

Consultation Document:

The draft Merchant Shipping (Nuclear Ships) Regulations 2021

Summer 2021

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Section 1: Overview of this consultation

Aim

1.1. This consultation seeks your views on the proposed Merchant Shipping (Nuclear Ships) Regulations 2021, which will transpose Chapter VIII of the International Convention for the Safety of Life at Sea, 1974 ('SOLAS' or 'the Convention') into UK law. Views are also sought on the draft Marine Guidance Notice (MGN).

Views sought

- 1.2. Consultees are invited to comment on any aspect of this consultation; however, you are specifically invited to respond to the consultation questions in Section 5.1. A more indepth explanation of the areas for consideration can be found in Section 2 of this document.
- 1.3 A full list of consultation questions is contained in Section 5 of this document.

Deadline for responses

1.4 Responses are welcomed from the 12th August 2021 until the 5th of October 2021.

Section 2: Areas for consideration

Background

2.1 SOLAS is regarded as the most important of all international treaties concerning merchant ships. It was first adopted in 1914 after the Titanic disaster, a second version in 1929, a third in 1948, a fourth in 1960, and the last version in 1974. The Convention in force today is sometimes referred to as SOLAS 1974. This has been updated and amended on numerous occasions.

The UK is committed to enabling the adoption of new technologies that manufacturers and ship owners may choose to meet legal requirements relating to air pollution and greenhouse gas emissions, and therefore will establish a regulatory framework that will support nuclear-powered ships as an alternative fuel option.

Chapter VIII of SOLAS relates to nuclear ships. It sets out the basic requirements for nuclear-powered merchant ships with especial attention to radiation hazards. In addition, a detailed and comprehensive Code of Safety for Nuclear Merchant Ships was adopted by the IMO Assembly in 1981 in Resolution A.491(12) ('the Nuclear Code'). The Nuclear Code places particular importance on the approval of the installation of nuclear reactors, their suitability for use on board ships, the safety assessment of the nuclear plant and ship to prevent unreasonable levels of radiation, operating manuals and their adequacy to ensure safety levels, survey requirements and limitations due to the presence of radiation, the issuing of certificates for nuclear passenger ships and nuclear cargo ships, special controls prior to entering a port, and what to do when casualties occur.

The UK is behind with implementing Chapter VIII into UK law. The UK has an obligation in international law, as a signatory to SOLAS, to keep domestic law in line with the updates to the Convention. Secondary legislation has therefore been developed (the draft Merchant Shipping (Nuclear Ships) Regulations 2021) and, once made, this instrument will implement Chapter VIII, and also the Nuclear Code, in UK law. The legislation is referred to in this consultation document as 'the proposed Regulations'.

The UK currently lacks experience of commercial nuclear-powered ships, as there is none on the UK flag and no nuclear-powered ships visiting UK waters. We therefore intend to establish a legal framework for nuclear ships that may flag in the United Kingdom and for any visiting foreign nuclear ships. The accompanying MGN will be expanded further in the future as experience is acquired.

- 2.2 The proposed Regulations will also include an ambulatory reference provision to ensure that any future amendments to provisions in Chapter VIII of SOLAS that are referred to in the Regulations are automatically implemented into UK law. They will also include provision to allow amendments to the Nuclear Code to be included in UK law by publishing the changes in a Merchant Shipping Notice. The latter provision is of greater significance as a large number of references are made to the Nuclear Code in the proposed Regulations, but only a few references are made to requirements in Chapter VIII. Together, these methods of updating are referred to as 'ambulatory reference provision'.
- 2.3 If the UK has objected to an amendment in the IMO but that amendment is nevertheless accepted and comes into force internationally, the Secretary of State may make secondary legislation to prevent it coming into force domestically. An amendment that is accepted and to which the UK did not object in the IMO will be publicised before it

- comes into force in a Written Ministerial Statement (WMS) and by way of a Marine Guidance Note.
- 2.4 UK domestic shipping accounted for 5.0 metric tons of CO2 equivalent in 2017, equating to 1% of all domestic emissions. Domestic and international shipping together were responsible for 13.87Mt of CO2 equivalent in 2017. Many green fuels are being looked at by industry and the Government as part of the UK Clean Maritime Plan towards zero emission shipping, including nuclear, covering:
- Hydrogen fuels
- Ammonia fuels
- Methanol fuels
- LNG fuels
- 2.5 It is unclear at this time which fuels will dominate. However, due to the high costs of nuclear power and its unique features, it is not expected to be widely rolled out for traditional shipping and is not listed in the UK Clean Maritime Plan.

Application

- 2.6 The proposed Regulations apply to United Kingdom nuclear ships, wherever they may be, and to non-United Kingdom nuclear ships while they are within United Kingdom waters. They do not apply to ships of war and naval auxiliaries or ships owned or operated by a State and engaged only on governmental non-commercial service.
- 2.7 At present¹, the UK does not have any nuclear ships on its flag and has not ever had any on the flag. There is a potentially lengthy time associated with the design and build of a nuclear reactor and a bespoke vessel to accommodate this. The MCA is unaware of any existing or upcoming plans for a nuclear ship to be built in the UK and the likelihood of such a ship being constructed here is quite low given that the UK has never had a nuclear ship on its flag. It is therefore assumed that there will be no nuclear vessels registering in the UK over the appraisal period, resulting in no additional costs to industry.

Proposal

- 2.8 There is currently no UK legislation that applies to merchant nuclear ships and this is the first. Accordingly, the objective is to allow for the use of nuclear power for UK ships, and the reception of nuclear ships in UK waters. In accordance with SOLAS Chapter VIII, there will be no exemptions for nuclear ships from the requirements of the Regulations.
- 2.9 The 2021 Regulations will introduce a pre-commissioning test programme and surveys dedicated to nuclear ships. Surveys of a nuclear ship must be carried out during the construction phase, and trial phase, mainly for quality assurance purposes but also to verify that the ship is built in conformity with the requirements of regulation 19 of the

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¹ 2021

2021 Regulations, which include the requirements of Chapter 8 of the Nuclear Code (surveys), and with any added recommendations. In addition, the nuclear component of a nuclear-powered vessel should be surveyed during the operational phase as required by paragraphs 8.4 and 8.5 in Chapter 8 of the Nuclear Code, which supplement the periodical surveys required by Chapter I and Chapter VIII of SOLAS.

2.10 In order to provide guidance, the proposed Regulations are supported by a Marine Guidance Notice. In relation to the specific technical requirements for nuclear ships, the proposed Regulations and MGN refer to the Nuclear Code. The Code provides internationally accepted safety standards for the design, construction, operation, maintenance, inspection, salvage and disposal of nuclear merchant ships. The Code contains requirements in eight Chapters, with six appendices:

Chapter 1 General

Chapter 2 Design criteria and conditions

Chapter 3 Ship design, construction and equipment

Chapter 4 Nuclear steam supply system (NSSS)

Chapter 5 Machinery and electrical installations

Chapter 6 Radiation safety

Chapter 7 Operation

Chapter 8 Surveys

Appendix 1 Sinking velocity calculations

Appendix 2 Seaway loads depending on service periods

Appendix 3 Safety assessment

Appendix 4 Limiting dose equivalent rates for different areas and spaces

Appendix 5 Quality assurance programme (QAP)

Appendix 6 Application of single failure criterion

Summary of Options and Recommendations

- 2.11 The following options were considered:
 - Do nothing:

This option would mean that UK law does not reflect the requirements in SOLAS for nuclear ships. This is not viable as it would limit UK flagged vessels' choice and market growth, leaving them at a possible disadvantage and would lead to reputational damage for the UK. A failure to have in place a regulatory regime for foreign nuclear ships that may visit UK waters would also be risky as the UK may not be consistent with international safety standards.

• Option 1- Publish guidance to industry directing them towards the international standards:

This is not seen as a viable option as the UK has an obligation to reflect the requirements of Chapter VIII in UK law and the safety standards would not be enforceable, creating a risk of non-compliance.

• Option 2 - Bring SOLAS Chapter VIII into UK law by making Regulations (no ambulatory reference provision):

SOLAS Chapter VIII would be brought into UK law, closing the current regulatory gap which exists for nuclear vessels but without including any ambulatory reference provision. This may leave the possibility of updates to the Convention and the Nuclear Code being delayed, leaving UK law and international standards out of alignment.

 Option 3 - Bring SOLAS Chapter VIII into UK law by making Regulations and including ambulatory referencing provision:

This would achieve the same benefits as option 2. Furthermore, including ambulatory reference provision will also ensure that UK legislation remains up to date and in line with its international counterparts if amendments are made to the matters in Chapter VIII or the Nuclear Code referenced in the Regulations.

- 2.12 Our preferred option is 3, as this is the first time that Chapter VIII of SOLAS has been transposed into domestic legislation, and there is no other domestic legislation that relates to nuclear-powered ships.
- 2.13 Costs and benefits have not been monetised as the UK does not currently, nor is expecting to have in the short term, any nuclear ships on its flag. In relation to the impacts associated with the above-mentioned options, it is considered that the 'do nothing' option and option 1 would have very limited or negligible immediate costs but would expose the UK to reputational damage and create a risk to safety which could lead to a significant actual cost. In relation to the cost associated with compliance with the requirements proposed in options 2 and 3, it should be noted that these regulations are implementing, for the first time, the regulatory framework needed to enable the adoption of nuclear propulsion based on internationally accepted standards such as SOLAS and other standards developed in the IMO.

Supporting Information

- 2.14 Proposed Regulations (Annex A)
- 2.15 Marine Guidance Notice (Annex B)

This notice provides guidance on the application of the proposed Regulations and covers the following areas: approvals (general) and surveys, reactor installation, safety assessment, 'Quality Assurance Programme', operating manual, radiation safety, manning and training, ports.

Offences and Penalties

2.16 The MCA, as the UK's maritime regulatory and enforcement authority, has responsibility for both delivering and enforcing the Government's maritime policy relating to ships, seafarers and the seas around the UK. The MCA's approach to breaches of maritime legislation relies on a range of civil and criminal remedies in which, like many other

regulatory regimes in the UK, civil and criminal sanctions sit alongside each other to enable the MCA to take the most proportionate action in relation to a particular breach. The decision on what is the most proportionate approach is determined by matters such as the importance of the requirement being breached, the gravity of the contravention, the effect of the contravention on third parties etc.

- 2.17 MCA surveyors have enforcement and sanction powers which can be applied locally to ships calling at UK ports. The MCA's powers to use civil sanctions are primarily contained in the Merchant Shipping Act 1995 ('MSA'). These powers, including improvement and prohibition orders, are limited in scope and are available only for specific purposes. Other than the power to detain a ship, it is not possible to replicate all the civil sanctions in the MSA in secondary legislation implementing international obligations or other policy objectives as there is no power to do so in the MSA. Because these civil sanctions are contained in primary legislation (the MSA), if they are needed, the sanctions will be enforced directly under the MSA. The general policy approach, in line with the MCA's published enforcement policy, is to use these civil sanctions whenever possible before using criminal offences. The MCA is aware that other legislation provides a means of introducing new civil sanctions, and this is currently the subject of a formal review.
- 2.18 Maritime regulatory requirements govern both safety and pollution prevention. As such, their purpose includes the prevention of loss of life or injury to persons and the protection of the marine environment and adjoining coastlines. These very compelling objectives necessitate the availability of criminal sanctions in the more serious cases, and also provide a vital deterrent. To this end, criminal offences are included in the proposed Regulations and are set out in the table below.

2.19 Offences and penalties created by the proposed regulations:

Offence	Reg.	Committed by	Penalty	
requirement for safety assessment;	7(1)	owner and master of a nuclear ship in respect of each case of non-compliance.	a) on summary conviction— i) in England and Wales by a fine; or ii) in Scotland or Northern Ireland by a fine not exceeding the statutory maximum; or b) on conviction on indictment by imprisonment for a term not exceeding two years, or a fine, or both.	
design and construction of nuclear ships	8	owner and master of a nuclear ship in respect of each case of non-compliance.	as above	
suitability of reactor installation for service on board a ship	a nuclear ship in respect of each case of non-compliance.		as above	
approval of reactor installation	10	owner and master	as above	
radiation safety	11	owner and master of a nuclear ship in respect of each case of non-compliance.	as above	

general	12 (in so	owner and master of	as above
operating	far as this	a nuclear ship in	
requirements for	relates to	respect of each case	
		of non-compliance.	
nuclear ships	а	or non-compliance.	
	contraven		
	tion of		
	paragrap		
	h 7.1.1 or		
	7.1.4 in		
	Chapter 8		
	of the		
	Nuclear		
	Code)		
general	12 (in so	company	as above
operating	far as this		
requirements for	relates to		
nuclear ships	а		
	contraven		
	tion of		
	paragrap		
	h 7.1.3 in		
	Chapter 7		
	of the		
	Nuclear		
	Code)		<u> </u>
safety	13(1),	owner and master of	as above
assessment –			40 40010
	(2)(a) or	a nuclear ship in	
operational	(b), or (3)	respect of each case	
requirements		of non-compliance.	
operating	14(1),	owner and master of	as above
, ,			as above
manual	(3)(a) or	a nuclear ship in	
	(b), (4) or	respect of each case	
	(5)(a) or	of non-compliance.	
	1. 1 1 1	or non compliance.	
	(b)		
(additional	15(1),	owner and master of	as above
operating	(2)(a) or	a nuclear ship in	
documentation	(b), (3),	respect of each case	
documentation			
	(4) or (5)	of non-compliance.	
emergency	16	owner and master of	as above
operation		a nuclear ship in	
•			
procedures		respect of each case	
		of non-compliance.	
maintenance	17	owner and master of	as above
and repair		a nuclear ship in	
and repair			
		respect of each case	
		of non-compliance.	
manning and	18(1)	owner and master of	as above
training	(.)	a nuclear ship in	
Hairing			
		respect of each case	
		of non-compliance.	
surveys of	19(1)(a),	owner and master of	as above
United Kingdom	(b) or (c),	a nuclear ship in	
United Kingdom			
nuclear ships	(2), (3),	respect of each case	
	(4), (6),	of non-compliance.	
	(7), (8),	1	
	(9) or		
	(11)(a),		
	(b), (c) or		
	(d)		
roquiromont to		owner and master of	as abovo
requirement to	20(3)		as above
hold on board a		a nuclear ship in	
nuclear ship		respect of each case	
safety certificate		of non-compliance.	
	22(4)		as above
responsibilities	22(1)	owner and master of	as above
of owner and		a nuclear ship in	
master		respect of each case	
1		of non-compliance.	
manala ila iti	00		h
prohibition on	26	owner and master of	as above
proceeding to		a nuclear ship in	
sea or on a		respect of each case	
voyage without			
		of non-compliance.	
the appropriate			
certificate			

quality.	27	owner and master of	Los above
quality assurance programme	27	owner and master of a nuclear ship in respect of each case of non-compliance.	as above
decommissioning of nuclear ships	28	the master in respect of each case of non- compliance.	as above
loss of a nuclear ship	29(a) or (b)	master	as above
failure to have safety assessment ready for examination	13(2)(c)	owner and master of a nuclear ship	on summary conviction— in England and Wales by a fine; or in Scotland or Northern Ireland by a fine not exceeding the statutory maximum; or on conviction on indictment by imprisonment for a term not exceeding six months, or a fine, or both.
failure to have operating manual ready for examination	14(5)(c)	owner and master of a nuclear ship	as above
failure to have additional operating documentation ready for examination	15(2)(c)	owner and master of a nuclear ship	as above
failure to have results of surveys and tests readily available for examination	19(11)(e)	owner and master of a nuclear ship	as above
failure to have nuclear ship safety certificate ready for examination	20(4)	owner and master of a nuclear ship	as above
falsification of certificate etc	24(3)	the person in question.	as above
compliance with conditions of approval	18(9)	a person approved by the Secretary of State under regulation 18(3) (approval of person to provide training)	on summary conviction— in England and Wales by a fine; or in Scotland or Northern Ireland by a fine not exceeding the statutory maximum; or on conviction on indictment by a fine.
providing training without approval etc.	18(11)(a), (b), (c) or (d)	a person approved under regulation 18(3)	on summary conviction— in England and Wales by a fine; or in Scotland or Northern Ireland by a fine not exceeding the statutory maximum; or on conviction on indictment by a fine.

Section 3: Responding to this consultation

3.1 There are specific questions highlighted in Section 5 of this document and information on how to respond to this consultation document.

Consultees

3.2 Anyone may respond to this consultation and consideration will be given to all responses. We will be particularly interested to hear from: owners/operator of cargo and passenger ships, ports, terminals, shipbuilders, ship designers, UK's Recognised Organisations, UK Government Department for Business, Energy & Industrial Strategy, the Civil Nuclear Constabulary (CNC) and the Office for Nuclear Regulation (ONR).

Duration

3.3 This consultation is open for eight weeks from the 12th of August 2021. The deadline for responses is the 5th of October 2021.

Submitting your response

- 3.4 Consultation responses should be emailed to <u>carolina.dopico@mcga.gov.uk</u>. Any questions should also be sent to this email address. You can also send in your response by post. [During the current COVID-19 pandemic we are working away from the office and the collection of post is limited.]
- 3.5 When responding, representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions.

Freedom of Information

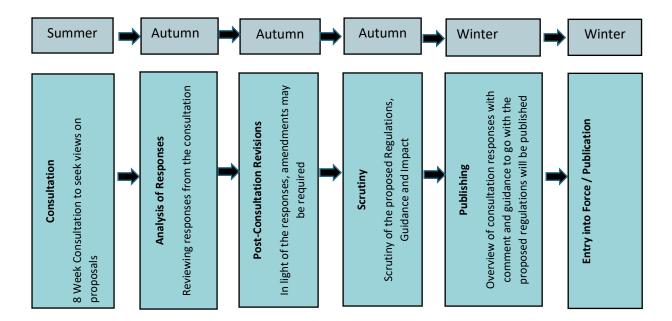
- 3.6 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.
- 3.7 If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.
- In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department/MCA.
- 3.9 The MCA will process your personal data in accordance with the data protection framework and, in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Data Protection

- 3.10 This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain information that allows you to be identified, under data protection law, the MCA, as an Executive Agency of the Department for Transport, will be the Controller for this information.
- 3.11 The MCA will use your contact details to send you information about the consultation, for example if we need to ask follow-up questions. You do not have to give us this personal information but if you do choose to provide it, it will not be used for any other purpose without your permission.
- 3.12 Details about how the MCA looks after personal data, your rights, how to complain, and how to contact our Data Protection Manager can be found on gov.uk at:
 - https://www.gov.uk/government/organisations/maritime-and-coastguard-agency/about/personal-information-charter
- 3.13 Your information will be kept securely on the MCA's IT system and any written responses will be held in a secure file and cabinet and kept for up to five years, until a post-implementation review has been completed.
- 3.14 If you do not wish to remain on this list, please let us know at: carolina.dopico@mcga.gov.uk

Section 4: Outline of plans beyond this consultation

- 4.1 Once this consultation closes, we will review all responses. In considering the responses we will apply appropriate weight to those from organisations and individuals with specialist knowledge of the subject area.
- 4.2 We will be analysing the responses during October 2021. Our aim is to publish an overview of the responses and the MCA's comments by the 1st of November 2021, which will be available on www.gov.uk along with the consultation.
- 4.3 Where appropriate the proposed Regulations/Guidance, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
- 4.4 Our aim is for the regulations to come into force mid to late December 2021. The Regulations will be published on www.legislation.gov.uk
- 4.5 Every effort will be made to publish the revised accompanying guidance on gov.uk in advance of December 2021.
- 4.6 An overview timetable is below for reference:



Section 5: Response form

Wha	at is your name?			
Wha	at is your email address?			
Wha	at is your job title?			
	•			
	en responding please states estates estates estates estates and the views of an		e r	esponding as an individual or
	I am responding as an indi I am responding on behalf			
	(name of organisation)			
	ase check the box that be anisation:	est describes you	as	a respondent and the size of your
Res	pondent Type	Si		of Organisation
	Classification Society			Large business (over 250 staff)
	Government Agency/Depa			Medium business (50 to 250 staff)
	Individual			Micro business (up to 9 staff)
	Legal representative]	Small business (10 to 49 staff)
	Protection & Indemnity Seafarer			
	Ship Operator			
	Ship Owner			
	Trade Union			
	Other			
	(please describe)			

Consultation Questions

During the consultation phase for these proposed Regulations, we ask that consultees provide evidence of the costs and benefits of this policy wherever possible.

- 1) Do you think that there exists industry appetite for new nuclear ships within the appraisal period? Please detail the reasons for your answer. [The standard 10-year appraisal period has been used for the purposes of this consultation, in line with HMT's Green Book.]
- 2) Is the assumption that no new or existing nuclear ships will be flagged in the UK within the appraisal period of 10 years (2021 2030) accurate or inaccurate? If inaccurate, please detail why.
- 3) Is it accurate or inaccurate to assume operators/owners of nuclear ships would already follow the building and operating standards of the Nuclear Code in line with the international requirements by way of best practice, incurring no additional costs as a result of this legislation, apart from survey and certification? If inaccurate, what costs would be incurred? Please provide evidence where possible.
- 4) Do you think that best practice in the construction and safety standards could potentially be at a level higher than that contained within the Nuclear Code, taking into account its age (40 years old)? Please detail the reasons for your answer.
- 5) Do you foresee any unintended consequences of the proposed Regulations? If so, please provide any relevant evidence.
- 6) Do you think the proposed Regulations will impact on your business if so please summarise and provide evidence where possible?
- 7) Do you anticipate any practical difficulties in meeting the survey and inspection regime contained in the proposed Regulations? Please provide any evidence to support your answer.
- 8) Are there any costs or benefits which need to be considered?
- 9) We welcome your views and evidence on costs or benefits and any other aspects of this consultation.

Additional comments

Do you have any additional comments to add to the response?	
Please return completed response forms to carolina donico@mcga gov uk	

Alternatively, responses may be posted to:

Future Propulsion and Fuel Safety Team Maritime and Coastguard Agency Spring Place

Section 6: Conduct of this consultation

6.1 This consultation has been conducted in accordance with the Cabinet Office Consultation Principles.

Consultation principles

6.2 The Cabinet Office Consultation Principles can be found at Consultation Principles 2018.

Feedback on conduct of consultation

- 6.3 If you have any comments regarding the conduct of this consultation, please contact the Consultation Co-ordinator at consultation.coordinator@mcga.gov.uk.
- 6.4 We are continually trying to improve the way in which we conduct consultations and appreciate your views. We would be grateful if you could complete and return the attached feedback form. These should be submitted to the Consultation Co-ordinator and are not affected by the deadline for this consultation.
- 6.5 If you require this consultation in an alternative format, please contact either the Consultation Co-ordinator or the named official conducting this consultation.

MCA CONSULTATION FEEDBACK FORM

1. P	Please indicate on which Consultation you are providing feedback:
2a.	Please indicate whether you are responding on behalf of:
	 Yourself as an Individual A Trade Association A Company A Government Organisation A Trade Union Other
	(please specify)
2b.	If you are representing a company, please indicate the size of your company:
	☐ Micro (1-9 employees)
	☐ Small (10-49 employees)
	☐ Medium (50-249 employees)
	☐ Large (250+ employees)
2c.	Please indicate whether you accessed this consultation package through:
	□ Post □ email □ Website
3.	Please rate the quality of this consultation regarding accuracy, good English and spelling:
	 □ Very good □ Good □ Average □ Poor □ Very Poor
4.	Please rate the format of the consultation presentation (layout, Annexes etc.):
	 □ Very good □ Good □ Average □ Poor □ Very Poor

5.	Please rate the consultation in terms of how clear and concise you felt it was:
	□ Very good
	□ Good
	□ Average
	□ Poor
	□ Very Poor
6.	Did you feel that the consultation was conducted over a sufficient period of time?
	□ Yes
	□ No
7.	Were any representative groups, organisations or companies not consulted who you felt should have been?
	□ Yes
	□ No
	If yes, who?
8.	Please let us have any suggestions for improvement or other comments you wish to make about this consultation below:
Tha	nk you for your time. Please return this form to:
	The year territory readed retains time result to:
	sultation Co-ordinator,
	itime and Coastguard Agency,
	ng Place, Bay 3/26, 105 Commercial Road thampton SO15 1EG
	e-mail it to: carolina.dopico@mcga.gov.uk
16	
furth	ou are happy to supply your name in case we need to contact you to discuss your views ner, please enter it below (this is optional, and your feedback will still be taken into account u wish to remain anonymous):
Nam	ne
Tel.	No.

Please note that the deadline for responses to the Consultation itself does <u>not</u> apply to the return of this form.

The following Annexes can be found with this consultation document on the Gov.UK web site: www.gov.uk/government/publications

Annex A: Draft Merchant Shipping (Nuclear Ships) Regulations 2021

Annex B: Draft MGN