

QUESTION: The Class has been questioned on the subject of composite « bulwarks » in place of aft pulpits when the Class40 Rules stipulate in Rule 402 that pulpits and stanchions must be steel. We have been asked whether these boats comply with the Class Rules.

REPLY: In order to reply to this question, the first thing to do is define what constitutes a pulpit as intended by our Class Rules.

The definition of pulpit is provided in **ISO 15085** which more generally covers protection from falling overboard and means of reboarding.

This standard is referred to in the OSR, and importantly, this standard **is in our Class Rules**.

Rule 100 (General Remarks) stipulates:

*The boat must comply with all aspects of:*

1. *the « **NF EN ISO 12217** Small Craft – Stability and Buoyancy Assessment - part 2: Sailing boats of hull length greater than or equal to 6 m » for design category A, except 6.1.4 b) where the sentence « for the next less demanding category » is replaced by « for the design category concerned »;*
2. *the « **NF EN ISO 11812** – Small Craft – watertightness requirements of quick draining cockpits » for design category A;*
3. *as well as the requirements set out in **OSR Category 1**, with the exception of chapter 3.09 (cockpit).*
4. *Requirements of **ISO 12215 (RSO 3.03.1)***
5. *Requirements of **ISO 15085***

This standard defines the following points:

### **3.12**

#### **Pulpit**

*Rigid frame replacing or extending a guard-line or guard-rail*

### **3.9**

#### **Guard-rail**

*Permanent rigid structure designed to restrain people from falling overboard*

### **3.10**

#### **Guard-line**

*System of flexible lines supported by rigid structures or stanchions, designed to restrain people from falling overboard*

## **10 Common requirements for low and high guard-rails and guard-lines**

### **10.1 General**

*In compliance with the options of article 6, guard-rails can be required, either low guard-rails/guard-lines ( $h \geq 450$  mm), or high guard-rails/guard-lines ( $h \geq 600$  mm) as per the requirements of 10.2.*

*Guard-rails must entirely surround the perimeter of the working deck, except transversely in the cases allowed for in paragraphs 10.3, 10.6 and 10.8.*

### **10.2 Height of guard-rails or lifelines**

*High guard-rails/guard-lines must be at least 600 mm high.*

With all these elements, according to ISO 15085:

- that the working deck must be surrounded by guard-rails/ guard-lines
- that the guard-rails are permanent rigid structures. That these must be at least 600mm high.
- The standard defines a pulpit as being a **rigid frame extending** a guard-line or guard-rail

According to this standard, a pulpit is not defined as a guard-rail. It extends it. It cannot be defined as a solid structure.

A rigid frame extending the lifeline is a pulpit, and being a pulpit, it must be steel according to Class Rule 402.

A guard-rail is not a pulpit, therefore it is not governed by Rule 402 which only covers pulpits and stanchions. Its composition is not limited by the Class Rules other than Rule 401 which specifies forbidden materials.

As a result, the Rules Committee finds that on the Mach40.5, and the Musa40 #201, the working deck is surrounded by lifelines supported by stanchions, pulpits (at the bow) and guard-rails (at the stern). Stanchions are steel, in compliance with Rule 402.

Pulpits are steel, in compliance with Rule 402.

The guard-rails are composite. They comply with Rule 401 with regard to the materials permitted in the hull, the deck and the structure.

The Rules Committee henceforth considers that boats with composite guard-rails to which the lifelines are affixed in place of aft pulpits comply with the Class Rules where these guard-rails comply with the dimensions required by the OSR.

Les sables d'Olonne the 17th October 2023