

CONSULTATION – INFLATABLE NON-SOLAS LSA

2nd August 2016

Marine Technology Branch (MTB) of the Maritime and Coastguard Agency would like to ask you the following questions to complete our responsibilities for considering the impacts of new measures, including guidance, under the banner of “Business Impact Target”.

We would be grateful if you could respond to the following questions in the context of the proposed new MGN on “Life-Saving Appliances – Inflatable Non-SOLAS Liferafts, Lifejackets, Marine Evacuation Systems, Danbuoys and Lifebuoys “

Operational Impacts

1. Please provide an overview of what you see as being the operational impact on business of being able to operate vessels in accordance with the new policy described in the MGN. By making a comparison with what happens now, compared with how the position might look in two and five years from now, would be particularly useful. You might like to consider the following potential impacts:

- a) Service providers resources – e.g. requirements for: personnel, time, infrastructure, finances, etc;
- b) Education and training certified in accordance with a recognised national, international or industry standards as applicable with the different levels of authorisation;
- c) Access to sufficient materials, spare parts, accessories, tooling, guidance and instructions as specified by the original equipment manufacturer.
- d) Impact to a ship’s operations and certification
- e) Any other potential impacts.

2. The proposed guidance addresses equipment aspects which differ from existing requirements. Please assess the proposed change against the current statutory requirements and highlight any aspects where you feel the change will offer cost savings, or conversely, where costs will be greater. Please quantify the costs and benefits, where possible.

3. The proposed guidance (supersedes the provision of paragraph 13.2.3.5 of MGN 280 and also applies to vessel certified against the Code of Practice for the safety of small commercial vessels and fishing vessels) addresses that all ORC liferafts, installed on board UK vessels are to be formally phased out. Please quantify the costs and implication to your business and to the operation of vessels.

4. Will you, as a vessel owner/operator or manufacturer of equipment, choose to invest by following the new guidance? If so, please quantify, preferably based upon your own company’s position; or if not then from a general industry perspective.

5. Do you consider it will be more costly to follow the proposed guidance as opposed to the standards that are currently available? If so, please quantify costs and explain which standards are currently available.

6. Please comment on the flexibility and likelihood that the proposed guidance might provide for vessels built to this standard to operate in other States, outside of the UK.

7. Any other points you would wish to raise.

Impacts on Small and Micro Business Assessment

Micro – 10 or less employees

Small – 11-49 employees

Medium – 50-249 employees