

SFPA Cont,

These provisions will apply to all vessels targeting mackerel, horse mackerel or herring operating in the mapped area and using 'pelagic wet stowage' ie onboard tanks or stowage areas where fish are held on ice or in water or use water to pump onboard catches ashore. This will certainly include the Polyvalent pelagic fleet.

I would envisage that the requirement here is to prevent discharge perhaps similar to that which was discovered at the Scots investigation of in the Shetlands where fish was pumped ashore using exit valves at or below the waterline. There is also the suspicion of discharge to harbours in various Irish locations if vessels are targeted for full inspections and this is facilitated by such through hull valve seats. The flushing of tanks etc would still be possible but with perhaps a cover grid on the external end of the through hull valve to prevent fish from being discarded or dumped.

If preferred any valve configuration can be used alternatively as you suggest but would likely require the assessment of the MSO in relation to vessel safety.

This to my mind is a requirement to register the ships drawings for certification which would have 'pipe run' and valve diagrams related to the catch handling inboard pipe work and discharge valves fitted to the vessel as a follow on from the above.

The certification would be undertaken by MSO as the national competent authority if required and presumably after a survey of the drawings vs the 'actuals' onboard. I am given to understand that such drawings are part of the ships drawing book in any event and that only if modifications have take place since the drawings were completed would new drawings be required.

There may be an inherent grace period but it would be our intention to progress this substantially ahead of the coming season