

GUIDANCE NOTE 07/2020 (Rev. 1.1)

OVER-SIDE WORKING EXTERNAL ACCESS SYSTEMS (EAS) – EXISTING VESSELS

To: OWNERS, MANAGERS AND MASTERS OF ALL CAYMAN ISLANDS YACHTS

1. BACKGROUND

- 1.1 REG YACHT Code Part A (Corrigenda No.1) 1.6.2 (w) and Part B (Corrigenda No.1) 1.7 (1) (n) denotes that Common Annex B Over-Side Working External Access Systems (EAS) applies to non-compliant or pre-existing systems.
- 1.2 It is apparent that many existing vessels lack the necessary documentation relating to the design and pre-installation testing requirements according to Common Annex B-2.
- 1.3 There is a perception that the lack of design approval and pre-installation testing can be resolved by conducting the post-installation testing in accordance with Common Annex B-4. This is not the case and post installation should not be conducted unless there is clear evidence of design approval and pre-installation testing of the as fitted EAS.

2. ELEMENTS FOR VERIFICATION OF EXISTING SYSTEMS

- 2.1 There are three elements for verification of existing EAS, for which documentation is required to be carried on board to support the continued use of existing systems following 1st January 2019.
 - a. EAS Installation Plan (showing track locations, corresponding details of supporting structure (i.e. material type and scantlings) and fastening details
 - b. Pre-Installation Load Test Report in accordance with Common Annex B, Section B-3
 - c. Post Installation Load Test Report in accordance with Common Annex B, Section B-4
- 2.2 If any of the elements above are missing the EAS should not be used unless the crew member has a fall arrester attached by a secondary line which is secured to a strong point suitably tested to take the full load for fall arrest or around an item of yacht structure substantial enough to withstand the drop loads. For example, a system of pad-eyes and jacklines for which the loads can be verified.

3. RETROSPECTIVE VERIFICATION

- 3.1 Where no record of design approval and pre-installation testing is available the following methods may be adopted to assist with retrospective verification.
 - a. Post installation verification of the design and mock-up¹ testing of the track and means of attachment in accordance with the requirements of BS EN795:1997 or BSEN795:2012. Tests to be witnessed by Class or Flag.

¹ Pre-installation testing should never be conducted onboard. Test rigs must be discarded after testing.

b. re-install the system in accordance with a known approved and tested configuration. A system using rivet nuts that meet an approved tested configuration or other verifiable approved methodology, for example.

3.2 Following the completion of the 3.1.a or 3.1.b the post installation testing in accordance with Common Annex B4 is to be conducted and records maintained accordingly.

4. IN SERVICE TESTING

4.1 Subject to confirmation that the system has been designed, pre-installation tested and installed in accordance with the approved methodology the systems are to be subject to periodical testing in accordance with Annex B5. The full external access system should be subject to annual thorough examination by a competent person and the tracks subject to 5 yearly testing using the post installation testing method described in Annex B4, unless more frequent testing is specified by the manufacturer.

4.2 The persons performing the five yearly test shall be approved by the manufacturer or approved by Class on behalf of the manufacturer. Where the entity performing the tests is not approved by the Manufacturer, the test should be witnessed by an attending Class Surveyor.