



## A Consultation on Changes to MCA Survey and Inspection

### Marine Office Locations

### External Responses

**Question 5: Do you have any further proposals for enhancing the MCA's support to the shipping industry and the attractiveness of the UK Ship Register for ship owners and operators?**

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Response ID	Represent Person or Organisation? (size if applicable?)	Response
REXT0001	Individual	To support the UK shipping industry and ensure that ships on the UK Ship register are manned with qualified people, and that in the years to come the MCA has a large pool of marine professional to recruit and train as Surveyors the existing CEC system needs to be overhauled. It should include the requirement for an oral exam. I have sailed with people from the so called equivalent countries and have been shocked in some cases of the poor levels of knowledge and English language skills. The safety and reputation of the UK flag should be maintained at a high level. In order to ensure that there are enough skilled UK seafarers then incentives need to be given to ships on the UK register to employ British seafarers. The Tonnage tax breaks to train cadets simply lead to an oversupply of junior officers who were not taken on by the company who trained them as there were no associated tax breaks, but another round of cadets were taken off. The industry as a whole needs to cultivate the image of the professional, skilled British seafarer. This can be helped by incentives for companies on the UK register employing British Seafarers.
REXT0002	Organisation	No Response
REXT0003	Individual	More staff - for example 2 assistant surveyors (non-degree) instead of 1 surveyor (degree/chief engineer/ master etc). Simplify some reporting aspects e.g. CERS.
REXT0004	Individual	No Response
REXT0005	Organisation, 6 - 15	AS THIS SURVEY IS ABOUT OFFICE LOCATIONS NOTHING FURTHER TO ADD
REXT0006	Individual	No Response
REXT0007	Organisation	No Response
REXT0008	Individual	MCA could do with modernising the ticket structure for both deck and engine room, the antiquated system compared to the European counterparts is very cumbersome, would suggest module based for exams as taking 3-6 months out of work isn't easy for most seafarers. Plus the level required for chief engineers is way beyond other European white flagged countries, so straight away putting the UK seafarer at a disadvantage. - Look at merging in yacht tickets to commercial tickets, eg Y1 yacht can sail unlimited 2nd engineer or chief engineer on north sea anchor handlers as the vessels are probably closer to yachts than anything else. The MCA has to adjust quickly as all to often they are being left behind by other more open minded flag states
REXT0009	Organisation, 6 - 15	No Response
REXT0010	Organisation, 0 – 5	No Response
REXT0011	Organisation, 31 – 100	No Response
REXT0012	Organisation, 0 – 5	The biggest issue is the lack of internal resource, which needs to be addressed as a matter of urgency
REXT0013	Organisation, 100+	No Response
REXT0014	Organisation	Further proposals- Surveyors having seafarer experience is considered by <b>Redacted</b> staff as necessary for effective surveys to be conducted. The number of surveyors remains a recognised issue; a surveyor training scheme for OOW holders such as the Lloyds graduate apprenticeship might be an option for developing future talent whilst continuing to have seafarer experience.
REXT0015	Individual	As above – ‘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.’ (This is Q4 response for reference).
REXT0016	Organisation	In summary, despite our reservations, the <b>Redacted</b> broadly welcome the proposals, providing our concerns can be addressed and the benefits shared in terms of greater surveyor availability and reduced travelling time.
REXT0017	Organisation	No.
REXT0018	Individual	To be competitive and provide services as demanded by the shipping industry. To that end to draw pool of talents MCA should consider how it can attract seafarers into MCA as the experience gained by seafarers at sea cannot be replaced with anything else.

REXT0019	Organisation, 6 – 15	Continuing the SMART funding to encourage companies to hire cadets is important, however this could be continued to provide a tax break if the companies then go on to employ these cadets when they qualify, even if it is just for one year. This would give them the experience that they need to move on to other jobs and retain the skills required in the UK fleet.
REXT0020	Organisation, 100+	A transparent roster of surveyor availability would be useful to help manage expectations in terms of response times.
REXT0021	Organisation, 100+	For me, the MCA offers a great range of services. Rather than add to this they need to concentrate on delivering its current commitments to a high level of customer service. Then once this is achieved they should expand.
REXT0022	Organisation, 100+	We agree with the recommendations of the UKSR advisory panel and Recommendation #6 of the UK Maritime Growth Study.
REXT0023	Individual	very good communications with everybody at the MCA in Plymouth and Torquay exist at present
REXT0024	Organisation, 100+	NONE AT PRESENT.
REXT0025	Organisation	Being in the fishing sector, the only contact we have with the UK Shipping Register, is the Cardiff MCA Fishing Vessel Register office. Having had many contacts with this office over the years for the registration of new vessels or the re-registration of existing vessels, I can honestly say that this specific office are far from helpful. What should be a simple process is made to be some-what of an ordeal due to unhelpful attitudes within this single office. This could easily be rectified and would enhance the overall opinion of the MCA service. Every other MCA office or individual staff that I have dealings with, are wonderfully courteous and helpful. I hope that the above is of some use and look forward to seeing what decisions are made for the future of the MCA.
REXT0026	Organisation	No Response
REXT0027	Organisation	No Response
REXT0028	Organisation	The expense of bringing a surveyor up or down from another area, instead of using our local office will prove to be expensive for those seeking surveys in the future.
REXT0029	Organisation	Only a few things spring to mind :- some of the regulations and especially equipment carried on board need drastically updating, for instance we still carry fire sand!! The fire service just laughed when we told them on a firefighting course! We don't have to carry a compass!!!! How ridiculous is that every boat should have one! The basic first aid equipment you have listed that we should carry is laughable and looks like hasn't been updated for years These are just a few small examples but on our smaller passenger carrying vessels are pretty important. The best thing that could be done is that all the paperwork, rules ,regulations that come through can be written in such a way that the general lay man can actually understand them, they are so hard to decipher we always need to call the office for translation! Several other things on the other hand have improved ie tier system for BML is very good idea and helps in individual areas.
REXT0030	Organisation, 31 – 100	<b>Our justification for seeking more delegation to competent CA's;</b> A MCA/Certifying Authorities Professional Standards Working Group was set up in Feb 2015 with a view to setting & increasing the standards of CA's & their surveyors/naval architects. The report of the findings of the WG were presented to the annual MCA/CA BCC meeting in February and accepted. In the short term this will require the CA's to establish formal systems governing their professional standards activities which must withstand future enhanced scrutiny at MCA & REG audits. In the longer term, the CAPSWG has agreed to co-operate with the higher Institutions (eg IMarEST & RINA) to establish a professional framework for the marine surveying industry (not just small vessels) with accredited training & education modules towards higher academic (masters level) & professional qualifications (up to chartered via Engineering Council), also supported by technical apprenticeship schemes at the entry end. This has already been enthusiastically embraced by IMarEST & major education/training providers & a working group has been established. <b>What can the MCA do to help?</b> 1. <b>Support those CA's</b> who can demonstrate high professional expertise by delegation of work that is often all too easy to delegate to Class with the resulting very high cost burdens to the industry eg <500GT Code for domestic waters, Domestic Passenger Vessels, HSOSC Code, Fishing Vessels (if financially sustainable), ISPS for small vessels, ITC measurements, Dredgers/Tugs that may still be limited under MS Shipping Regs. In fact, parts of the Workboat Code can only be done exclusively by Class eg IMDG, ISPS & by MCA via Load Line Exemption (Dredgers/Tugs/Survey Vessels) unless an Instrument of Appointment is sought (please note; our recent request for IoA has just been refused by MCA for HSOSC on an already classed vessel, as a matter of policy). This latest MCA initiative ("A Consultation on Changes to MCA Survey and Inspection Marine Office Locations") perhaps illustrates that MCA policy has not considered supporting those "higher" CA's. There is no mention of definition of CA's, only a brief reference of delegation to RO's for vessels abroad. There is an opportunity here to allow qualified delegation to competent CA's for non Convention work that does not require mandatory RO involvement. In the workboat sector (a very large sector) the unchecked drift into Class puts pressure on owners to stick with Class for the whole regulatory process, even that normally & historically delegated to CA's. The large reduction in MCA resources should logically encourage such delegation but the opposite seems to be happening. It may be that one reason for this is that where MCA time resources are overstretched, it is simpler for the MCA to delegate to Class. This does perhaps help to solve the resourcing problems of the MCA but it can impose a significant cost burden on the industry & in many cases without technical justification. Using a technically competent CA can result in a very significant saving but without sacrifice to the scope & quality of approval/survey work & most importantly, without reduction of safety.

		<p><b>2. Support the new professional standards initiative.</b> Perhaps the best way to do this is for the MCA to buy into the new professional/educational process rather than stick with internal training. The ultimate status of "chartered marine surveyor" could be achieved with all the necessary technical training &amp; educational modules under the umbrella authority of IMarEST (this initiative is under way). Cost savings should be achievable here plus a welcome support from govt for the UK training/educational establishments. Please support us on this.</p> <p>All CA's have signed up to the new Professional Standards initiative which includes a surveyor matrix accreditation <b>and is subject to annual MCA audit.</b></p> <p>At <b>Redacted</b> we have invested in a comprehensive ISO9001 QC system over many years to cover both our technical &amp; professional standards operation. We get no recognition from the MCA for this (except for positive audit outcomes) &amp; we are in direct competition with other CA's who do not have such QC accreditation in place.</p>
REXT0031	Organisation, 31 – 100	We have no comment here.
REXT0032	Organisation	<p>The MCA website is very badly designed and I have not met with an operator yet who can find any relevant information without spending hours and hours of searching and usually to no avail. Perhaps the MCA website could be made simple by categorising the regulations that apply to a specific category of water or class of vessel, thus preventing the enquirer from searching the entire MCA website.</p> <p>Improving the MCA website would enable operators to find out information rather than telephoning the marine office for information.</p>
REXT0033	Organisation	No Response
REXT0034	Organisation	try to be more understanding when enforcing the rules that everything has a cost implication in these trying times in my industry
REXT0035	Organisation	The current system of applying for, and receiving Notice of Eligibility is creating delays to both candidate, employer and MCA Surveyors. The time delay between applying and received the NoE is too variable and the repeated requests for information may take up more time than the processing of the NoE itself. The whole rational of having this NoE before the oral exam needs reviewing, or make the process much quicker, which we assume would require more not less human resources to do so.
REXT0036	Organisation	More proactive with recruitment of new officers.
REXT0037	Individual	No Response
REXT0038	Organisation	<p>This is in addition to parliament authorising major public infrastructure projects, including the Thames Tideway Tunnel and the Northern Line Extension. These major infrastructure projects in the heart of Central London will see further major expansion of river traffic throughout the tidal Thames in the coming years. These projects, and your proposals, come at the same time that the Mayor of London's office is continuing to encourage heavy goods vehicles off the overcrowded roads in London by transferring the freight onto barges on the tidal Thames. This in turn, will create a further increase in workload for the inspection and licencing of vessels and the examination of personnel for their BMLs, including Thames Local Knowledge Endorsements (LKE).</p> <p>It is anticipated that the closing of the Orpington marine office will lead to an increase in the lead time for obtaining an MCA officer to attend BML and Thames LKE examinations, which already stands at two months.</p>
REXT0039	Individual	Do away with half the stupid rules so ships do not have to go under flags of convenience or skippers to Scotland to avoid your rules.
REXT0040	Not specified	No Response
REXT0041	Organisation	No Response
REXT0042	Individual	No Response
REXT0043	Individual	No Response
REXT0044	Organisation	You ask for suggestions as to how MCA could better support its Flagged Shipping industry. I not with quite some disappointment the renewed exodus of large passenger vessels from the mainland registry. Making a separate entity of the registry may be one solution, but it needs a commercial hand at that tiller and a rethink. Please take a page out of the book of the open registries and how they inspect their vessels in a quite cost effective way. They use a network of trusted independents around the globe and support their findings often at the expense of their flagged owners. It has good and bad results, nothing is perfect, but it does work. Cost is king to international shipping, especially in a market like that of today. The BMA for example we used to look down our survey noses at, but it has achieved a cost effective system of international once per annum inspections, that allow Class to do their job and avoid the really quite ridiculous cost of flying an UK domiciled MCA surveyor around the globe.

REXT0045	Organisation, 100+	<p>Yes. The MCA should define some clear standards that it guarantees for routine elements of its core service to shipowners and seafarers, so that those companies and individuals know what they will get and plan accordingly. Many examples of excellent service, from the MCA corporately and from individual surveyors, have been reported to <b>Redacted</b>, but it is equally reported that the standard of service varies and that no-one can rely upon always receiving that high standard of service.</p> <p>The establishment of service standards for routine core functions will ensure consistency of service for customers, thereby enabling them to plan their business (in the case of shipowners) and career path (in the case of individuals) with confidence. It will also establish a fixed point around which the Survey and Inspection service can be organised – so that it is resourced, equipped, and located to ensure that it can deliver that defined standard of service.</p> <p>At the moment, the quality of the MCA’s output is determined by the resource available to the Survey and Inspection service; the latter is fixed, and former is therefore variable. This is neither satisfactory nor customer-focussed. A re-orientation is required, so that delivery of service to the customer defines everything else. Defined standards of service are the starting point for determining what resources the MCA requires (chiefly in skills and expertise) in order to deliver those services, how those resources should be organised (whether through in-house personnel or through service contracts with Classification Societies) and where they should be located.</p> <p>As a starting point, <b>Redacted</b> proposes the following standards for the MCA’s core routine services:</p> <ul style="list-style-type: none"> <li>• a surveyor to attend a UK-flag ship within six hours of a request from the shipowner;</li> <li>• ships’ certificates to be issued immediately on successful completion of a survey/inspection;</li> <li>• notices of seafarers’ examination eligibility to be issued within 10 working days of an application (by an applicant who is eligible);</li> <li>• oral examination slots to be always available within a month;</li> <li>• certificates of competency to be issued within ten working days of passing an oral exam;</li> <li>• letters of initial assessment to be issued with six weeks of application; and</li> <li>• automatic and immediate reimbursement of any application fee, in all cases where these standards are not met.</li> </ul> <p>Clearly, the MCA needs to provide a high standard of service in response to all its customers’ requirements, not simply those of a routine nature. For example, it is vitally important that, when approached for specialist advice on the interpretation of a particular IMO requirement or on how a generic provision applies to the specific circumstances of a given ship, the MCA provides such advice promptly and accurately. <b>Redacted</b> would be pleased to contribute to a discussion with the MCA to define standards for such qualitative elements of its overall service, alongside those for the performance of routine tasks.</p> <p>The attractiveness of the UK Ship Register would be enhanced by removing more “red tape” and administration. Additionally, the alignment of standards and survey requirements to gain consistency by all of the Red Ensign Group shipping administrations would be welcome. The UK Ship Register would be more attractive if the transposition of IMO Conventions, such as the Maritime Labour Convention, were transposed into UK law in their entirety without any MCA interpretations, which although well-intentioned, bring about unintended consequences.</p> <p>In conclusion, <b>Redacted</b> welcomes the specific proposals in the consultation document and urges the MCA to realise them expeditiously. <b>Redacted</b> also urges the establishment of defined standards for MCA services, so as to provide reassurance to operators of UK-flag ships and to UK seafarers of the quality of service they will receive. Those standards should match those provided by well-regarded Flag Administrations, in order to demonstrate to existing customers and to prospective new ones that the service provided by the MCA is world-class.</p>
REXT0046	Organisation, 100+	<p>This question appears to me more aimed at the Merchant Navy fleet. As in question 2 we would like to reiterate industries request to see a specific marine fishing office/team based in Peterhead. If the MCA is committed to enhancing its support to the fishing industry and dealing with recommendations placed upon it by the MAIB then action is needed now. FISG at this moment is working on a safety strategy. An extract from the current strategy states “<b>What can the various organisations offer in terms of expertise and resources?</b>”</p> <ul style="list-style-type: none"> <li>• <b>MCA – Enforcement/standards/information and communication</b></li> </ul> <p>From the above point the MCA could provide better information and communication if it had a specific estate and team dedicated to the fishing industry in Peterhead. Then instead of just being words on paper it would be a visible commitment to the ultimate goal of zero deaths in the UK fishing industry. This centre of excellence can also be used as the training ground for future fishing vessel surveyors for the whole of the UK. A team that could then deliver consistence to the whole UK fishing fleet whether its looking at survey items or witnessing drills.</p>
REXT0047	Organisation	Ensure that all staff, whatever their position, have telephone customer service skills, something that has been sadly lacking in some areas.
REXT0048	Organisation	While technology and hardware/software systems can be developed to address many of the "back office" functions and requirements there is no substitute for good, knowledgeable and practical surveyors that are given the authority and can make decisions without delay. Where they need advice (and there will always be occasions where this is necessary) they must have immediate access to a senior person within the MCA who can not only guide them but thereafter stand by the decision. It is not acceptable for the client to get pushed from one location to another, to another, to be able to get the position clarified (and even then not always satisfactorily). This will be even more important if the number of local offices is further reduced.
REXT0049	Individual	No
REXT0050	Organisation	Raise the profile of the UK Ship Register over others? More information within the public domain through reporting to the public through various media channels the importance and significance of the work of MCA ( to exclude forecasts and coastguard responsibility)
REXT0051	Organisation, 100+	<p>The attractiveness of the UK Ship Register would be enhanced by removing more ‘red tape’ and administration. Additionally, the alignment of standards and survey requirements to gain consistency by all of the Red Ensign Group shipping administrations would be welcome. The UK Ship Register would be more attractive if the transposition of IMO Conventions, such as the Maritime Labour Convention, were transposed into UK law in their entirety without any MCA interpretations, which although well-intentioned, bring about unintended consequences.</p> <p>Finally on a positive note the MCA System of appointing a Customer Service Manager who is a Senior Surveyor works really well and should continue to be well supported by MCA. These Customer Service Managers provide a key interface between the companies they support and the MCA. It is absolutely essential this role is maintained.</p>

REXT0052	Individual	A clear accessible point of contact. For Fishing Industry:- inspectors with industry experience. At present each different inspector has a different interpretation of the statutory rules and how they should be applied to each individual vessel, which leads to confusion in the fishing industry especially for young fishermen.
REXT0053	Organisation, 100+	<b>Redacted</b> urges the reinstatement of the MCA as an effective inspectorate by recruiting more surveyors Whilst in UK waters ships should not have the advantage of hiding behind flags of convenience.
REXT0054	Organisation	<p>a. Specialised departments eg Class V v Merchant shipping. In August 2015 <b>Redacted</b> invited senior MCA personnel to witness first-hand the inconsistency and poor quality of surveying of Class V passenger vessels within UK waters. This included incorrect implementation of existing legislation and a failure to follow statutory regulation. Thus it follows that much aborted time is being incurred within the MCA surveying regime as a result of poor training, and incorrect understanding of the legislation over and above the MCA not complying with its fundamental statutory duties.. This leads to duplication of work, increases the risks to the travelling passengers and means a poor use of resources thus increasing both client and regulator costs. The consultation document makes no reference how such fundamental failings are being addressed within the context of “Change to MCA Survey and Inspection Regime”. Consultation opportunities are therefore being missed to enable the MCA to be guided by practical experience of operator feedback.</p> <p>b. Increase niche surveyor costs for niche areas eg Dukw surveys and advice. This would be required to cover the higher level of expertise from surveyors.</p> <p>c. Separation of International and UK registers. This will allow the MCA to be more impartial and become a more focused and responsive service. Creating specialised units will enhance accountability and greater commercial return will be achieved, thus attaining the MCA’s stated aim of attracting more tonnage under the UK flag. It is important to note, major international businesses including some of the UK’s most profitable and respected Public Limited Companies have generally separated out by sector and specialisation to maximise their commercial returns.</p> <p>d. Personnel invariably leave organisations for a combination of reasons and not exclusively for remuneration. Whilst remuneration will be a factor it is solely the only factor. By creating specialised departments with direct accountability, the MCA will be able to attract and retain quality personnel because of clear career path progression and the working environment will be enhanced.</p> <p>e. Specialised units eg Port State Control should be separated from general Surveyor duties.</p> <p>f. <b>Redacted</b> fully understands the need to control and or reduce overheads within the context of today’s business climate and as part of the Government led austerity measures. As an initial start the MCA should seek to increase revenue, MCA’s accounting systems fail to collect legitimate monies due. The failure to invoice in excess of some 18 months, despite formal requests, means the MCA is not generating much needed legitimate cash from debtors. Thus, cutting costs eg office closures is being considered at a time when basic collection of monies due would make a huge and immediate difference to the MCA finances. Additionally clients, such as <b>Redacted</b>, would be able to account correctly and appropriately within their own business this would allow good reconciliation of missing payments, <b>Redacted</b> acknowledges smaller operators may be more difficult.</p> <p>In conclusion, removal of the Orpington office at a time of growth and in a location of massive need is a serious risk to the London river economy. Based upon practical experience <b>Redacted</b> remains sceptical that surveyors working by remote or home will be co-ordinated enough and provide the necessary exchange and transfer of skills to provide the efficiency the MCA requires if it is to provide a cost effective, flexible quality consistent service to industry.</p> <p>If money must be saved, <b>Redacted</b> suggests that other government property within or around London could be leveraged to create an office at low cost to the MCA thus allowing the MCA to have the benefits of both cost saving and high quality service.</p>
REXT0055	Organisation	<p>Shipping is a 24/7 operation. Surveyors are not generally available at the weekend for S&amp;I – but PSC may be a different matter. We operate into tidal ports so we are governed by the tides for berthing/unberthing and weather can be also be a factor but if needing a surveyor over the weekend we don’t have much faith in securing his services. It’s as if the S&amp;I system has shut down from Friday afternoon to Monday morning. The same cannot be said of Class.</p> <p>In addition, sometimes we are able to give a Marine Office 7-10 days notice of an impending survey/audit requirement but are still told there is no-one available. This cannot be good enough because we’re sure there would be every expectation from your side that we would be able to attend/arrange something 7-10 days ahead. In some cases, but not all, annual SEC’s have been delegated to Class with an additional cost to us. We have to pay Class the going rate for SEC’s as they are outside of our fee agreement and then we are charged a further amount by MCA/HQ for a Letter of Appointment due to your inability to provide a Surveyor. Why not delegate as a policy decision and then we can agree fees with Class?</p> <p>The proposed closure of some of the Marine Offices (ie, Beverley &amp; Orpington) has the potential to affect us from a cost point of view. It is known that Surveyors based at Orpington have the facility to work remotely and we are charged travel time from this Office to the vessel. The next nearest Marine Office will be Dover, which is further away, so how is this going to be charged out? Similarly, Beverley is earmarked for closure and Bridlington will be the next nearest Marine Office.</p> <p>There has to be a question mark over the closure of Tyneside and Beverley with Bridlington offered as an alternative. Why close 2 Offices close to main ports (and colleges) and move further away? The same can be said in the south east with closure of Orpington which covers the Thames with all the Class V &amp; VI’s plus BML’s.</p> <p>Survey costs? It is not always possible to work out how a survey is being charged out with different surveyors from the same Marine Office requesting different funds for the same survey (eg, annual SEC). Although we have been told that a tariff system exists it doesn’t always seem that way. Why not work a system similar to Class (eg, block fee agreement)?</p> <p>Survey costs? The practice has been to pre-fund a survey when booking it and we have had occasions where the surveyor has threatened not to attend because the funds haven’t arrived. We find this poor customer relations and makes us feel like second class citizens especially as we have been dealing with the MCA for years, so we are not unknown to you. Clearly we are not trusted.</p> <p>Survey costs? The past 12-18 months has seen a dramatic decline with invoice administration. In the past few weeks we have received requests for additional funds for surveys/audits conducted 12 months previously. Why has it taken so long to produce and why should we pay such a late request? Survey costs? Why is it necessary to have a Surveyor in attendance for a 5 yearly load test of a lifeboat/rescue boat/davit. These tests are conducted by approved contractors who have far more experience/knowledge than most, if not all Surveyors. This also causes an additional headache in co-ordinating a contractor and surveyor for the same time, or in some cases having it delegated to Class with additional cost. Why is your attendance required? Seafarer’s medicals are carried out by approved doctors - how many do you attend? Stability Approvals. Unfortunately we have had some experience of this department. In some cases it has taken almost 3 years to get a Stability Book approved after a simple fuel system conversion. In another case it took 2 years and we now have another Stability Book pending re-approval following a flag-in and after 18 months nothing has happened. Why or how can this be for a Flag that prides itself on being one of the best? Remote working. While this has its benefits there are drawbacks from not being in an Office as this is where information is picked up/shared. This could be a disadvantage for trainee surveyors.</p>

REXT0056	Organisation	Introducing an annual fixed fee per vessel based on individual ship survey and certification requirements over a survey period. A review of current invoicing practices is needed as unnecessary delays have been experienced in attributing survey costs to vessels.
REXT0057	Organisation, 100+	Our members recognise that many MCA surveyors have considerable technical expertise. However, as the agency itself acknowledges, the MCA has been experiencing difficulties in recruiting and retaining surveyors. This inevitably affects the quality of the services provided to MCA customers and also threatens to undermine the MCA's international reputation for quality. While we appreciate that the MCA, like other UK government agencies, has been subject to budget cuts, it is important to invest properly in attracting sufficiently high calibre personnel. An MCA surveyor's salary is significantly lower than that of their industry contemporaries, such as a Vessel Manager or Fleet Manager, and it is necessary to invest in paying MCA surveyors an appropriate rate in order to be able to attract the high end of the industry and to improve standards and retention rates. With respect to the implementation of UK policy, a more consistent approach is needed between the regional marine offices and the headquarters office in Southampton. Surveyors must have the flexibility to exercise their professional judgement on some of the practical details of implementing regulations, particularly when it comes to the specific design and operational requirements of specialised sectors, such as the offshore support sector. However, to assist planning and to ensure a level playing field, there should be a consistent, agreed approach on general positions. Anecdotal reports from our members suggest that, particularly when it comes to implementing new legislation, the approach taken by individual surveyors may often differ from the official advice provided by MCA headquarters, causing considerable confusion and uncertainty.
REXT0058	Organisation	We have no further proposals
REXT0059	Organisation	The UKSR will not succeed unless there is a complete change in how the department views the companies that it deals with. In a world market, acting as a government regulator with no commercial understanding and no culpability, operators will move to another flag. There is a need to understand that the UKSR has to be a commercially orientated business and without providing the same customer service as other flag states there will be a constant loss of Tonnage which affects both income and the perception of the UK within the international maritime community. In conclusion, there is an understandable need for this review and changes are required however the choice of offices raises significant concerns, the closure of a number of offices without having the systems in place to enable the level of service envisioned does not seem to be sensible and will undoubtedly impact those businesses that rely on the MCA to provide regulatory services. The financial impact that this will have on UK business should not be underestimated.
REXT0060	Individual	Yes, my proposal is that you leave the Orpington office up and running.
REXT0061	Organisation, 31 – 100	No Response
REXT0062	Organisation, 100+	The regional marine office structure that the MCA currently has in place is important to <b>Redacted</b> , furthermore, the Norwich MOs location within the heart of the developing offshore wind energy centre of the UK helps to reinforce the Southern North Sea and East Anglia as a strategic location for the sector. This manifests itself in the creation and safeguarding of high value employment in an area of high social and economic deprivation. We are very concerned that the loss of the Norwich MO may hinder the ongoing development of the maritime supply chain related to offshore wind in the area. - - We are also concerned that Lowestoft College and its Maritime students will not be serviced as well by the MCA without a MO presence nearby.
REXT0063	Organisation	No Response
REXT0064	Organisation, 100+	No Response
REXT0065	<b>Redacted</b>	<b>Redacted</b>
REXT0066	Organisation, 100+	No Response
REXT0067	Organisation	No Response