

## **A Consultation on Changes to MCA Survey and Inspection**

### **Marine Office Locations**

### **External Responses**

### **General Comments**

Response ID	Represent Person or Organisation? (size if applicable?)	Response
REXT0045	Organisation, 100+	<p>Your consultation document published on 22 March 2016 invited comments on proposed changes to the ways of working of the MCA's Survey &amp; Inspection service and to the network of Marine Offices. <b>Redacted</b> is pleased to respond.</p> <p><b>Redacted</b> is the <b>Redacted</b> UK-based shipping industry, with over 170 members from all segments of the shipping industry and wider maritime sector. Our membership includes a large part of the MCA's customer base, including the operators some 353 ships under the UK flag totalling 4.53m GT and the employers of 8,442 UK Merchant Navy officers and 9,567 UK ratings. This response is submitted on their behalf, and reflects views gathered through bespoke correspondence relating to these proposals and expressed in numerous meetings where such matters have been discussed for several years.</p> <p><b>Redacted</b> welcomes the MCA's commitment to improving the standard of service it provides to its customers, and welcomes this consultation exercise as a step towards that objective. We share the aim of the MCA that the Survey and Inspection service should provide a service comparable with that provided by highly-regarded Flag Administrations overseas so that operators of ships under the UK flag are in a position to compete on an equal footing with operators of ships flagged elsewhere and that further tonnage can therefore be attracted to the register.</p> <p>Similarly, <b>Redacted</b> sees clear scope for improvement in the examination and certification service the MCA provides to UK seafarers. Such individuals (unlike shipowners who can choose to register their ships in the UK) are captive customers, and the MCA therefore has a special duty towards them.</p> <p>Our comments relate to the MCA's role as a service provider to owners of UK-flag ships and to British seafarers. We do not seek, on this occasion, to comment on the MCA separate policing role under Port State Control given that these two functions are distinct, notwithstanding the fact that the MCA currently uses the same set of personnel to perform them both.</p> <p>It is also our view that insufficient prominence has been given in the review to improving the level of service provision by delegating additional powers to Classification Societies. The retention of a monopoly position by a public body is perceived by both Government and industry to be undesirable and a move towards a mixed public/private model for delivery is therefore thought to be essential.</p>
REXT0046	Organisation, 100+	<p>We can make comments regarding aspects not specifically included in this consultation. These will be noted but will not be taken forward by the S&amp;I programme. Being mindful of this I have tried below to remain true to the questions in the hope that at a further date we will get the opportunity official to challenge the MCA of survey consistencies across Scotland. There is work going on at the moment however to create Aide Memories for all size of fishing vessels. These aide memories will be an agreed instruction note to MCA surveyors and can be used by fishermen. It will assist members to prepare their boat for survey and if during an inspection a surveyor deviates from the document he/she will need to explain to the skipper there reasons for doing so.</p>
REXT0053	Organisation, 100+	<p><b>General comments</b></p> <p><b>Redacted</b> has a number of concerns about these proposals and the consultation process in addition to considering our response to the consultation questions. These include safety issues which require direct intervention from the inspectorate (eg the safety of lashings), seafarer welfare issues, environmental issues, developing issues in the industry which need to be considered eg offshore windfarms and expansion of cruising and other traffic, national security issues, the location of the offices themselves and the short timescale for this consultation. Referring to the introduction to the consultation paper, <b>Redacted</b> agrees that the UK "must have a strong and effective survey and inspection regime capable of ensuring the safety of the industry while delivering commercially attuned support". We also agree that "effective survey and inspection is key to.. compliance and must be robust ..."</p> <p>We believe that the proposals being made will not achieve these stated objectives and wish to object to any proposals to cut a service which is already severely curtailed.</p> <p>We strongly object to any of the essential services provided by the MCA being privatised as this could have adverse effect on the impartiality and effectiveness of the service.</p> <p>We are also extremely concerned that this important consultation is being carried out over one month only which limits the ability for the industry to respond meaningfully. Given its implications we request that the consultation is extended for a further 2 months to enable substantive responses to be made from across the ports industry.</p>
REXT0063	Organisation	<p><b>Redacted</b> thanks you for the opportunity to comment on the above document. However, we would like to express grave concern over the limited timeframe for this consultation. Furthermore it would appear that the changes have either already taken place or been pre-determined. <b>Redacted</b> understands the necessity for cost reduction and the advantages that advances in technology can offer. However, this should not be used as a means of reducing either the service to ship owners and seafarers and/or a reduction in the level of safety associated with UK registered vessels.</p> <p>Survey and inspection of vessels is inextricably linked to the overall quality of service, including examination of seafarers for certificates of competency. Therefore it is important that an adequate survey and inspection service is retained, as is the capability for oral examinations throughout the United Kingdom. In a competitive labour market, with the reducing number of UK certificated officers and relatively poor compensation it is inevitable that there will be a shortage of suitably qualified personnel. <b>Redacted</b> has warned of this situation, not over years but decades.</p> <p>The split of the UK Ship Register away from the regulatory and safety management activities of the MCA is somewhat illusory given the lines of reporting and accountability.</p> <p>It is generally accepted that application for and granting of certification is undertaken centrally in order to combat fraud. However, we believe that this could be effected more easily by online application with document checks being undertaken prior to the oral examination. This would remove the possibility of loss of documentation and speed up the both the application and renewal process.</p>

REXT0065	Organisation, 100+	<p>The <b>Redacted</b> organises seafarer ratings working in the domestic short sea shipping sector, predominantly passenger and freight ferries and offshore supply vessels but also including the Royal Fleet Auxiliary, passenger cruise ships and marine research vessels. We represent nearly 6,000 UK seafarers working at sea today, predominantly as ratings in the catering, engine and deck departments. <b>Redacted</b> welcome the opportunity to respond to the MCA's consultation over the future organisation of the national network of Marine Offices and the working practices of the Survey and Inspection team in the MCA.</p> <p><b>Key points</b></p> <p>The <b>Redacted</b> submission makes the following key points:</p> <ul style="list-style-type: none"> <li>• The proposed net reduction of seven Marine Offices between 2014 and 2019 is a risk to the MCA's survey standards and the provision of seafarer services.</li> <li>• The loss of the Tyne Office would be particularly damaging, given the estimated 8,000 annual ship movements at Tyne Port and Tees Port alone and its status as the busiest Marine Office for seafarer oral exams.</li> <li>• Between 2009-10 and 2015-16 the number of seafarers using the Marine Offices network to keep their certification updated increased by 30%.</li> <li>• The proposed location of the new network of Marine Offices overlaps with the MCA's earlier reforms to the UK Coastguard.</li> <li>• The proposal to effectively privatise international strands of the MCA's survey and inspection role is a serious threat to high regulatory standards with which the MCA, the Red Ensign and the Red Ensign Group is rightly associated.</li> </ul>
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