree	Floor areas reflect MLC and unless reduction agreed with ILO this will be adhered to. The reference to 7.5m ² for vessels over 10000 GT is an error.	MACI to correct error
Batch 10					
		The wording of the frontispiece should we think clearly explain that where this latest Code applies to pleasure yachts, this is in contrast to earlier regulations such as the Vessels in Commercial Use for Sport or Pleasure Regulations 1998 which are stated to apply to "any vessel used for sport or pleasure which is not a pleasure vessel", and the LY2 Code where "it is recommended that pleasure vessels comply with the standards of the Code". In LY2, Annex 5 states that the meaning of "pleasure vessel" is the same as that in the Vessels in Commercial Use for Sport or Pleasure Regulations 1998 SI 1998/2771. There seems to be a general confusion about the use of the term "Pleasure Vessel" for which clarity in the Code would prove helpful to the reader.	noted	none	none
Preamble		Para 1 The second sentence should be constructed differently to avoid the term "non-passenger yacht"	Noted	This was intended to distinguish this Code from vessels to which LY2 applies	MACI to consider rewording to remove any potential confusion
17		1.2(4) refers to a "passenger yacht" where we think the term "pleasure yacht" may be	Do not agree	The term passenger	MACI to review initial

		appropriate, because the term “passenger yacht” is defined as a yacht engaged in trade, where logically, any vessel covered by the Code would be covered by this clause.		yacht and passenger pleasure yacht are correct terminology. We aim to distinguish these vessel from pleasure yachts	text to ensure consistency
19		Table 1-1 Under the LSA scale, where “ MESSs are not permitted as the sole means of abandonment”, the allowable percentage of the LSA which the MES constitutes should be defined.	Do not agree	This has been defined in Chapter 7, with the minimum DVLLR requirements	none
19		Table 1-1 The first column refers to a “Pleasure vessel not engaged in trade”. Should this not be “Passenger Yacht (Not engaged in Trade)” to match the other categories in the column?	Agreed	none	See comment above MACI will review for consistency
19		It does not seem logical that the enhanced survivability standard of Ch.4 Part 4 should not apply to a vessel not engaged in trade. This enhanced standard is for vessels which do not carry lifeboats and we would assume that the enhancement offers a standard which is needed for safe launching of liferafts/MESs (although we have not come across this enhancement in any set of criteria before).	noted	This is a key philosophical issue that has been agreed by the REG Group members	none
20		Table 1-1 For operational area PY2, there is no restriction in gross tonnage as is applied to LY2 vessels. A new vessel registered LY2 “short range yacht” has to be < 300GT.	Agreed	This code is not GT limited	none
21		1.3(e) should read “the Administration has required...”	Agreed	none	MACI to correct the TYPO
28		The list of definitions uses many definitions related to the class or description of the various vessels, which would benefit from rationalisation. It looks as if the Code has inherited various terms from LY2 which gain in complexity as more vessel derivatives come under the umbrella.	Do not agree	We have strived to ensure that all definitions are rationalized and appropriate for this vessel type	None at this time
30		The terms “watertight” and “weather deck” are better and more simply described in LY2.	Do not agree SOLAS provision	none	none
35		2.3(6)(a) The words “painted or otherwise” should be deleted.	Do not agree, LL provision	none	none

56		Para 4.3(3)(a) refers to “all passenger ships”. This application is to make clear whether it applies to vessels which are not engaged in trade.	Do not agree	This will apply to all vessels operating under this Code even those provided with a National Certificate as a passenger pleasure yacht	none
58		4.5(3) allows a reduced value of N if the vessel does not proceed more than 20 miles from land. This is a probabilistic clause, where Table 1-1 shows that this class PY2 requires deterministic damage stability only.	Agreed.	none	MACI to review this provision for consistency of approach
59		4.6(1) includes the term A_i , which should read A_i	Agreed	none	MACI to correct typo
69		4.9(1) The permeability of void spaces is given as 0.85. We believe this should be 0.95.	Agreed	none	MACI to correct typo
70		4.10(2) refers several times to 400 passengers where the document applies for only <99 persons.	Agreed	Some provisions will inevitably be carried through from SOLAS but will not apply	MACI to consider if this causes confusion
71		The title in 4.11 refers to passenger ships, though all ships under the code will be passenger ships.	Agreed	none	MACI will remove the term ‘passenger ship’ to be consistent with the approach applied throughout the Code.
73		4.13(10) refers to cargo holds intended to hold water, which term is not appropriate for the class of ship covered by the Code.	Partially agree	none	MACI will consider to ensure consistency
89		Referrals to “hold” in (1)(a) and security of cargo” in (1)(4) do not seem appropriate where the class of ship excludes carriage of cargo.	Partially agree	none	MACI will consider to ensure consistency of approach.
94		The title refers to alternative subdivision and stability standards where the yacht does not exceed 80m in length and compliance with the probabilistic requirements in SOLAS proves impractical. In fact this appears to be the deterministic standard that is applied to all yachts whose length is less than 80m.	Agreed	Title has been reworked	MACI will include new title in the next revision of the Code
106		This standard is described as providing “enhanced survivability” where davit-launched liferafts and marine evacuation systems are fitted in lieu of lifeboats in accordance with	Agreed	This is fairly clear but agree that this	MACI to consider further explanatory

		Table 1-1. Table 1-1 does not however mention any such substitution to be allowed. It would appear that a deterministic 2-compartment standard is applied, which would be in addition to the normal probabilistic standard. Generally speaking, the relationship between table 1-1 and the parts VI – VII needs to be clarified.		could benefit from clearer definition.	statement where appropriate.
173		While Table 1-1 suggests to us that liferafts should primarily be davit-launched, Section 7.6 allows for the liferafts to be boarded directly from a position on deck, in the usual manner.	Do not understand comment	none	None at this stage
193		7.21(1) refers to a Passenger Yacht 1 which does not comply with the enhanced survivability standards of Parts II and VI of Chapter 4. Part II does not appear to be an enhanced standard, rather the normal probabilistic standard. The reference to the lifeboat option should be noted in Table 1-1.	Agreed	MACI to check cross references and consistency of table 1-1	MACI to review this reference for consistency.
195		Para (5) refers to a passenger yacht which carries less than 200 persons, where the overall Code is for <99 persons.	Partially agree	This is a SOLAS provision that is included for completeness. Such vessels may fully comply with SOLAS for LSA purposes but may wish to comply with the Code for other purposes	None at this time
		END of First Batch of Comments			