



Maritime &
Coastguard
Agency

Consultation Document:
The Merchant Shipping
(Radiocommunications) (Amendment)
Regulations 2021

March 2021

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Supplementary documents forming part of this consultation

Annex A: Draft of The Merchant Shipping (Radiocommunications) (Amendment) Regulations 2021

Annex B: De Minimis Assessment DfT DMA072

Annex C: The Merchant Shipping (Radio Installations) Regulations 1998 (as amended by the 2021 Regulations)

Annex D: Merchant Shipping Notice 1903

Annex E: Merchant Shipping Notice 1690

Annex F: Marine Guidance Note 641

Section 1: Overview of this consultation

Aim

- 1.1 This consultation seeks your views on proposed changes to domestic legislation regarding the implementation of Chapter IV of the Annex to the International Convention for Safety of Life at Sea (SOLAS) 1974 as it applies to ships in UK law. The Merchant Shipping (Radiocommunications) (Amendment) Regulations 2021 (the “2021 Regulations”) propose to do this by implementing the up-to-date version of Chapter IV in UK law and give direct effect to future changes to Chapter IV by means of a power to make an ambulatory reference to those international requirements.
- 1.2 The 2021 Regulations will amend the existing Merchant Shipping (Radio Installations) Regulations 1998 (“the 1998 Regulations”) to limit their application to ships engaged on domestic voyages which fall outside the scope of Chapter IV.
- 1.3 This package of legislative changes will include the introduction of two new M-Notices; a Merchant Shipping Notice that will revise the (Global Maritime Distress and Safety System (GMDSS)) requirements in the 1998 Regulations and a Marine Guidance Notice that gives guidance on aspects of the application of Chapter IV.

Views sought

- 1.4 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; a more in-depth explanation of the areas for consideration can be found in Section 2 of this document. The areas covered are as follows:
 - The amendment of the Merchant Shipping (Radio Installations) Regulations 1998;
 - The use of the power to make ambulatory references to implement Chapter IV of the Annex to SOLAS in UK law;
 - The assessment made of the impact of the changes on the UK shipping industry and seafarers;
 - The relevance of the accompanying notices;
 - The proposed changes to the penalties for existing offences.

Deadline for responses

1.5 Responses are welcomed from between 16/03/2021 to 11/05/2021

Section 2: Areas for consideration

Background

- 2.1 The International Convention for Safety of Life at Sea, 1974 (SOLAS) is considered the most important treaty relating to merchant shipping. It sets the minimum safety standards for the construction, equipment and operation of merchant ships. The UK has ratified SOLAS and the Government has a responsibility to implement any amendments to SOLAS to remain compliant for the safety of our seafarers and ships worldwide, and compliance by foreign ships when in UK waters.
- 2.2 This proposal is concerned with Chapter IV of the Annex to SOLAS, which relates to radiocommunications. Radio is vital for safety at sea as it is the primary means of ship to ship and ship to shore communication for distress, safety information and warnings, search and rescue coordination and operational traffic.
- 2.3 Chapter IV applies (subject to limited exceptions) to all passenger vessels on international voyages and all cargo vessels of at least 300 gross tonnage (GT) on international voyages. The 2021 Regulations will apply to all UK registered ships within those categories (anywhere in the world, subject to very limited exceptions), and all non-UK ships within those categories when they are in UK territorial waters.
- 2.4 Chapter IV standards ensure that a ship's radio installations are compatible with those of other ships and shore stations, and that they are resilient in distress and properly maintained.
- 2.5 Chapter IV also relates to a ship's capability to participate fully in the Global Maritime Distress and Safety System (GMDSS), thereby enhancing the safety of the seafarers on board and provide mutual support.
- 2.6 Chapter IV prescribes the functional requirements; GMDSS Sea Areas; the corresponding necessary minimum radio installations when operating in each Sea Area; the requirements for a competent radio operator, watchkeeping, maintenance and records.

Ambulatory Reference

- 2.7 The United Kingdom's obligations as a member state of the International Maritime Organization (IMO) places on it the responsibility for implementing changes to Chapter IV into UK law. In the past, changes to the regulatory framework, including the need for new secondary legislation, took a minimum of 12 months and required significant administrative and parliamentary time and resources, which are limited and compete against other priorities. Transposing international requirements into UK law therefore requires a more effective method of implementation.
- 2.8 On 26th March 2015, the Deregulation Act 2015 received Royal Assent and introduced a new power to make ambulatory references to international instruments. This is contained in Section 306A of the Merchant Shipping Act 1995.
- 2.9 An ambulatory reference in domestic legislation is a reference to the technical requirements of an international instrument as it is modified (or replaced) from time to time. This change to domestic legislation will ensure all future modifications or other changes to Chapter IV automatically have direct effect in UK law as soon as they enter into force internationally.
- 2.10 The Secretary of State retains the power to make secondary legislation to prevent an unwanted modification or other change to SOLAS taking effect in the UK, although this is considered highly unlikely to be required as matters relating to maritime safety are agreed internationally in the IMO and the UK as a member state is involved in the process throughout. That said, UK ships to which Chapter IV applies, will still be required to meet the international obligations regardless of amendments not taking effect in UK law.

Benefits

- 2.11 Simplification - shipowners, shipbuilders, other industry professionals and other interested parties, will only have to refer to the text in Chapter IV setting out technical requirements for the regulatory framework governing radiocommunications on ships to which SOLAS applies.
- 2.12 Cost-saving - saving to the public purse due to a reduced demand on government department resources (lawyers, economists, policy officials), Ministers and members of Parliament to amend statutory instruments every time Chapter IV is updated.
- 2.13 Clarity and Compliance with international obligations - industry professionals and others mentioned will have the final legal text of any amendments to Chapter IV requirements at an earlier stage; i.e. they will not have to await transposition into UK secondary legislation, which can take several years to complete
- 2.14 Better regulation - achieved by separating the regulations for SOLAS ships and ships to which the 1998 Regulations apply. Plus, by reducing the number of amending Regulations it will further the government's aim to reduce the amount of secondary legislation, thus furthering the Government's Better Regulation Agenda.

Application

2.15 The application of the 2021 Regulations is specified in regulation 3. Subject to what follows, they apply to:

- UK ships, wherever they may be; and
- Non-UK ships while they are within UK waters.

2.16 Although the application provision above appears very wide, in accordance with the Convention the 2021 Regulations do not apply to certain types of ships as detailed below.

They do not apply to:

- Warships;
- Naval auxiliaries; or
- Other ships owned or operated by a State and used only in government, non-commercial service;
- Cargo ships of less than 300 gross tonnage
- Ships not propelled by mechanical means
- Wooden ships of primitive build
- Pleasure vessels
- Fishing vessels
- Ships to which the Merchant Shipping (Radio Installations) Regulations 1998 apply
- Ships to which the Merchant Shipping (Passenger Ships on Domestic Voyages) Regulations 2000 apply
- Ships to which the Merchant Shipping (High Speed Craft) Regulations 2004 apply;
- Ships navigating the Great Lakes of North America and their connecting and tributary waters as far east as the lower exit of St. Lambert Lock in Montreal in the Province of Quebec, Canada.

2.17 A non-United Kingdom ship flying the flag of a State which is not a party to the Convention is not subject to the 2021 Regulations if it would not have been in United Kingdom waters but for stress of weather or any other circumstances which neither the master nor the owner or the charterer (if any) could have prevented.

Penalties and offences

2.18 The Maritime and Coastguard Agency (“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.

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 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.

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 4 criminal offences are included in the proposed Regulations and are set out below.

2.19 Existing offences and penalties in the 1998 Regulations will be broadly replicated (with some slight amendments) in the 2021 Regulations. Three offences (1 to 3 below) relate to failures by a person who holds an operator certificate under the Radio Regulations and who is responsible for carrying out specific matters (“the nominated person”). The final offence (4 below) is committed by the owner and the master if the ship proceeds, or attempts to proceed, to sea in breach of the Regulations (this includes permitting the nominated person to fail to carry out the specific matters). In broad terms, the four offences are:

1. Failure by to carry out checks and tests on equipment while at sea;
2. Failure to inform the master if any relevant radio installations are not in working order;
3. Failure to record in the radio log any installations found not be in working order;
4. Any breach of the Regulations.

2.20 It is a defence for a person charged with an offence that the person took all reasonable steps to avoid commission of the offence.

Note: By virtue of Part III of the 1998 Regulations ceasing to have any effect, the references in the penalties provision to “radiotelephone operator” and “radio officer” have been removed.

2.21 The prescribed penalties for offences 1 to 3 differ between the 1998 and the 2021 Regulations. In the former, these offences are triable summarily only and attract a maximum “level 2” fine. In the latter, these offences are triable either way. On summary conviction, the court may impose a fine up to the statutory maximum.

2.22 Prescribed penalties for offence 4 are the same in the 1998 and the 2021 Regulations. These are triable either way. On summary conviction, they attract a fine up to the statutory maximum. On conviction on indictment, they attract imprisonment of to 2 years, or a fine, or both.

2.22 Offences which are 'summary only' mean that the criminal proceedings are required to be brought within 6 months of the alleged offence. Offences which may now be tried as 'either way offences' are not subject to this time limit and this will permit more comprehensive investigation, which will help especially where offences have been committed by non-UK ships in UK territorial waters.

Marine Notices

Merchant Shipping Notice (MSN) 1903

2.24 GMDSS requirements, found in PART II of the existing 1998 Regulations, will instead be prescribed in an MSN. This means that it will be easier to amend those requirements and also enable affected persons to find this information as it will be accessible in one place. The prescribed requirements in the MSN will remain generally the same with a few minor updates to bring it into line with the current GMDSS requirements. Points to note specifically, include:

- Very High Frequency (VHF) Emergency Position-indicating radio beacon (EPIRB) – No certified products have ever existed on the market for this type of device, it is due to be removed from the next version of the SOLAS Convention. It also considered to contradict the GMDSS functional requirements of two separate and independent means of distress alert. Our intention is to remove reference from UK legislation now as opposed to waiting for SOLAS to be updated.
- 1.6GHz band EPIRB (Inmarsat geostationary) - has been withdrawn from service and therefore reference to it in the 1998 Regulations has been removed.
- Recognised mobile satellite service - To ensure that the UK remains up to date with developments in GMDSS, the addition of this text when talking about ship earth stations reflects changes to SOLAS which took effect on 1st January 2020. SOLAS now uses the above term for 2-way communication satellite services which are part of the GMDSS. This change enables service providers other than Inmarsat to be part of the GMDSS. Iridium has been recognised by IMO as a mobile satellite service provider for GMDSS and other such providers may follow.

Marine Guidance Note (MGN) 641

2.25 The MGN, which will have effect by virtue of the 2021 Regulations, will give guidance on the interpretation of certain regulations in Chapter IV, and also incorporates the serviceability and maintenance requirements of radio equipment under GMDSS for ships to which SOLAS applies.

Merchant Shipping Notice (MSN) 1690

2.26 As part of the review, an impact assessment was carried out and MSN 1690 was identified as having to be updated; its references were redundant and the

introduction of the 2021 Regulations will mean that it no longer applied to SOLAS ships. Therefore, it has been decided that an amended version of MSN 1690 will remain, solely for ships to which the 1998 Regulations will continue to apply.

Merchant Shipping Notice (MSN) 1714

2.27 As part of the review an impact assessment was carried out and was decided that it was outdated and that MSN 1874 (Amended) (M+F), relating to matters governed by the Merchant Shipping (Marine Equipment) Regulations 2016, covered all relevant performance and equipment standards.

Proposed Changes

2.28 It is proposed that:

- The provision for all ships to which Chapter IV (radiocommunications) of SOLAS applies be removed from the scope of the Merchant Shipping (Radio Installations) Regulations 1998. This instrument will be amended to apply only to certain ships engaged on domestic voyages.
- A Merchant Shipping Notice 1903 given force by the 1998 Regulations and be concerned with GMDSS equipment requirements, replacing the substantive requirements in Part II of the 1998 Regulations, will allow for easier and more cost effective way of implementing future GMDSS amendments by way of consultation, without the need to go before parliament.
- A new statutory instrument, the 2021 Regulations, governing only ships to which Chapter IV of SOLAS applies, and includes provision to make ambulatory reference to SOLAS to ensure up-to-date requirements have effect in the UK.
- A Marine Guidance Note, given effect by the 2021 Regulations, gives guidance on aspects of regulations contained within Chapter IV of SOLAS.
- Merchant Shipping Notice 1690 amended to apply only to ships to which the 1998 Regulations apply.
- Revoke Merchant Shipping Notice 1714, to cut down on duplication of information; this is contained in Merchant Shipping Notice 1874, the marine equipment notice.

Summary of Options and Recommendation

2.29 The proposal is subject to De Minimis Assessment (DMA) no DfTDMA072 which is included in this consultation document in ANNEX B. The total Net Present Value (NPV), Business NPV and equivalent annual net direct cost to business (EANDCB) are zero because monetised costs for the do nothing, option 1 and option 2 are the same.

2.30 The following options have been considered:

- Do nothing: International amendments are not transposed into UK law.

- Option 1: To bring UK law up to date with changes to Chapter IV of SOLAS on the subject of radiocommunications which have been introduced internationally over the past few years.
- Option 2: To bring UK law up to date with changes to Chapter IV of SOLAS on the subject of radiocommunications which have been introduced internationally over the past few years, and to introduce ambulatory reference provision to increase the efficiency of implementing future amendments.

2.31 Option 2 is the preferred option as it achieves the objective of updating UK law and also puts in place efficiencies for the implementation of future modifications. This proposal will ensure that the UK fulfils its obligations as a member state and the implementation of an ambulatory reference will mean no additional work will be required to give direct effect in the UK future modifications to Chapter IV of SOLAS into UK law.

2.32 UK cargo and passenger ships are required to obtain a Cargo Ship Safety Radio Certificate and a Passenger Ship Safety Certificate. Radio surveys are not carried out by the MCA but by third party organisations, such as Authorised Persons or Recognised Organisations (ROs). The UK ROs are Classification Societies, such as Lloyds Register. Certification is issued either by the RO or the MCA on the basis of a declaration from an Authorised Person. Third party organisations are “flag blind”, meaning they survey ships for many different national registers, including the UK. They use the latest IMO requirements and then apply any additional national requirement specific to the flag State of the ship they are surveying. They do not issue a certificate unless the ship meets those requirements. Hence, because regulation is already being established effectively upon UK registered ships, if international amendments are not implemented into UK law (i.e. Do Nothing), shipowners will still incur in costs related to safety tests. Nevertheless, total estimated costs borne by businesses in all options range from £463.8 thousand (low estimate) to £837.4 thousand (high estimate) (over a 10-year period), considerably below the threshold for undertaking a DMA. Likewise, the legislation is entirely uncontroversial given the international acceptance of these requirements.

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 shipowners, shipbuilders, class societies and other parties who are affected by these regulations.

Duration

- 3.3 This consultation is open for 8 weeks from 16/03/2021. The deadline for responses is 11/05/2021.

Submitting your response

- 3.4 Consultation responses should be emailed to radio.consultation@mcga.gov.uk . Any questions should be sent to this email address.
- 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.
- 3.8 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

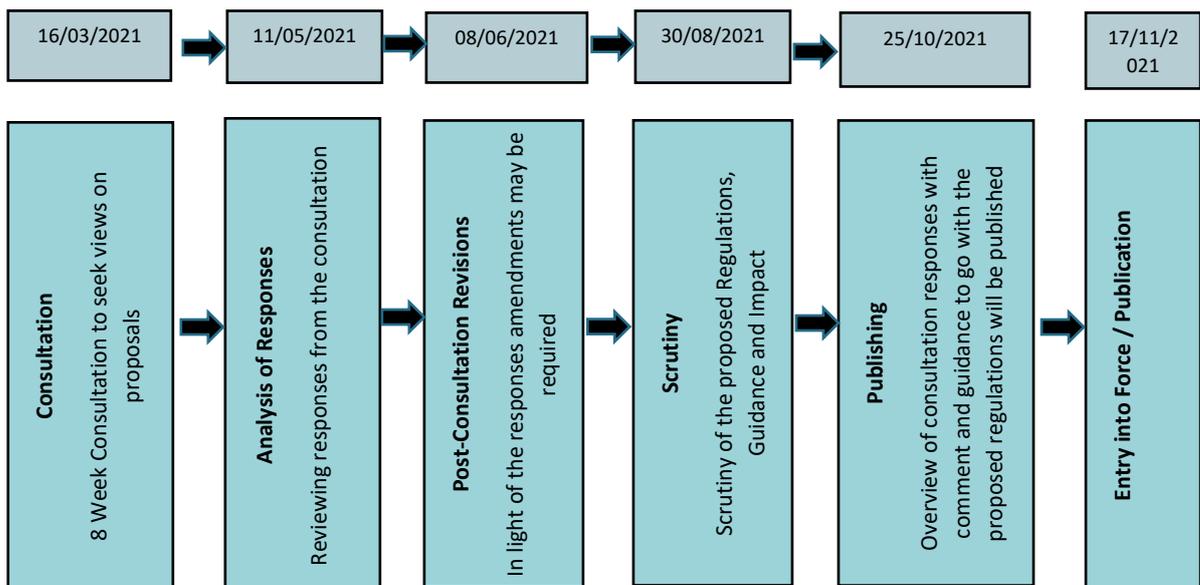
- 3.10 The MCA is carrying out this consultation to gather evidence. The consultation is being carried out in the public interest to inform the development of policy.
- 3.11 The MCA will use your contact details to send you information about the consultation, for example if we need to ask follow-up questions, 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.
- 3.12 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 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 May and June 2021. Our aim is to publish an overview of the responses and the MCA's comments by 7 September 2021, which will be available from: www.gov.uk/government/publications
- 4.3. Where appropriate the draft Regulations/Guidance, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
- 4.4. Our aim is for the changes to come into force in November 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 25 October 2021.
- 4.6. An overview timetable is below 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 5.1 Consultation Questions

- 1) Do you agree that using the power to make ambulatory reference to implement Chapter IV of SOLAS is the most appropriate way of ensuring our legislation remains up-to-date with all amendments as soon as they enter force and that this will benefit the UK shipping industry?

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

If no, please provide reasoning.

- 2) Do you agree with the reasons for removal of all reference to 1.6GHz and VHF distress beacons from domestic legislation?

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

If no, please provide reasoning.

- 3) Are the attached M-Notices clear and contain all relevant information?

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

If no, please provide reasoning.

- 4) Do you feel the proposed amendments to the penalties are fair?

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

If no, please provide reasoning.

5) Do you feel the proposed penalties will act as an effective deterrent for non-compliance the respective statutory instrument?

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

If no, please provide reasoning.

6) Do you feel the amendment of the Merchant Shipping (Radio Installations) Regulations 1998 appropriate and accurate?

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

If no, please provide reasoning.

7) Do you agree with the cost identified in the De Minimis Assessment? If not please provide alternative evaluations

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

If no, please provide reasoning.

Section 5.2

Do you have any additional comments to add to the response?

Please return completed response forms to radio.consultation@mcga.gov.uk

Alternatively, responses may be posted to:

**Radio Spectrum and Technical Standards Unit
UK Technical Services Navigation
Bay 2/25
Maritime and Coastguard Agency
Spring Place
105 Commercial Road
Southampton
SO15 1EG**

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:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf

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@mcca.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. 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) _____

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

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.