



**Maritime &
Coastguard
Agency**

Mr P Hobbs
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Your ref: Ladders
Our ref: MS3/97/3PART3
13 April 2015

Dear Mr. Hobbs

CONTROLLED MEANS OF DESCENT: MARINE GUIDANCE NOTE 519

I'm writing on behalf of the Secretariat of the Red Ensign Group (REG) of British Overseas Territories and Crown Dependencies to confirm the status of the following product manufactured by Fibreight Developments Limited:-

Fibreight Emergency Ladder; 10m and 30m Units each with 600mm Width

This is to confirm that the type approval documents issued by Lloyd's Register (LR) for the above mentioned product (certificate number: SAS S120038/M3) have been reviewed by the Marine Technology Branch of the UK Maritime and Coastguard Agency (MCA) and it is apparent that the type approval and initial load test requirements required by the MCA in MGN519 have been completed, and approved by LR as an independent approval body (not under authorisation from the United Kingdom). At a meeting of the REG Technical Forum on 28 October 2014 it was agreed that the above mentioned product, while maintained and installed in compliance with the conditions of the above mentioned LR Certificate, could be used on UK and REG ships, large yachts and passenger yachts for compliance with the following SOLAS provisions and the corresponding requirements of the Large Yacht Code and Passenger Yacht Code:-

- Reg.III/11.7 - the replacement of embarkation ladders by approved devices to afford access to the survival craft when waterborne, provided that there shall be at least one embarkation ladder on each side of the ship.
- Reg.III/11.7 / Reg. III/31.1.4 - other means of embarkation enabling descent to the water in a controlled manner to be permitted for remotely located liferafts on cargo ships.
- Reg.III/21.1.1.2 – passenger ships with liferafts accommodating at least 25% of total persons on board served by equivalent approved devices on both sides which need not be stowed within reach of lifting hooks.

It must also be noted that this letter does not constitute a Letter of Acceptance as referenced in para 2.5 of MGN519. Surveyors of the flag Administration are required to



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issue a letter of acceptance before the above mentioned product can be accepted and a template Letter of Acceptance has been provided to all REG Administrations. The attending flag surveyor, or delegated representative, must be satisfied that the arrangements, particularly fitting arrangements to the ship, are fit for purpose on a case-by-case and ship-specific basis. This is to account for the design, size and shape of the ship to which the CMD device is fitted, the number of persons for which the CMD device is intended, and whether it is intended for crew or passengers.

Further, we would like to draw your attention to the comments raised by this department on the potential difficulties that passengers may experience when descending this device, and therefore the need for ship operators to adequately address those risks when demonstrating to the attending surveyor that the arrangements for embarking survival craft are fit for purpose.

Finally, we would also like to highlight that the acceptance of units is subject to satisfactory test before dispatch from the manufacturers to a static load test of 2.2 times the working load and a lowering test of 1.5 times the working load, and to a lowering test after installation on board of 1.1 times the working load. Particulars of the workshop test and the date of test should be clearly and durably marked on the unit. The ladders should be of sufficient length to reach the water with the ship in the lightest service condition and with an adverse list of 20 degrees. The lowering test of 1.1 times the working load is to be repeated at approximately six monthly intervals by the ship's personnel and noted in the ship's logbook.

Yours sincerely,



Ian Lardner
Head of Marine Technology Branch
Maritime and Coastguard Agency