



To: All Sail Canada Schools, Clubs and Instructors

Date: September 2014

Re: Transport Canada Recreational Boating Standard TP15136

This note contains information important to schools and clubs delivering Sail or Power training when the instructor and students are on the same vessel. Questions concerning the content of this note or any standards that are referenced may be addressed to Sail Canada at instructor@sailing.ca.

Application of the RBS Standard

The Canada Shipping Act defines pleasure craft using the following wording: ***“pleasure craft” means a vessel that is used for pleasure and does not carry passengers.*** A vessel that does not fit into the definition of a pleasure craft is under the shipping act a commercial vessel and is legally required to comply with the regulations concerning commercial vessels.

Under the Canada Shipping Act (2001) any recreational vessel with an instructor on board and carrying students will be subject to Transport Canada commercial vessel regulation concerning manning, construction, equipment, and areas of operation. The Recreational Boating Standard (TP15136) implemented through the Small Vessel Compliance Program for Recreational Boating Schools provides a mechanism by which schools and training operations may continue without meeting the full requirements of a commercial operation. Instances where there is no compensation provided by the students or paid to the instructor, and instances where the owner or master of a vessel hires an instructor for instruction on his or her vessel fall outside of the requirement to comply with commercial regulation or with these rules.

The Transport Canada publications describing the standard may be viewed via the Sail Canada website page accessed by clicking Programs/instructors/Keelboats & Cruising.

Background and Schedule for Reaching Compliance

The *CSA, 2001* and its associated regulations provide the regulatory framework that governs pleasure and non-pleasure vessel operations in Canada. Vessels used by Recreational Boating Schools are not pleasure craft. They are used as part of a business activity. As an RBS, you must meet the requirements of the *CSA, 2001* and its regulations as they apply to passenger-carrying or passenger vessels.

In July of 2014 Transport Canada published a new Standard for RBS operating small vessels. The new Standard is intended to address some of the challenges the RBS industry has faced with respect to complying with the existing requirements for vessels other than pleasure craft. The RBS industry has been strong advocates for this Standard and through formal consultations over several years helped shaped its development. In addition to Sail Canada representatives from many organisations participated actively in its development through the Transport Canada CMAC, NRBAC, RBAC and ad-hoc meetings. Many of you have received various iterations of earlier drafts, for comments, that led to this final standard.



The Standard provides an alternative to some CSA, 2001 requirements for RBS operating vessels no larger than 15m, carrying no more than 12 students, and are engaged on a Sheltered Waters Voyage or a Near Coastal Voyage, Class 2 as defined in the regulations.

Transport Canada has clarified for us that with their support and full cooperation, eligible RBS that choose to apply the new Standard are expected to be in compliance by boating season 2015. Note that an RBS that does not choose to meet this standard is expected to be compliant with the applicable regulations for non-pleasure craft.

Equipment Requirements to Reach Compliance

Sail Canada has received some questions about equipment (required to meet the standard) that is often not normally installed on recreational vessels used for pleasure craft purposes. The following are suggestions that may help schools in identifying equipment that is needed to meet the requirements of TP 15136.

Engine compartment fire alarm

Look at an Aqualarm fire detector kit. The manufacturer has indicated that the heat sensor portion of this kit is suitable for installation in an engine compartment. Look for product at your local chandlery or on the web by searching for “aqualarm fire warning kit”. The product description is as follows:
Fire Alarm Panel size 1-3/4" x 3" The Remote Fire Detector (UL and ULC listed) and the Warning Panel included in the kit, monitors heat level and activates the red light on the Warning Panel and sounds a loud buzzer, built into the panel, when the temperature reaches 194°F or Rate of Rise is reached. Multiple Remote Fire Detectors can be wired in parallel on this boat fire alarm.

High water bilge alarm

Rule markets a high water alarm kit that includes both the alarm panel and float switch. You may find this item at your local chandlery or by searching on the web for “rule high water bilge alarm”. The alarm produces an 89 decibel audible warning.

Rekord Marine Enterprises produces standalone components under the Victory Products name that may be combined to install either a high water alarm or an alarm combined with a bilge pump. The alarm panels appear to support both audible and visual alarm and includes an indicator showing that the panel and its linked pump or alarm component are powered. You may find this item at your local chandlery or by searching on the web for “victory bilge water alarm” or for “victory bilge water alarm & switch”.

Life Rafts

Under TP 15136 some vessels will be required to carry life rafts. There is a range of life raft specifications, approvals and inspection regimes (SOLAS, ISAF, ORC, RORC, TC) which impact raft costs and to some extent their capabilities. TP 15136 allows relaxed requirements in comparison to the requirements for commercial vessels. School vessels may choose to carry ISO 9650 rafts which tend to be less costly than rafts approved for commercial use. The inspection and repack requirement for the rafts has been relaxed from an annual requirement (common for commercial purposes) to that recommended by the manufacturer (typically every 3 years).

ISO 9650 is an EU life raft standard targeted for recreational users. There are 2 types of ISO 9560 raft – Type 1 for open ocean navigation and adapted for risks associated with longer voyages including high seas and heavy winds. ISO 9650 Type 2 rafts are intended for coastal and inshore waters where more



moderate conditions may be encountered and the likelihood of rapid rescue is significantly higher than might be the case offshore. The purchaser may select one of a number of different kits to be packed with the raft. Rafts may be purchased in a hard case, designed to be stored in a cradle on deck or on the pushpit, or may purchasers may choose a soft valise style of packaging which is designed to be stored in some protected but accessible location on board. Rafts must be purchased to accommodate the number of individuals that may need to be housed in the raft, with 4, 6 and 8 person rafts available from most vendors. Canister style rafts may be equipped with a hydrostatic release that will automatically launch a raft should a vessel sink. This device will need to be replaced every second year. Purchase considerations should include product capability as well as availability of local service. In reviewing raft specifications you may choose to carry some items in an abandon ship bag. Coastal class rafts may not have insulated floors so the impact of water temperature and potential hypothermia may be of concern.

For those needing to purchase an ISO 9650 life raft consider products from Survitec or Viking. Selection considerations should include product capability, availability of local service, and availability of deck mounting kits if a container style raft is under consideration.

Survitec DBC markets an ISO 9650 Type 1 raft known as a Crewsaver. For further information about the product look for www.survitecgroup.com on the web.

Viking offers ISO 9650 Type 1 and Type 2 rafts known as RESCYou. In a review conducted in 2011 by Sailing Today Viking rafts ranked first. For further information about the product look for www.viking-life.com on the web.

Implementation Support

The Cruising Panel has prepared a generic school safety manual and a note on labeling. These are available to registered instructors in the Cruising Instructor Member Resources section of the Sail Canada website. Sail Canada School Managers who may not have access to this section and wish to obtain copies should contact instructor@sailing.ca at the Sail Canada office.