

Public consultation on a review of EU passenger ship safety legislation

I. Information about the participant	
In what capacity are you completing this questionnaire? -single choice reply-(compulsory)	A private organisation, professional association or a public authority
Please provide your first name, surname, and email address. <i>This question will help us identify contributions.</i> -open reply-(optional)	
Benoit Loicq mail@ecsa.eu	
Contributions received will be published on the Internet, together with the identity of the contributor, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Do you consent to the publication of your response by the European Commission? -single choice reply-(compulsory)	Yes
Is your organisation registered in the Transparency Register of the European Commission? http://europa.eu/transparency-register/index_en.htm -single choice reply-(compulsory)	Yes
Please indicate the identification number -open reply-(compulsory)	59004966537-01
What is the name of your organisation or authority? -open reply-(compulsory)	European Community Shipowners Associations (ECSA)
What is your function within this organisation or authority? -open reply-(compulsory)	Safety and Environment Executive Adviser
The type of your organisation -single choice reply-(compulsory)	Ship owner association
What is the country where your organisation or authority is established? -single choice reply-(compulsory)	Belgium
SOLAS 74 Convention -single choice reply-(compulsory)	More than 20
Directive 2009/45/EC (and not including SOLAS ships operating in international waters) -single choice reply-(compulsory)	More than 20
IMO High Speed Craft Code -single choice reply-(compulsory)	More than 20
National legislation -single choice reply-(compulsory)	More than 20

For ship owners and operators: Which of the following ship types do you own/operate?

Historical ships: covers a variety of different ship types and ranges from historical sailing ships to power-driven vessels. Historical ships include former fishing boats, cargo vessels, coastal passenger traditional ships, tugs, icebreakers, light vessels and others falling within the framework of the European Maritime Heritage. -multiple choices reply-(optional)

RoRo passenger (ropax) ships - High Speed Ferries - Ferries (other than ropax or High Speed) - Cruise ships - Cruise ship tenders - Vessels carrying off shore workers

II. Section II

II.1 Problems

The need for safety measures above and beyond what is required in the EU Directives -single choice reply-(compulsory)

Occasionally

Trade barriers due to differences in regulations on safety between the Member States/EEA countries -single choice reply-(compulsory)

Rarely

Complexity of different regulations making it difficult to comply -single choice reply-(compulsory)

Rarely

Unnecessary administrative costs (e.g due to differing passenger ship safety requirements between Member States/EEA countries) -single choice reply-(compulsory)

Rarely

2. Please specify other problems you have experienced and how often you experienced these -open reply-(optional)

Amendment process to Directives is cumbersome, lack of consistent application/interpretation, transposition of international regulations not always consistent, appeal process cumbersome. Some minor issues are created by different administrations taking different approaches to exemptions.

Some ships are not covered by Directive 2009/45/EC -single choice reply-(compulsory)

Low

Passenger ships (covered by the Directive 2009/45/EC) which are not in compliance -single choice reply-(compulsory)

Do not know

The limitation of coverage to steel ships has led to stakeholders preferring ships made of other materials -single choice reply-(compulsory)

Do not know

The limitations of coverage to domestic trade only -single choice reply-(compulsory)

Do not know

Sailing ships -single choice reply-(compulsory)

Do not know

Tenders -single choice reply-(compulsory)

Not at all

Ships carrying offshore workers -single choice reply-(compulsory)

Not at all

5. Are there any other ship types concerned? And if so, how much are they then concerned? -open reply-(optional)

No	
6. Please specify any other concerns regarding passenger safety levels -open reply-(optional)	
The vast majority of the ships operated by European shipowners are built SOLAS compliant even if covered by Directive 2009/45/EC. Cruise ship's tenders are certified by the Flag State in accordance with IMO guidelines. This creates high standards of compliance under internationally accepted regimes.	
The shipbuilding market is adversely affected by incoherent regulations -single choice reply-(compulsory)	Not at all
Access of other EU operators to the market of a specific Member State is adversely affected by incoherent regulations -single choice reply-(compulsory)	Do not know
The limitation of the scope of Directive 2009/45/EC to domestic trade only adversely affects cabotage services -single choice reply-(compulsory)	Not at all
For SOLAS ships, the different ways Flag States deal with exemptions creates a barrier -single choice reply-(compulsory)	Low
8. Please specify any other concerns regarding barriers to trade -open reply-(optional)	
Inconsistent approaches by Member States place sometimes restrictions on the use of certain types of materials / alternative designs / use of exemptions.	
Need to comply with different rules (international, EU and national) -single choice reply-(compulsory)	Medium
Different rules applying to different types of ships -single choice reply-(compulsory)	Not at all
The complexity of the rules in Directive 2009/45/EC -single choice reply-(compulsory)	Not at all
Unclear, imprecise definitions in Directive 2009/45/EC -single choice reply-(compulsory)	Low
Lack of flexibility in Directive 2009/45/EC to take new technical innovations into consideration -single choice reply-(compulsory)	Do not know
The fact that the scopes of the EU legislative instruments (see introduction) differ -single choice reply-(compulsory)	Low
The fact that 2003/25/EC refers to international legislation which is no longer in place for new ships -single choice reply-(compulsory)	Low
10. Please specify any other concerns regarding complexity of regulative framework -open reply-(optional)	
The complexity of applying different instruments means that this requires a greater degree of knowledge on behalf of inspectors and that unnecessary confusion can arise during Port State Control.	
a) Excessive requirements of regulation: Directive 2009/45/EC – main directive -single choice reply-(compulsory)	Not at all
b) Excessive requirements of regulation: Directive 99/35/EC – on surveys -single choice reply-(compulsory)	Do not know

c) Excessive requirements of regulation: Directive 98/41/EC – on registration -single choice reply-(compulsory)	Not at all
d) Excessive requirements of regulation: Directive 2003/25/EC applies an inter-governmental agreement, the 1996 Stockholm Agreement -single choice reply-(compulsory)	Not at all
e) Excessive requirements of regulation: National legislation <i>Please specify below which Member State(s) -single choice reply-(compulsory)</i>	Do not know
f) SOLAS -single choice reply-(compulsory)	Not at all
g) Different layers of regulatory framework (e.g. SOLAS, Directive 2009/45/EC, national legislation). <i>Please specify below which legislation -single choice reply-(compulsory)</i>	Low
h) Differences in regulations between Member States. <i>Please specify below which legislation -single choice reply-(compulsory)</i>	Low
i) Differences in exemptions regimes within the Member States. <i>Please specify below which legislation -single choice reply-(compulsory)</i>	Low
j) Overlapping inspection regimes (e.g. SOLAS vs Directive 2009/45/EC; 99/35/EC; 98/41/EC). <i>Please specify below which legislation -single choice reply-(compulsory)</i>	Medium
Please specify the Member State(s) from question 11e. -open reply-(optional)	
n/a	
Please specify the legislation from question 11g. -open reply-(optional)	
Please specify the legislation from question 11h. -open reply-(optional)	
It is more about the application of the exemption regimes varying between Member States	
Please specify the legislation from question 11i. -open reply-(optional)	
Please specify the legislation from question 11j. -open reply-(optional)	
12. Please specify any other concerns regarding administrative costs -open reply-(optional)	
Far too many inspections are not coordinated. There are also excessive costs for transport for surveyors, additional costs for surveys performed at weekends and overtime, often too many inspectors per inspection.	
Transposing legislative requirements to national law -single choice reply-(compulsory)	Do not know
Updating safety requirements to meet technical	To some extent

advancements -single choice reply-(compulsory)	
Notification to the Commission of the main provisions of national law adopted in the field covered by Directive 2009/45/EC, regarding the updates of the Directive -single choice reply-(compulsory)	Do not know
Procedure for approving national exceptions -single choice reply-(compulsory)	Do not know
Application for equivalents and exemptions from EU legislation -single choice reply-(compulsory)	Do not know
Surveys required by EU legislation vs. international legislation -single choice reply-(compulsory)	A lot
Surveys required by the different EU legislative instruments (see introduction) -single choice reply-(compulsory)	A lot
Requirements for registration of passengers/persons on board -single choice reply-(compulsory)	Not at all
Procedures for attaining the passenger Ship Safety Certificate -single choice reply-(compulsory)	To some extent
High Speed Craft Safety Certificate -single choice reply-(compulsory)	To some extent
Permit to Operate High Speed Craft -single choice reply-(compulsory)	To some extent
Dynamically Supported Craft Construction and Equipment Certificate -single choice reply-(compulsory)	To some extent
Dynamically Supported Craft Permit to Operate -single choice reply-(compulsory)	To some extent
Establishment of rules on penalties applicable to infringements of the national provisions adopted pursuant to Directive 2009/45/EC -single choice reply-(compulsory)	Do not know
Inspections -single choice reply-(compulsory)	A lot
Other measures <i>Please specify below</i> -single choice reply-(optional)	
Please specify the other measures -open reply-(optional)	
14. Please justify your choices and explain how relevant procedures can be simplified -open reply-(optional)	
Further emphasis should be placed upon IMO Regulations and national implementation of that, rather than adding additional requirements thereto.	
II.2 Objectives	
a) Ensure maritime passenger transport safety -single choice reply-(compulsory)	1
b) Establish harmonised safety standards so that	

shipyards can construct ships in Europe applying the same standards -single choice reply-(compulsory)	1
c) Establish harmonised safety standards so that ships can be transferred within Europe without any problems related to differences in the safety standards -single choice reply-(compulsory)	1
d) Establish harmonised safety standards so that ships can trade between Member States / EEA countries -single choice reply-(compulsory)	1
e) Establish harmonised safety standards so that ships flagged Member State A can trade within Member State B -single choice reply-(compulsory)	1
f) Simplify legislative framework by including more references to international accepted regulations like SOLAS -single choice reply-(compulsory)	1
g) Simplify legislative framework by establishing requirements on a more global level instead of inclusion of many detailed requirements -single choice reply-(compulsory)	1
h) Simplify legislative framework by targeted technical requirements for specific types of ships -single choice reply-(compulsory)	5
i) Simplify legislative framework by combining EU legislative instruments <i>Please specify below which legislative instruments</i> -single choice reply-(compulsory)	5
j) Improve consistency in the legislative framework, as regards e.g. coverage of different safety related Directives and definitions in EU and international regulations -single choice reply-(compulsory)	3
k) Ensure flexibility in order to facilitate technical updates of legislation in the light of international standards -single choice reply-(compulsory)	1
l) Reduce administrative burdens -single choice reply-(compulsory)	1
Please specify the EU legislative instruments from question 1i. -open reply-(optional)	
None.	
2. Do you see any other objectives when revising EU legislation in this area? -open reply-(optional)	
For internationally trading ships the objective should be to abolish separate EU regulations and simply apply the internationally agreed standards developed by the IMO. EU legislation should restrict itself to enforcement and monitoring to ensure a level playing field. If improvements are needed to safety legislation the EU Member States should take these to the IMO for further possible implementation.	
3. Do you have any further observations on the objectives of the legislative review? -open reply-(optional)	
Problems have been reported in relation to the requirements of public requirements on routes with more than 300.000 passengers, where Member States allow public owned companies to operate not in full compliance with Regulation EC/3577/92.	

II.3 Options

Option 1: No policy change -single choice reply-(compulsory)	2
Option 2: Soft law Explanatory guidelines on interpretation of provisions in the Directives. Promoting establishment of sufficient national requirements to vessels made of materials other than steel. -single choice reply-(compulsory)	4
Option 3: Elimination of Directive 2009/45/EC and reliance on national law -single choice reply-(compulsory)	3
Option 4: International safety legislation Passenger ship safety legislation will comply with IMO legislation for all or for the main selected market segments/ship types <i>Please specify below which ship types you consider to be the main ones</i> -single choice reply-(compulsory)	1
Option 5: Tailored common EU safety rules Tailoring the EU legislation to pursue high safety standards for the main market segments/ship types <i>Please specify below which ship types you consider to be the main ones</i> -single choice reply-(compulsory)	7
Option 6: National safety legislation Passenger ship safety will mainly rely on national legislation (if all = Option 3) - i.e. only tailored common EU safety rules for a few selected market segments/ship types <i>Please specify below which ship types you consider to be the main ones</i> -single choice reply-(compulsory)	5
Option 7: Extension of the scope of the Directive from domestic voyages to voyages between EU Member States (in combination with option 5) -single choice reply-(compulsory)	6
Please specify the ship types in option 4 -open reply-(compulsory)	
Legislation should apply to all passenger ship's types.	
Please specify the ship types in option 5 -open reply-(compulsory)	
Legislation should apply to all passenger ship's types.	
Please specify the ship types in option 6 -open reply-(compulsory)	
Legislation should apply to all passenger ship's types.	
2. Do you consider other policy options when revising the existing EU legislative framework? -open reply-(optional)	
None.	
3. Do you have any further observations regarding the options of the legislative review? -open reply-(optional)	
For internationally trading ships the objective should be to abolish separate EU regulations and simply apply the internationally agreed	

standards. EU legislation should restrict itself to enforcement and monitoring to ensure a level playing field.

Below a number of ship materials and types of ships are listed for different types of trade. Information on which types of trade/material and ships that should be regulated by the different regulations is important for optimising the output of the legislative review.

4. By which rules should different types of ships be regulated?

In order to answer to this question, please fill out the table in the Microsoft Excel sheet: **Download the document here**, and upload it in the box below.

-single choice reply-([compulsory](#))

I filled out the table in the Microsoft Excel sheet

5. Do you have any further observations regarding the rules to be applied to different types of ships? -open reply-([optional](#))

For the purpose of safety regulations, voyages should be considered to be either domestic or international, with common level of safety on all types of passenger ships.

II.4 Impacts

Overall safety levels -single choice reply-([compulsory](#))

Neutral

Share of ships with insufficient safety levels -single choice reply-([compulsory](#))

Neutral

Level of compliance with Directive 2009/45/EC -single choice reply-([compulsory](#))

Slight increase

Transfers of ships within EU -single choice reply-([compulsory](#))

Neutral

Access of EU operators to the cabotage services in another Member State -single choice reply-([compulsory](#))

Neutral

Administrative costs of public authorities -single choice reply-([compulsory](#))

Neutral

Administrative cost for shipbuilders -single choice reply-([compulsory](#))

Do not know

Compliance costs for shipbuilders -single choice reply-([compulsory](#))

Do not know

Other operating costs for shipbuilders -single choice reply-([compulsory](#))

Do not know

Profitability of shipbuilding industry -single choice reply-([compulsory](#))

Do not know

Administrative cost for ship operators -single choice reply-([compulsory](#))

Do not know

Compliance costs for ship operators -single choice reply-([compulsory](#))

Do not know

Other operating costs for ship operators -single choice reply-([compulsory](#))

Do not know

Profitability of ship operators -single choice reply-

Do not know

(compulsory)	
2. Anything else that could be impacted? -open reply-(optional)	
None.	
Overall safety levels -single choice reply-(compulsory)	Neutral
Share of ships with insufficient safety levels -single choice reply-(compulsory)	Neutral
Share of passenger ships - covered by Directive 2009/45/EC - sailing in non-compliance -single choice reply-(compulsory)	Neutral
Transfers of ships within EU -single choice reply-(compulsory)	Do not know
Access of EU operators into the market in another Member State -single choice reply-(compulsory)	Do not know
Administrative costs of public authorities -single choice reply-(compulsory)	Do not know
Administrative cost for shipbuilders -single choice reply-(compulsory)	Do not know
Compliance costs for shipbuilders -single choice reply-(compulsory)	Do not know
Other operating costs for shipbuilders -single choice reply-(compulsory)	Do not know
Profitability of shipbuilding industry -single choice reply-(compulsory)	Do not know
Administrative cost for ship operators -single choice reply-(compulsory)	Do not know
Compliance costs for ship operators -single choice reply-(compulsory)	Do not know
Other operating costs for ship operators -single choice reply-(compulsory)	Do not know
Profitability of ship operators -single choice reply-(compulsory)	Do not know
4. Anything else that could be impacted? -open reply-(optional)	
None.	
Overall safety levels -single choice reply-(compulsory)	Neutral
Share of ships with insufficient safety levels -single choice reply-(compulsory)	Neutral
Share of passenger ships - covered by Directive 2009/45/EC - sailing in non-compliance -single choice reply-(compulsory)	Do not know
Transfers of ships within EU -single choice reply-(compulsory)	Do not know

Access of EU operators into the market in another Member State -single choice reply-(compulsory)	Do not know
Administrative costs of public authorities -single choice reply-(compulsory)	High increase
Administrative cost for shipbuilders -single choice reply-(compulsory)	High increase
Compliance costs for shipbuilders -single choice reply-(compulsory)	High increase
Other operating costs for shipbuilders -single choice reply-(compulsory)	High increase
Profitability of shipbuilding industry -single choice reply-(compulsory)	Slight decrease
Administrative cost for ship operators -single choice reply-(compulsory)	High increase
Compliance costs for ship operators -single choice reply-(compulsory)	High increase
Other operating costs for ship operators -single choice reply-(compulsory)	High increase
Profitability of ship operators -single choice reply-(compulsory)	Slight decrease
6. Anything else that could be impacted? -open reply-(optional)	
None.	
Overall safety levels -single choice reply-(compulsory)	Do not know
Share of ships with insufficient safety levels -single choice reply-(compulsory)	Do not know
Share of passenger ships - covered by Directive 2009/45/EC - sailing in incompliance -single choice reply-(compulsory)	Do not know
Transfers of ships within EU -single choice reply-(compulsory)	Do not know
Access of EU operators into the market in another Member State -single choice reply-(compulsory)	Do not know
Administrative costs of public authorities -single choice reply-(compulsory)	Do not know
Administrative cost for shipbuilders -single choice reply-(compulsory)	Do not know
Compliance costs for shipbuilders -single choice reply-(compulsory)	Do not know
Other operating costs for shipbuilders -single choice reply-(compulsory)	Do not know
Profitability of shipbuilding industry -single choice reply-(compulsory)	Do not know

Administrative cost for ship operators -single choice reply-(compulsory)	Do not know
Compliance costs for ship operators -single choice reply-(compulsory)	Do not know
Other operating costs for ship operators -single choice reply-(compulsory)	Do not know
Profitability of ship operators -single choice reply-(compulsory)	Do not know
8. Anything else that could be impacted? -open reply-(optional)	
None.	
Overall safety levels -single choice reply-(compulsory)	Slight decrease
Share of ships with insufficient safety levels -single choice reply-(compulsory)	Neutral
Share of passenger ships - covered by Directive 2009/45/EC - sailing in incompliance -single choice reply-(compulsory)	Neutral
Transfers of ships within EU -single choice reply-(compulsory)	Neutral
Access of EU operators into the market in another Member State -single choice reply-(compulsory)	Neutral
Administrative costs of public authorities -single choice reply-(compulsory)	Slight increase
Administrative cost for shipbuilders -single choice reply-(compulsory)	Neutral
Compliance costs for shipbuilders -single choice reply-(compulsory)	Do not know
Other operating costs for shipbuilders -single choice reply-(compulsory)	Do not know
Profitability of shipbuilding industry -single choice reply-(compulsory)	Do not know
Administrative cost for ship operators -single choice reply-(compulsory)	Neutral
Compliance costs for ship operators -single choice reply-(compulsory)	Neutral
Other operating costs for ship operators -single choice reply-(compulsory)	Do not know
Profitability of ship operators -single choice reply-(compulsory)	Do not know
10. Anything else that could be impacted? -open reply-(optional)	
Ships in trade between EU Member States have to apply SOLAS. Any Duplication of legislation should be avoided.	
Overall safety levels -single choice reply-(compulsory)	Do not know

Share of ships with insufficient safety levels -single choice reply-(compulsory)	Do not know
Share of passenger ships - covered by Directive 2009/45/EC - sailing in non-compliance -single choice reply-(compulsory)	Do not know
Transfers of ships within EU -single choice reply-(compulsory)	Do not know
Access of EU operators into the market in another Member State -single choice reply-(compulsory)	Do not know
Administrative costs of public authorities -single choice reply-(compulsory)	Do not know
Administrative cost for shipbuilders -single choice reply-(compulsory)	Do not know
Compliance costs for shipbuilders -single choice reply-(compulsory)	Do not know
Other operating costs for shipbuilders -single choice reply-(compulsory)	Do not know
Profitability of shipbuilding industry -single choice reply-(compulsory)	Do not know
Administrative cost for ship operators -single choice reply-(compulsory)	Do not know
Compliance costs for ship operators -single choice reply-(compulsory)	Do not know
Other operating costs for ship operators -single choice reply-(compulsory)	Do not know
Profitability of ship operators -single choice reply-(compulsory)	Do not know

12. Anything else that could be impacted? -open reply-(optional)

None.

13. Do you have any further comments on the impacts of the planned review? -open reply-(optional)

None.

II.5 Other

1. Do you have any other further comment? -open reply-(optional)

As per MSC90 Draft Resolution, passenger ship companies have been recommended to conduct a review of operational safety measures taking into consideration the recommended interim measures on a voluntary basis (Lifejackets, emergency instruction for passengers, passenger muster policy, access of personnel to the bridge and voyage planning).

III. Additional questions

III.1 Evacuation

1. The SOLAS Convention as well as Directive 2009/45/EC contain requirements for an orderly evacuation of ships in case of an accident.

What is your opinion on the evacuation procedures as implemented today, specifically taking into account the increased

size of passenger ships? -open reply-(optional)

Current evacuation procedures are robust and effective. The passenger ship industry is, however, re-evaluating these procedures as part of a operational safety review to ensure that the standards are as high as possible (according to IMO MSC 90 recommendation). Should deficiencies be found, prompt and efficient action will be taken to remedy those. Larger ships do not pose any additional evacuation challenges. Large ships offer different options for evacuation (including more exits and a larger platform from which to conduct the exercise) and are held to the same timeframes as all other ships for evacuation.

2. The requirements for evacuation prescribe that information on what to do in cases of emergencies for which evacuation is required shall be supplied to the passengers.

What is your view on the provision of information as regards evacuation and use of life saving appliances? -open reply-(optional)

Current information as regards evacuation and life saving appliances is robust and effective. However, the passenger ship industry is re-evaluating these procedures as part of a operational safety review to ensure that the standards are as high as possible (according to IMO MSC 90 recommendation). Should deficiencies be found, prompt and efficient action will be taken to remedy those.

3. The requirements for evacuation further prescribe that specific instructions (e.g. on the use of life jackets) related to evacuation shall be given to the passengers. Would you consider that the present instructions given to passengers are sufficient to prepare them to evacuate the ship? -single choice reply-(compulsory)

Yes

4. According to the requirements the crew should perform a weekly abandon ship drill. Would you consider that such drills are effective in training the crew so that they are prepared for an evacuation? -single choice reply-(compulsory)

Yes

5. According to the requirements the crew should perform a weekly abandon ship drill. From your experience, is the crew familiar with the assigned duties in cases of emergency? -single choice reply-(compulsory)

Yes

6. Passenger ships, in particular cruise liners, often have passengers on board of many different nationalities.

In what ways, if any, would you consider that language could form a barrier in an evacuation process? -open reply-(optional)

The STCW Convention which the IMO has developed prescribes international training standards for seafarers. In addition, the STCW convention for ship management and other staff on passenger ships foresees the following supplementary trainings: Crowd management training and Passenger communication in emergencies. Current information as regards passenger communication in emergencies indicates it is robust and effective. However, the passenger ship industry is re-evaluating these procedures as part of a operational safety review to ensure that the standards are as high as possible (according to IMO MSC 90 recommendation). Should deficiencies be found, prompt and efficient action will be taken to remedy those.

7. While there have been developments and research into new evacuation systems as alternatives to the traditional life boats, the traditional systems are still widely used. Is there a need to (re)evaluate the traditional evacuation systems (lifeboats and life rafts)? -single choice reply-(compulsory)

No

8. Please explain? -open reply-(optional)

Ships use increasingly sophisticated technologies, processes and procedures to improve safety standards and minimize the risk of accidents. Modern marine evacuation systems (MES) have experienced an impressive evolution from simple liferafts to high-tech rafts.

These rafts consist of an escape chute that is connected to an inflatable liferaft, allowing passengers to slide directly onto the raft with the evacuation system controlling the speed. It should be noted however that the current technology in use works well and is considered robust. Continuous improvement in IMO should be considered in first instance.

III.2 Other issues

<p>1. The SOLAS Convention and Directive 98/41/EC require that information on the (number of) persons on board is collected and reported.</p> <p>From your experience, do you consider that there is a need to re-examine procedures for establishing passenger lists and the reporting of this information?</p> <p>-single choice reply-(compulsory)</p>	<p>No</p>
<p>2. Please explain? -open reply-(optional)</p> <p>Current practices as regards procedures for establishing passenger lists and reporting that information is robust and effective. However, the passenger ship industry is re-evaluating these procedures as part of a operational safety review to ensure that the standards are as high as possible (according to IMO MSC 90 recommendation). Should deficiencies be found, prompt and efficient action will be taken to remedy those.</p>	
<p>3. Recent accidents have shown that fire on the vehicle deck of a ro-ro (passenger) ship can have very severe consequences.</p> <p>Would you consider a review of the fire detection and extinguishing arrangements on the vehicle deck of ro-ro (passenger) ships appropriate? -single choice reply-(compulsory)</p>	<p>No</p>
<p>4. Please explain? -open reply-(optional)</p> <p>Current practices as regards fire detection and fire fighting equipment are robust and effective. However, the passenger ship industry is re-evaluating these procedures as part of a operational safety review to ensure that the standards are as high as possible (according to IMO MSC 90 recommendation). Should deficiencies be found, prompt and efficient action will be taken to remedy those.</p>	
<p>5. Bridge Resource Management procedures are in place to ensure the most effective use of available resources, especially in critical situations.</p> <p>In your view is there a need to re-evaluate the bridge resource management procedures that are in place, specifically on the larger passenger ships, also in critical situations? -single choice reply-(compulsory)</p>	<p>No</p>
<p>6. Please explain? -open reply-(optional)</p> <p>Current practices related to Bridge Resource Management Procedures are robust and effective. However, the passenger ship industry is re-evaluating these procedures as part of a operational safety review to ensure that the standards are as high as possible (according to IMO MSC 90 recommendation). Should deficiencies be found, prompt and efficient action will be taken to remedy those.</p>	
<p>7. IMO has recently adopted guidelines on watertight doors (IMO Circular MSC.1/Circ.1380), which give guidance on when such doors have to be closed and when they may be open.</p> <p>If you are aware of these guidelines, do you consider that they provide for a proper balance between safety and operations on board the ship? -single choice reply-(compulsory)</p>	<p>Yes</p>

8. Please explain? -open reply-(optional)

Yes, especially as any exemptions granted by Flag states are subject to robust oversight.

9. Any other issues you may wish to raise? -open reply-(optional)

None.