

09/01/2025

British Marine response to the coroners Regulation 28: REPORT TO PREVENT FUTURE DEATHS After Inquest LEWIS E J 22082020 (1) (1).

We as an industry association take the safety of all the activities carried out by the industry and our members as a primary concern. This is why prior to the Seadogz accident, in 2010 as part of an industry collaboration, and on the evidence outlined by previous MAIB reports, we helped produce and publish the HSPV code which was made available to industry. Due to further concerns and developments in the type of craft used and activities being carried out this was further revised and republished in 2019. As stated in the MAIB report, one contributing factor to this tragic accident is that the operator was found not to be implementing either the HSPV code or the PCA's (not British Marine affiliated) code of conduct.

Further to the development of the HSPV code we made the use of the code a requirement of our membership for any operator carrying out his type of activity, this has been done through the British Marine constitution.

I have provided responses below to each of the concerns outlined in the report:

- a. *Whether consideration should be given to licensing arrangements for port authorities and local authorities to achieve an early, uniform and comprehensible framework for the use of RIB craft on high speed experience rides, including crewing levels, manoeuvres, craft standards and risk assessments*

This would be down to the individual licencing and port authorities to establish, British Marine are happy to collaborate if requested to help set the framework up. Industry is currently waiting for the new sport and pleasure code to be bought into legislation, (this is currently in an industry consultation and is expected that the legislation will be passed later this year) which will go a long way to addressing many of the concerns although it recognised there will be an implementation period of the new code. In the meantime British Marine's suggested interim step would be for the HSPV to become a licencing requirement, but this would be down to the licencing authorities to implement.

- b. *Whether interim measures should be considered to manage risks of high-speed RIB experience rides*

We are now expecting the new Sport and pleasure code to come into legislation later this year. We have taken interim measures by reminding our members of all the current available guidance through our Marine Talk articles. We have also sent direct emails to the appropriate members as well as mandated our members to use the HSPV code.

Some port and licencing authorities have also implemented further licencing requirements.

*c. Whether the existing BS EWN ISO 11591 needs revision (or supplementing) to take into account the effect on forward visibility of passengers about RIB craft and whether any practicable retrospective steps can be identified to improve forward visibility on RIB craft*

BSi are providing a full response to this concern which British Marine has seen and agrees with. Since the construction of the Seadogz vessel there have been further amendments to ISO 11591 which go some way to addressing this issue, however it could be argued that the wording could be improved to add further clarity. If believed necessary we are happy to support this proposal through the ISO small craft committee, this can be brought up at this year's ISO plenary in May for discussion with all the relevant industry experts and national bodies.

*c. The need for consideration of seat and handrail design : as well as the injuries sustained by Emily Lewis I note the MAIB's concerns about handholds for jockey seats*

We agree consideration of seat and handrail design should be undertaken.

The new sport and pleasure code under section 25.7 of the draft has a requirement for a risk assessment which includes – “The availability, suitability and effectiveness of handholds provided on board the vessel.”

The HSPV code also has a section which states:

Handholds - all seats should have handholds located in front of the passenger allowing them to hold on with both hands. These should be roughly at chest height and shoulder width apart. Consideration should be given to the potential loss of firm hand grip during cold conditions. Further consideration may need to be given to padding the rear facing back of a seat and associated handholds to avoid risk of facial injury to the passenger behind in the event of rapid deceleration.

*e. The need to consider whether there should be provision of AIS for RIB craft to facilitate monitoring of RIB craft operations and intervention in the event of unsafe practices being identified*

Some port authorities are starting to implement this already such as ABP Southampton - [SOU-LNtM-2025-022 Commercial Craft Operators.pdf](#). It is our opinion that carriage requirements should be based on the licencing authorities and operators risk assessments taking into consideration the type of craft, operations being carried out, operational area including navigational risks, traffic density etc and resources of the licencing authority to monitor and make use of the AIS data.

*f. The need to consider how timely and comprehensive review of MAIB recommendations can be achieved”*

As an industry association we aim to implement all MAIB recommendations that we have been given as quickly as possible and have acted on each MAIB report, either helping produce guidance (and revising said guidance where necessary) such as the HSPV code or ensuring that industry is aware of new guidance such as MGN 436.

It is recognised throughout industry that the new sport and pleasure code is long overdue with the first MAIB recommendation to update it being back in 2011.