Thanks for getting in touch, our comments are as follows –

The proposed changes to the regulations will undeniably make Jersey's territorial waters safer. We strongly believe that it should be an offence to operate a ship whilst under the influence of alcohol or drugs. We believe there should be a legal requirement to ensure that vessels are seaworthy; as long as seaworthiness is clearly defined and reasonably achieved. We do not think there should be a compulsory requirement for training, first aid or sailing qualifications before piloting a vessel.

We believe that there needs to be more work on the definition of "operating a ship". It is currently not clear if you're "operating a ship" when you're under way but not making way. It is also unclear if you're "operating a ship" whilst attached to a mooring buoy. Please get in touch if you would like any further comments on the above points.