



## A Consultation on Changes to MCA Survey and Inspection

### Marine Office Locations

### External Responses

**Question 4: What alternative working practices do you believe could be adopted by the MCA to improve or support to the industry whilst meeting our statutory and regulatory obligations?**

Response ID	Represent Person or Organisation? (size if applicable?)	Response
REXT0001	Individual	Not sure that MCA eye examinations should be continued, after all the ENG1s carried out by MCA approved Doctors not directly by the MCA. Would it not be a better use of resources if MCA approved opticians carried out the eye tests at the own locations? The ability to have surveyors working remotely from home via secure remote servers systems or from other government offices would provide a much more flexible structure. This would also mean that when recruiting new surveyors the MCA would not be limited to recruiting talent in the local area or only people available to relocate.
REXT0002	Organisation	No Response
REXT0003	Individual	More staff - for example 2 assistant surveyors (non-degree) instead of 1 surveyor (degree/chief engineer/ master etc). HSE recently took this approach for their Inspectors and recruited Compliance Officers (particularly in London where they found it hard to recruit inspectors due to commuting and living costs), HSE recognised vocational experience, instead of academic qualifications, and backed this up with thorough training programme through Warwick University. In Northern Ireland there is the possibility of working more closely with the Irish IMA, particularly during high workload periods. The ports of Derry and Warrenpoint and more or less on the border between NI and ROI. This could be a reciprocal arrangement (MCA help out IMA e.g. Killybegs in Donegal or Greenore in Louth). I appreciate this is all a bit political due to the historic NI position. And possibly questionable due to the current Brexit situation.
REXT0004	Individual	No Response
REXT0005	Organisation, 6 - 15	THIS SURVEY IS ABOUT OFFICE LOCATIONS; THERE IS NO NEED TO HAVE LOTS OF OFFICES PROVIDING THERE IS A MECHANISM IN PLACE FOR ACCESS TO THE MCA
REXT0006	Individual	Any realised cost savings in the restructure would I trust be reflected in reduction of any charges currently incurred for surveys and inspections.
REXT0007	Organisation	No Response
REXT0008	Individual	Looking for more surveyors with a back ground in the area they specialise in, i.e. fishing boats where the surveyor understands the needs and requirements and doesn't go in guns blazing and cause any ill feeling, which I have witnessed several times on the Glasgow area on fishing vessels. Bring in younger surveyors who are basically apprentices and develop them into all round surveyors
REXT0009	Organisation, 6 - 15	No Response
REXT0010	Organisation, 0 – 5	No Response
REXT0011	Organisation, 31 – 100	No Response
REXT0012	Organisation, 0 – 5	A more positive, speedier and consistent approach to applications for exemptions would be beneficial, with greater clarity on where decisions lie and the basis on which they are taken. Much greater resource is needed within the stability unit, as it can currently take several years to gain stability book approval. Where they pass work to an RO, they must recognise that the RO cannot make exemptions on their behalf. Guidance notes need to be issued much earlier on upcoming legislation – currently sometimes legislation is in force before guidance has been issued. Where new IMO or EU regulation enters force, there is little information on when it might pass into UK law, which causes confusion around compliance.
REXT0013	Organisation, 100+	No Response
REXT0014	Organisation	Alternate working practice – The consultation document outlines a number of areas where <b>Redacted</b> yr; experience has shown improvement is needed. Slow process of ship plans and stability changes, multiple requests for already held information, waiting for paper files to be transferred have all had an impact and the proposals for new systems may address this. The correct training of staff on these new systems and revised processes must also be included in this programme if the full benefits are to be realised. Ultimately these changes still need to deliver surveyors on site when required, surveying to a consistent standard and providing continuity during projects such as drydocks.
REXT0015	Individual	For fishing vessels under 10metres a standardised inspection regime and checklist so as to stop individual surveyors making it up as they go along and hopefully stop any conflict between the fishermen and the surveyor. - In one particular case a boat was inspected and passed and another surveyor failed it 2weeks later. - All safety certificates for fishermen could be kept on a data base with the surveyor having access to it via laptop. This would negate the need for paper copies to be produced at the Quayside. -
REXT0016	Organisation	Proposals for the use of digital certificates, electronic storage and management are welcomed. Access by vessel owners to MCA documentation held about their vessels is potentially a significant improvement in efficiency. Royal Sun Alliance (now British Engineering Services) use a similar system, which permits us an approved log on to view our boiler surveys paperwork. This is a good model and worthy of serious consideration.
REXT0017	Organisation	Feedback of non-conformancies, in real time, in order to adapt our working practices and operational procedures. Pilotage and port authorities should be made aware of any problems which might impact on sailing or working the vessel. Notification of inoperative Ballast Water treatment systems, or fire-fighting systems, oily water discharge systems, etc. to enable a co-ordinated response from all parties.

REXT0018	Individual	availability of sufficient surveyors to meet industry demands.
REXT0019	Organisation, 6 – 15	Currently some Flag states such as Malta and the Bahamas use a worldwide network of Marine consultants to carry out some of the initial and annual safety inspections of their vessels. Many inspections are also carried out by Class. If the MCA did this then it could free up time for PSC inspections and the more important statutory inspections and also having a world-wide network of contractors would save on travel costs.
REXT0020	Organisation, 100+	If time and resource are an issue- consider delegation of some tasks to Class – for example during system installation etc.
REXT0021	Organisation, 100+	No Response
REXT0022	Organisation, 100+	We believe that strategic level changes to the MCA and the role of the UKSR, in the way described in the UKSR Advisory panel in order to provide more autonomy would improve support to the industry. Specifically the use of Class Societies as Recognised Organisations. - - Many UKSR processes are slow, complicated and bureaucratic. A recent example was the problems with trying to Flag in a non EU flag ship, whilst in service and not under our management or ownership. - - The MCA and UKSR needs for plans, approvals and a certificate of Survey was very difficult and seemed impossible at times. - - The requirements of OFCOM /Spectrum to issue a Radio Station licences is also long, complicated and time consuming with a lot of exchanges.
REXT0023	Individual	None
REXT0024	Organisation, 100+	WE BELIEVE THE MCA SHOULD OFFER MORE FLEXIBILITY WITH REGARD TO SURVEYORS WORKING AT WEEKENDS ETC. IF REQUIRED. WE REALISE THAT THIS WOULD COME AT A COST BUT EVEN WITH HIGHER SURVEY FEES AT WEEKENDS THIS COULD OFFER US AND OTHER SHIPOWNERS BETTER OPTIONS WITH REGARD TO CARRYING OUT SURVEYS AT WEEKENDS IF THEY ARE REQUIRED.
REXT0025	Organisation	With regard to working practice improvement, the one issue we have encountered more and more in the last few years, is not knowing who to contact for fishing vessel surveys or advice. In the past we had known surveyors who we could contact for advice and for booking surveys. Surveyors had fixed areas of operation and stayed in that role for a period long enough for the contact to become known. In the last few years, as the number of surveyors has dwindled, surveyor's areas of operation have become far less defined and this together with staff changes, has left the industry not knowing a contact point. Sometimes offices tell us to contact surveyors and at other times surveyors ask us to contact various offices. A focal point for contact would be good. In these times of modern communications and in order to keep the number of people involved in a conversation, down to a minimum, I would have thought that the suggestion for surveyors to work from home and for us to have the ability to communicate directly with them, would be beneficial to all concerned. This said, it is my opinion that the most important issue is consistency of contact. It is important to build a relationship with the surveyors in order that advice flows freely to us operators. This inevitably results in better run and maintained vessels from the industry's perspective, and presumably could lead to less administrative staff and more surveyors from the perspective of MCA?
REXT0026	Organisation	No Response
REXT0027	Organisation	Splitting up the working practices to enable different types of craft to have different forms to complete.
REXT0028	Organisation	We are hoping that Plymouth is one of the local MCA offices that remain open in the future.
REXT0029	Organisation	I feel it would be a real help if the working practices were split into different categories so us smaller companies wouldn't have to wade through pages and pages of totally irrelevant information that only applies to larger companies and vessels.
REXT0030	Organisation, 31 – 100	1. More delegation to non RO's eg those CA's who can show technical competency & accredited QC systems (or specific individuals within such CA's via Instruments of Appointment) 2. Please do not automatically delegate to class as the easy option – which significantly increases costs to the sector over 1. above.
REXT0031	Organisation, 31 – 100	Recruitment of staff at surveyor level with practical experience of boats who respect experiential knowledge of fishermen with an ethos of enablement rather than obstruction. An appreciation that the MCA is just one of a number of regulatory controls contributing to pressures on fishermen, and that especially for young fishermen trying to comply and get a start in the industry, their enthusiasm can be easily quashed through cumulative negative interactions as opposed to enabling interactions. The hurdles faced by young new entrants span finance to compliance and can be so daunting that they give up. Experienced fishermen who have operated at sea for 20 or 30 years have a wealth of experiential knowledge which sometimes goes unappreciated. Acknowledgement of prior practical learning should be something that those coming from other learning perspectives understand and appreciate. The remote island areas have in past years suffered from a lack of surveyors, with some fishermen having to wait months for a survey. These delays mean that fishermen as small business operators with loans, business expenditure and domestic expenditure commitments cannot work, and their business is in effect suspended. To work legally on their boat is dependent on a timeous and successful survey. Delays in obtaining a satisfactory MCA survey could have the result of removal of their vessel from the certificate of registry which effectively could rob their business investment (their boat) of all of its commercial value. It is difficult to think of any other business enterprise operating in the UK where the shop or office would effectively be closed for weeks pending a survey and in this respect fishermen are in a disadvantaged position. Socially and economically they cannot access any welfare benefits while they are prevented from working.
REXT0032	Organisation	Flexibility of surveyors. Please see response to Question 3.
REXT0033	Organisation	No Response
REXT0034	Organisation	need more people on the ground who have worked in the different sectors of the marine industry
REXT0035	Organisation	No Response
REXT0036	Organisation	Current rationalization has already put a strain on services and response times.
REXT0037	Individual	No Response
REXT0038	Organisation	No Response

REXT0039	Individual	Look at your main office. Get rid of all the overpaid senior staff. Also the people dreaming up the stupid rules.
REXT0040	Not specified	No Response
REXT0041	Organisation	No Response
REXT0042	Individual	No Response
REXT0043	Individual	No Response
REXT0044	Organisation	No Response
REXT0045	Organisation, 100+	<p><b>Redacted</b> view in relation to working practices is the same as its view in relation to Marine Offices: namely, that the MCA should adopt whatever working practices are necessary to enable it to deliver a high-quality and responsive service to operators of UK-flag ships and to UK seafarers. As regards services to operators of UK-flag ships, your consultation document indicates that the MCA intends to make greater use of Classification Society and other surveyors in order to perform surveys and inspections. This is welcome. It appears, however, that this intention is confined to surveys and inspections of ships overseas – with an implication that surveys and inspections of ships in UK ports will be reserved for MCA’s in-house personnel. It is not clear why such a distinction should be drawn, and <b>Redacted</b> <b>Redacted</b> can see no good reason for managing the function differently depending on where the ship may be at the time when its survey due.</p> <p>At the moment, the MCA reserves certain surveys of UK-flag ships for its in-house employees. If this practice is continue, the MCA should make clear (by formal notice) which surveys are reserved for its directly-employed surveyors, which are formally delegated to Classification Societies and other surveyors, and which may be performed by either depending on availability and any option expressed by the operator. There clearly needs to be a rational basis for reserving any surveys for in-house MCA personnel, and the Chamber would wish to participate fully in the consultation process that would need to precede the adoption of a formal policy of reservation. In <b>Redacted</b> view, the assignment of a surveyor to undertake any particular survey should be based on his/her competence/expertise, availability and cost. <b>Redacted</b> sees no good reason for the MCA to give preference to its in-house personnel (or indeed to surveyors employed by Classification Societies or other Flag Administrations) simply because of the identity of their employer. The MCA should accordingly be willing to assign any surveyor who is a suitably qualified and authorised expert to carry out a Flag State survey (wherever the survey is to be carried out). If a service can be delivered more quickly or at a lower cost by a private sector service provider then the customer should be given the option of choosing that provider. Such an approach would enable the MCA to draw on a much broader resource than just its in-house employees, and thereby to provide a more responsive service to the operator of the ship. Clearly, all surveyors carrying out UK Flag State surveys need to have full delegated authority: an arrangement where surveys carried out by a Classification Society surveyor (for example) need to be signed off by an MCA employee would have limited merit.</p> <p>The MCA should also adopt a structure for charging for surveys that does not leave operators of ships facing different costs depending on whether the surveyor is directly employed by the MCA or is employed by a Classification Society (or other organisation) that is acting under contract for the MCA. In particular, the MCA should terminate its extant and unpopular practice of requiring operators of ships to pay the cost of gold-plated travel perks (like business class fares and unduly expensive hotel accommodation) or inflexible working conditions.</p> <p>As regards services to UK seafarers, the MCA should review the requirement for oral examinations to be held at Marine Offices. It is unusual for an examining body to require candidates to attend its own premises in order to be examined. Although there may be value in holding the examination in a setting that it is intimidating, there is no obvious value in requiring a candidate to travel to a location that is inconvenient to him/her. The MCA should consider adopting the practice of most examining bodies and holding its exams at various premises around the country, close to (or in) colleges and major towns and easy to reach by public transport.</p>
REXT0046	Organisation, 100+	Many of the Scottish fleet provide Guard vessel, Chase vessel, etc. to the Oil and gas and renewable industries. To be able to carryout this function, which has financial benefits but also, more importantly safety benefits to the fleet and to the client’s assets being protected requires a Load Line Exemption certificate (LLE). This survey at the moment is done annually and due to the lack of resources at the MCA has caused huge difficulties for industry. As this is primarily supposed to be a, weathertight/watertight inspection, <b>Redacted</b> would suggest an alternative. The alternative we feel would still meet the requirements of a LLE while freeing up a burden on the MCA and allow the fleet to be more profitable. The suggestion would be to extend the length of the LLE to coincide with a fishing vessels safety certificate. At the renewal survey the LLE would be credited and then again at the intermediate survey if all defects were completed. This would reduce the annual check and if a new emphasis was placed on the self-assessment the industry would also be held more accountable.
REXT0047	Organisation	The MCA is probably the only authority existing in the UK able to survey and deal with big ships. However we feel that consideration should be given to small commercial boat surveying being moved to the private sector, i.e. an organisation along the lines of MECAL.
REXT0048	Organisation	<p>The following points (not in any order of priority) are raised for consideration and are given in the spirit of generating improvement rather than just criticism:</p> <ol style="list-style-type: none"> <li>1. A collective email address for Marine Offices to ensure enquiries are picked up.</li> <li>2. A lack of surveyors with sea-going experience is an issue for the MCA/Owner/Operator relationship. The lack of practical experience displayed by some Surveyors is becoming more and more obvious with each passing year as older, experienced, Surveyors leave/retire.</li> <li>3. More consistency on board on how the rules are applied. All the interpretations are subjective and arbitrary by the attending Surveyor. As an example a recent passenger ship survey involved 8 different MCA Surveyors, each with their own interests, views and skills. The point raised at (2) leads to a frequent lack of "common sense" being applied.</li> <li>4. Consideration should be given to alternatives, or at least greater control and consistency in approval of Manufacturers Service agents as we are increasingly be required to use these for all repairs and testing. Apart from the financial implications of this policy, the standard of service delivered by some of the "approved" manufacturer’s service teams is in some cases far from being acceptable.</li> <li>5. The online booking portal could be supplemented by an online general reporting portal where general enquiries and reporting of issues where for example a request for dispensation can be submitted. This would then be picked up by the appropriate person/department in the MCA to ensure a prompt response and follow up. Similar to the DNVGL DATE service where there is a commitment to reply and follow up within a specific time frame.</li> </ol>
REXT0049	Individual	No comment

REXT0050	Organisation	Not knowing the full extend of the current practices, how much sharing of information - port state to port state, via technology? Relocate the HQ function to Liverpool Office w here there is spare capacity, geographically centrally located within the UK, with good road, rail and airport connections. Integrate with other governmental offices (Health & Safety Executive)
REXT0051	Organisation, 100+	The MCA should seek to provide resources to the shipowner and operator within a reasonable timeframe of being requested. More frequent use of the resources of the Recognised Organisations and the Red Ensign Group are welcome. The MCA should identify which UK surveys will be full delegated to Class on a formal basis without referring back to MCA. These could include newbuilding and routine surveys of Class VII Cargo Ships in locations remote from the UK such as the Far East, would also be welcome. Equally, this could apply to our UK Flag Class IIA Passenger Ferries operating ex Dover, when dry-docked and undergoing annual surveys in a continental shipyard e.g. France and Holland.
REXT0052	Individual	Scottish Islands: - a person possibly based at home (part time?) on the islands that the fishing/shipping industry can talk to regarding safety issues and routine inspections.
REXT0053	Organisation, 100+	<b>Redacted</b> believes that there is no substitute for a trained body on the ground to check on the operation of the shipping line and the activities of workers in the port area. <b>Redacted</b> believes that the MCA has already gone too far in reducing the number of inspectors and support staff and has significant concerns over the effectiveness of the MCA in fulfilling its legal obligations in a timely manner. The main concern from the <b>Redacted</b> perspective is the continuing degradation of local people available for short notice defect inspection of ships when we report them, particularly safety concerns such as defective pilot ladders.
REXT0054	Organisation	<p>a. A “traffic signal” control system should be incorporated within the working practice system of the MCA. This should mark clients and ships as Green, Amber, and Red. This information should be available to clients through a website. This alternative working practice creates a more professional non-judgemental working relationship between client/operator and regulator. It creates improved accountability, allows clients and ship owners to work from an accountable and level based system across industry. In addition within a short period of time improves the working relationship between operator and regulator. It also permits the regulator to concentrate and optimise resources using a logical, legally defensible, balanced basis that all parties understand. This in turn improves the long term efficiency of the organisation and regulator beyond recognition. A proven system is now in use through the DVSA statutory obligations system. It has revolutionised the safety of publicly operated fare paying passenger vehicles within 10 years.</p> <p>b. The methodology of the examination structure of the MCA approved “Boatmasters qualification” practice requires overhaul. There is no easy to follow UK training system and the lack of clarity of how a student follows a course has created a shortfall of personnel coming through to the UK inland waterways systems. This is a core regulatory function and the MCA should accelerate a working practice programme to assist and support the educational training route for UK inland waterways industry.</p>
REXT0055	Organisation	For the past year or so it has become noticeable that being able to speak with a Surveyor has become more difficult, particularly if dealing with one person. When phoning up the Marine Office you often get passed from pillar to post and if using email it’s an out of office reply. So someone in each Office who can maintain an overview but this is going to be more difficult if Surveyors are working remotely
REXT0056	Organisation	Any proposed changes to working practices should not have a negative impact on the services currently provided to our managed vessels, especially those on the short sea routes. There is a difference in arranging surveys for vessels trading Worldwide to conducting rolling PSSC renewal surveys where short term delays can have an impact on the times available to conduct surveys. 7 day and 24 hour availability of surveyors to travel and conduct surveys is vitally important to the shipping industry as is the retention of marine experienced surveyors supplemented by surveyors from a Naval Architect background. These are essential for providing the level of service required to supporting the industry whilst meeting statutory requirements.
REXT0057	Organisation, 100+	An improved understanding and appreciation that the offshore sector is not 9-5 Monday to Friday and often port calls are last minute, due to client demands and weather windows etc. An improved mechanism and availability for out of hours service offering, which should include access to decision makers and fee structures that reflect 24 hour operations, would greatly facilitate members’ business.
REXT0058	Organisation	We are happy with the service that we currently receive from the Norwich Marine Office and would like to see this continue.
REXT0059	Organisation	There is a need to remove the civil service attitude of dealing with UK business if the MCA is to succeed.
REXT0060	Individual	I honestly believe that no alternative working practices could be introduced that would improve upon the support I currently receive from Corinne Hopper at the MCA Orpington office.
REXT0061	Organisation, 31 – 100	Improved training and packages to encourage new surveyors to join the MCA. - The MCA is highly regarded in the UK and internationally and part of this is the vast and relevant experience the surveyors hold. To encourage more experienced deck/engineering officers to consider the MCA needs a review of the current packages offered. - Reductions in overhead costs could be used to facilitate this.
REXT0062	Organisation, 100+	It is extremely beneficial and important to <b>Redacted</b> and its students to have a MCA Marine Office located within close proximity to <b>Redacted</b> . The MCA surveyors/examiners already work with us and use the College facilities to conduct oral exams.
REXT0063	Organisation	Surveyors - While working remotely has advantages, equally there are significant disadvantages in that support, training, exchange of ideas and knowledge may be absent, with a long-term detrimental effect. It is essential that surveyors are duly compensated for their skills and experience and the hours worked both in travelling to and from vessels and the office/home. Recognised Organisations – <b>Redacted</b> has accepted limited use of Recognised Organisations, in particular for surveys of radio equipment, where specialist expertise was not available, and notably prior to the advent of Electro Technical Officer certification. <b>Redacted</b> also accepted the Alternative Compliance Procedure (ACP) where class and flag operated co-operatively. This afforded the opportunity for access to confidential information held by class. This option had limited take-up. <b>Redacted</b> is opposed to the use of recognised organisations due to their commercial links with ship owning interests. Red Ensign Group – The opportunity for co-operative working and the provision of an enhanced world-wide service should be explored. In particular <b>Redacted</b> notes the service provided by the Isle of Man registry.

REXT0064	Organisation, 100+	<p><b>MCA Survey and Inspection outsourcing</b></p> <p>Redacted recognise that there may be scope for a more mobile Survey and Inspection team in the UK, although this depends heavily on the quality of IT services that the MCA procures for its S&amp;I team when they are on the road.</p> <p>Redacted do not, however, support the consultation's proposals for outsourcing international S&amp;I tasks to Red Ensign Group administrations and private sector 'recognised organisations.'</p> <p>In the case of the REG administrations, Redacted has long standing concerns over the effectiveness of the MCA's own inspection regime for S&amp;I and other statutory duties conducted by maritime authorities in the REG. We cannot accept such a change under the current arrangements which see the MCA going out every 4-5 years to audit safety inspections and other duties of REG administrations.</p> <p>We share our sister union Redacted opposition to the proposal for increased use of the euphemistically termed 'Recognised Organisations' in discharging the UK's S&amp;I of tonnage registered under the Red Ensign. These RO's are usually private sector classification societies that will have an existing relationship with the ship owner which would clearly lead to conflicts of interest, to the detriment of the UK Register and seafarer and passenger safety.</p>
REXT0065	Redacted	Redacted
REXT0066	Organisation, 100+	<p>Proposals for flexible working</p> <p>a) We recognize that the proposals for flexible working from home may bring benefits such as reduced travelling time in some instances. We would like a guarantee that no one will be charged more travelling that under the current system.</p> <p>b) We also have concern that new working arrangements for surveyors will mean that surveyors no longer meet on a regular basis and conversations that would take place regarding both positive and negative issues concerning specific issues will not take place.</p>
REXT0067	Organisation	No Response