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Edward Mountain
Convenor
Net Zero, Energy & Transport Committee
Scottish Parliament
EH99 1SP

15 December, 2023

Dear Mr Mountain,

Approvals process for Hull 801 (Glen Sannox)

I refer to your letter dated 16th November and provide the following information as requested. Please note that this letter has been discussed and agreed with the FMPG board.

I refer to the paragraphs as numbered in your letter:

1. In the first 3 months after my appointment in February 2022, the FMPG engineering & project teams – and the external designers ICE - set out to me that significant design and engineering work remained outstanding, and contractors were mostly employed on a time and materials basis through framework agreements and instructed through sequential work orders.
 - a. Work & costs have arisen to solve hundreds of these ‘issues and gaps’ in design and engineering across each of the disciplines – e.g. structural, mechanical, electrical, outfitting and others. A comprehensive list is too extensive for this letter and has evolved over time – as I have set out in quarterly updates. We are open to finding a different solution to this request.
 - b. However, I focus on the MCA issues and can confirm that solving these has been less than 2% of the costs of solving the overall design & engineering challenge and as previously advised, has been solved within the timelines to delivery required by other issues.
2. As part of a routine call with DGEconomy on 26th June '23 I advised him that we were facing more complex solutions for the MCA approvals processes. We then followed up with the SG team who, together with CMAL, were aware of the emerging issues earlier in April-June '23 as part of the regular programme reviews and CMAL through their team who are permanently on-site, surveying progress. The June '22 discussions were not specifically referred to, however board and SG in attendance were updated from time to time during the rest of 2022 in relation to the evacuation modelling leading to MSF 1261 Application no 1 – see table and background below.

3. Ref your points 3(a) to 3(h)
 a. there are 4 MSF 1261's:

Number	MSF1261 (Alternative design arrangement)	Date application made	Date approved by MCA
1	Stairway widths between car deck 3 and passenger deck 5, MCA log number 2022099.	Escape modelling May '22 followed by 1261 application.	4/11/22
2	Escape routes plan revision 9, for the additional staircases and changes to doors. MCA log number 20230205.	26/7/23	30/8/23 Passenger numbers reduced to 929
3	Escape trunk dimensions for the sizes of the eleven 'secondary' escape trunks for crew to reach muster stations from machinery and other spaces below the car deck (primary escape routes from these spaces are through main stairwells and passageways). MCA log number 20230324.	22/9/23	7/11/23
4	Escape trunk systems. MCA log number 20230344.	06/10/23	Not required - "no non-compliance" confirmed by MCA 10/11/23

b. and background:

- i. The undersized dimensions of the stairwells in the side casing structures were identified prior to FMPG being set up in late '19 and were first raised with the new FMPG engineering team by the external designers ICE in December '20.
- ii. During '21, discussions continued between the FMPG Compliance Director and the local MCA office. Part of the solution eventually agreed came from evacuation modelling commissioned by FMPG using Lloyds Register as consultants, which confirmed the requirement to get all passengers to evacuation stations well within the 60 minutes maximum time allowed.
- iii. This led to the first MSF 1261 in November '22 (Application 1 above) and increased existing levels of over-confidence within the FMPG team, that other aspects of non-compliance would secure MSF 1261 exemptions or equivalence approvals as an out-put of the modelling (without additional stairways).

- iv. Following feedback from the MCA head office in April '23 (via the local surveyor) that further solutions would be required, FMPG worked internally and with the local MCA office on revisions 1-6 of the proposals.
 - v. In late June '23 it became clear that more significant changes would be required, and we advised CMAL, the FMPG board and SG as above.
 - vi. On 11th July '23 the FMPG Compliance Director submitted an MSF 1261 application for the secondary escape routes plan, revision 7, for passengers on deck 6, including new stairwells and a request for the crew spaces to be treated under 'Cargo Rules' for doorways and corridor widths (as originally designed by FMEL in 2015-2017).
 - vii. This was updated 17th July with revision 8 and finally 26th July with revision 9 (Application 2 above).
 - viii. Dates of Applications 3 & 4 are in the table above, arising after the discussions over Application 2.
 - ix. During this process, the FMPG board was updated in monthly meetings. SG and CMAL team through the monthly programme review meetings and through interim on-site updates as part of general programme tracking.
 - x. As noted above, the costs of the additional work on stairways and doors will represent less than 2% of the increase in costs for Glen Sannox since Mar '22.
4. As set out in point 1 above, the vast majority of 'Design Gaps' (for the much larger programme of closing out the engineering and design of Glen Sannox over the past 18 months and in capturing the final design data for the build of hull 802) were broader than the regulatory aspects with the MCA as set out in point 3 above.
5. The 'other areas' refer to only to the MCA issues with the escape trunk dimensions and escape trunk systems - the subject of Applications 3 and 4.
6. The Lloyds surveyors have been on site regularly (daily now in these later stages) and are progressively signing off both ships in build against pre-approved design drawings working closely with the FMPG build teams for each ship. Guarantees cannot be secured during this progressive process.

I note your request for future quarterly updates and confirm I will also provide interim updates as and when required - each case as agreed with the FMPG board.

Yours sincerely,

David R Tydeman

David Tydeman
Chief Executive Officer