

Summary of Responses to the consultation on draft Marine Guidance Note (MGN) entitled “Roll-on/Roll-off Ships: Stowage and Securing of Vehicles”.

This document is intended to be a summary of the main points raised in the consultation. It is not intended to be a comprehensive account of every point made in each response.

Index	Respondent	Comments on the Draft MGN	General Comments	MCA’s Response
1	Marine Accident Investigation Branch (MAIB).	<ul style="list-style-type: none"> • Section 2.3, 'The wheels of wheel-based cargoes should be blocked to prevent shifting. This can be achieved by proper use of suitable chocks', does not accurately reflect what we have said in our report and safety flyer. Alternative suggestion: 'Where wheel chocks are to be used to supplement the securing of vehicles on board ro-ro ferries, they must be of suitable design, well maintained and positioned correctly against the wheels'. • Where 3.3 of the Annex states that 'wheel-based cargoes should be blocked', I believe this refers to wheel based cargoes carried on general cargo ships, car carriers etc. not ro-ro vessels. The MGN does not refer to the requirement set out in IMO resolution A.581(14) for the parking brakes on each element of a road vehicle to be applied. The same resolution also points out that 'Wheel chocks should be used to provide additional security in adverse conditions'. 		<ul style="list-style-type: none"> • MCA concurs fully with the remarks made by MAIB and reflected them in the proposed MGN. • The entire IMO Resolution A.581(14) entitled “Guidelines for securing arrangements for the transport of road vehicles on Ro-Ro ships” has been included in Annex 1 of the MGN.
2	P&O Ferries Holdings Limited.	<ul style="list-style-type: none"> • Para 2.1 - It is not practicable to undertake physical checks on the parking brakes of semi-trailers. How would these checks be conducted? There are a wide-ranging variety of parking brake systems in use throughout the haulage industry. Semi-trailer parking 		<ul style="list-style-type: none"> • Paragraph 2.1 – Comments noted. • Paragraph 2.2 – Comments noted. • Paragraph 2.3 – Accept -

		<p>brakes apply automatically on disconnection of the braking system airline. This is the most practicable method of ensuring that parking brakes are applied; moreover this is the safest process also as it does not introduce the need for unnecessary exposure to 'pedestrians' within the vehicle decks of ro-ro ships whilst vehicles are being operated.</p> <ul style="list-style-type: none"> • Para 2.2 - Lashing point compliance with the appropriate regulations is unenforceable in the present disparate manner in which roadworthiness (MOTs) exclude the seaworthiness of trailers. Until such time as the regulators of the haulage industry accept that every trailer on the road is likely to be shipped by sea and include ro-ro securing points as a matter of basic roadworthiness, the existing ad hoc compliance will be unavoidable. • Para 2.3 - This para is wholly impracticable if wheel-based cargoes includes all vehicles. A ship with 200 trailer capacity will need 800 wheel chocks which will present a hazard during cargo operations and serve no useful purpose. Wheel chocks are a sensible supplement to other securing arrangements where specific need is identified, but can never be applied to a wheel based cargoes. Road vehicles have efficient braking systems which adequately guard against lateral movement of the vehicle in nearly all circumstances of ro-ro carriage. If wheel-based cargoes do not include all 'cargo on 		<p>text amended as per IMO Resolution A.581(14)</p> <ul style="list-style-type: none"> • Paragraph 3.6 – Partly accept - text amended. • Paragraph 3.9 – Partly accept - Resolution A.581(14) included in the Annex 1.
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3	Commercial Vehicles and Regulation, Transport Technology and Standards Division, Department for Transport.	<ul style="list-style-type: none"> • Paragraph 2.2 - This requires the lashing points of the vessel and chassis of the vehicle to meet the requirements of the 'appropriate regulations'. However, from the information supplied it would seem that both regulations and codes of practice require lashing points to be fitted so, perhaps the text should refer to these in addition to the appropriate regulations. • Paragraph 3.3 - Requires 'occasional' checks to be carried out on lashings. It would seem 		<ul style="list-style-type: none"> • Paragraph 2.2 – Accept. Reference made to IMO Resolution A.581(14) • Paragraph 3.3 – Accept. The word “occasional” removed from the text. • Paragraph 3.9 – Accept. The text is in bold.

		<p>that the word 'occasional' is superfluous given that this paragraph recommends that checks should be carried out during audits and inspections.</p> <ul style="list-style-type: none"> Paragraph 3.9 - This recommends that masters should not accept road vehicles on board their ship unless the vehicle is suitable for the intended voyage and is provided with securing points. Given that this would seem to be the key recommendation of the MGN perhaps the text of this paragraph should be in bold to highlight the importance of this recommendation. 		
4	Unite the Union	<ul style="list-style-type: none"> The chocking of wheels on a road vehicle and the application of its brake only goes so far in preventing the Ro-Ro cargo from moving mid voyage. In the case of lorries and vehicles with high centres of gravity, severe weather may cause these vehicles to tip and shift if they are not properly secured. Such lashing should be employed especially in rough sea conditions and not removed until the vehicle reaches the safety of the harbour wall. It should not be the case that chocks should be removed until after the rams are lowered ready for disembarkation. In practice, however, it is often the case that vehicles have the lashings removed prior to entering the harbour and chocks removed prior to the ferry reaching the dock to decrease the time spent during disembarkation. The existence or otherwise of lashing points on a vessel and vehicle are irrelevant unless 	<ul style="list-style-type: none"> Due to commercial pressures brought on the master and crew, it has become increasingly common for cargos to be unlashed prior to the ship reaching the dock or in some cases even entering the harbour. The longer the ship takes to unload the smaller the financial incentive given to the crew. Such work should not be carried out by the ship's crew but left to professional dock workers. It should be the case that the lashing and unlashings of all cargo should be left to dock workers and pilots should be supported if they refuse to move a ferry or other vessel into harbour if these lashings have been tampered with. In Dover it has become common practice for the crew to perform the lashing duties as there are no docking facilities in the French ports to which 	Remarks on proposed MGN, Roll-on/Roll-off: Stowage and Securing of Vehicles have been noted and partly agree in principle.

		<p>there is a firm stance over when they should be in use. Although it may state under Regulation 6 of The Merchant Shipping (Carriage of Cargoes) Regulations 1999 that cargo on board is stowed and secured throughout any voyage, Unite members experience suggests it is becoming increasingly rare for this to be followed in practice.</p> <ul style="list-style-type: none">• There is no way in which a properly secured tanker should have slipped off the back of a ferry, as was the case on the HSS Stena Voyager, if it had been properly secured. The use of the parking break alone is not enough. Equally, the cargo on the MS Riverdance would not have shifted causing the ship to list and beach if the lashings had been properly applied.	<p>they call. These crews are well trained and experienced in the securing of vehicles, but this does not stop corners from being cut. In other ports around the country Unite believes that this use of experienced crew is far from common practice. Unite has discovered instances of a Philippine crew being employed on one line, being paid far less than the minimum wage, and taking on the vehicle lashing and unlashings duties. When challenged the line dismissed the crew and employed untrained agency workers to take their place, some fresh out of school.</p> <ul style="list-style-type: none">• Unite believes that the lashing and balancing of loads not just on ferry operations but on all shipping needs to be performed by trained professionals. In the vast majority of cases this means dock workers and not the crew. Unite also believes that this task should only be performed at the quayside and not in the open water of the harbour or whilst at sea.• Unite welcomes the opportunity to voice our concerns that this matter is only deemed to warrant the issue of a guidance note and not proper enforceable legislation against an offending master and its owners. Unite believes that the lashing of vehicles is a dock workers duty and should not be left to inexperienced ships crew or agency	
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			workers with little or no training.	
5	Seatruck Ferries Ltd.	<ul style="list-style-type: none"> • We have reviewed the draft MGN and broadly agree with the MAIB's conclusions. • We have a concern over item 3.7, regarding freight companies being 'encouraged' to fit parking brake alarms. We agree the fitting of such alarms is an excellent idea and should be mandatory. [It is understood that this cannot be enforced solely by an MGN]. In our opinion, hauliers are unlikely to fit anything extra to their vehicles unless it is mandatory. Additionally the term 'freight company' could be misconstrued to mean the ship's owner and not the truck's owner. Maybe this should be changed to 'road hauliers'? • With regards the dissemination of the MGN, how can we be sure that all the intended addressees will receive it? As I previously mentioned, we think there is a large problem in that most road hauliers are completely, and innocently, oblivious to the raft of Merchant Shipping legislation, codes, guidance, etc. they are bound by. In view of this, is it worth amplifying in the MGN's 'summary' box - last line "this MGN reminds industry of the various applicable Codes and Standards which should be followed"? Perhaps this could be clarified to ensure the word 'industry' does not just mean the marine industry. 		<ul style="list-style-type: none"> • Paragraph 3.7 – Agree in principle. The Department for Transport shall raise awareness of this MGN for vehicle operators / drivers through “Information Sheet” with heading “HGVs using Roll-on/Roll-off ferries”. • VOSA has also published “Information Sheet” entitled “Taking your lorry on a ferry?” to raise the awareness.