

	<b>Maritime and Coastguard Agency</b> <b>SURVEYOR ADVICE NOTE</b>	<b>Document number:</b> <b>SAN 96</b>
<b>Revision:</b> 0	<b>Construction: Safe Operation of Daughter Craft</b>	<b>Date:</b> 04 Sep 2017
<b>Target document:</b>	SAN 13 is incorporated Instructions to Surveyors.	
<b>Distribution</b>	<b>HQ and Marine Offices, Recognised Organisations, Certifying Authorities, Red Ensign Group</b>	
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### Key Changes

This new document incorporates and replaces the advice contained in SAN 13. It also reflects increased use of the Workboat Code<sup>1</sup> for daughter craft certified for “off-ship working” under the Workboat Code and as an alternative to the UK Load Line certificate, or exemption certificate. Their motherships are frequently larger ships and beyond the direct application and customary readership of the Workboat Code. It is therefore appropriate through this note, for the direct consequences of acting as a mother ship, (including in cases where the ship acts as a ‘safe haven’ for daughter craft) to be better recognised for mother ships of any size. It averts any mistaken perception that those consequences are exclusive to mother ships within application of the Workboat Code.

## 1. Summary and Introduction

1.1 This document provides guidance on the safe operation of daughter craft including application by the United Kingdom of statutory survey requirements applicable to daughter craft that are a ship within the meaning of the Merchant Shipping Act 1995; and on application of regulation 4 of the Merchant Shipping (Load Line) Regulations 1998, SI 1998 No. 2241 as amended, and/or the Workboat Code<sup>1</sup> the Merchant Shipping (Small Workboats and Pilot Boats) Regulations 1998, SI1998/1609, as amended for the Workboat Code.

1.2 In addition, this note is intended as a reminder of consequences of operating as a mother ship and a ‘safe haven’ for the purposes of daughter craft (that would be expected to comply with the Workboat Code). This note is related to similar, provisions within application of the Workboat Code (to vessels of less than 24 metres load line length).

1.3 It is becoming increasingly common for certain vessel types (e.g. research,

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<sup>1</sup> The Safety of Small Workboats and Pilot Boats – a Code of Practice applicable to small workboats operating in commercial use to sea and all pilot boats, the Merchant Shipping (Small Workboats and Pilot Boats) Regulations 1998, SI 1998/1609, as amended).

fishing protection, survey and wind farm accommodation vessels) to act as mother ships, using workboats provided in addition to their statutory lifesaving appliances for a variety of purposes in connection with the primary work of those vessels (e.g. vessels for guard, recovery, boarding and transfer purposes). It has more recently extended into the Offshore Renewable Energy sector during the development and construction phases, along with the ongoing maintenance, including concepts of providing a mooring for overnight or rest periods, and facilities for daughter craft at accommodation vessels offshore.

1.4 For future projects, additional precautions appropriate to the risks associated with increased distances from the shore; e.g. the safe craft operating limits compared to forecast sea states, additional reserves of fuel, should be considered and incorporated in the procedures developed by the mother ship operator.

1.5 References are given to applicable statutory requirements, standards and guidance contained in other documents.

## **2. Application**

2.1 Mother ships. *See also the definitions.*

2.2 It does not preclude or affect alternative certification requirements for similar craft that include:

- (a) existing and future tenders, (prescribed as type-2 tenders in the Workboat Code) and passenger tenders that are also lifesaving appliances if they are used exclusively for those purposes<sup>2</sup>;
- (b) existing and future Emergency Response and Rescue Vessel (ERRV)<sup>3</sup> daughter craft carried by some ERRV mother ships, where such craft carry valid Load Line exemption certificates; and
- (c) other daughter craft with existing valid UK Load Line Exemption certification, bearing in mind that under such certification, use of a mother ship as a 'safe haven' may not be recognised.

2.3 New requirements are currently being finalised for daughter craft and for mother ships if either or both are workboats (limited to vessels of less than 24 metres load line length). In that context, new daughter craft as workboats should be certified and operated in accordance with "The Workboat Code – Industry Working Group Technical Standard<sup>4</sup>.

2.4 For Non-UK daughter craft intended for operation in UK Waters, the principle of no more favourable treatment shall apply.

## **3. Definitions**

3.1 Autonomous Daughter craft - may operate in association with a mother ship where there is no intent or ability for launch or recovery on board, with the craft being

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<sup>2</sup> Note: MSC.1/Circ.1417 of 13 June 2012, incorporating Corrigenda 1.

<sup>3</sup> In relation to Load Line Exemption certification issued for such ERRV daughter craft as referred to in the Survey Guidelines published by Oil and Gas UK and the ERRV Association.

<sup>4</sup> Is available for downloading from the GOV.UK website.

primarily shore-based. Despite the support being given by a mother ship, the statutory 'safe haven' for autonomous daughter craft is located ashore and not by the mother ship.

3.2 Dedicated Daughter Craft – (sometimes referred to as non-autonomous daughter craft) is a craft launched and operated from a mother ship and recovered between operations. The statutory 'safe haven' may be considered to be on board the mother ship and not a safe haven ashore under the conditions given in section 4.3 below.

3.3 Mother ship – is a vessel certified and manned for independent operation, and remaining 'on station' to provide a base from which daughter craft may operate to service offshore installations/structures, or undertake other duties.

3.4 Tender – is a craft provided (towed by or carried on board the mother ship) solely for tendering persons or stores directly to and from the mother/parent vessel and not for workboat duties. Such transits should be restricted to nearby shore facilities or vessels, either within harbour limits, categorised waters or no more than 0.5 n.m. from the parent mother vessel whilst at sea. Tenders in this note are defined as Type-2 Tenders in the Workboat Code.

#### **4. Operating conditions for mother ships and daughter craft, including the safe haven**

4.1 Mother ships may for example, provide a place of rest, or base for change of crew, or a supply of cargo for transfer.

4.2 Any mooring alongside, stowage or position of launching of daughter craft must not interfere with the statutory provision for lifesaving on board the mother craft.

4.3 In all cases the LOLER and PUWER Regulations apply to mother and to dedicated daughter craft for launch and recovery. Dedicated daughter craft should be certified under the Workboat Code (assuming they are of less than 24 metres load line length). The scantlings of the daughter craft must be such that the structure is adequate for both static and dynamic loading. Freeboard may become a consideration for safe launch and recovery to or from mother ships with higher freeboards. Additional operational restrictions on the area of operations should apply as follows:

- (a) If certified by area category limited to a distance from a safe haven, the safe haven is considered located ashore; unless
- (b) written safety procedures and capable lifting arrangements are available on-board the mother ship to ensure the recovery of the daughter craft (Type1 Tender) in ALL anticipated weather and sea conditions during which times the daughter craft is permitted to be launched and operated; and
- (c) the daughter craft has a valid Workboat Code certificate;

in which cases the safe haven may alternatively be considered to be located on the mother ship.

## **5. Good practice operational arrangements for operation of daughter craft with the mother ship**

5.1 Mother ships should be certificated as cargo ships, passenger ships or special purpose ships as appropriate, depending upon the extent of their operations and the total number of persons expected on board whilst conducting such operations.

5.2 Mother ships of 500 GT or more are required to carry a valid International Safety Management Certificate. When of less than 500 GT, if not mandatory, they should have documented operational procedures and are strongly recommended to carry ISM safety management certification on a voluntary basis.

5.3 In all cases, with the mother ship's written operational procedures there should be safe systems of work based on the principles of risk assessment, for the safe operation of all daughter craft operating from it. Operating procedures should give due consideration to the safety effects from other operations being conducted nearby, and information and or instructions received from an appointed marine coordinator (or equivalent) responsible for the project/area.

5.4 Daughter craft operations should interface and harmonise with mother ships' SMS procedures and safety systems, including 'permit to work', mustering, and for the recording of numbers and location of persons on board.

5.5 Effective radio communication should be checked and be established with the mother ship prior to launching of dedicated daughter craft and maintained during any operation.

## **6. Status and suitability of daughter craft crew**

6.1 When onboard the mother ship, it shall be the mother ship's responsibility to properly assign the safety status of daughter craft crew and other personnel, and to maintain up to date the list(s) of persons on board or their location accordingly. Persons primarily employed as crew for autonomous daughter craft may not normally be considered as part of a mother ship's crew; and are in most cases considered as passengers or as special personnel while on board the mother ship. Those employed as dedicated daughter craft crew may be considered as part of the crew or as special personnel while on board the mother ship.

6.2 Daughter craft and mother ship shall be safely manned at all times, including situations when both are operated simultaneously.

6.3 In assessing the suitability of individuals to undertake transfer from mother to daughter craft, suitable proof of sea survival training and a medical fitness should be considered.

6.4 A common working language should be formalised as part of the agreed safe operational procedures under 5.3 above to ensure the ability to communicate in that language for all on board the mother and daughter craft.

## **7. Transfer of persons and other operational safety considerations**

7.1 Conditions for safe, dry-shod transfer whether by foot, craft launch/recovery, transfer device, or by other means, must always be a primary consideration. In preparing procedures for daughter craft operations the relevant guidance or provisions in MSC-MEPC.7/Circ.10<sup>5</sup> and MGN 432<sup>6</sup> should be incorporated. Any risk assessments used by the daughter craft operator to develop the procedures/ safe system of work, should also be documented and annexed as a routine part of the procedures, and made available to the master of the mother ship if requested.

7.2 In addition to the published guidance referred above, the operating procedures should also consider, but not necessarily be limited to:

(a) Guidance on limiting criteria for operation (including launch and recovery – see also 4.3 above) due to weather, wind force and sea state for transfers and method and frequency of forecasting weather;

(b) Details of oversight from the mother ship, secure mooring arrangements to ensure safe manoeuvring alongside;

(c) Means to ensure moored daughter craft are appropriately marked and lit (operations in accordance with the International Regulations for Preventing Collisions at Sea, 1972);

(d) Means to ensure moored daughter craft do not impede safe navigation or the safe operation of the mother ships' Life Saving Appliances including the launching & recovery areas;

(d) Emergency procedures for “man overboard” recovery of personnel during transfers, and dealing with fire/flooding of a moored daughter craft; and

(e) Should transfers of limited cargo, stores or luggage be also necessary, they should take place separately from embarkation or disembarkation of personnel.

Further guidance on issues for inclusion in safety assessments and operating instructions is given in the following annexes to this note:

Annex 1 – Issues for inclusion in operational instructions for operation of the daughter craft.

Annex 2 – Maintenance of daughter craft and Equipment.

## **8. Additional note on bunkering & Storage of oil fuels**

8.1 The 2012 amendments (SI 2012 No.742) to Statutory Instrument 2010

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<sup>5</sup> MSC-MEPC.7/Circular.10 of 14 July 2014, Guidance on Safety when transferring persons at sea.

<sup>6</sup> MGN432 - Safety during Transfers of Persons to and from Ships

No.1228, The Merchant Shipping (Ship-to-Ship Transfers) Regulations 2010, do not prevent transfers between mother ships and their daughter craft. Further details on application of the statutory requirements can be found in MSN 1829.

8.2 Operators retain responsibilities to risk assess and maintain proper procedures, training and a safe system of work/procedures; and to report incidents; with consideration for the impact such operations may have on the environment in the intended area of bunkering.

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## Annex 1

### Issues for inclusion in operating procedures for daughter craft operations

Operating instructions should include but should not necessarily be limited to:

#### For Autonomous Daughter Craft

- Crew numbers, training and minimum qualifications;
- Development of operational restrictions within which daughter craft shall be operated, such as wind and wave limits;
- Planning meeting and briefing prior to operation;
- Procedures for abandonment of operation;
- Procedures to be adopted in an emergency;
- Pre-departure checks;
- Means of recording and embarking passengers or special personnel (if any);
- Man Overboard procedures whilst berthed / moored

#### For Dedicated Daughter Craft

As above plus:-

- Procedures, including any limiting conditions (due to e.g. weather, sea state, lifting equipment), for launching from, and recovery to, the mother ship;
- Procedures for maintaining communications with the mother ship.
- Procedures for monitoring the position of the daughter craft.
- Appropriate planned maintenance procedures and records for the daughter craft plus its equipment and the launching and recovery appliance.

The operating procedures should make provision for the maintenance of adequate records to demonstrate that the defined procedures are being followed. Such records should be recorded within the SMS and/or planned maintenance system where on an ISM compliant mother ship. For other ships, records should be held in an efficient manner such that they may be inspected / audited as required.

## **Annex 2**

### **Maintenance of daughter craft and equipment**

A Daughter Craft should be regularly inspected and maintained to ensure that it remains in satisfactory working condition and fit for purpose.

Where tasks of maintenance are carried out on board the mother ship, the planned maintenance system (PMS) should define all necessary instructions governing inspection and maintenance of the daughter craft. For a mother ship that is not an ISM ship, full instructions governing inspection and maintenance should still be produced, fully defining the duties and responsibilities of all those concerned

Such instructions should provide for:

Autonomous Daughter Craft -

Operators should ensure that craft are maintained and operated in accordance with the requirements of the Code, the arrangements as documented in the Workboat Compliance Examination and Declaration report (or form SCV2) and any conditions stated on the vessel's certificate. Additionally, operators should ensure that the vessel is maintained in accordance with manufacturer's recommendations or best engineering practice.

Instructions for inspection and maintenance should make provision for the maintenance of adequate records to demonstrate that the defined procedures are being followed. Such records should be recorded within the ships planned maintenance system on an ISM compliant mother ship. For other ships, records should be held in an efficient manner such that they may be inspected/ audited as required.