

3. EXECUTIVE SUMMARY

- 3.1 Rowing on the upper reaches of the tidal Thames between Putney and Teddington is a high profile sport involving large numbers of rowers of all abilities. Historic rowing patterns on the tidal river had been incorporated within the regulatory framework by means of Notices to Mariners published in 1992 and revised in 2002.
- 3.2 These previous changes to the regulatory framework were believed by the PLA to have been ineffective in successfully reducing risks to navigation following a number of incidents involving rowers and other river users. The PLA therefore decided on an independent risk assessment.
- 3.3 The objective of this project (undertaken between 1st October 2004 and 31st March 2005) was to identify and assess the risks of rowing on the upper tidal Thames, including its impact on other recreational and commercial river users and to establish the value and credibility of PLA Notice to Mariners U6 of 2002. Also to determine the understanding and application of N to M U6 by all river users and whether U6 should be retained, modified or withdrawn to improve safety of navigation. In addition, the project was required to identify other risk control measures to reduce the risks to life and navigation, improvements for the effective promulgation of regulations, the effects of tidal heights and streams, whether wash was greater than should be expected and whether rowers were adequately prepared for the prevailing conditions on the river.
- 3.4 Rowing and other activities on sections of the river were observed at different stages of the tide by various means. These included transits in a narrow boat, Class V passenger vessels, PLA Harbour Service launches, a rowing coach boat and also from various locations on the river bank and bridges. Visits to Clubs and submissions from and consultation with many river users and stakeholders provided a reasonably balanced knowledge base. BMT Reliability Consultants Limited held a formal hazard ID and risk assessment meeting with representatives from many of the river stakeholders.

THE SALVAGE ASSOCIATION

- 3.5 The period of the study over the winter months is one of the busiest for rowers with the greatest numbers on the river, however, it was not ideal as few recreational and commercial users were in evidence and for much of the time the rowers constituted nearly 100% of traffic on the river. Nevertheless, a good appreciation of the general situation and problems in summer was obtained by consultation with river users. The decision taken by the PLA to proceed with the study at the earliest opportunity was in the interests of safety, rather than deferring it for an additional six months.
- 3.6 The study has shown that many non-rowing river users were either unaware of separate navigation Rules for rowers or had little knowledge of their content. Generally most local rowers have an adequate working knowledge of the contents of the Rowing Rules set out in N to M U6, particularly with regards the tracks to follow and crossing points. This is not universal, with visiting rowers and those who normally row on different stretches of river being less aware of the particular requirements for that stretch of river. Rowers have apparently a lesser understanding of the COLREGS and their interaction with the Rowing Rules. There is also a significant problem because many rowers have been and are still taught that when rowing with the stream, they should be positioned on the centreline rather than on the starboard side of the channel as required under N to M U6.
- 3.7 Observation on the river showed that application was not always in line with knowledge of the Rules. For instance a significant number of rowers and coach boats travelling with the stream were seen positioned on the centreline or even well to the port side (left) of the river, rather than on the starboard (right) side. Avoiding action in a head on situation with a power driven vessel needing to maintain the centre of the channel at low water was frequently incorrect with rowers moving to port (instead of to starboard) resulting in confusions and passing starboard to starboard.
- 3.8 Promulgation to leisure users of the regulations variously contained in the Notice to Mariners, PLA Byelaws and COLREGS was considered to be generally ineffective.
- 3.9 The Risk Assessment shows there is increased risk of collision introduced by the Rowing Rules and a clear requirement to amend the current arrangements. The Rowing Rules, as set out in PLA Notice to Mariners U6 of 2002, are considered to increase the risk of collision above a level As Low As Reasonably Practicable (ALARP), particularly when the navigable channel converges at low water in way of bridges and pinch points. The risk from collision between rowers is mitigated in practice, only because the Rowing Rules as drafted are partially ignored. However, where other non-rower users such as powered leisure craft are involved, with little knowledge of these special rules, the risk remains.

- 3.10 The Rowing Rules do reduce risks to rowers by separating them from some physical hazards.
- 3.11 We have considered a number of options as follows:
1. Retain the status quo with Notice to Mariners U6
 2. Amend N to M U6 to mitigate risk of collision
 3. Withdraw N to M U6 and revert to Rule 9 of COLREGS
 4. Draft and implement a “Code of Practice” for rowers on the upper tidal Thames in consultation with the ARA, TRRC and other user groups and then withdraw N to M U6.
- 3.12 Option 1 - As noted above the current Rowing Rules are believed to increase the risk of collision above ALARP and this is therefore not considered to be a safe option.
- 3.13 Option 2 – Despite widespread consultation no meaningful and practical amendments that would significantly reduce the risk profile have been identified.
- 3.14 Option 3 - Reduces the risk of collision below ALARP but introduces various hazards and physical obstructions which are currently avoided when rowing under N to M U6. Whilst this is an option, rowers at all levels have expressed opinions that reverting to the right hand rule would significantly increase risks to both rowing craft and rowers.
- 3.15 Option 4 - A Code of Practice should be developed by the PLA in conjunction with, the rowing authorities and other river user groups and consideration given to enforcing it through PLA General Directions. It will be most important that such a Code is “owned” by all the river user groups, particularly the rowing community. Once implemented the Code will need to be suitably monitored on a regular basis and reviewed as necessary under the PLA Safety Management System to ensure that risk to navigation and personal safety remains as low as reasonably possible.
- 3.16 The Code will need to take in to account various aspects and risks highlighted by this study. These will include but not be limited to the following:
- the requirements of the PLA Byelaws and COLREGS relating to navigation and collision avoidance on the river
 - a simple definition of the narrow ‘channel’ or ‘fairway’ in the upper tidal reaches

THE SALVAGE ASSOCIATION

- the facility for rowing craft to proceed outside this channel when rowing against the stream
- the risks at low tide for rowing craft on the port side of the river to converge into the main channel at bridges counter to the flow of opposing traffic
- overtaking to be restricted for rowing craft proceeding outside this channel against the stream
- overtaking to be limited to only one other vessel at a time as required under PLA Byelaws
- overtaking to be restricted on approaches to and under bridges and other blind or constricted areas
- restrictions on rowers significantly slowing or resting on approaches to and under bridges
- standard fitted lights for navigation of rowing craft and coach boats at night and in poor visibility
- emphasis on the importance of maintaining an effective lookout and greater awareness of the developing river situation including other vessels, obstructions, wash and weather
- risk assessments prior to boating by individual rowers, steersmen, coaches and Club/Regatta officials
- The ARA Water Safety Code
- and etc

3.17 The Code would include suitable illustrations, diagrams and maps to assist with understanding and compliance. It would need to be extensively and actively promulgated to ensure the widest circulation amongst all stakeholders and possible river users. Simple details of the Code and its affect on other users should also be published with the Environment Agency in a joint "User Guide", and all users moving onto the upper tidal Thames should be provided with a copy. Enforcement of the Code by rowing clubs, and the rowing authorities would need to be more effective than at present and the PLA would need to take a greater role in enforcement.