



Maritime &  
Coastguard  
Agency

Consultation Document:

Recasting the Merchant Shipping (Safety of Navigation) Regulations to reflect up to date requirements as contained in the International Convention for the Safety of Life at Sea (SOLAS)

September 2018

# Contents

<b>Section 1: Overview of this consultation</b>	<b>1</b>
Aim	1
Views sought	1
Deadline for responses	1
Overview Timetable	1
<b>Section 2: Areas for consideration</b>	<b>2</b>
Introduction	2
Use of Ambulatory Reference	3
Updates to bring UK requirements up to date with international ones	4
Areas within SOLAS Chapter V where the MCA has discretion in application	5
Penalties and Offences	6
Guidance for the Merchant Shipping (Safety of Navigation) Regulations	8
<b>Section 3: Responding to this consultation document</b>	<b>9</b>
Audience	9
Duration	9
Submitting your response	9
Freedom of Information and Data Protection	9
<b>Section 4: Outline plans beyond this consultation</b>	<b>11</b>
<b>Section 5: Response form</b>	<b>12</b>
<b>Section 6: Conduct of this consultation</b>	<b>18</b>
Consultation Criteria	18
Feedback on conduct of consultation	18
MCA consultation feedback form	19
<b>Annex A: Draft regulations – See separate document</b>	
<b>Annex B: Application of the recast Merchant Shipping (Safety of Navigation) Regulations – see separate document</b>	
<b>Annex C: Proposed Offences and Penalties recast Merchant Shipping (Safety of Navigation) Regulations – see separate document</b>	
<b>Annex D-1: Draft Guidance – see separate document</b>	
<b>Annex D-2: Annexes to draft guidance - see separate document</b>	
<b>Annex E: Impact Assessment – see separate document</b>	
<b>Annex F: RPC Opinion – see separate document</b>	

## Section 1: Overview of this consultation

### Aim

1. This consultation seeks your views on a recast of The Merchant Shipping (Safety of Navigation) Regulations 2002, as amended. The recast will bring UK legislation up to date with the latest requirements contained in Chapter V of the International Maritime Organization's (IMO) International Convention for the Safety of Life at Sea (SOLAS).
2. Primarily the recast proposes to introduce an ambulatory reference to the requirements for industry contained in SOLAS Chapter V. In the future, this will mean that the requirements of the recast Regulations will automatically reflect those of SOLAS Chapter V as they come into force internationally. Associated benefits of this approach are detailed in this consultation package.
3. A number of less significant changes to the Regulations and associated guidance is also proposed.

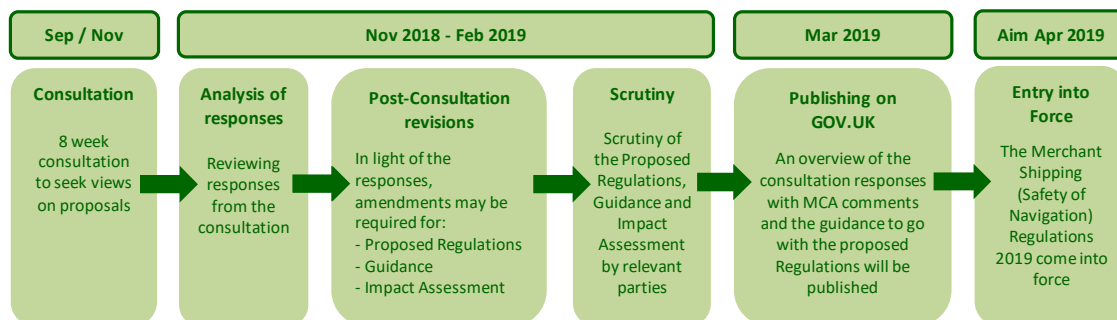
### Views sought

4. Your views are sought in broadly the following areas:
  - whether the use of Ambulatory Reference to incorporate SOLAS Chapter V requirements into UK legislation as they come into force internationally is appropriate;
  - where the Administration's discretion is permitted, whether the Maritime & Coastguard Agency has successfully determined the extent of application for the SOLAS Chapter V requirements;
  - whether the proposed change to offences and penalties is appropriate;
  - whether the proposed guidance to accompany the Regulations is adequate and in the right format.
5. A full list of consultation questions is contained in Section 5 of this consultation document.

### Deadline for responses

6. Views are welcomed **from Monday 24 September until Monday 19 November 2018.**

### Overview Timetable



## Section 2: Areas for consideration

### Introduction

7. The International Convention for the Safety of Life at Sea (SOLAS) is one of a number of Conventions adopted by the International Maritime Organization (IMO) to which the UK is signatory. As a signatory to the SOLAS Convention, the UK has an obligation to implement any amendments to SOLAS in UK law.
8. Chapter V of SOLAS focuses on measures that improve safety of navigation to reduce the risk of an accident occurring at sea. It is principally transposed into UK law through The Merchant Shipping (Safety of Navigation) Regulations 2002 (S.I.2002/1473), as amended.
9. SOLAS (including Chapter V) is regularly amended to improve the safety of ships and lives at sea and to reflect technological advances. Each time an amendment is made to SOLAS, UK legislation must be updated if the amendment is to be effective in UK law. The process to update legislation takes a minimum of 12 months and requires significant administrative, legal and parliamentary time and resources.
10. Under a backdrop of competing priorities for limited resources within Government, a new approach to transposing international requirements into UK legislation is vital.
11. On 26 March 2015, the Deregulation Act 2015 received Royal Assent. The Act introduced a new power to make ambulatory references to international instruments through new section 306A of the Merchant Shipping Act 1995 (MSA 95).
12. The recast of The Merchant Shipping (Safety of Navigation) Regulations will make use of this new power.

## 2.1 Use of ambulatory reference

13. An ambulatory reference for the purposes of this consultation is a reference in domestic legislation to an international instrument which is to be interpreted as a reference to the international instrument as modified from time to time (and not simply the version of the instrument that exists at the time the domestic legislation is made).
14. It is proposed that an ambulatory reference to the requirements for industry contained in SOLAS Chapter V be introduced into the recast Merchant Shipping (Safety of Navigation) Regulations.
15. From a legal perspective, this will mean that any future amendments to Chapter V of SOLAS will automatically become UK law when they enter into force internationally. No new or amending regulations will be required to bring such amendments into force in the UK as is currently the case.
16. From a practical perspective, this means that ship-owners, shipbuilders, and other interested parties can refer directly to the text of SOLAS Chapter V to determine both the UK and international requirements. Where the text of SOLAS is unclear or needs amplification - for instance, where SOLAS states that something is done "to the satisfaction of the administration", guidance will provide the additional clarity required. At present the above-mentioned parties need to refer both to UK legislation (which is likely to be out of step with international requirements and phrased differently to SOLAS) and the text of SOLAS to be sure they are in compliance with international requirements.
17. The main benefits of using ambulatory reference are:
  - simplification of the regulatory framework for both industry and regulatory users – currently a mixture of primary and secondary legislation is used to implement international maritime conventions;
  - legal clarity for ship-owners, shipbuilders and other industry professionals/ interested parties – they will only have to refer to one set of legal text in relation to SOLAS Chapter V, the international text, instead of having to refer also to a UK version of those provisions. Therefore, there will no-longer be disparity between national and international requirements;
  - provision of a level playing field between UK and foreign operators calling at UK ports – the automatic incorporation of amendments in legislation means that the UK will be able to enforce amendments as soon as they come into force internationally. Therefore, foreign ships visiting the UK that are not compliant with the latest international requirements will be subject to appropriate regulatory measures;
  - a reduction in the long-term burden on the Maritime & Coastguard Agency (MCA), Government lawyers and parliamentary time; and
  - maintaining the UK reputation as a leading maritime nation.
18. Further information on the application and benefits of using ambulatory references is contained in sections: 3.2, 3.3, 3.4, 3.5, 5.3, 7, 8.2 and Annex 1 of the Impact Assessment at Annex E.
19. A number of questions relating to the impact of using ambulatory references are posed to consultees in Section 5 of this consultation document.

## 2.2 Updates to bring UK requirements up to date with international ones

20. The Merchant Shipping (Safety of Navigation) Regulations 2002 were last amended in 2011 to incorporate the SOLAS Chapter V requirements for Long-Range Identification and Tracking of ships (LRIT) and Master's Discretion.
21. Since the last update, a number of amendments to SOLAS Chapter V have been adopted and these will be incorporated into UK law through this recast of the Merchant Shipping (Safety of Navigation) Regulations. The amendments are:
  - MSC.201(81) – which details additional situations when ballast water exchange can take place [http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-\(MSC\)/Documents/MSC.201\(81\).pdf](http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-(MSC)/Documents/MSC.201(81).pdf)
  - MSC.282(86) – which introduces mandatory carriage requirements for Bridge Navigational Watch Alarm System (BNWAS) carriage requirements for ships constructed 2002 onwards and Electronic Chart Display & Information System (ECDIS) carriage requirements. The acceptance of ECDIS as meeting chart carriage requirements is also introduced by this amendment <http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-%28MSC%29/Documents/MSC.282%2886%29.pdf>
  - MSC.308(88) – which introduces annual testing for Automatic Identification System (AIS) and revised pilot transfer arrangements [http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-\(MSC\)/Documents/MSC.308\(88\).pdf](http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-(MSC)/Documents/MSC.308(88).pdf)
  - MSC.325(90) – which introduces the requirement for a transparent procedure for determining safe manning [http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-\(MSC\)/Documents/MSC.325\(90\).pdf](http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-(MSC)/Documents/MSC.325(90).pdf)
  - MSC.350(92) – which introduces mandatory BNWAS carriage requirements for ships constructed prior to 2002 [http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-\(MSC\)/Documents/MSC.350\(92\).pdf](http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Maritime-Safety-Committee-(MSC)/Documents/MSC.350(92).pdf)
22. Further information and detail on what these amendments entail and their impact is contained within sections 3.1 and 5.2 of the Impact Assessment at Annex E.
23. In calculating the impacts of these amendments, a number of assumptions have been made in the Impact Assessment. To challenge the assumptions, a number of questions are posed to consultees within the Impact Assessment and replicated in Section 5 of this consultation.

## 2.3 Areas within SOLAS Chapter V where the MCA has discretion in application

24. The requirements of SOLAS Chapter V apply to all ships on all voyages, except:
  - Warships, naval auxiliaries and other ships owned or operated by a Contracting Government and used only on Government non-commercial service; and
  - Ships solely navigating the Great Lakes of North America and their connecting and tributary waters as far east as the lower exit of the St Lambert Lock at Montreal in the Province of Quebec, Canada.
25. Regulation 1 of SOLAS Chapter V permits Administrations (in the UK this is the MCA):
  - to decide the extent to which the chapter applies to ships operating solely in waters landward of the baselines which are established in accordance with international law (categorised waters); and
  - to determine to what extent the provisions of regulations 15 – 28 do not apply to the following categories of ships:
    - ships below 150 gross tonnage engaged on any voyage;
    - ships below 500 gross tonnage not engaged on international voyages; and
    - fishing vessels
26. The application of the recast Merchant Shipping (Safety of Navigation) Regulations is set out in regulation 3 of the draft at Annex A and applies to all UK ships wherever they are, and all ships in UK waters. However, certain ships are exempted from the application of the draft Regulations to take account of (i) the above SOLAS Chapter V provisions; and (ii) other applicable UK regulations, so as not to replicate requirements contained in other regulations.
27. The table at Annex B expands on the application of the recast Merchant Shipping (Safety of Navigation) Regulations.
28. Consultees are invited to review the application of the recast Merchant Shipping (Safety of Navigation) Regulations to assess whether the MCA has successfully determined the extent of application for the SOLAS Chapter V requirements.
29. A number of questions in relation to the extent of application for SOLAS Chapter V requirements are posed to consultees in Section 5 of this consultation document.

## 2.4 Penalties and offences

30. The existing Merchant Shipping (Safety of Navigation) Regulations 2002 have a detailed offences and penalties section. An offence is listed for non-compliance with each individual requirement placed on industry within SOLAS Chapter V.
31. The MCA has undertaken a thorough review of the existing offences (including parties responsible for committing the offence) and penalties to assess whether they should be replicated in the recast Regulations. On assessment, we believe that some (i) parties identified as committing the offence; and (ii) penalties, are not commensurate with the offence committed.
32. There are a number of offences where the parties committing the offence do not reflect where the true responsibility lays. This is true of the offences in relation to:

- *Failure to test manual steering (i) after prolonged use of heading and/or tracking control systems; or (ii) before entering areas where navigation demands special caution (SOLAS V/24.4).*

Rationale for change: The existing Regulations state the offence is committed by the person directed to undertake tasks, however, the MCA believes that the Master could also commit the offence where he/she does not direct a person to undertake the task. The Master has ultimate responsibility for the safety of navigation on a ship.

- *Failure to check and test ship's steering gear in accordance with requirements (SOLAS V/26.1&2).*

Rationale for change: The existing Regulations state the offence is committed by the person directed to undertake tasks, however, the MCA believes that the Master could also commit the offence where he/she does not direct a person to undertake the task. The Master has ultimate responsibility for the safety of navigation on a ship.

- *Failure to maintain up to date and make available to the Master the list of operational limits for passenger ships (SOLAS V/30).*

Rationale for change: The existing Regulations state the offence is committed by the Owner, however, the MCA believes that the Master could also commit the offence as being responsible for the safety of navigation of a vessel, the Master must ensure they have access to the list of operational limits for the ship.

- *Any other contravention of the requirements for use of (i) heading and/or tracking control systems, (ii) operation of steering gear or (iii) steering gear: testing and drills (SOLAS V/24.1-3, 25 and 26.3.2,4 & 6).*

Rationale for change: The existing Regulations state the offence is committed by the Master, however, the MCA believes that the offence could also be committed by a person directed (by the master) to undertake the relevant task, but who fails to do so.

33. With regard to fines, the Government in 2012 abolished the ceiling for Level 5 fines (in England and Wales), with the objective of empowering the courts to take a decision on the appropriate fine. It is proposed that all references to 'Level 1 to 4 fines' be increased to level 5 fines.



*Proceeding/attempting to proceed on any voyage or excursion without complying with the requirements for carriage of the International Code of Signals and Volume III of the International Aeronautical and Maritime Search and Rescue (IAMSAR) Manual (SOLAS V/21).*

- *Proceeding/attempting to proceed on any voyage or excursion without adequate and up to date nautical charts and publications (SOLAS V/27).*
  - *Failure to ensure availability of illustrated table describing the life-saving signals (SOLAS V/29).*
  - *Failure to report dangers to navigation (SOLAS V/31.1).*
34. With respect to penalties that have the option of imprisonment, it is proposed that for the following offences this option be removed as it is disproportionate to the offence committed.
- *Failure to install electronic equipment so that it does not interfere with other navigational systems and equipment (SOLAS V/17.2&3)*
  - *Failure to display in the navigation bridge and steering compartment of change-over procedures for remote steering gear control systems and steering gear power units. (SOLAS V/26.3.1)*
35. The table at Annex C compares the existing and proposed offences and penalties and provides commentary where a change is proposed.
36. A number of questions in relation to the proposed changes to offences and penalties are posed to consultees in Section 5 of this consultation document.

## 2.5 Guidance for the Merchant Shipping (Safety of Navigation) Regulations

38. As previously stated, where the text of SOLAS is unclear or needs amplification - for instance, where SOLAS states that something is done "to the satisfaction of the administration", guidance will provide the additional clarity required.
39. At present this guidance is provided through a microsite hosted by the MCA and within various Marine (M) Notices. A link to the microsite 'SOLAS Guidance on Chapter V – Safety of Navigation' is provided below:  
<http://solasv.mcga.gov.uk/>
40. In addition to the SOLAS V Regulation by Regulation guidance above, the current guidance has Annexes attached which provide in-depth guidance on particular areas.
41. A new Marine Guidance Note (MGN) will replace the main body of existing SOLAS V Regulation by Regulation guidance, but it is intended to retain the Annexes to the existing guidance on .GOV.UK as supplementary, in-depth guidance on particular areas, at least for the time being. The need for these will be reviewed in due course, and a decision made as to whether they are still required and should be published in a different format.
42. The guidance on .GOV.UK will therefore be retained as it is until the new Regulations come into force, when it will be replaced by the new MGN.
43. Annex D to this consultation provides the draft MGN described above.
44. A number of questions in relation to the proposed format of guidance are posed to consultees in Section 5 of this consultation.

## Section 3: Responding to this consultation

45. There are specific questions highlighted in section 5 of this document, which provides a structured way to respond to this consultation document.

### Audience

46. Anyone may respond to this consultation and we will give full consideration to all responses. We will be particularly be interested to hear from: ship owners, shipping companies, protection and indemnity clubs and other parties with an interest in shipping.

### Duration

47. This consultation is open for 8 weeks **from 24 September 2018. The deadline for responses is 19 November 2018.**

### Submitting your response

48. The response form is available at section 5 of this document. Completed response forms should be emailed to [arteam@mcga.gov.uk](mailto:arteam@mcga.gov.uk). Any questions should be sent to this email address.
49. 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 and data protection

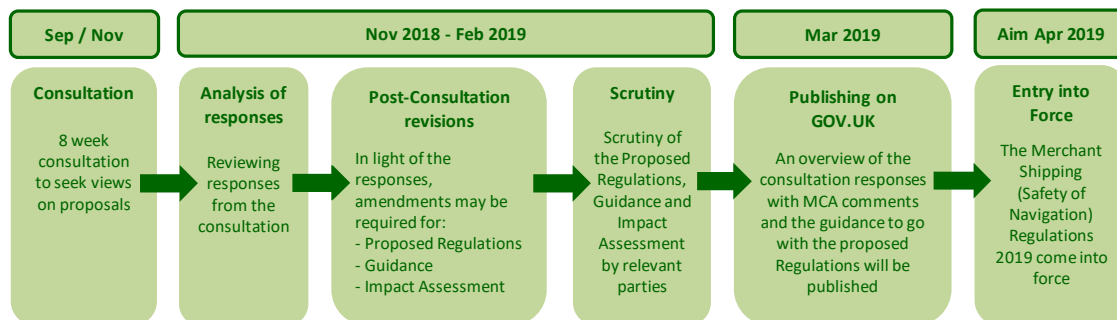
50. Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.
51. If you want the information that you provide to be 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.
52. 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.
53. 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.
54. The MCA is carrying out this consultation to gather evidence. The consultation is being carried out in the public interest to inform the development of policy.

55. The MCA will use your contact details to send you information about the consultation, for example if we need to ask follow-up questions, as part of its functions as a government department. Your information will be kept secure and will not be used for any other purpose without your permission.
56. To find out more about how the MCA looks after personal data, your rights, and how to contact our data protection officer, please go to:  
<https://www.gov.uk/government/organisations/maritime-and-coastguard-agency/about/personal-information-charter>

If you do not wish to remain on this list, please reply and let us know.

## Section 4: Outline plans beyond this consultation

53. 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.
54. We will be analysing the responses during November 2018 and December 2018. Our aim is to publish an overview of the responses and the MCA's comments during March 2019, which will be available from: [www.gov.uk/government/publications](http://www.gov.uk/government/publications)
55. Where appropriate the draft Regulations, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
56. Our aim is for the recast Merchant Shipping (Safety of Navigation) Regulations to come into force during **April 2019**. Once they have been made the Regulations will be published on [www.legislation.gov.uk](http://www.legislation.gov.uk)
57. Every effort will be made to publish the revised accompanying guidance on GOV.UK in advance of April 2019.
58. A full impact assessment of the effect that the recast Merchant Shipping (Safety of Navigation) Regulations will have on the costs of business will be published with the Explanatory Memorandum on [www.legislation.gov.uk](http://www.legislation.gov.uk)
59. An overview timetable is below for reference:



## Section 5: Response form

What is your name? \_\_\_\_\_

What is your email address? \_\_\_\_\_

What is your job title? \_\_\_\_\_

**When responding please state whether you are responding as an individual or representing the views of an organisation:**

- ☐ I am responding as an individual
- ☐ I am responding on behalf of an organisation

(name of organisation) \_\_\_\_\_

**Please check the box that best describes you as a respondent and the size of your organisation:**

Respondent Type

- ☐ Classification Society
- ☐ Government Agency/Department
- ☐ Individual
- ☐ Legal representative
- ☐ Protection & Indemnity
- ☐ Seafarer
- ☐ Ship Operator
- ☐ Ship Owner
- ☐ Trade Union
- ☐ Other

(please describe) \_\_\_\_\_

Size of Organisation

- ☐ Large business (over 250 staff)
- ☐ Medium business (50 to 250 staff)
- ☐ Micro business (up to 9 staff)
- ☐ Small business (10 to 49 staff)

## Section 2.1

- a) Do you agree with the approach of using ambulatory references to implement SOLAS Chapter V?

- ☐ Yes, I agree  
☐ No, I don't agree

- b) Can you see any other benefits or drawbacks of using ambulatory referencing in UK legislation, for implementing international conventions?

We particularly welcome the views of ship owners in relation to ambulatory referencing – what benefits/drawbacks would this new approach mean for you?

- c) On average, how many hours each year does your company spend reading and understanding the requirements of SOLAS Chapter V?

Reading international text: \_\_\_\_\_ hours  
Reading related UK legislation: \_\_\_\_\_ hours  
Reading related UK guidance: \_\_\_\_\_ hours

## Section 2.2

- a) Does your company own any UK flagged ships that meet the criteria below, for which BNWAS has NOT already been installed?

- Cargo Ships of 150GT and upwards (but less than 3,000GT) constructed before 1 July 2002: \_\_\_\_\_ ships

- b) Is £3,094 representative of purchasing and installing BNWAS? If not what is a representative cost?

- ☐ Yes, I agree  
☐ No, I don't agree      £ \_\_\_\_\_

- c) Does your company own any UK flagged ships the meet the criteria below, for which ECDIS has NOT already been installed?

- Cargo ships, other than tankers, of 10,000GT and upwards (but less than 50,000GT) constructed before 1 July 2013: \_\_\_\_\_ ships

- d) Is £8,658 representative of purchasing and installing ECDIS? If not what is a representative cost?

- ☐ Yes, I agree  
☐ No, I don't agree      £ \_\_\_\_\_

- e) Is £100 a representative cost for the annual performance testing of AIS? If not, what is a representative cost?
- ☐ Yes, I agree
- ☐ No, I don't agree                      £ \_\_\_\_\_
- f) Have the revised pilot transfer arrangements altered your company's expenditure in this area? If so, please detail the specific item and change in cost.
- ☐ Yes, it has resulted in a saving of    £ \_\_\_\_\_ per ship
- ☐ Yes, it has increased costs by        £ \_\_\_\_\_ per ship
- ☐ No, it has not

### Section 2.3

- a) Do you agree with the way the MCA has applied SOLAS Chapter V requirements?
- ☐ Yes
- ☐ No

If you do not agree, we welcome further explanation:

- b) Within the parameters set by Regulation 1 of SOLAS Chapter V, are there any further areas where the MCA should apply or dis-apply the requirements?
- ☐ Yes
- ☐ No

If you feel there are, we welcome further explanation:



## Section 2.4

- a) Do you agree that the possible penalty of imprisonment for up to 2 years on indictment should be removed for the offences relating to:

(i) ensuring that electronic equipment does not interfere with other navigational systems and equipment, and

(ii) displaying in the navigation bridge and steering compartment change-over procedures remote steering gear control systems steering gear power units?

(Note: The remaining penalties available for these offences would be a fine of the statutory maximum on summary conviction, and a fine on indictment.)

- ☐ Yes  
☐ No

We welcome further explanation for your answer.

- b) Do you agree that where offences currently have a penalty on summary conviction of a fine between levels 1 and 4 inclusive, these should be rounded to the statutory maximum, thus giving the Magistrates' courts greater discretion as to the level of fine to be awarded?

- ☐ Yes  
☐ No

We welcome further explanation for your answer.

- c) Is there any other way in which the penalties should be streamlined?

- ☐ Yes  
☐ No

We welcome further explanation for your answer.

d) Do you feel that the proposed penalties are fair?

☐ Yes

☐ No

We welcome further explanation for your answer.

e) Do you feel that the proposed penalties will act as an effective deterrent for non-compliance with the requirements of SOLAS Chapter V?

☐ Yes

☐ No

We welcome further explanation for your answer.

## Section 2.5

a) Does the proposed guidance meet your needs in terms of (i) format and (ii) content?

- ☐ Yes  
☐ No

We welcome further explanation for your answer.

b) Do you feel there is a better way of providing guidance for the SOLAS Chapter V requirements?

- ☐ Yes  
☐ No

We welcome further explanation for your answer.

**Please return completed response forms to [arteam@mcga.gov.uk](mailto:arteam@mcga.gov.uk)**

Alternatively, responses may be posted to:

AR Team (SOLAS V)  
Maritime & Coastguard Agency  
Bay 2/29, Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG

## Section 6: Conduct of this consultation

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

### Consultation criteria

61. The Cabinet Office Consultation Principles can be found at:  
<https://www.gov.uk/government/publications/consultation-principles-guidance>

### Feedback on conduct of consultation

62. If you have any comments regarding the conduct of this consultation, please contact the Consultation Co-ordinator at [consultation.coordinator@mcga.gov.uk](mailto:consultation.coordinator@mcga.gov.uk).
63. 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.

## **MCA CONSULTATION FEEDBACK FORM**

1. Please indicate on which Consultation you are providing feedback:

***Recasting the Merchant Shipping (Safety of Navigation) Regulations to reflect up to date requirements as contained in the International Convention for the Safety of Life at Sea (SOLAS)***

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) \_\_\_\_\_

2a. 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:

Thank you for your time. Please return this form to:

Consultation Co-ordinator,  
Maritime and Coastguard Agency,  
Spring Place, Bay 3/26, 105 Commercial Road  
Southampton SO15 1EG  
Or e-mail it to: [consultation.coordinator@mcga.gov.uk](mailto:consultation.coordinator@mcga.gov.uk)

If you are happy to supply your name in case we need to contact you to discuss your views further, please enter it below (this is optional and your feedback will still be taken into account if you wish to remain anonymous):

Name \_\_\_\_\_

Tel. No. \_\_\_\_\_

**Please note that the deadline for responses to the Consultation itself does not apply to the return of this form.**