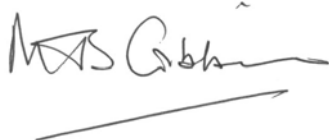
 Regulatory Policy Committee	OPINION	
Impact Assessment (IA)	Merchant Shipping (Maritime Labour Convention)(Survey and Certification) Regulations ("the proposed Regulations")	
Lead Department/Agency	Department for Transport (Maritime and Coastguard Agency)	
Stage	Consultation	
Origin	International	
IA Number	Not provided	
Date submitted to RPC	13/02/2013	
RPC Opinion date and reference	15/03/2013	RPC12-DfT-1716
Overall Assessment	GREEN	
<p>The IA is fit for purpose. The rationale and impact of the proposals to implement the Maritime Labour Convention (MLC) requirements for Survey and Certification have been adequately assessed. At this stage the estimated costs and benefits appear to have been adequately identified which will have to be strengthened at the consultation.</p>		
<p>Identification of costs and benefits, and the impacts on small firms, public and third sector organisations, individuals and community groups and reflection of these in the choice of options</p>		
<p>Costs and Benefits. The IA says on page 18 that "<i>However, it should be noted that the costs to MCA that have been identified in this impact assessment will not increase the overall costs to government of MCA's role, as MCA is required [to] absorb the extra work within existing resources. In particular, other surveyor activities may have to be curtailed or re-prioritised in order to release sufficient surveyor resources to accommodate the inspection and certification work required by the MLC.</i>" Although these costs have been correctly included in the overall estimates, it should be noted that this reasoning does not recognise that these efficiency savings should be achievable in the counterfactual (and therefore should be recorded as an additional cost in the preferred option) or that the "<i>other surveyor activities</i>" that "<i>may have to be curtailed...</i>" involves a loss of benefit.</p>		
<p>Have the necessary burden reductions required by One-in, One-out been identified and are they robust?</p>		
<p>As this proposal originates from an International Agreement, with no evidence of going beyond minimum requirements, it is out of scope of 'One-in, One-out' in accordance with the current One-in, One-out Methodology (paragraph 16; iii).</p>		
<p>Signed</p> 	<p>Michael Gibbons, Chairman</p>	