



## A Consultation on Changes to MCA Survey and Inspection

### Marine Office Locations

### External Responses

**Question 2: What alternative estate laydowns within the UK would, in your view, enable the MCA to deliver more efficient services to customers?**

Response ID	Represent Person or Organisation? (size if applicable?)	Response
REXT0001	Individual	Having studied a number of times at south shields college and knowing that it does have a large intake of cadets, as well as the shipping industry still in the Tyne area I am surprised at the closure of the Tyne office. Considering that the office at Bridlington is over 2.5 hour drive away, which no one would really want to do before an oral exam, and Liverpool is only another 40 min away its seems like there are 2 choices at nearly 3 hours away yet nothing within a lesser radius. The road network around the UK coast is not fantastic and considering Bridlington is too remote from major infrastructure to allow easy access from further afield. Potential Marine Offices should be placed closer to major roads to allow better access for other parts of the country and not necessarily located close to a port area. Moving the office inland to York reduces the time to Newcastle to 1.75 hours but is only 1.25 hours from Bridlington. That is the most obvious of the offices that seem to be far more remote from everything else that any of the other proposed offices.
REXT0002	Organisation	Thank you for the opportunity to respond; I am doing so on behalf of the <b>Redacted</b> . Regarding the proposed closure of Plymouth and relocation of functions to the existing Falmouth office, we would like to point out that this significantly extends the distance from the Devon, West Dorset and Somerset Coasts from an MCA office. While the retention of Falmouth was doubtless selected on workload and operating costs, had Plymouth instead been retained then this would have been a much more central location for maritime communities across the peninsula. Your proposal to rely more heavy on IT remote access would make the loss of Falmouth more acceptable since Cornwall already enjoys superfast broadband whereas many parts of Devon and Dorset currently do not.
REXT0003	Individual	Utilising remote working from other Government offices, and working from home, should assist with response times and workload, and facilitate inspections, oral exams etc, without having to travel from the proposed office locations. Our own organisation is making use of hot desking in various Government offices, and staff can log in to their desk phone and pc from these locations, and then their telephone number is redirected. Some of us also use Blackberry's. The average 12 month number and hours seem well spread across the offices / regions.
REXT0004	Individual	It seems to make little sense to move the Beverley office, closely located to the busiest Port Complex in the country to a location an hour further away?
REXT0005	Organisation, 6-15 people	A CENTRAL OFFICE WOULD SUFFICE BUT WITH THE ABILITY TO HAVE A LOCAL OFFICER ON THE GROUND IN THE REGION
REXT0006	Individual	As a <b>Redacted</b> I only have dealings with MCA over certification on a 5 yearly basis. I am still awaiting delivery of a safety certificate since 4th February 2016.
REXT0007	Organisation	It does not seem very long ago the Yarmouth office was re-located to Norwich. There is always a cost involved, and again you may lose some very long standing experienced staff that will require replacing and retraining etc. The team at Norwich are very knowledgeable and extremely helpful. They know the area of our operation etc. From personal and business point of view, we have always enjoyed a very good relationship with each other, always able to provide any information required, both ways. A move to Ipswich will of course drastically increase the necessary charges for surveys, visits etc. and almost certainly lead to a decrease in efficiency from our point of view, just because of distance alone. Over the past years we have had many dealings with Capt. Anam, Peter Maynard - surveyor and Wendy Vaudin, who seems always at the Office, along with many others. They make a very good team and we at <b>Redacted</b> greatly appreciate their help and personal service.
REXT0008	Individual	No Response
REXT0009	Organisation, 6 - 15	We have had reliable and efficient service from the Beverly Marine Office - and Norwich when necessary.
REXT0010	Organisation, 0 – 5	No Response
REXT0011	Organisation, 31 – 100	We use the Beverly office
REXT0012	Organisation, 0 – 5	The proposed revisions do not present a problem from <b>Redacted</b> perspective
REXT0013	Organisation, 100+	24/7 Contact Duty Officer
REXT0014	Organisation	Alternate estate layouts. Given that direct access to MCA offices is largely in the <b>Redacted</b> view unnecessary the estate layout would be best to optimise surveyor access to concentrations of survey and inspection work perhaps for a group of ports, and access to transport networks to ensure efficient attendance. The <b>Redacted</b> believes it is necessary to have a Scottish presence. Offices in Glasgow and Aberdeen are well placed both in terms of concentrations of work but also access to transport in particular to ensure attendance in the outer Hebrides, Orkney, and Shetland.

REXT0015	Individual	One estate office in Aberdeen, instead of Glasgow and Stornoway
REXT0016	Organisation	Concern at the proposed closure of the Plymouth office centres around; <ul style="list-style-type: none"> <li>• The availability and flexibility of surveyors for slip surveys and sea trials.</li> <li>• It is strongly believed that the loss of administration staff from our local Plymouth Office will have a considerable impact on the ability of the organisation to schedule running trials at relatively short notice. This is of particular importance to us due to the nature of our refit schedule, unforeseen 'extra' works often encountered and need to be able to act quickly to bring a vessel into service earlier than planned due to customer demand.</li> <li>• Loss of records from the Plymouth Office may also have an impact on the speed enquiries with regards to vessel changes and upgrades are handled.</li> <li>• Potential additional costs for travel from Falmouth or Southampton and reduced time available. 3 hours travel each way only permits sufficient time for a single inspection whereas with travel from Plymouth 2 or 3 inspections can be carried out in a day. This could double or triple our costs with no discernible benefit.</li> <li>• Loss of personal contact with key staff potentially leading to a reluctance to engage and seek advice. At present we are very confident to ring and talk to our MCA staff.</li> <li>• There is a concern that loss of the Plymouth Office may have minor impact on Boatmaster Training and upgrade.</li> </ul>
REXT0017	Organisation	London would appear to be the obvious omission. Taking surveyors from Ipswich, Dover or Southampton to attend vessels on the Thames and Medway might leave those Offices short. Ipswich is a reasonable, central location to cover the Harwich International Port, Port of Felixstowe and ABP Ipswich.
REXT0018	Individual	Availability and speed of response are the key factors for any ship owner and therefore reduction of staff ratio within MCA to handle customer services should not be the priority. - The MCA staff undertake fantastic job of guarding the vessels statutory regulations and this is paramount to prevent accidents and incidents. There should not be a route of self regulation left to ship owners in the view of cutting MCA cost.
REXT0019	Organisation, 6 – 15	I feel the proposed layoffs would be improved upon if an office was maintained in Shetland or the Western Isles. Use could be made of the existing Coastguard Stations.
REXT0020	Organisation, 100+	We have traditionally dealt only with the Southampton office.
REXT0021	Organisation, 100+	I understand that efficiency needs to improve but that should not affect services in a negative affect. The Thames in Britain's busiest waterway and the UK's second busiest port and still growing therefore to lose local experience in my view is not a solution to efficiency.
REXT0022	Organisation, 100+	An MCA or UK Ship Register presence in London could provide an opportunity to improve communication and relations with London based Shipowners / Shipmanagers and others. Over the last few years contact with the MCA has mostly limited to auditor attendance for the Annual DOC audit. - - There has been almost no contact on the basis of industry support or customer service for the last few years.
REXT0023	Individual	at present there would be no alternative for the mca to deliver a better efficient service
REXT0024	Organisation, 100+	WE BELIEVE IT WOULD BE BENEFICIAL TO US AND OTHER PORT USERS IN LOWESTOFT / GREAT YARMOUTH TO HAVE WHERE POSSIBLE SURVEYORS WHO LIVE LOCAL TO THE AREA. <b>Redacted</b> IS CURRENTLY UNDERGOING SIGNIFICANT COST REDUCTION CHALLENGES FROM OUR CUSTOMERS AND IT IS ESSENTIAL THAT WE KEEP OUR COSTS UNDER CONTROL AT ALL TIMES.
REXT0025	Organisation	I would have thought that the proposal to have 10 centres as per fig 1, on page 9, is quite logical and they look to be strategically placed to enable access across the UK. It could be argued that Plymouth may be a better base for the West Country than Falmouth, but I am sure you have good reason for this?
REXT0026	Organisation	As a <b>Redacted</b> we work closely with the Ensign at Tyne Marine Office. The yacht industry is a bit special where we work with the Large Yacht Code. It is appreciated working with the team at the Ensign who understands this business and the LY3. We are concerned that the closing of the Tyne office will make it difficult to retain the persons with competence within the yacht industry.
REXT0027	Organisation	Keeping the Norwich based office as it is makes far more sense to me in relation to saving the cost of setting up a new one in Ipswich. We also need to maintain contact at a level that is helpful to the small businesses and vessels that operate, and moving to a larger area could well affect the assistance offered to us. We also recognise that by moving to Ipswich it is highly likely that the costs incurred to us will increase considerably. This, again, is hitting at the small businesses who cannot afford such financial pressure.
REXT0028	Organisation	We would rather have the Falmouth office closed and keep Plymouth open because of its location. We feel that Plymouth is a major Port City, with the Devonport Naval Base situated within its waters There are also numerous marine craft , naval, and pleasure boat operators/ferry operators / fishing fleet which would warrant having an MCA office remaining in this location. Plymouth marketing are also trying to bring cruise ships to our area and would be a benefit to all concerned.
REXT0029	Organisation	It makes complete sense to me to keep an existing well run office running rather than spending huge amounts of money setting up a complete new one in Ipswich. Norwich is a pretty central area for all passenger carrying and other craft, there are 4 companies here at <b>Redacted</b> taking hundreds of passengers on a weekly basis (thousands in the summer) also others along the coast at Burnham overy and at Hunstanton, also near to Norwich are the Norfolk Broards where there are loads of passenger carrying companies operating, They all rely on the local Norwich office, to move this away from the area to where there are hardly any passenger carrying companies seems absurd to us! Keeping the office in Norwich I feel is the best way to keep the service most efficient! Another worry is we are guessing the survey fees would jump up dramatically as the surveyors would have a 2- 3 hr drive to get here.
REXT0030	Organisation, 31 – 100	Plymouth would perhaps be a better main centre than Falmouth for communications & accessibility, with office shared with another Govt agency if cost is fundamental to this decision. With modern comms for surveyors (including working from home), coverage in West Cornwall could be coordinated from Plymouth.
REXT0031	Organisation, 31 – 100	We do not have the expertise to comment here other than to say that if closures in one area of the country add pressures to other parts of the country then this could in turn have a detrimental effect on the quality of service throughout.

REXT0032	Organisation	The MCA currently deliver an efficient service. The Liverpool Office is flexible and helps to keep operator costs down by arranging to survey vessels on different lakes operated by different organisations while in the lakes area.
REXT0033	Organisation	I would wish to respond <b>Redacted</b> Tynemouth and with regard to the fishermen <b>Redacted</b> . There is concern that the proposals as they stand reduce services for local fishermen. The proposed closure of the South Shields Office will have a detrimental effect and will not be compensated for in the proposed new format. There is concern that once again cost cutting measures will lead to a less accessible. There is already problems in a system struggling to meet demand. There should be a physical presence in the region, if not in the current location, or as suggested in say the Marine School then a facility could be found elsewhere such as in North Shields.
REXT0034	Organisation	should be out on the ground more getting more involved with the clients
REXT0035	Organisation	<b>Redacted</b> can provide accommodation at commercial rates for up to six interview rooms and one admin room that would allow MCA Surveyors to undertake oral examinations on our site. This would provide a secure and professional facing service to candidates undertaking their oral examinations. It would be unreasonable for our 1000+ candidates to have extended travel distances to undertake their MCA orals examinations leading to higher costs and delays to both the student and their employer.
REXT0036	Organisation	I do not consider that decreasing the amount of regional offices will provide a more efficient service. Closing the Norwich Office will leave a very large area between the Bridlington and Ipswich Offices, without a local office for South Yorkshire, Lincolnshire, Norfolk and much of Suffolk. Road Networks in East Anglia and Lincolnshire are not the best, so response times for ports in these areas would be poor.
REXT0037	Individual	I need to be able to deal with a local office (Plymouth). I have no access to computer or no how to use one. I would miss the help they arrange for me. Without this I would miss surveys etc.
REXT0038	Organisation	In response to the second question raised in the consultation paper, we consider that should we lose the local marine office at Orpington; the MCA will need to ensure that MCA officers have access to suitable offices or Government facilities in Central London. This is something that we believe will be essential to ensure that there are no additional costs or delays to the London operators, Boat Masters and officers of the port authority.
REXT0039	Individual	Do not close the Norwich Office. They do an efficient and cost efficient service. Leave Norwich office open because it cost enough now to survey my little boat. It only carries 24 people. If you close Norwich are you going to pick up all the extra cost? Or do we stop having the boat surveyed as you will be putting me out of business due to cost. As well as all the other small boats that come under your rules in this area.
REXT0040	Not specified	Every time I ring MCA HQ I just get told to ring my local office. So without them I wouldn't have any support.
REXT0041	Organisation	No Response
REXT0042	Individual	Do not close Plymouth survey office as it is vital to my business. To pay for surveyors from Southampton or Falmouth will bankrupt me, and only the local surveyors understand my vessels. Whoever came up with this plan doesn't understand the West country.
REXT0043	Individual	I am located a considerable distance from the Marine Office already and have to pay lots for a surveyor to travel to me. If my nearest office closes I will have to pay even more and will go out of business. I am a very small outfit and can't afford more money. This government money grabbing yet again and its small hardworking guys suffer.
REXT0044	Organisation	I worked for the UK MCA, leaving in the late 1990's, eventually becoming the <b>Redacted</b> part time with MCA. I am providing you with an individual's feedback to your consultation (I remain a UK citizen and although I presently live <b>Redacted</b> , I will return in the next year or so). I have worked both at Liverpool Marine office and at Headquarters. I have good memories of the Agency and its aims and successes, but have been away long enough to lose the contacts that could cause you to consider this submission as attached to vested interests; it is not. I apologise if this is not answering your specific questions, but the feedback is practical and sincere. Whilst I support the proposal to close what in reality are small Marine Offices, the exception is the Orpington region. Harwich port (Felixstowe) can easily be serviced by an Ipswich office; important. However, the Thames estuary and the Medway are locations where large volumes of shipping traffic access large and important terminals. You can always argue that Oral examinations can be done from many locations, that is true, but the Port State Control function cannot. That is key to the maintenance of shipping standards trading into Europe. The area also has a large number of Class V and VI domestic passenger vessels who need MNZ surveyor services; they are also high capacity and therefore high risk consequence. Can I suggest that MNZ embark on some traffic analysis as part of the policy development as that should be as much a factor in your decision making as is the number of internal records of surveyor activity. By traffic analysis I mean both domestic as well as SOLAS. The concept of servicing the large and economically important London/Medway/Kent area from either Dover or Ipswich is, frankly, nuts in my humble opinion. I urge you to think again in this area.

REXT0045	Organisation, 100+	<p>Redacted has no definitive view about where Marine Offices should be located, or how many of them should exist, and therefore expresses no preference for the current or the proposed estate laydown or indeed for any alternative.</p> <p>The network of Marine Offices should be whatever is necessary to enable the MCA to deliver a high-quality and responsive service to operators of UK-flag ships and to UK seafarers. The value of any individual Marine Office does not derive from its existence or its location, but from the quality of the service it provides. This will be a function of the expertise of its personnel, their responsiveness to the requirements of shipowners and seafarers, and the accessibility and opening hours of the office, etc.</p> <p>Redacted offers a number of suggestions for specific measures of service quality, in response to Question 5 below. In our view, it would be more appropriate to decide upon an optimum network of Marine Offices after those standards of service and indeed methods of delivery have been defined. For example, if Marine Offices are in future to rely more heavily on improved IT, and, for example, virtual inspections then fewer Marine Offices will be required. Consistency of advice and the manner in which regulations are interpreted between the offices, however many remain, will though remain key.</p>
REXT0046	Organisation, 100+	<p>Both Marine offices in Scotland provide services to both the fishing and merchant fleets which we appreciate. However in the case of the Glasgow office and the service it provides to the whole West coast of Scotland fleet it is unacceptable. The MCA must to provide a more central base or more local surveyors. The West coast has many small harbors' giving a safe haven to the fleet. This fleet provides a vital economic benefit to many local economies yet the survey and inspection service provided is very poor. The industry appreciates that an under 15m survey is free but often fishermen lose fishing income trying to fit into surveyors timings because they are trying to do as many visits as they can while away from head office in Glasgow. Industry would like the MCA to look at this issue. In relation to the Aberdeen office that services the East and North coasts alone with the Northern Isles requires major changes. The fishing industry over the last 5 years in particular has suffered due to the lack of surveyors in the Aberdeen office. In many cases fishermen have had to wait a month for a survey date and on occasions these can be cancelled. It states in the introduction to the consultation <b>"several years ago the MCA's ability to maintain its levels of service began to deteriorate primarily as a result of difficulties of recruiting and retaining surveyors in a highly competitive market. The MCA has had difficulties in recruiting and keeping staff"</b>. This has resulted in many cases poor performances and bad service. Surely under this review and to quote a section of Sir Alan's opening remarks <b>"The core of this programme is the delivery of a better service to customers principally through improvements in our internal standards, procedures, systems and processes with a fully resourced and enthused surveyor workforce"</b> we would offer another estate solution, <b>a fishing specific office in Peterhead.</b></p> <p>A large proportion of the over 15m fleet is based in the NE and in Shetland. The only shipyard in Scotland building several fishing vessels over 15m is also based in the North East. We would suggest an extension to the estate laydown by placing a fishing specific team in Peterhead for the following reasons.</p> <ul style="list-style-type: none"> <li>• Fishing safety has and must be the biggest driver for any estate changes or reviews like this that affects the fishing industry. The current system has done nothing to improve the safety record as an industry as we have always felt disengaged and a hindrance to the MCA. By embedding a specific fishing team in Peterhead it's the belief of Redacted that a better relationship and understanding would promote a better safety culture within the industry.</li> <li>• Peterhead, Fraserburgh and Lerwick are the biggest seafood landing ports in the UK and in Europe. The above ports are home to 90% of the UK pelagic fleet and a major home to the demersal and shellfish fleets.</li> <li>• Part of the reason behind the inability of the MCA to retain staff in Aberdeen is partially due to house prices in an inflated Aberdeen city housing market. Also many surveyors joining the branch in Aberdeen only do so as it's a stepping-stone into the Oil and Gas capital of Europe. By creating a base in Peterhead all of the above issues in this point would be resolved.</li> <li>• With better road links between Peterhead and Aberdeen airport under construction at the moment surveyors would not be disadvantaged by the travel to Shetland or Orkney from Peterhead.</li> </ul>
REXT0047	Organisation	It is important to have personal contact with the Marine Office, arrangements can be made instantly. The ladies in the Plymouth office are very helpful and knowledgeable of our requirements and the local area, but you plan to close the Plymouth office.
REXT0048	Organisation	As above, for the ferry fleet the opening of an office in Harwich would be very useful to the southern North Sea ferry fleet. The current arrangement of Belfast and Liverpool works well for the deployment of Redacted managed vessels on the Irish Sea. Otherwise the proposed locations should be sufficient as long as they contain sufficient resources to swiftly respond to all queries.
REXT0049	Individual	As proposed
REXT0050	Organisation	<p>The major UK ports will be covered through the proposed Marine Office, it's the smaller remote berths around the UK which may be overlooked due to the distances involved and the availability of officers to respond.</p> <p>The concerns raised within the fishing fleet may not be addressed. Is MCA effective on PSC and MLC issues</p> <p>Rationale on Marine Offices (Y5) based upon meeting operational need and not financial constraints</p>
REXT0051	Organisation, 100+	The layout of proposed Marine Offices will service the UK route network satisfactorily. No objection to the closure of the nominated offices.
REXT0052	Individual	No Response

REXT0053	Organisation, 100+	<p><b>Redacted</b> has growing concern over the effectiveness of the MCA as an inspectorate. As a manufacturer of rules and regulations to follow the MCA is extemporary but what use are rules and regulations when they are frequently being breached and ignored.</p> <p>For a more efficient service <b>Redacted</b> believes there should be more inspectors not less especially in relation to the applicability of safety rules. Following the introduction of emissions legislation requiring all shipping in the Low emission zone of the North Sea and English Channel, need to utilising 0.01% sulphur fuel from the moment they enter the zone, until they leave or have some alternative way of reducing the sulphur content of the fumes leaving their exhaust stacks. The only ways to ensure this is the case is to be on board or have some way of remotely analysing the emissions.</p> <p>Whilst the traffic leaving the area South can be inspected from Falmouth, inspecting shipping entering the area from the North, when there is only the office in Aberdeen is not practicable. This is especially true when you consider the growth of windfarm development around Scotland and the exploration of new fields in the North Sea.</p> <p>With increasing traffic through the Thames due to the influx of freight calling at the London Gateway and into Felixstowe growth, relying on Ipswich to cope will inevitably cause delays to the certification of officers and ratings to declare them fit to hold their rank and carry out their respective duties. With ever more capacity being added to the mix in the Port of Tyne and growth in the Humber it is difficult to see the administrative demands being met in a timely fashion if left to a single office in Bridlington.</p> <p><b>Redacted</b> believes that there needs to be a MCA presence in each of the major ports.</p> <p>We strongly object to the proposed closures of any office particularly on the Thames, Plymouth and the Tyne. In the case of the Thames the level of river traffic has increased, and will continue to do so with the growth of London Gateway. Added to this is the likelihood of additional short sea/ferry traffic and cruise vessels.</p> <p>Whilst we can see that increased use of IT may assist with information collection, we do not believe that a remote IT enabled regime is a substitute for a systematic and robust programme of practical intervention by the MCA, which must be properly funded, to ensure the safety of ships and seafarers as well as the safety others who come into contact with them such a port operatives.</p>
REXT0054	Organisation	<p><b>Redacted</b> is concerned that closing the MCA Orpington Office will leave the UK's Capital and second biggest port by tonnage at 44.5million tonnes [1] without a dedicated office for survey and inspection. Additionally, the Thames carries 3 million tonnes (61%) [2] of the UK's domestic inland waterways freight and has one of the largest collections of Class V vessels in the country. The PLA states over 793 [3] vessels are registered in its managed region alone, and TFL report over 10 million passengers now travel on the Thames each year, a growth of 20% year on year from 2013/14 - 2014/15, [4]. We should also recognise the Mayor of London's 2012 River Action Plan where he set a target of 12 million passengers by 2020. This is in contrast to the DFT's own statistics for the entire UK's shortsea travelling passengers at 21 million in 2015 [5] (of which 13 million are in Dover), if using "all journeys", the figure is 23 million in 2014 [5]. In summary, this activity contributes over £1bn [6]to the economy and supports 44,000 jobs [6] and is on par with the combined UK figure on international passenger numbers. Smooth, safe and effective running of the London regulatory environment is essential to protecting this market.</p> <p>Additionally, with the MCA's review and subsequent implementation of Class V standards made by Lord Justice Clarke's report, combined with the Thames Tideway tunnel, and the large investments at Thames Gateway, London and the Thames in 2018 will enter a period of peak operation. The need for a dedicated office to coordinate the complex and unpredictable nature of regulatory work during this period is paramount to maintaining the standards the industry expects of the MCA. Nonetheless, <b>Redacted</b> issues this stark warning: If vessels are not permitted to operate due to the MCA's closure of its local office, leading to issues such as miscommunication, poor availability, differing applied standards, or poor co-ordination with surveyors, London's economy will suffer. It is simply too big a market to ignore.</p> <p><b>Redacted</b> has experienced first-hand the failings of having a regional office based so far from its area of operation. Thus <b>Redacted</b> is able to comment with the benefit of hindsight. We incorporate our practical experience of the "remote office surveyor system" within our responses below.</p> <p>The suggestion to close "leased offices" against "freehold offices" as per the Government's Estates policy, naturally means the Orpington office would understandably be vulnerable to closure because of its leased status. However, there is an assumption within the question that some offices remain "open". The consultation document is silent on the logic of keeping some offices open but others closed. Given the data we provided in the introduction to our response it does not seem logical, prudent or safe to close an office in the vicinity of the second largest port in the UK. The logic of such a closure has not been outlined within the consultation document.</p> <p>How can a decision to close Orpington be justified given</p> <ol style="list-style-type: none"> <li>The need for coordinated surveyor flexibility is absolutely essential.</li> <li>The significance of a high risk River with a very heavy passenger carrying load must be managed by senior experienced MCA surveyor personnel.</li> <li>The need to achieve an appropriate level of safety, including policing and monitoring risk and the need to exchange information through an office based management system is absolutely essential.</li> <li>The evidence seen and experienced by <b>Redacted</b> is that the present system is only just coping and any diminution in service will mean a real and unacceptable increase in risk.</li> </ol> <p>An office location within the M25 ring for the River Thames is absolutely essential if statutory safety levels are to be maintained. If Orpington is to be closed because of its leased status, the Estates Office must, with all the accommodation at its disposal in Central London, accommodate a relocated Orpington office within one of its existing locations. Institutions which could be approached include:</p> <ul style="list-style-type: none"> <li>• Department for Transport</li> <li>• Environment Agency</li> <li>• Police or Fire and Rescue services such as London River Fire Service, or Marine Police Unit.</li> <li>• Port of London Authority</li> <li>• International Maritime Organisation</li> <li>• Lloyds Classification Society</li> </ul>

		The Port of London Authority operates from two locations (Tower Pier and Gravesend) to cover the 96 miles of the River Thames which falls under its navigational responsibilities. This arrangement is to ensure an appropriate level of safety on the River and client flexibility and responsiveness is maintained. Improvements in how the PLA relate to operators through their close proximity and stakeholder relationships has significantly improved safety as has been borne out by the data where incidents fell from 196 in 2013 to 156 in 2014 continuing the downward trend [8].
REXT0055	Organisation	Due to the additional travel costs from Aberdeen another laydown or facility close to Inverness could be helpful.
REXT0056	Organisation	Redacted managed vessels are not directly affected by the proposed closure of Marine Offices.
REXT0057	Organisation, 100+	Redacted supports the MCA's efforts to modernise its survey and inspection functions to ensure it continues to meet the UK's statutory responsibilities and to provide better support to its customers. However, it will take time for any changes to have concrete effects, and in the immediate term the number and depth of experience of MCA surveyors is likely to continue to dwindle. It will therefore be important to ensure that the MCA continues to provide a multi-skilled workforce at each location. It would seem counter-productive to disperse surveyors through a wider network of fewer offices, if individual offices then need to call upon surveyors from other offices further away for particular audits or surveys. A more robust programme should be in place to ensure surveyors from each location have the appropriate expertise for ISM, ISPS, ISO and MLC etc. Regarding the locations of the regional marine offices, Redacted supports the proposal to retain the Aberdeen office. Aberdeen is the key hub for the offshore sector, and over the years the Aberdeen office has built up significant and valuable expertise on the specific design and operational requirements of the offshore support sector.
REXT0058	Organisation	I do not feel able to comment on this, as in my opinion, we receive a very efficient service from the Norwich Marine Office and would very much like this to continue.
REXT0059	Organisation	Unknown, the consultation is solely concentrated on the 16 marine offices and does not include any other MCA property, in addition given the large list of unused government buildings within the locations scheduled for proposed closure it would be more efficient to retain these office locations within existing government owned properties.
REXT0060	Individual	None - I find the local Orpington office extremely efficient.
REXT0061	Organisation, 31 – 100	Facility for surveyors to work from home, subject to suitable home locations relative to shipping activity. - The concern is centralisation of MCA offices will result in reduced response times and availability of surveyors. Additionally we could face increased survey costs due to surveyors travelling greater distances
REXT0062	Organisation, 100+	The service ourselves, our students and the employers we work with from the Norwich MO in very effective as it is.
REXT0063	Organisation	Office Estate – While it appears entirely sensible to relocate and reduce the number of offices, Redacted has grave concern over the intended closure of the office in Newcastle. Closure would be detrimental not only to the North East of England but in particular to one of the four major nautical colleges in the UK. While accepting there is no such office at Fleetwood, the distance to Liverpool is relatively short whereas from South Shields to the nearest Marine Office it is considerable and transport links are poor. Therefore Redacted strongly urges that a Marine Office be retained in the locality.
REXT0064	Organisation, 100+	<p><b>Marine Office network</b> - Redacted believe that the Marine Office network is a vital link between port communities, seafarers, ship owners and MCA Surveyors. There is considerable potential in the MCA's proposals for the historic link between port communities and the shipping industry to further diminish, especially in areas of high unemployment, such as Plymouth and north east England. More practically, we are concerned by the potential loss of local knowledge of ports infrastructure and the regulatory requirements attending shipping movements, particularly in the offshore supply and cargo sectors. The loss of the Tyne Office would be particularly damaging, for a number of reasons and the following facts support our case for the retention of a Marine Office in Newcastle.</p> <ul style="list-style-type: none"> <li>• The Tyne Marine Office covers the coastline from Berwick to Whitby, covering the Ports of Berwick, Blyth, Tyne, Sunderland, Seaham and the Tees.</li> <li>• Teesport has over 5,000 ships call per year and is a one hour drive from the existing Tyne Marine Office. As a result, Teesport is the most frequent port visited by the MCA for Port State Control inspections and surveys.</li> <li>• The port of Tyne sees 3,000 ship visits a year, totaling 26 million tons. Again Port State Control carries out frequent inspections at the numerous berths and the river Tyne.</li> <li>• The Port of Sunderland has dry dock facilities, crucial to the maintenance of a diverse range of shipping, particularly in the offshore supply sector. Again, the MCA again frequently are requested to attend the port to carry out surveys.</li> <li>• Tyne Marine Office has the highest number of members of MCA Survey and Inspection team based in the Marine Office network.</li> <li>• The Marine Office is located just inside Port of Tyne dock gates. It provides valuable services to local seafarers through walk-ins for advice on legislative, certification and operational matters.</li> <li>• Workers in the fishing industry are also reliant on the Tyne Marine Office for guidance on a range of matters affecting their industry.</li> <li>• It is estimated that the Tyne Office currently receives at least three new cases per week of seafarers seeking guidance on updating training certification and qualifications to comply with changes to the Standards in Training, Watchkeeping and Certification (STCW) due to come into effect on 1<sup>st</sup> January 2017.</li> <li>• The Tyne office handles the most seafarer oral examinations across the Marine Office network. Last year, it handles over 1,200 and has carried out nearly 7,700 since 2009-10.</li> <li>• Like many other Marine Offices it also provides a counter service to cater for issues such as discharge books, seaman's cards and other certification, which can be turned around in one hour.</li> </ul> <p>Following its discussion of the MCA's proposals, Redacted in the North East Shipping Branch made the following comment:  <i>"The Branch feel the closure of the Port of Tyne office and opening an office a Bridlington will open the North East coast to be exploited by shipping companies when inspectors maybe working from home and do not have a central centre to coordinate their inspections and monitor shipping movements along the North East coast."</i></p> <p>The Redacted reiterates the call from the North East Shipping Branch for the MCA to keep the Tyne Office open.</p> <p><b>Seafarer services</b></p> <p>Data relating to the <i>existing</i> Marine Office network contained in Written Answers to Parliamentary Questions (and not in the MCA's consultation document) provide a clearer picture of the significance of Marine Office services for UK based seafarers. The information (written Answer 19<sup>th</sup> April 2016 to PQ 33599) reveals that the number of seafarers using Marine Office services between 2009-10 and 2015-16 jumped by nearly 1,400, an increase of 30%. As stated above in the case of the Tyne office, we accept that some of the recent increases will be due to seafarers updating or checking compliance of their training qualifications with the amendments made in 2010 to the IMO Convention on Standards in Training, Watchkeeping and Certification (STCW) due to come into effect internationally on 1<sup>st</sup> January 2017.</p>

		It is clear, however, that international maritime regulations affecting seafarer qualifications are subject to regular amendments and the introduction of the ILO Maritime Labour Convention in 2014 provides minimum employment and safety standards for all seafarers working in the shipping industry. It is therefore essential that the Marine Office presence continues in maritime centres that retain a high number of seafarers working in the industry, such as north east England. In addition, the key issue of seafarer safety is also addressed and better maintained when an open and active Marine Office is available to service the needs of MCA Surveyors discharging the UK's Port State Control responsibilities. With 18 members of the MCA Survey and Inspection team currently based at the Tyne Marine Office, it is clear that a permanent S&I presence in the port and north east England region is essential.
REXT0065	Redacted	Redacted
REXT0066	Organisation, 100+	<p>Concerns at the closure of local marine offices.</p> <p>a) We are concerned that the closure of local marine offices will lead to increased traveling times for surveyors and in so lead to increased costs for operators, some of whom are operating to extremely tight budgets in the seasonal tourism industry</p> <p>b) We are concerned that the should a surveyor have to travel a fair distance then the current practice of splitting travelling time where possible between different operators will have to cease due the limited time available to conduct a survey.</p> <p>c) Currently many operators in our association have built up a good working relationship with the local marine office. This includes both admin staff and surveyors. Breaking this relationship may lead to difficulties in resolving some quite simple issues.</p> <p>d) We are concerned that a central booking service may result in different surveyors attending follow up visits, leading to the repeated need to discuss complex issues therefore taking up valuable surveyors and operator's time and adding significantly to operator's costs.</p>
REXT0067	Organisation	<p>I wanted to say how important it is to our business that MCGA continue to carry out Class VI survey work. We have always had an excellent working relationship with Falmouth, our local Marine Office. I find them extremely helpful and their experience enables us to agree non conformities and defects in a mutually acceptable manner. The use of risk assessed based decisions are extremely useful to our operations and they are able to provide us with excellent advice. I am positive that such flexibility would not occur if class VI vessels were derogated to another Certification Society.</p> <p>We have always had extremely good levels of service from Falmouth Marine Office. I would hope that the proposals would build on this success and we continue to have good working relationships with both our local Marine Office and the MCA in the wider sense.</p>