



Shipping Guidance Notice 114

Use of overside working systems on commercial yachts, small commercial vessels, and loadline vessels

To: Ship Owners, Operators, Master's, Classification Societies and Recognised Organisations

1. Summary

- 1.1. This notice provides guidance on the use of overside working systems for working over the side and at height on yachts, small commercial vessels and load line vessels.
- 1.2. Ship-owners have a responsibility to ensure that;
 - 1.2.1. new systems comply with the current BS/EN Standards;
 - 1.2.2. systems are installed as per manufacturer's instructions;
 - 1.2.3. existing systems have been checked to an equivalent standard; and
 - 1.2.4. maintenance is carried out according to manufacturer's instructions

2. Introduction

- 2.1. The use of overside working systems are now considered standard on vessels especially commercial yachts. Such installations allow crew members to work outside conventional guardrails for cleaning and maintenance purposes.
- 2.2. Most overside working systems consist of one or a combination of the following;
 - 2.2.1. "rail and car" or "rail and trolley" systems comprising of two travellers, cars or trolleys
 - 2.2.2. linked in tandem that can be separated, if necessary, into independent units. These cars
 - 2.2.3. are fitted to a metal rail which allows them to glide along it and to which support
 - 2.2.4. harnesses are attached
 - 2.2.5. harnesses, lanyards, fall arresters, energy absorbers and similar devices
 - 2.2.6. single anchoring points, pad eyes and eye bolts.

2.3. Traditionally many of the early “rail and car” systems were designed for the sole purpose of sail handling and not for supporting crew members working overside of the vessel. It is a requirement that equipment which is used for lifting persons must be designed for the purpose. It is not acceptable to use a “rail and car” system designed solely for sail handling for the purpose of supporting crew members working over the yacht’s side.

3. Installation

3.1. A newly installed overside working system, anchoring point and attachment should be tested, certified and approved to a recognised standard for fall protection equipment (EN 795:2012; Type D (or any subsequent revision)) and is marked with the UK Conformity Assessed marking (UKCA), CE mark, or to an equivalent standard if manufactured elsewhere.

3.2. EN795:2012 is supported by a Technical Specification – CEN TS 16415: Personal Fall Protection Equipment Anchor Devices Recommendations for anchor devices for use by more than one person simultaneously; which addresses multiple simultaneous users.

3.3. An overside system should not be used, unless specifically designed and certified by the manufacturer for that purpose. Including any conditions attached to its use, while supporting crew working overside or at height.

3.4. It is essential that specific manufacturer’s instructions are followed e.g. which fastenings to be used, torque limits of fastenings, bending limitations on the rail etc. Full details of the installation including method of anchorage and supporting technical documentation (fixing certification) must be issued on completion of every installation.

4. Operation

4.1. Prior to permitting the work the employer should ensure that all alternative means for carrying out the work are considered.

4.2. Before use of the equipment the employer should ensure that:

4.2.1. the manufacturers’ instructions are read and understood by the persons who will be using the equipment

4.2.2. a risk assessment is carried out and an appropriate rescue plan developed to recover person who fall into the water and

4.2.3. crew members are competent to use the equipment and are aware of any conditions relating to its use and their safety.

4.3. Overside working systems must not be used whilst the vessel is underway.

4.4. These systems are designed to be used with the appropriate personal protective equipment (PPE) e.g. harnesses, lanyards, fall arresters and other devices.

4.5. On systems where one of the travellers is fitted with a locking device, the device which locks the traveller in position along the track rail must only be disengaged from the track rail while the user is changing position. Once the user is in position, the locking device shall be re-engaged to hold the car or trolley in position and limit the user’s movement along the track rail.

- 4.6. The user must never rely on only one attachment point for personal protective equipment. The working harness should be attached to one traveller and a fall arrestor or other safety device to the other. A third traveller could be used to attach work tools.
- 4.7. More guidance can be found in the Code of Safe Working Practices for Merchant Seafarers (COSWP) Chapter 8; Personal Protective Equipment and Chapter 17; Work at Height.
- 4.8. The use of systems for overside work or working at height that do not meet the requirements or fail to provide instructions in the use of such equipment, could place the employer of the crew, and also the master, in breach of their obligations and render them liable to prosecution and a fine for non-compliance.
- 4.9. The overside working system should never be used to hold fenders or tenders alongside the vessel, as this could lead to dynamic loading which could lead to damage or failure of the system.

5. Maintenance

- 5.1. Where systems meeting the requirements are used for overside work, relevant information regarding the maintenance and testing of such systems should be obtained from the system manufacturer. Such information is to be kept on board the vessel to which it applies.
- 5.2. Anchor devices which have been installed and certified to EN 795:1996 are still valid.
- 5.3. Existing anchor devices conforming to and pre-dating EN 795:1996 can continue to be tested and certified to this standard. Existing anchor devices which have been modified or changed must meet the latest standards. Uncertified or decommissioned systems are not to be used.
- 5.4. Where any overside working systems, anchoring point or attachment has been subject to damage, overloading or a dynamic loading equivalent to fall arrest, the system should be retired from service and subject to a full review by a representative of the manufacturer, to confirm the system remains fit for continued use.
- 5.5. All overside working systems, anchoring points and attachments should be suitably marked with the UKCA mark or CE mark.

Steve Gomez – Chief Surveyor (Ag)
For & on behalf of the Maritime Administrator

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