

A Consultation on Changes to MCA Survey and Inspection

Marine Office Locations

External Responses

Question 1: To what extent do you need to have direct access to a Marine Office; for what activities; and how frequently?

Safer Lives Safer Ships Cleaner Seas

Response ID	Represent Person or Organisation? (size if applicable?)	Response
REXTO001	Individual	Direct face to face contact for oral exams, once every few years.
REXT0002	Organisation	No Response
REXT0003	Individual	We have annual refits for our ferries which require a surveys, sea trails and MCA Passenger Certificates. Occasionally due to breakdowns and other incidents we may require a visit from an MCA surveyor. Periodically we require MCA examinations for our staff for their BML, Large Passenger Vessel endorsement etc. We also meet the MCA survey team twice a year in relation to our maintenance, PMSC, training, CERS etc. In relation to the proposed S&I / MO locations, it would appear a sensible geographic spread, compared to the existing system. For example currently Falmouth and Plymouth are relatively close to each other, as are Dover, Orpington and Harwich. In particular I appreciate retaining S&I / MO offices in each region of the UK, particularly Northern Ireland, which would require someone flying in or taking a ferry from mainland GB.
REXT0004	Individual	Access to a Surveyor is very important to this company as a shipowner and manager. The Beverley Marine Office is closely located to our areas of operations in Hull and the wider Humber Estuary. The proximity of the MO allows easy access to surveyors, for our planned inspection needs as well as the more reactive work. Planned inspection work is in the order of 8 vessel visits per year.
REXT0005	Organisation, 6 - 15	NO NEED, GOOD PHONE AND E-MAIL IS ALL THAT IS REQUIRED
REXT0006	Individual	The MCA organisation needs to modernise its practises and in particular IT.
REXT0007	Organisation	No Response
REXT0008	Individual	For oral examinations in the past for various tickets, for surveys for fishing vessel, for advice on new rules and regulations coming into force
REXT0009	Organisation, 6 - 15	We generally do not require to have direct access to a Marine Office. Telephone or e-mail response to all queries is sufficient.
REXT0010	Organisation, 0 – 5	Rarely - However the surveyor's travel time is usually charged from the point of 'leaving the office'. We would want to make sure this was not increased if the Orpington office was closed.
REXT0011	Organisation, 31 – 100	We have our vessels UK flagged and the MCA perform our vessel classification work we have 3 vessels that require annual surveys.
REXT0012	Organisation, 0 – 5	Direct access is infrequently required as customer service meetings are usually held off site. Interaction with policy unit or other MCA bodies is usually conducted via our CSM's. Main access need is for examination of our seafarers, which is infrequent.
REXT0013	Organisation, 100+	UK Flag Vessel application of Ship Certification and dispensation.
REXT0014	Organisation	Access to Marine Offices. The general view is that direct access to MCA offices for the Redacted business is largely not necessary with the majority of ship and seafarer matters dealt with by phone, email and online processes. It is recognised that this may not be the same for certain other parts of the seafarer community (perhaps fishing and leisure) and a level of service needs to be maintained for those clients.
REXT0015	Individual	Only when inspections are required.
REXT0016	Organisation	I write on behalf of Redacted in response to the Changing MCS survey and inspection consultation. We currently operate 10 vessels based in Redacted, our operations can extend to Dawlish and Salcombe.
REXT0017	Organisation	No requirement for direct access to a Marine Office. Surveyors are available by telephone or email, and attend the port on a regular basis.
REXT0018	Individual	There is generally not required for office visit as many queries are either resposnded through telephone call or by email.
REXT0019	Organisation, 6 – 15	As a company we do not need direct access to a Marine Office.

REXT0020	Organisation, 100+	We operate a fleet of Redacted ships, based in Redacted. We have very regular & ongoing contact with the Southampton Office regarding a range of operational matters. We greatly value this direct access. The relationship with a consistent team of flag management/surveyors who have good working knowledge of all our ships is important.
REXT0021	Organisation, 100+	For our company Redacted we appoint surveyors for our Clients to attend for DOC/SMC audits but also document reviews. As this work is predominently for vessel below 500GT it is important that this work is carried out by a surveyor with a good working and local knowledge of the Thames trade. If this is lost buy in from the local operators will also be lost.
REXT0022	Organisation, 100+	We arrange for Ship's Masters to attend Marine Offices to take UKLAP1 examinations, this is typically 10 - 15 times a year Our office is in London and we usually send UKLAP candidates to Southampton Marine Office, but we have also sent candidates to Liverpool and other offices when we have not been able to get a slot.
REXT0023	Individual	Annual hull survey for passenger vessel - any change in the office location may affect timing of surveys and flexibility of timing of my survey and also might also affect the costs of surveys dramatically.
REXT0024	Organisation, 100+	Redacted AS AN ORGANISATION CURRENTLY DOESN'T HAVE OR NEED TO HAVE DIRECT ACCESS TO OUR LOCAL MARINE OFFICE. THE DAY TO DAY ACCESS WE CURRENTLY HAVE IS MOSTLY BY EMAIL OR TELEPHONE FOR BOOKING SURVEYS FOR THE VESSELS. WE DO EMPLOY A NUMBER OF OFFICER CADETS WHO WOULD NEED ACCESS TO THE MARINE OFFICE FOR EXAMS ETC. BUT THIS WOULD BE ON A FAIRLY INFREQUENT BASIS OUR CONCERN IS THAT SURVEY FEES WOULD INCREASE DUE TO SURVEYORS HAVING TO TRAVEL FURTHER TO ATTEND VESSELS ETC.
REXT0025	Organisation	With the experience of operating fishing vessels for very nearly 30 years, and interacting with the MCA through-out, I can honestly say that I have never physically visited an MCA office. All the organisation of surveys and surveyors has always been via telephone.
REXT0026	Organisation	No Response
REXT0027	Organisation	In order to operate our business in an efficient and safe way we have access to Norwich office on a daily basis. We are working to achieve complete safety within our profession, and, in order to maintain our positive structures and work procedures have discovered there is a rolling need to stay in touch with the main office for a variety of different reasons. It is definitely in our interests to have a human being at the end of a telephone line who is completely au fait with our individual business. One of the most difficult aspects of our job, in trying to stay in line with procedures, is trying to define what is actually relevant to us. The forms and information that are enforced on us are often written with huge vessels and companies in mind that do a completely different job to us. Therefore, we struggle to understand much of what is expected, and often need a third party to support us if we are unsure. The expectation to interpret what is relevant to us is huge and, while I have the chance to voice an opinion, I personally feel the MCA let us down by not issuing paperwork more relevant to small passenger craft. We have to work extremely hard to decipher what is meant for our business. We are supported in this by staff that know us and know our business. The contact that we have is crucial. I am extremely concerned we will lose this if the office is made larger and more remote from our needs.
REXT0028	Organisation	We have operated the Redacted (crossing between Redacted and Redacted) for the past 31 years and have used the Plymouth Marine office during that period for our annual docking and running surveys. Also, we have called upon them for the issue of exemption certificates and oral examinations for BML licences. In addition we have used this office to record entries in our crew member's seafarer's book of certificates attained. When we have purchased new vessels from another area we have obtained exemption certificates for their safe passage and have always found them to be cooperative with our requests and abide by their recommendations. We have always been provided with an excellent back up service from all at the Plymouth Office, from the receptionists to the Surveyors, they have always had time to give their professional recommendations, which we have gratefully received.
REXT0029	Organisation	So we can run our business efficiently and safely we really need to have access to our local Norwich office on a regular basis often monthly sometimes weekly and just lately due to all new regulations on a daily basis! We are always trying to keep up to date with various new & existing rules and regulations which unfortunately seem geared up for larger companies and vessels, the documents are very hard reading and generally near impossible to pick out the bits that actually affect our 'smaller' business we therefor completely rely on our local office who all know our business, how we operate and what's involved to help us understand them. The staff there are absolutely great and are crucial to keep us moving in the right direction. A quick phone call sorts most problems out straight away or if not a short journey to go in and see them. The thought of the office moving so far away is rather worrying as I feel that in doing so we will be left out on a limb so to speak without the knowledge that the 'local' team have of our set up & operation to get the correct assistance in our daily passenger carrying operations
REXT0030	Organisation, 31 – 100	It would be useful if we were given additional delegations, as requested below.
REXT0031	Organisation, 31 – 100	Fishermen need access frequently as required and need competent staff to be available, efficient in response, quick to respond, able to provide accurate information, and have the social skills to interact positively with fishermen At all levels, staff should understand the social and economic pressures which apply uniquely to fishermen who are small businessmen. Some cannot access internet easily due to remote locations and who work anti-social hours. Information is routinely sought on courses, qualifications, MCA vessel surveys and registration, timetables and availability of surveyors. The human quality of interaction is of prime importance.
REXT0032	Organisation	The question is not clear to me, what does direct access mean? I need to contact the Marine Office on a regular basis via the telephone and email and that will suffice. There I no requirement for any of the aforementioned operators to visit their marine office.
REXT0033	Organisation	No Response
REXT0034	Organisation	where would i go if i need to sit down and discuss proposals for alterations on my vessel
REXT0035	Organisation	Redacted utilise the audit and course approvals from MCA Surveyors to ensure all our programmes retain their approvals. We have 32 separate approvals which are checked every 2-3 years, with a workload of approximately 30 man days/ year Surveyors from MCA Tyne also attend biannual meetings with staff to discuss issues with oral examinations Students from Redacted undertake their MCA orals examinations at MCA Tyne for a range of orals from OOW/EOOW to Master/Chief Engineer. Including re-sit examinations the annual total of orals undertaken are 1100-1200/year, with an equivalent workload of 360 man days / year. Currently MCA Tyne are the only centre offering ETO and SETO oral examinations in the UK. Students from Redacted visit MCA Tyne offices to ask for and receive advice and guidance on certification issues that directly affect their employment.

REXT0036	Organisation	Bi annual Regional Safety Meetings. Occasional visits to the office, (usually no more than one per year), in relation to local issues with ships or ship owners. Good response times for officers when required for ship deficiencies or survey matters. Good provision of examiners for students at our local college at Lowestoft. Good availability of officers for inspection of vessels engaged in STS work.
REXT0037	Individual	No Response
REXT0038	Organisation	On behalf of the Redacted I would like to draw your attention to a number of concerns that the Redacted has with the proposed changes, particularly with the loss of our local marine office at Orpington. We have a long established working relationship with the officers at our local marine office, as we have a vast number of commercial inland waterway vessels and the largest inland waters fleet in the country on the tidal Thames. These proposals come at a time when there is an ever growing Class V trade and an increase in personnel being trained for Boat Master Licences (BML) on the tidal Thames. Therefore the removal of the local marine office at Orpington raises questions as to how the increasing workloads will be managed efficiently. In the past our Marine Surveyors used to deal with MCA officers at headquarters to discuss technical queries; however it has become increasingly difficult to talk to the same person in the same department each time they call. Therefore over the course of time we have relied more and more on calling the local marine office and the local surveyors, who have an extensive knowledge of dealing with all the operators on the tidal Thames. This example further deepens our concerns should we lose our local marine office and the surveyors at Orpington. We also consider that the removal of the local marine office will increase the cost burden on operators on the tidal Thames and will lead to less efficiency for all concerned. For example, a surveyor travelling from either the Dover or Southampton offices will need to travel approximately two hours each way from the office to conduct inspections and/or examinations. This would soon lead to the MCA officer being on overtime rates and potentially not having the necessary time to complete all vessel inspections for an operator in one day, leading to a second day of inspections for the organisation.
REXT0039	Individual	To find out information and for surveying my boat. I frequently contact the local office as their local knowlage is most helpful. The local Coastguard has been ruined by the changes that have been instergated.
REXT0040	Not specified	No response
REXT0041	Organisation	Without my local office I would have struggled to get my staff suitabley qualified e.g. BML – confusing, and each staff member had different problems. I was able to call into Plymouth and discuss and sort it out/get documents copied/and dates booked. This would have been difficult on the phone and I could not have driven further 2.5 hours to Falmouth.
REXT0042	Individual	No Response
REXT0043	Individual	No Response
REXT0044	Organisation	No Response
REXT0045	Organisation, 100+	Collectively, the operators of UK-flag ships whom which the Redacted represents need access to the entire network of Marine Offices for the full range of Flag State services they provide: from routine statutory surveys and audits to ad hoc call-outs of surveyors when particular questions arise on board ship, and consultation and advice on the interpretation of law and the application of generic requirements to specific circumstances. The need for access to a local office, rather than a national service, reflects the fact that surveyors based in Marine Offices have customarily developed special expertise relating to the ships that are based in (or call regularly at) ports that are geographically nearby. Thus, for example, surveyors in the Marine Office in Dover have developed special expertise relating to ferries and those at Aberdeen have developed special expertise relating to OSVs. Access to the Dover office for instance, is very important for UK-flag ferries operating from Dover: this office provides considerable assistance dealing with queries regarding the complexities and survey requirements of passenger vessels, so as to not delay the vessels in the short port turnaround timeframes available. The Marine Offices in Belfast and Liverpool perform the same function in relation to UK-flag ferries operating on the Irish Sea and, for the same reasons, access to those offices is similarly important. Such specialist expertise is based on personal familiarity with the ships in question and is not replicated across the MCA nationally. For the shipping company, both specialist expertise and personal familiarity (and continuity) with individual surveyors are highly valued. Providing such ship-specific or ship-type-specific specialist expertise across all Marine Offices is probably uneconomical. Similarly, there is a risk of dilution of expertise and service levels if the MCA seeks to maintain too great a number of regional offices. The analysis available to us as respondents, does not allow us to judge whether or n
REXT0046	Organisation, 100+	As the fishing industry it is quite clear by Figure 2 and 3 that the work carried out by both Scottish offices is vital for the Scottish fleet by the amount of surveys carried out and the hours worked. Direct access, 24/7 is vital for the industry as many fishing vessels are small businesses relying on the ability to be able to contact its local office whenever. Having surveyors embedded in the main fishing communities is vital for surveyors to understand the vital role they play in maintaining that Scotland's seafood continues to supply jobs, security, national income and a prime food source for our nation and the world. It can be seen from figure 2 in particular that the call by the fishing industry in relation to surveys is a major part of the MCA's role in Scotland. We believe the MCA's issues over the last 5 years in particular for surveying the under 15m fleet the figures may have been larger in relation to the amount of surveys carried out. A valid Safety Certificate is imperative for the existence of a fishing vessel for those in Class and for those looking to register or re register their vessels. If a fishing vessel is not registered it will not be eligible for a fishing license making the business inoperable. The Marine Office in Aberdeen also used to be a main center of fishermen being examined for COC oral exams. In the last few years, fishermen have had to travel to Glasgow and England, which has caused severe expenses and loss of earnings. This facility and the ability must be reinstated to the Aberdeen office especially when the only Maritime institute for teaching fishermen in COC's on the mainland UK is based in Peterhead some 25 miles away. If we are to see a safer industry then part of that is the MCA providing better, closer links with the Scottish Maritime Academy in Peterhead.
REXT0047	Organisation	Several times annually for booking surveys and related queries.

REXT0048	Organisation	Our fleet consists of two distinct types of operation, namely the Roro/Ropax fleet which predominantly operate around or out of the UK coastal waters and the internationally trading tanker fleet which operates world w ide with rare calls to the UK. Therefore our position on this question is also somewhat split. Firstly for the ferry fleet it certainly assists, access to a Marine Office is very useful as regards surveys and inspections. RoPax vessels under the UK Flag are inspected regularly and a good working relationship with local surveyors is a huge benefit. It is usual to talk to the responsible MCA surveyors at least twice a month, keeping them updated on what is happening on the ship, forward planning Passenger Certificate visits etc. In addition on average about 2 visits per year to the Marine Office to discuss project works proposed for the vessels. In summary for the Ferry Fleet there is use in having direct access to a Marine office. Contrasting with this, for the tanker fleet the majority of the routine contact is via Email and telephone for arrangement of scheduled audits and in the case of isolated situations which may require dispensation or reporting of an incident. Therefore the location of the office is not as critical as long as emails and queries are swiftly responded to, or in the event of a non routine requirement access can be gained at short notice.
REXT0049	Individual	As and when any queries arise such as and when certification and inspection is required
REXT0050	Organisation	Liaison in confidence when representing Seafarers who confide in the Seafarers Centre seeking advice upon issues which may have repercussions if raised on board Important to know individual officers when discussing concerns raised on behalf of Seafarers Welfare - both points are demand lead. Detentions can be very time consuming Availability of Officers and frequency for Oral Examinations
REXT0051	Organisation, 100+	We welcome the proposals for the improvements but recognise ferry operators specifically need access to the Dover Marine Office in relation to UK Flag Passenger ships operating from Dover. This assists to deal with queries regarding the complexities and survey requirements of passenger vessels, so as not to delay the vessels in the short port turnaround timeframes available.
REXT0052	Individual	Fishing vessel safety inspections every 5 years and vessel change of ownership.
REXT0053	Organisation, 100+ Organisation	Redacted members in the relevant ports have frequent contact with the MCA over concerns they raise over the operation of shipping in UK waters. There is a clear need for an inspector to be working on the port so they can witness the scene when a ship arrives into the port area with the lashings already removed, or where the crew have been worked well beyond the maximum safe working hour's limits. With the loss of MCA vessels to take the inspectors out to the ships, members feel it has become pointless contacting the MCA as they do not have the capacity to do anything about a situation and by the time an inspector can arrive in Felixstowe from Ipswich or in the Port of Tyne from Bridlington the ship owner or the crew can cover up the offence. When the duties performed by the MCA rely on the ITF inspectors to discover abuses of the system at sea, it becomes a sorry state of affairs. How would an inspector know if the captain and cox had their glasses with them when operating the vessel without a surprise visit? Redacted is concerned over how long you prove that the bridge crew needed an eye test at all if all the local facilities are closed delaying the processing of officers and ratings During the period 2005 to 2009, Redacted experienced at first hand the system now being proposed/considered by the MCA namely a surveyor working remotely but deemed to be based in Dover. Regretfully, that system did not work as envisaged Redacted regularly delivers documentation to the MCA by hand to the Orpington office eg drawings which the MCA cannot receive electronically due to their own internal regulations. The remote system operated by Orpington via the late Phil Matteson meant that on many occasions the files were in one location and the surveyor in another. Inability to access files and discuss history of the vessel certification was a major failing of the "remote office system". The time delays, lack of consistency, inability of other surveyors to access key papers resulted in surveys that were always more diffic
REXT0055	Organisation	companies. Despite MCA's Officers' best efforts the split regime between Dover and Orpington did not work. Such failings have not been addressed within the consultation document. Additionally, the proposed closure would change the legal status for surveyors with regard to their hours of work as per European Court of Justice ruling C-266/14 [7] on the working time directive. This creates two issues: • Overtime costs will increase significantly. Dover to London is approximately 1.5 hours via train which is 42% of a 7 hour shift. It would seem therefore, more surveyors will be needed to cover additional hours lost through travelling time. Redacted is unsure of the magnitude of the cost implications but it seems it will make the closure of Orpington less attractive. • Not all surveyors have access to personal cars. This will make travel arrangements difficult. This would be especially prevalent for surveyors who live in cities. This will increase costs to the MCA as public trains are far more expensive and time consuming than private transport. We have a fleet of 8 UK flagged vessels and use Marine Offices for arranging surveys, audits, approvals and general queries. In the main we use Beverley (where our CSM is located) and
NEXTO033	Organisation	Orpington. Most surveys/audits are carried out in the Rivers Humber and Medway, both which are proposed for closure. Occasionally we use Cardiff & Belfast.
REXT0056	Organisation	Direct access to Marine Offices is very important for our vessels, especially for the vessels on short trade routes that already have a strong relationship with each of the surveyors. The statutory surveys for most of our managed passenger ferries is done on a rolling survey basis and the schedules for these vessels can be subject to short notice delays. Access to the Duty Surveyor is beneficial but delays have been experienced in applying for exemptions as the duty surveyor may not know the complete history of the vessel or the reason for applying for the exemption. It can take some time to provide this information which can have an impact on a vessels schedule.
REXT0057	Organisation, 100+	Redacted, is the Redacted representing offshore, marine and underwater engineering companies. Redacted members carry out the marine construction operations that support offshore exploration and production activities all over the world, including the North Sea. Redacted member companies have around 100 vessels registered in the Red Ensign Group. Although offshore vessel activity has been reduced considerably in the last year or so, Redacted members have traditionally required direct access to MCA Marine Offices on a regular basis for routine survey and inspection services, and for more detailed advice on the application of UK regulations for offshore support vessels.

REXT0058	Organisation	As an operator of Redacted boats on the Redacted it is vital that we have direct access to a Local Marine Office.
	Organisation	When the MCA updates procedures and protocols it is essential that we have timely, reliable advice on hand.
		We have an excellent working relationship with the team at the Norwich Marine Office; it is a great advantage that they know us and our business very well; this obviously makes our dealings with them
		much more efficient. It is also of great advantage that the MCA officers are able to visit us at short notice to offer advice or help resolve uncertainties. We have a seat on the East Anglian District Marine
		Safety Committee. The committee meetings are held at the Norwich Marine Office. These very useful meetings give the opportunity to share best practice with other agencies. If the Norwich Office
		was to close we would have great difficulty attending these meetings at an Office further away. We have regular visits from the MCA surveyors. As the Norwich Marine Office is so close to us we can
		time these visits to fit in with our timetable of maintenance, for example we can request a visit for an out of water survey when we already have the boat lifted for maintenance. As well as the actual
		surveys we have requested visits to seek advice on maintenance work required. Other surveys can be booked at times to suit our business. We gain so much information and support from these regular
		visits.
		We have a regular training programme for Boat Masters. We require visits for the BML tests at least once a year, but require continual access to the Marine Office during our training process. With the
		Marine office based in Norwich we are able to drop off all paperwork for assessment prior to the test visit. We have at least five visits per year.
REXT0059	Organisation	A number of our members use the office facilities on a regular basis, of specific concern are the Orpington and Plymouth offices. With the current system of MCA operation excluding the use of video
	0	and teleconference facilities and limited online services there is a question over the sensibility of proposing to remove the on-site facilities available. Given the governments history of providing online
		services, delays, failures and significant cost increases it cannot be sensible to schedule closures without the replacement online facilities already in place.
		In particular, the Orpington Office service the majority of the Class V fleet, with the Thames Tideway Tunnel project commencing, the proposed Parliament refurbishment and the Mayor of London
		wanting to double the footfall on the Thames there has to be a question of the timing of this proposal. In addition the current consultation to remove the grandfathering rights of pre 1992 vessels is
		going to put extreme pressure on the current level of service without the proposed closures.
REXT0060	Individual	Weekly contact - arrange MCA surveyors for boats, book BML exams, refer ML5 failures, ask questions.
REXT0061	Organisation, 31 – 100	Regular access required for liaison with MCA surveyors - Required for vessel surveys and clarifications on M notices etc - Required for prompt response on our vessels in home port if required - Attending
		regional safety committee meetings
REXT0062	Organisation, 100+	Redacted is an MCA approved training and assessment centre, we have daily contact with the Norwich Marine Office for both the ongoing maintenance of the College's MCA approvals and also the
		management and organisation of MCA Oral Examinations of our UK and International students which include: Officer of the Watch (Unlimited) Chief Mate (Unlimited) Master Mariner
		(Unlimited) Master Mariner (200Gt) In total we work with the MCA's Norwich MO to deliver 250+ MCA oral exams to our students Both of these activities and the close relationship we have
		with the Norwich MO are of strategic importance to Redacted and the local maritime economy
REXT0063	Organisation	No Response
REXT0064	Redacted	Redacted
REXT0065	Organisation, 100+	No Response
REXT0066	Organisation, 100+	No Response
REXT0067	Organisation	No Response