



Maritime &
Coastguard
Agency

Certifying Authority MCA Interpretation

No. 001/2022

Issue Date: 28 March 2022

Originator: RYA

**Applicable to: Workboat Code Edition 2,
MGN 280**

Query related to totally independent steering systems

Scenario

This SCV interpretation discusses the meaning of totally independent systems.

Q&A 1 of the interpretation states that totally independent systems means 100% redundancy and Q&A 2 clarifies that the requirements cover all components including the steering systems.

Section 9.1.3 of MGN 280 and Workboat Code Edition 2 require vessels with steering gear which is remote control to have arrangements for emergency steering in the event of failure of the control.

Question 1

Are the emergency steering arrangements provided to ensure compliance with section 9.1.3 sufficient to meet the 100% redundancy requirement for totally independent systems or is a third system required?

Agreed Response

Answer 1

A vessel has a primary means of propulsion, and Appendix 8 requires an independent secondary means of propulsion.

A vessel has a primary means of steering, and section 9.1.3 requires that it has emergency steering arrangements.

The means of propulsion and the means of steering may be inherently linked or may be functionally separate from each other (particularly in the case of the emergency steering, e.g. 9.1.3.3 “a steering oar”).

Therefore, in cases where the emergency steering arrangements would be equally effective when used with either the primary or secondary means of propulsion there is no need to have two sets of emergency arrangements (i.e. the vessel would only need to carry one steering oar not two...)

However, in cases where the emergency steering arrangements is tied directly to the means of propulsion, the vessel would need separate arrangements for both means of propulsion.



HM Coastguard



The Certifying Authority shall ensure that, where applicable, both requirements are met.

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