

FEEDBACK ON THE INFORMAL PUBLIC CONSULTATION ON Code of Practice For Passenger Vessel Operations On The Thames

	Consultee	Organisation	Summary of Feedback	PLA Response
1.	ANDREW		<p>For sailing, it is not just several sailing events as there are numerous clubs that sail more that weekly on the river.</p> <p>For food hygiene the following link is more relevant as the HSE is for health & safety rather than food safety</p> <p>https://www.food.gov.uk/business-industry/food-hygiene</p> <p>Andrew</p>	<p>Thank you for your comments and we will look to enhance our guidance in the Code.</p> <p>Thank you for your comment, however on the tidal Thames this is the responsibility of London Port Health Authority and we are content with the guidance as stated in the Code.</p>
2.	DEREK MANN	Head of Safety DPA - MBNA Thames Clippers	<ul style="list-style-type: none"> ➤ MCA Logo shown throughout is old one, no longer used. ➤ Page 15 : Typo “ Staffs” in para 1. ➤ Page 19, I disagree ref the wearing of crew lifejackets, They should be worn at <u>all times</u> when working in a workboat, Bulwarks size have nothing to do with the risks of working afloat. ➤ Page 20, the photo shows mate with his back towards the direction of travel, see you section on page 72 ref “Lookouts” should he not be facing forward and be at the conning position. ➤ Page 26, The new DSMC audit process list should be shown in this section, see MGN 536 & MSN 1869 for further detail. ➤ Page 28, DPA, the wording is not correct, it is not the role of the DPA to receive defects, The DPA role is <i>to ensure the safe operation of each ship and to provide a link between the Company and those on board, every Company, as appropriate, should designate a person or persons ashore having direct access to the highest level of management. The responsibility and authority of the designated person or persons should include monitoring</i> 	<p>Thank you for all your comments and highlighting the various typos, which will be amended in the final draft of the Code.</p> <p>There is no national legislation that requires the wearing of lifejackets at all times. While we respect and encourage this view we can be only encourage the wearing of lifejackets within the Code.</p>

			<p><i>the safety and pollution prevention aspects of the operation of each ship and ensuring that adequate resources and shore-based support are applied, as required.</i></p> <ul style="list-style-type: none"> ➤ Page 29: the spelling of the word “Licence” is not consistent in the document. “Also “<u>Carrying250</u>” is a typo. ➤ Page 33: should this not also read as HSC, that all PP should be approved? ➤ Page 41, it is not practical for all vessels to go up through the bridge before turning? ➤ Page 53, Last section, should this not read agreed by MCA , not Harbour Master? ➤ Page 54, Mandatory on all class V, Should this not read all classes of passenger vessels? ➤ Page 76, should the TRANSEC guidance we worked and developed not be mentioned, see attached. ➤ Page 83, HSE section, HSE relates to shore side activity’s only? <p>In Ref to the front cover, I think a selection of passenger vessels should be used, not just one, also rear cover shows an old style class V vessel, should this COP not be showing modern styles of vessels?</p> <div style="text-align: center;">  <p>transec guidance.pdf</p> </div>	<p>The covers were designed for the consultation period and the final version is yet to be agreed.</p>
3.	BOB GARDNER		<p>Thank you for the consultation draft of your PV CoP. I got to page 2 and started there. Please find attached my initial comments.</p> <p>Then I turned to page 3 and found some of the same content/ideas being repeated. Plus I found the first paragraph to be hard to follow. I think this also applies to much of what follows in the draft. For example a para on page 7 starts with "Following a recommendation to all licensing authorities by the Marine Accident Investigation Board". Why? Does the reader need to know that? Is</p>	<p>Thank you for your comments, which we will look to include where appropriate.</p>

			<p>it not more important that are told that "the PLA has adopted the Inland Waters Small Passenger Boat Code along with industry good practice as the base requirement for licensing Small Passenger Vessels", without having to read past the previous section?</p> <p>I could go on...but I won't. All the information is probably in there, but it is not user friendly, in my opinion that is. Have you considered approaching the Plain English Campaign? (www.plainenglish.co.uk)</p> <p>Sorry to be so blunt, but this is something I used to deal with, although I'm not a professional in the field. I applaud your intention to be user friendly but I think you need quite a change of style to achieve it. I'm happy to discuss this further if that would help. – SEE BELOW</p> <table border="1" data-bbox="748 571 1536 986"> <thead> <tr> <th data-bbox="748 571 1021 587">ORIGINAL</th> <th data-bbox="1021 571 1299 587">PROPOSED AMENDMENT</th> <th data-bbox="1299 571 1536 587">COMMENT</th> </tr> </thead> <tbody> <tr> <td data-bbox="748 587 1021 708">This third edition (2016) of the Passenger Vessel Operations Code of Practice for the Tidal Thames is substantially rewritten and redesigned to be user-friendly and give both the operator and master of a passenger vessel more guidance on performing in an ever-changing environment with increasing demand on services and busier than ever waters.</td> <td data-bbox="1021 587 1299 708">This third edition (2016) of the Passenger Vessel Operations Code of Practice for the Tidal Thames has been substantially rewritten and redesigned. It should be user-friendly and give both the operator and master of a passenger vessel guidance on how best to perform their roles.</td> <td data-bbox="1299 587 1536 708">The original is as single sentence! That's far too long to be user friendly.</td> </tr> <tr> <td data-bbox="748 708 1021 799">This code of practice has been written to enable both the operator and the mariner a reference booklet of what to do and how to do it. It does not replace current legislation and regulating bodies but provides a central collection of advice, regulations and best practice.</td> <td data-bbox="1021 708 1299 799">The code of practice does not replace current legislation and regulating bodies but provides a collection of advice and best practice.</td> <td data-bbox="1299 708 1536 799">The original repeats what has already been written.</td> </tr> <tr> <td data-bbox="748 799 1021 986">The code has been written and produced by the Port of London Authority in consultation with London River Services, The Maritime and Coastguard Agency, the Passenger Boat Association, Company of Watermen and Lightermen, London Coastguard and the Marine Policing Unit, as well as experienced passenger boat operators and mariners already providing a good standard of safety for staff and passengers on the River Thames.</td> <td data-bbox="1021 799 1299 986">This document has been produced by the Port of London Authority in consultation with: <ul style="list-style-type: none"> • London River Services • The Maritime and Coastguard Agency • The Passenger Boat Association • The Company of Watermen and Lightermen • London Coastguard • The Marine Policing Unit • Other experienced passenger boat operators and mariners already providing a good standard of safety for staff and passengers on the River Thames. </td> <td data-bbox="1299 799 1536 986">Move this to the end or, at least, below the signature block. It's useful info but not essential reading. Are not London Coastguard part of the MCA? The Marine Policing Unit of what organization?</td> </tr> </tbody> </table>	ORIGINAL	PROPOSED AMENDMENT	COMMENT	This third edition (2016) of the Passenger Vessel Operations Code of Practice for the Tidal Thames is substantially rewritten and redesigned to be user-friendly and give both the operator and master of a passenger vessel more guidance on performing in an ever-changing environment with increasing demand on services and busier than ever waters.	This third edition (2016) of the Passenger Vessel Operations Code of Practice for the Tidal Thames has been substantially rewritten and redesigned. It should be user-friendly and give both the operator and master of a passenger vessel guidance on how best to perform their roles.	The original is as single sentence! That's far too long to be user friendly.	This code of practice has been written to enable both the operator and the mariner a reference booklet of what to do and how to do it. It does not replace current legislation and regulating bodies but provides a central collection of advice, regulations and best practice.	The code of practice does not replace current legislation and regulating bodies but provides a collection of advice and best practice.	The original repeats what has already been written.	The code has been written and produced by the Port of London Authority in consultation with London River Services, The Maritime and Coastguard Agency, the Passenger Boat Association, Company of Watermen and Lightermen, London Coastguard and the Marine Policing Unit, as well as experienced passenger boat operators and mariners already providing a good standard of safety for staff and passengers on the River Thames.	This document has been produced by the Port of London Authority in consultation with: <ul style="list-style-type: none"> • London River Services • The Maritime and Coastguard Agency • The Passenger Boat Association • The Company of Watermen and Lightermen • London Coastguard • The Marine Policing Unit • Other experienced passenger boat operators and mariners already providing a good standard of safety for staff and passengers on the River Thames. 	Move this to the end or, at least, below the signature block. It's useful info but not essential reading. Are not London Coastguard part of the MCA? The Marine Policing Unit of what organization?	
ORIGINAL	PROPOSED AMENDMENT	COMMENT														
This third edition (2016) of the Passenger Vessel Operations Code of Practice for the Tidal Thames is substantially rewritten and redesigned to be user-friendly and give both the operator and master of a passenger vessel more guidance on performing in an ever-changing environment with increasing demand on services and busier than ever waters.	This third edition (2016) of the Passenger Vessel Operations Code of Practice for the Tidal Thames has been substantially rewritten and redesigned. It should be user-friendly and give both the operator and master of a passenger vessel guidance on how best to perform their roles.	The original is as single sentence! That's far too long to be user friendly.														
This code of practice has been written to enable both the operator and the mariner a reference booklet of what to do and how to do it. It does not replace current legislation and regulating bodies but provides a central collection of advice, regulations and best practice.	The code of practice does not replace current legislation and regulating bodies but provides a collection of advice and best practice.	The original repeats what has already been written.														
The code has been written and produced by the Port of London Authority in consultation with London River Services, The Maritime and Coastguard Agency, the Passenger Boat Association, Company of Watermen and Lightermen, London Coastguard and the Marine Policing Unit, as well as experienced passenger boat operators and mariners already providing a good standard of safety for staff and passengers on the River Thames.	This document has been produced by the Port of London Authority in consultation with: <ul style="list-style-type: none"> • London River Services • The Maritime and Coastguard Agency • The Passenger Boat Association • The Company of Watermen and Lightermen • London Coastguard • The Marine Policing Unit • Other experienced passenger boat operators and mariners already providing a good standard of safety for staff and passengers on the River Thames. 	Move this to the end or, at least, below the signature block. It's useful info but not essential reading. Are not London Coastguard part of the MCA? The Marine Policing Unit of what organization?														
4.	GRAEME FAULKNER	MARINE LOGISTICS MANAGER – GPS MARINE	<p>Please see comments below:</p> <p>Section: Calculating bridge clearance: would suggest that minimum limit is returned to 0.5m as previously published. 1.0m on flood tide would prove restrictive to operational windows. How would this be policed?</p>	<p>This is a guidance document and the operating minimum limits are in line with good practice. The only way this could be 'policed' is through General Direction 8 and 12 which permits the PLA to review operators' passage plans and navigation risk assessments.</p>												
5.	NEIL BLAKE		<p>Referring to your consultation draft, I find little or no evidence that you have taken on board the complaints against high speed watercraft (RIBs) creating dangerous was between Limehouse and Tower Bridge. That reach is heavily used by small leisure craft (narrowboats and cruisers) at the mercy of commercial thrill operators. You have succumbed to pressure to license them and some skippers deserve to be warned and their licenses revoked for repeated complaints.</p>	<p>The PLA has chaired the Navigational Risk Assessment Working Group (NRAWG) 56 which specifically looked at this issue. The conclusions and recommendations from the NRAWG are still being considered. However we are currently addressing the issues that you specifically raise in your response, directly with the RIB operators and ensure that regular harbour patrols are conducted.</p>												

			<p>The advice to call London VTS with the offending craft's details is ridiculous when trying to hold on whilst rolling up to 45° As for taking evidence photos at the time of the incident get real!</p> <p>A robust reporting and recording process is well overdue since you relaxed the speed limit for commercial gain.</p> <p>Your Clipper skippers are responsible but not some of your RIB cowboys.</p>	<p>We still recommend that should you encounter such an experience incidents of this nature, that you please report the incident as soon as possible to London VTS, when it is safe to do so, to ensure that appropriate action can be taken. We can assure you that we are continuing to work with RIB operators to alleviate these type of incidents.</p> <p>Thank you and we will pass this feedback onto Thames Clippers who operate these vessels.</p>																										
6.	<p>JANE COMMONS</p>	<p>Business Development Manager London River Services – Transport for London</p>	<p>The revised Ops Code looks great. Some proof-reading comments:</p> <table border="0"> <thead> <tr> <th>Page</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>Word missing, change to: "the operator of a passenger vessel should obtain permission from the pier operator"</td> </tr> <tr> <td>12</td> <td>Says: "the figure entered should equal the total numbers of passengers and crew". Can this be changed to "the figures entered must reflect the numbers of passengers and crew boarding and disembarking the vessel to arrive at the total number of persons on board."?</td> </tr> <tr> <td>20</td> <td>Change "ridgid" to "rigid"</td> </tr> <tr> <td>23</td> <td>Various full stops are missing.</td> </tr> <tr> <td>23</td> <td>Change "vessles" to "vessels".</td> </tr> <tr> <td>23</td> <td>Narrow boats won't just fail to respond if they don't have VHF – they won't hear the communication at all. Current phrasing suggests they just won't respond rather than they won't hear.</td> </tr> <tr> <td>24</td> <td>Various full stops are missing</td> </tr> <tr> <td>53</td> <td>The "l" is missing from 'location'</td> </tr> <tr> <td>54</td> <td>Is it possible to reword this section, as with my comment re page 12, to talk about recording the numbers boarding and alighting rather than just the final number of persons on board?</td> </tr> <tr> <td>55</td> <td>The given departure announcement example doesn't cover the points said to be required in the previous section...</td> </tr> <tr> <td>57</td> <td>Text says the pier edge needs to be visible but this is not what is shown in the photo. Possible to change photo for one that shows the white stripe on the edge of LRS piers?</td> </tr> <tr> <td>59</td> <td>More operators should start using ramps so rather than draw attention to the Thames Clippers ramps (as if these are the only ones that can be used) I would shorten the relevant sentence from "The gangways fitted to some piers are not available to all vessels, but if used..." to simply "If used..."</td> </tr> </tbody> </table>	Page	Comment	11	Word missing, change to: "the operator of a passenger vessel should obtain permission from the pier operator"	12	Says: "the figure entered should equal the total numbers of passengers and crew". Can this be changed to "the figures entered must reflect the numbers of passengers and crew boarding and disembarking the vessel to arrive at the total number of persons on board."?	20	Change "ridgid" to "rigid"	23	Various full stops are missing.	23	Change "vessles" to "vessels".	23	Narrow boats won't just fail to respond if they don't have VHF – they won't hear the communication at all. Current phrasing suggests they just won't respond rather than they won't hear.	24	Various full stops are missing	53	The "l" is missing from 'location'	54	Is it possible to reword this section, as with my comment re page 12, to talk about recording the numbers boarding and alighting rather than just the final number of persons on board?	55	The given departure announcement example doesn't cover the points said to be required in the previous section...	57	Text says the pier edge needs to be visible but this is not what is shown in the photo. Possible to change photo for one that shows the white stripe on the edge of LRS piers?	59	More operators should start using ramps so rather than draw attention to the Thames Clippers ramps (as if these are the only ones that can be used) I would shorten the relevant sentence from "The gangways fitted to some piers are not available to all vessels, but if used..." to simply "If used..."	<p>Thank you for all your comments and highlighting the various typos, which will be amended in the final draft of the Code.</p>
Page	Comment																													
11	Word missing, change to: "the operator of a passenger vessel should obtain permission from the pier operator"																													
12	Says: "the figure entered should equal the total numbers of passengers and crew". Can this be changed to "the figures entered must reflect the numbers of passengers and crew boarding and disembarking the vessel to arrive at the total number of persons on board."?																													
20	Change "ridgid" to "rigid"																													
23	Various full stops are missing.																													
23	Change "vessles" to "vessels".																													
23	Narrow boats won't just fail to respond if they don't have VHF – they won't hear the communication at all. Current phrasing suggests they just won't respond rather than they won't hear.																													
24	Various full stops are missing																													
53	The "l" is missing from 'location'																													
54	Is it possible to reword this section, as with my comment re page 12, to talk about recording the numbers boarding and alighting rather than just the final number of persons on board?																													
55	The given departure announcement example doesn't cover the points said to be required in the previous section...																													
57	Text says the pier edge needs to be visible but this is not what is shown in the photo. Possible to change photo for one that shows the white stripe on the edge of LRS piers?																													
59	More operators should start using ramps so rather than draw attention to the Thames Clippers ramps (as if these are the only ones that can be used) I would shorten the relevant sentence from "The gangways fitted to some piers are not available to all vessels, but if used..." to simply "If used..."																													

			<p>59 The width of gangways is key to use by wheelchairs too, not just their gradient.</p> <p>59 Does that mean that ramps must be secured on the pier-side, or that if they are to be secured, it must be on the pier-side?</p> <p>65 Could 'staffed' be used rather than 'manned' please?</p> <p>65 North Greenwich and London Eye piers are also staffed</p> <p>67 In the General Direction 27 quote should it say 'VTS' rather than 'VST'?</p> <p>69 Could 'River Bus' and 'River Tours' be used rather than 'Fast Ferry' and 'sightseeing service' please?</p> <p>75 The exotic spelling of 'of' needs correcting</p> <p>76 Remove "a" in the first line</p> <p>78 Looks like the penultimate bullet point is supposed to be two pullet points?</p>	<p>In an attempt to gain consistency with terms used between all operators on the tidal Thames we will make this amendment as requested.</p>
7.	DARREN KNIGHT	Deputy Harbour Master (Safety Management) - PLA	<p>I attended a number of meetings for the PLA from mid-2013 until Sept/Oct 2014, regarding Party Boat Noise on the river Thames. This group involved representatives from; London Port Health Authority, Passenger Boat Association, London River Services, Passenger Boat Operators, Riparian Borough Councils and Murad Qureshi (from the Mayor of London office).</p> <p>While the PLA does not regulate the noise coming out of party boats, our colleagues in the London Port Health Authority do have some influence on this matter along with the relevant riparian borough licencing authority, where the vessel gains its bar licence from.</p> <p>The Passenger Boat Association produced a very good guidance document (see attached), which London Port Health Authority together with the relevant riparian borough licencing authorities would encourage and enforce adherence with this guidance. In addition, London Port Health Authority would ask to include a standing agenda item at the PLA's River Users Consultative Forum (Upper) to ensure that any ongoing issues are discussed with relevant river users. For the PLA's part, we agreed to put this guidance document in the next version of the Passenger Vessel Operators Code of Practice, as an appendix with the ownership of it retained by the Passenger Boat Association and London Port Health Authority.</p> <p>I notice that the current draft consultation document does not include or reference this guidance as an appendix or any general noise guidance within the Code, which in my opinion should be</p>	<p>Thank you for this feedback and we will include guidance of this in the final draft of the Code.</p>

			<p>rectified prior to the final draft being promulgated.</p>  <p>River Thames Charter Vessel Noise</p>	
8.	JOHN FORBES	Harbour Master – Chiswick Quay Marina	<p>I have read the draft code of practice for passenger vessels on the (tidal) Thames, and would make the following observations:</p> <ol style="list-style-type: none"> 1. The Passage Planning section makes no reference to passage times. Commercial interests obviously dictate that passage times should be as short as practicable, but this does not absolve operators from adhering to speed limits. Some vessels appear to have unrealistic timetables, and are frequently to be seen travelling in excess of the speed limit, with consequences that do not need enumerating. The vessel "Cockney Sparrow" is a particularly egregious example, but there are others. The effects of Cockney Sparrow's excessive speed is aggravated by its unfortunate hull design. 2 It has always been a mystery as to why the high speed RIBs should be allowed to operate at all. They appear to delight in creating the maximum inconvenience to other river users. If they are to be allowed to continue they should be forbidden to conduct their manoeuvres within 300 metres of other craft. 3 The pamphlet appears to have been designed by somebody whose normal job is to illustrate children's books of the more lurid kind. It is, as a consequence, unpleasant to read, and at times almost illegible. White text on a pink background is an especially bad idea. Furthermore, a document that looks like a fairground leaflet lacks the gravitas that a code of practice requires. A more restrained colour palette would encourage readers to take the content more seriously. 	<p>Thank you for your comments and although the Code does not address this directly, General Direction 8 and 12 addresses the operator's requirements to plan and risk assess their passages appropriately. This should alleviate these concerns. With regards the vessel you specifically mention, if this vessel causes you any particular concerns or causes an incident, then you should notify London VTS as soon as possible.</p> <p>Thank you for your comments and these issues are currently being addressed through the PLA's Navigational Risk Assessment Working Group (NRAWG) 56. We can assure you that we are continuing to work with RIB operators to alleviate these types of incidents.</p> <p>Thank you for your comments, however this Code has been designed to bring it in line with our new and improved Code of Practice designs to make these guidance documents more user friendly. Your comments we regards text colours on other light backgrounds will be looked at again prior to producing the final document.</p>
9.	ROBERT WATT	Greenwich Yacht Club	<p>Many thanks for the opportunity to comment on the proposed guidelines for commercial masters on the river. I have consulted with others in the club and I have had a few comments. We are , as you may be aware, now fully engaged with the clipper management which is a great improvement on years gone by and is testament to the change in attitude both from the Clippers and us at GYC. We would also like to thank the PLA for their assistance in this.</p> <p>I would like to make a comment on the high speed RIBS. I note in</p>	<p>The PLA recently convened a Navigational Risk Assessment Working Group (NRAWG) 56 to review of High Speed RIB Operations. During this risk assessment we reviewed a number of incidents between Tower Bridge and the Thames Barrier, where we considered the statistical evidence as to where these incidents have been reported and occurring. Follow this thorough risk assessment process we are introducing new zones where high speed</p>

			<p>the guidelines a proposal to introduce a "no frills" restriction in certain areas. I would like to ask for consideration to this being imposed past our moorings and down to the slipway at the clubhouse on their way down river. The reason being that the ribs do produce a short chop wash which can be unsettling for a person in a tender going to and from their boat. By unsettling I mean to the point of capsizing. I have experienced this at first hand . I would also ask that the RIBs pass a minimum of thirty meters off the outside trots. At present they can pass very close indeed.</p> <p>I do accept that when we ask for a pass with caution the RIB's do slow down but we would ask for consideration that they are limited passing the moorings on the way down river.</p>	<p>manoeuvres should not be happening, which we believe will reduce the risk of these incidents occurring again in the future. This does not mean that the Master of these vessels are exempt from Thames Byelaw 57 and complying with their Safety Management System and Passage Plans. We will therefore be reviewing all RIB operators passage plans to ensure that they will be taking due regard of your operations at Greenwich Yacht Club and other mooring sites in this area.</p>
10.	TANYA FERRY	PLA Environmental Dept	<p>Here are our comments both relating to text on Page 18,</p> <ul style="list-style-type: none"> o Waste & Garbage - The responsibility of the operator and what happens to the waste, and licenced carriers should be strengthened given the number of rubbish bags reported or seen in Thames, particularly as feedback from the Cleaner Thames Campaign. <ul style="list-style-type: none"> • Suggested text- <ul style="list-style-type: none"> o The waste you produce on your vessel(s) and/or operation(s) must be removed by a waste carrier licenced by the EA. o Bunkering - We would recommend that the GD10 & Appendix IV are replaced with regulatory articles to the act of bunkering, rather than the lighting & marking of craft undertaking bunkering. Reporting spills to VTS should be reiterated with in the code in support of other publications and notices. <ul style="list-style-type: none"> • Suggested Text- <ul style="list-style-type: none"> o Should an incident occur resulting in waste or fuel oils being spilt into the River Thames, it must be reported immediately to the Harbourmaster via London VTS, as stipulated in Thames Byelaw 8 and Permanent Notice to Mariners No.7. If you happen to see any oil sheens on the River Thames, these should also be reported to London VTS immediately. 	<p>Thank you for this feedback and we will include guidance of this in the final draft of the Code.</p>

11.	STEPHEN ANGELL	<p>noticed a spelling mistake on page 67</p> <p>General Direction 27 Extract from GD27: "overtaking is restricted in the Thames Barrier Control Zone (TBCZ). Overtaking in the TBCZ is only allowed with the express permission of VST"</p> <p>Last word in that sentence should be "VTS"</p>	<p>Thank you for this feedback and we will include guidance of this in the final draft of the Code.</p>
-----	---------------------------	---	--

No Comments: Colin Barnard, Julie Morris – Environment Agency