



Law Society  
of Scotland

# Consultation response

MGN 681 - Fire safety and storage of small electric powered craft on yacht

December 2022



## Introduction

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The Law Society of Scotland is the professional body for over 12,000 Scottish solicitors. With our overarching objective of leading legal excellence, we strive to excel and to be a world-class professional body, understanding and serving the needs of our members and the public. We set and uphold standards to ensure the provision of excellent legal services and ensure the public can have confidence in Scotland's solicitor profession.

We have a statutory duty to work in the public interest, a duty which we are strongly committed to achieving through our work to promote a strong, varied and effective solicitor profession working in the interests of the public and protecting and promoting the rule of law. We seek to influence the creation of a fairer and more just society through our active engagement with the Scottish and United Kingdom Governments, Parliaments, wider stakeholders and our membership.

Our Marine Law Sub-committee welcomes the opportunity to respond to the Maritime and Coastguard Agency's (MCA) *Consultation on MGN 681 - Fire safety and storage of small electric powered craft on yacht*<sup>1</sup>. We have the following comments to put forward for consideration.

## Consultation questions

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### Section 5.1

#### **Is there any content which you believe to be inaccurate?**

At paragraph 2.1.1, we note that the amount of water suggested as being required to extinguish a Li-Ion fire seems low as compared to other guidance. For instance, Tesla, in their first responders guide, suggests that between 3000 and 6000 gallons of water is required to extinguish a battery fire, (11400 - 30300 litres). This may merit re-consideration.

#### **a Are there any typographical errors?**

We have no comments.

#### **b Is there any non-statutory advice with which you disagree?**

We have no comments.

<sup>1</sup> <https://www.gov.uk/government/consultations/consultation-document-for-draft-mgn-681>

### **c Is there any content you believe is unclear?**

We consider that there may be confusion between the guidance in paragraphs 1.5 and 1.6 – paragraph 1.5 discusses requirements for batteries over 100Wh but paragraph 1.6 states that the MGN refers to batteries over 500Wh. While the narrative contained in paragraph 1.5 may be of interest, it does not appear to have any direct relevance to the overall guidance which only applies to batteries over 500Wh and might be best removed.

At paragraph 2.4, ‘off-gassing’ seems unusual phraseology. This is normally referred to as ‘venting’ in other guidance which seems more easily understood and technically correct.

We also consider that the discussion on emitted gases is somewhat vague. There are descriptions of emitted gases in other publications which might be considered. For example, see the description contained in paragraph 3.5.4.1 of ‘Risks associated with alternative fuels in road tunnels and underground garages’ by Jonatan Gehandler, Peter Karlsson, and Lotta Vylund<sup>2</sup>.

### **d Is there any content you think is inappropriate to include, and should therefore be omitted?**

We have no comments.

### **e Do you believe any content which has been omitted should be included?**

We have no comments.

### **f Are you satisfied with the proportionality of the guidance and do you believe that any content is overly restrictive or does not go far enough?**

We are satisfied with the proportionality of the guidance.

## **Section 5.2**

### **Do you have any additional comments to add to the response?**

We consider that there guidance accords with other advice that the MCA has given in respect to Li-Ion batteries, such as the guidance for the carriage of EV.

<sup>2</sup> Published by the SP Technical Research Institute of Sweden, accessible here: <https://www.diva-portal.org/smash/get/diva2:1081095/FULLTEXT01.pdf>



**For further information, please contact:**

Alison McNab  
Policy Team  
Law Society of Scotland  
DD: 0131 476 8109  
[policy@lawscot.org.uk](mailto:policy@lawscot.org.uk)