



Maritime &
Coastguard
Agency

Consultation Document:

Recasting the Merchant Shipping (Load Line) Regulations to reflect up to date requirements as contained in the International Load Line Convention 1966 (ILLC) and Protocol 1998 (ILLP)

June 2017

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Section 1: Overview of this consultation

Aim

1. The purpose of the proposed Regulations is to bring up to date the UK's transposition of the International Maritime Organization's (IMO) International Load Line Convention (ILLC) and the International Load Line Protocol (ILLP) into domestic law.
2. At the same time, it is proposed that they will introduce Ambulatory Reference with the Regulations to incorporate any future amendments to three technical annexes to the Convention/Protocol (the detail which is of a more technical nature) of the ILLC/ILLP into UK law by reference on an ongoing basis, instead of transposing it provision by provision.

Views sought

3. **Consultees are requested to use the form at section 5 for their responses.** Consultees are invited to comment on any aspect of this consultation. However, you are specifically invited to respond to the following questions, some of which are reproduced at the relevant points in the Impact Assessment:
 - do you agree with the government's interpretation of the post-1988 Protocol amendments to the ILLC/ILLP?
 - do you agree that Ambulatory Reference will make familiarisation with new amendments to the ILLC/ILLP easier? (Ambulatory Reference is described on pages 3 to 5 of this document.)
 - consultees are requested to provide estimates of cost savings resulting from having to refer only to the technical standards in the international text rather than also referring to UK text transposing the standards, and to comment generally on this approach (Impact Assessment section 6.4)
 - do you agree with the cost categories identified in the table in Annex A of the Impact Assessment? If not, please provide alternative evaluations (Impact Assessment section 6.8).
 - do you agree with the above assumptions (which are contained in section 8.5 of the Impact Assessment and relate to the monetary analysis)? If not, please provide full reasoning and any applicable evidence (Impact Assessment section 8.6).
 - do you agree with the assumption in Options 1 and 2 that costs have already been incurred (Impact Assessment section 6.8)?
 - do you agree the proposed change to offences and penalties is appropriate?
 - do you agree the proposed guidance to accompany the Regulations is adequate and in the right format?
4. A full list of consultation questions is contained in Section 5 of this consultation.

Deadline for responses

5. Views are welcomed from **22 June 2017 until 24 August 2017**. For an overview of the timetable please refer to section 4 of this document.

Section 2: Areas for consideration

Introduction

6. The International Load Line Convention (ILLC) / Protocol (ILLP) is one of a number of Conventions adopted by the International Maritime Organization (IMO) to which the UK is signatory. As a signatory, the UK has an obligation to implement any amendments to them in UK law.
7. Load Line standards cover the position of the load (“plimsoll”) line painted on the side of ship to indicate the maximum loading point, as well as other measures, such as hull strength, buoyancy reserve, protection of crew, design of external doors and hatches, sub-division, drainage and other matters relating to the stability and water-tight integrity, which are vital for the safety of a ship.
8. The ILLC/ILLP are regularly amended to improve the safety of ships and lives at sea and to reflect advances in safety. Each time an amendment is made to the ILLC/ILLP, UK legislation must be updated. The regulatory change process to update legislation takes a minimum of 12 months and requires significant administrative and parliamentary time and resources.
9. Under a backdrop of competing priorities for limited resources within Government, a new approach to transposing international requirements into UK legislation is vital.
10. On 26 March 2015, the Deregulation Act 2015 received Royal Assent. The Act introduced a new power to make ambulatory references to international instruments under a new section 306A of the Merchant Shipping Act 1995 (MSA 95).
11. The recast of The Merchant Shipping (Load Line) Regulations will make use of this new power.

Use of ambulatory reference

12. An ambulatory reference for the purposes of this consultation is a reference in domestic legislation to an international instrument which is interpreted as a reference to the international instrument as modified from time to time (and not simply the version of the instrument that exists at the time the domestic legislation is made).
13. It is proposed that an ambulatory reference to the requirements for industry contained in the ILLC/ILLP be introduced into the recast of the Merchant Shipping (Load Line) Regulations.
14. From a legal perspective, this will mean that any new amendments to the technical Annexes to the ILLC/ILLP will automatically become UK law when they enter into force internationally. No new or amending regulations will be required to bring such amendments into force in the UK as is currently the case.
15. From a practical perspective, this means that shipowners, shipbuilders, and other interested parties can refer directly to the text of the ILLC/ILLP to determine both the UK and international requirements. Where the text of the ILLC/ILLP is unclear or needs amplification - for instance, where it is stated that something is done “to the

satisfaction of the administration”, guidance will provide the additional clarity required. At present the above mentioned parties need to refer both to UK legislation (which is likely to be out of step with international requirements and phrased differently to the ILLC/ILLP) and the text of the ILLC/ILLP to be sure they are in compliance with international requirements.

16. The main benefits of using ambulatory reference are:
 - a) simplification - it will make things easier for shipowners, shipbuilders, other industry professionals and other interested parties, as they will only have to refer to one set of legal text in relation to the ILLC/ILLP - the international text – instead of having to refer also to a UK version of those provisions;
 - b) legal clarity - industry professionals and others mentioned above will have the final legal text of any amendments to Load Line requirements at an earlier stage, ie., they will not have to await transposition into UK secondary legislation, which can take several years to complete;
 - c) a level playing field - it will enable the UK administration to prosecute substandard non-UK ships operating in UK waters, in the interests of safety of the ships and their crews, and also to protect the competitiveness of companies with UK registered ships being threatened by foreign shipping companies taking short cuts to save money at the expense of safety;
 - d) cost saving - it will result in a saving to the public purse, because resources which would be required in the time of government lawyers, economists, policy officials, Ministers and Members of Parliament to create a new Statutory Instrument every time the ILLC/ILLP are amended would be significantly reduced;
 - e) better regulation - it will further the government’s aim to reduce the number of instruments forming the body of secondary legislation, thus furthering the government’s Better Regulation Agenda;
 - f) clarity - it will aid clarity and transparency, including reducing debates about whether UK legislation has “gold plated” the international text;
 - g) compliance with international obligations - it will assist the UK in performing its international obligations to transpose amendments to the ILLC/ILLP promptly, and enable the UK maritime safety administration to demonstrate this compliance when undergoing the International Maritime Organization (IMO) mandatory audit.
17. Further information on the application and benefits of using ambulatory references is contained in section 5 and Annex B of the Impact Assessment.
18. A number of questions relating to the impact of using ambulatory references are posed to consultees in Section 5 of this consultation.
19. Parliamentary control will be maintained, as the Secretary of State will still have the power to make an instrument to prevent an unwanted amendment to the ILLC/ILLP from becoming UK law. Such an event is thought to be extremely unlikely as the measures are generally related to safety, are agreed internationally (with the UK government and industry involved) and will invariably be international obligations which the UK has to fulfil, and internationally applicable standards with which UK ships will have to comply regardless of whether they pass into domestic law or not.
20. Where international text is unclear, or needs amplification - for instance, where the international text of the ILLC/ILLP requires that something is done “to the satisfaction of the administration” - a Marine Guidance Note (MGN) will provide the additional

clarity required. This will be kept under review and amended if necessary. A draft of the proposed MGN is included at Annex D of this consultation package.

21. A formal Impact Assessment (IA) is completed for all but the simplest forms of new legislation. This is an iterative process of analysis (ie., it is developed over time, re-visited regularly and updated when new information becomes available).
22. The IA at Annex A of this consultation considers what the impact would have been of the amendments after the 1988 Protocol – which is the point up to which transposition into UK law has already been completed.
23. For future amendments to the ILLC/ILLP, an Impact Assessment will be developed during the process of negotiating the new Resolutions at the IMO, but it will be possible for it to be consulted upon with industry, interested parties and the public at an earlier stage than if domestic legislative instruments had to be developed. This is advantageous because it will better inform any negotiating process, and will involve industry bodies and other stakeholders at an earlier stage. Public consultation will be made simpler as a consultee will have only the international text and guidance to consider, rather than also having to examine secondary legislation, which by its nature is not always easy for a person who is not legally qualified to understand.

Updates to bring UK requirements up to date with international ones

24. The Merchant Shipping (Load Line) Regulations 1998 were last amended in 2000 to incorporate the 1998 Protocol, and in 2005 to reflect the change in the law relating to Civil Partnerships in the definition of Pleasure Vessel (to which those Regulations are disapplied).
25. The current UK transposition, which has been effected up to the 1988 Protocol, is contained in the following instruments:
 - Merchant Shipping (Load Line) Regulations 1998, as amended by the Merchant Shipping (Load Line) (Amendment) Regulations 2000 and the Civil Partnership Act 2004 (Amendments to Subordinate Legislation) Order 2005; and
 - Merchant Shipping Notice (MSN) 1752(M).
26. The new Regulations simply incorporate amendments since the 1988 Protocol, which are already in force in international law, and provide that future amendments agreed internationally at the IMO will be incorporated without further legislation being required.
27. A summary of the amendments are contained in Annex A to the Impact Assessment attached with this consultation. As the amendments are already in force internationally, it is considered that ships must already be compliant to operate internationally. Non-compliances would soon have been identified in port State Control inspections. Therefore no additional costs will result from these Regulations, other than any which arise from future amendments to the ILLC/ILLP, and these will normally only apply to ship constructed after the amendment has come into force, not retrospectively to ships which have already been built. However, for completeness and to fulfil the government requirement for costs to be considered, an attempt was made in the IA to estimate costs which would have to have been incurred by shipowners and shipbuilders in order to comply when the changes came into force internationally. Monetised costs and benefits have not been possible to ascertain, because:

- a) the changes are generally incremental and technical in nature;
 - b) the UK legislative regime applies to applicable UK ships and non-UK flagged ships in UK waters, and apportionment of costs and benefits by flag at the stage of a ship being built or “classed” by a Classification Society is not possible.
28. Therefore a “ball park” estimation of costs and benefits has been conducted, a Classification Society has been consulted informally on these, and consensus has been reached. This gives an idea of the order of costs which would have been incurred at the time of the changes. However, these are considered to be historical costs for the reasons given above.
29. Most of the amendments are minor, many are simply clarification or re-wording of existing text. Others are more significant, such as hatch cover loading which is a result of Lord Justice Colman’s Investigation into the loss of the Bulk Carrier DERBYSHIRE. Yet others formalise existing practice, in that, although they give the appearance of being new as they were not previously in the ILLC/ILLP, they already existed in the International Association of Classification Societies (IACS) Unified Interpretations (UI), which effectively made them requirements.
30. Another highlight is the incorporation of the IMO’s Intact Stability Code (IS Code) into the ILLC/ILLP. But the UK was applying this already.
31. Since the last update, a number of amendments to the ILLC/ILLP have been adopted and these will be incorporated into UK law through this recast of the Merchant Shipping (Load Line) Regulations. The Resolutions being incorporated are the following Resolutions of the IMO Assembly (amending the Convention) and the IMO Maritime Safety Committee (MSC) (amending the Protocol). There are often two Resolutions making the same amendment, one to the Convention and the other to the Protocol. The amendments are:
- Resolution MSC.143(77) – this is effectively a complete re-write of Annex I of Annex B of the Protocol. It also amends the definition of one area of Annex II.
 - Resolution MSC.172(79) – this amends the form of Load Line and Load Line Exemption Certificates specified in Annex III of the Protocol by adding the completion date of the survey on which the certificate is based.
 - Resolution A.972(24) – does the same thing in the Convention as Resolution MSC.172(79) does in the Protocol.
 - Resolution MSC.270(85) – Amends text of Protocol Regulation 1 specifying relevant standards for particular generations of ship, and Regulation 3 by adding a definition of the 2008 Intact Stability Code.
 - Resolution MSC.223(82) – imposes editorial changes in the Protocol (Regulations 22 and 39) in relation to freeboard.
 - Resolution MSC.329(90) – amends definition of Southern Winter Seasonal Zone in Annex II of the Protocol.
 - Resolution MSC.329(90) (Corrigendum) - Corrigendum amending definition of Southern Winter Seasonal Zone in Annex II of the Protocol.
 - Resolution MSC.345(91) – amends regulation 27(11) initial condition of loading and 27(13) Condition of Equilibrium.
 - Resolution A.1082(28) – makes same amendment to Convention as MSC.329(90) does to the Protocol.

- Resolution MSC.356(92) – revises the test in Regulation 2-1 of the Protocol about Recognised Organizations.
 - Resolution A.1083(28) – adds definitions to the Convention in relation to the IMO Audit scheme (Regulations 3) and member state obligations in the form of a new Annex IV (Regulations 53 and 54).
 - Resolution MSC.375(93) – adds the same in the Protocol as Resolution A.1083(28) does to the Convention.
32. Further information and detail on what these amendments entail and their impact is contained within Annex A of the Impact Assessment and the draft Marine Information Note (MIN) at Annex E.
33. In assessing the impacts of these amendments a number of assumptions have been made in the Impact Assessment. To challenge the assumptions, a number of questions are posed to consultees within the Impact Assessment and replicated in Section 5 of this consultation.
34. There is currently no EU legislation covering the subject matter of the ILLC/ILLP, and any ay EU legislation is outside the scope of ambulatory reference.

Application

35. The new Regulations will apply the ILLC/ILLP to all ships on international voyages, **except:**
- warships, naval auxiliaries and other ships owned or operated by a Contracting Government and used only on Government non-commercial service;
 - “new” ships of less than 24 metres in length;
 - “existing” ships of less than 150 tons gross;
 - pleasure vessels;
 - fishing vessels;
 - ships solely navigating–
 - the Great Lakes of North America and the River St. Lawrence as far east as a rhumb line drawn from Cap des Rosiers to West Point, Anticosti Island, and, on the north side of Anticosti Island, the meridian of longitude 63 degrees W;
 - the Caspian Sea;
 - the Plate, Parana and Uruguay Rivers as far east as a rhumb line drawn between Punta Rasa (Cabo San Antonio), Argentina, and Punta del Este, Uruguay.
36. The application of the Regulations matches that of previous legislation on the subject of Load Line, other than the fact that the new Regulations cover only the international obligations (ie., those arising from the ILLC/ILLP) whereas the existing UK legislation provides for both the international and domestic load line regimes. In due course, a new, separate domestic regime will be introduced to operate seamlessly with the international regime. But the new Regulations which are the subject of this consultation will incorporate a “saving” provision in the existing Merchant Shipping (Load Line) Regulations 1998 (as amended) so that those Regulations will remain in force for domestic vessels (and non-Convention size vessels engaged on international voyages) until such time as the new domestic regime is in place.

Penalties and offences

37. Arrangements for enforcement remain substantially the same as under the Merchant Shipping (Load Line) Regulations 1998 (as amended), as changes are marginal and no new offences are created, although most of the existing offences are re-made. (See “Offences” Regulation in the draft Statutory Instrument.) Where the option of conviction on indictment exists currently for an offence, this is retained, as it facilitates international co-operation in ways not possible with summary-only offences, which is particularly important given the international nature of shipping.
38. Two offences, that the Load Line Certificate and Draught of Water and Freeboard Notice are “posted in some conspicuous place on board the ship”, have been discontinued, as they are not in the ILLC/ILLP. This does not mean that the Master does not need to produce such documents to an authorised surveyor or inspector on demand – it simply means that failure to promulgate these documents in a prominent place onboard the ship is no longer a criminal offence.
39. Re-made offences are as shown in the Table below.

Subject matter	Penalty on Summary conviction/ indictment
Not proceed to sea without certification	On summary conviction – a fine maximum Level 5 On indictment – a fine
Surveyed, marked, complies with Conditions of Assignment (CoA), Information provided for Master, etc..	On summary conviction – a fine maximum Level 5 On indictment – a fine
Ship must not be overloaded.	On summary conviction – a fine maximum Level 5, including additional fine depending on the extent of submersion of the load line, as prescribed in the Offences Regulation of the new Regulations. On indictment, a fine.
Keep ship marked	On summary conviction – a fine maximum Level 5 On indictment - not applicable
Not to tamper with marks	On summary conviction – a fine maximum Level 5 On indictment - not applicable
Alteration and surrender of certificates	Fine max L5/ Fine or imprisonment not more than 6 months On summary conviction – a fine maximum Level 5 On indictment – a fine, and/or imprisonment for a term not exceeding 6 months

Guidance for the Merchant Shipping (Load Line) Regulations

40. The Marine Guidance Note (MGN) drafted to supplement the Regulations is included in this consultation package. The purpose of the MGN is to:
- explain the function of the Regulations, including the Ambulatory Reference approach;
 - provide clarification/ amplification to the international text of the ILLC/ILLP where this is considered necessary, eg., where the text states that something is to be done “to the satisfaction of the administration”, or that an item should meet “an approved standard”;

- c) provide a handy cross reference between Regulations within the ILLC/ILLP and relevant Unified Interpretations (UI);
 - d) provide details of the stability information which must be supplied to the Master of a ship;
 - e) provide examples of forms which are suitable to demonstrate compliance with particular obligations in the ILLC/ILLP.
41. The Marine Guidance Note (MGN) can be updated much more quickly than a Statutory Instrument, or even a Merchant Shipping Notice (MSN), both of which have mandatory status (the MSN is mandatory if it is incorporated into legislation). It will therefore be possible for the UK government to be more responsive in issuing guidance to industry, and this approach will also not preclude flexibility required to accommodate innovative solutions where appropriate.

Section 3: Responding to this consultation

42. There are specific questions highlighted in section 5 of this document, which provides a structured way to respond to this consultation document.

Audience

43. Anyone may respond to this consultation and we will give full consideration to all responses. We will be particularly interested to hear from: ship owners, shipping companies, protection and indemnity clubs and other parties with an interest in shipping.

Duration

44. This consultation is open for **9 weeks from 22 June 2017**. The deadline for responses is **24 August 2017**.

Submitting your response

45. The response form is available at Section 5 of this document. Completed response forms should be emailed to arteam@mcga.gov.uk. Any questions should be sent to this email address prior to the end date of the Consultation in 44 above, or you can telephone Matt Giacomini at the Maritime and Coastguard Agency on 0203 81 72379. It may not be possible to consider comments received after the closing date.
46. When responding, representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions.

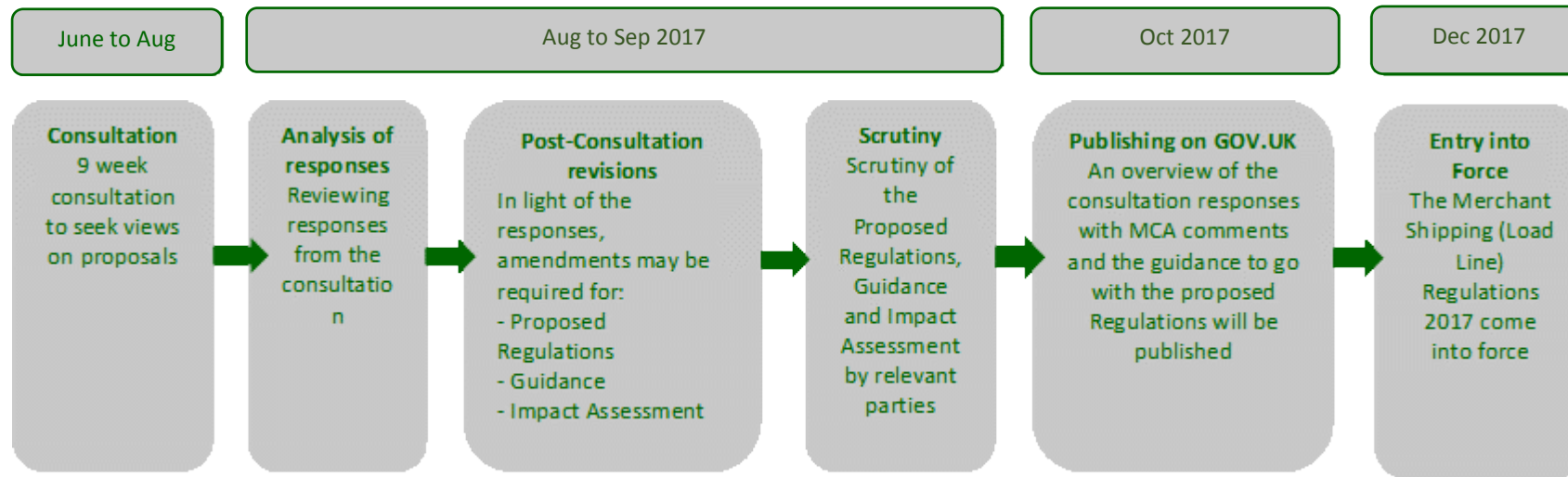
Freedom of information and data protection

47. Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).
48. If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.
49. The Department will process your personal data in accordance with the DPA and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Section 4: Outline plans beyond this consultation

50. Once this consultation closes we will review all responses. In considering the responses we will apply appropriate weight to those from organisations and individuals with specialist knowledge of the subject area.
51. We will be analysing the responses during August/September 2017. Our aim is to publish an overview of the responses and the MCA's comments during October 2017, which will be available from: www.gov.uk/government/publications
52. Where appropriate the draft Regulations, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
53. Our aim is for the recast Merchant Shipping (Load Line) Regulations to come into force during December 2017. The Regulations will be published on www.legislation.gov.uk
54. Accompanying guidance will be published on GOV.UK in advance of the Regulations coming into force.
55. A full impact assessment of the effect that the recast Merchant Shipping (Load Line) Regulations will have on the costs of business will be published with the Explanatory Memorandum on www.legislation.gov.uk
56. An overview timetable is below is below for reference:

Overview Timetable



Section 5: Response form

What is your name? _____

What is your email address? _____

What is your job title? _____

When responding please state whether you are responding as an individual or representing the views of an organisation:

- I am responding as an individual
- I am responding on behalf of an organisation

(name of organisation) _____

Please check the box that best describes you as a respondent and the size of your organisation:

Respondent Type

- Classification Society
- Government Agency/Department
- Individual
- Legal representative
- Protection & Indemnity
- Seafarer
- Ship Operator
- Ship Owner
- Trade Union
- Other

(please describe) _____

Size of Organisation

- Large business (over 250 staff)
- Medium business (50 to 250 staff)
- Micro business (up to 9 staff)
- Small business (10 to 49 staff)

Section 5.1 Questionnaire

a) Do you agree that the approach of using ambulatory references to implement ILLC/ILLP will make familiarisation easier?

- Yes, I agree
- No, I don't agree

b) Can you see any other benefits or drawbacks of using ambulatory referencing in UK legislation, for implementing international conventions?

We particularly welcome the views of ship owners in relation to ambulatory referencing – what benefits/drawbacks would this new approach mean for you?

c) On average, how many hours each year does your company spend reading and understanding the requirements of ILLC/ILLP?

Reading international text: _____ hours
Reading related UK legislation: _____ hours
Reading related UK guidance: _____ hours

Section 5.2

a) Do you agree with the government's interpretation of the post-1988 Protocol amendments to the ILLC/ILLP?

- Yes
- No

If no, please provide reasoning.

b) Do you feel that the costs and benefits assessment outlined in the Impact Assessment is a reasonable reflection of the costs and benefits?

- Yes
- No

If no, please provide reasoning.

c) Consultees are requested to provide estimates of cost savings resulting from having to refer only to the technical standards in the international text rather than also referring to UK text transposing the standards, and to comment generally on this approach (section 6.4 of the IA refers)?

d) Do you agree with the cost categories identified in the table in Annex A of the Impact Assessment? If not, please provide alternative evaluations (section 6.8 of IA refers)?

- Yes
- No

If no, please provide reasoning.

e) Do you agree with the above assumptions (which are contained in section 8.5 of the Impact Assessment and relate to the monetary analysis) (section 8.6 of IA refers)?

- Yes
- No

If not, please provide full reasoning and any applicable evidence.

f) Do you agree with the assumption in Options 1 and 2 that costs have already been incurred (section 8.7 of IA refers)?

- Yes
- No

If no, please provide reasoning.

Section 5.3

a) Do you feel that the MCA has successfully determined the extent of application for the ILLC/ILLP requirements?

- Yes
- No

If no, please provide reasoning.

Section 5.4

a) Do you feel that the re-made offences and penalties are necessary, fair and proportionate?

- Yes
- No

If no, please provide reasoning.

b) Is there a way that the penalties can be further streamlined?

- Yes
- No

If so, please provide amplification:

c) Is there a way through which the offences can be 'future proofed' to allow enforcement action to be taken without changing the legislation?

- Yes
- No

If yes, please amplify:

d) Do you feel that the proposed penalties will act as an effective deterrent for non-compliance with the requirements of the ILLC/ILLP?

- Yes
- No

If no, please provide reasoning:

Section 5.5

a) Does the proposed guidance meet your needs in terms of (i) format; and (ii) content?

- Yes
- No

If no, please provide reasoning:

b) Do you feel there is a better way of providing guidance for the ILLC/ILLP requirements?
Please provide reasoning for your answer.

- Yes
- No

If yes, please amplify:

Please return completed response forms to arteam@mcga.gov.uk

Alternatively responses may be posted to:

AR Team (Load Line)
Maritime & Coastguard Agency
Bay 2/29, Spring Place
105 Commercial Road
Southampton
SO15 1EG

Section 6: Conduct of this consultation

60. This consultation has been conducted in accordance with the Cabinet Office Consultation Principles.

Consultation criteria

61. The Cabinet Office Consultation Principles can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf

Feedback on conduct of consultation

62. If you have any comments regarding the conduct of this consultation, please contact the Consultation Co-ordinator at consultation.coordinator@mcga.gov.uk.
63. We are continually trying to improve the way in which we conduct consultations and appreciate your views. We would be grateful if you could complete and return the attached feedback form. These should be submitted to the Consultation Co-ordinator and are not affected by the deadline for this consultation.

MCA CONSULTATION FEEDBACK FORM

1. Please indicate on which Consultation you are providing feedback:

The Merchant Shipping (Load Line) Regulations to reflect up to date requirements as contained in the International Load Line Convention 1966 and Protocol 1988

2a. Please indicate whether you are responding on behalf of:

- Yourself as an Individual
- A Trade Association
- A Company
- A Government Organisation
- A Trade Union
- Other
(please specify) _____

2a. Please indicate whether you accessed this consultation package through:

- Post
- Email
- Website

3. Please rate the quality of this consultation regarding accuracy, good English and spelling:

- Very good
- Good
- Average
- Poor
- Very Poor

4. Please rate the format of the consultation presentation (layout, Annexes etc.):

- Very good
- Good
- Average
- Poor
- Very Poor

5. Please rate the consultation in terms of how clear and concise you felt it was:

- Very good
- Good
- Average
- Poor
- Very Poor

6. Did you feel that the consultation was conducted over a sufficient period of time?

- Yes
- No

7. Were any representative groups, organisations or companies not consulted who you felt should have been?

Yes

No

If yes, who? _____

8. Please let us have any suggestions for improvement or other comments you wish to make about this consultation below:

Thank you for your time. Please return this form to:

Consultation Co-ordinator,
Maritime and Coastguard Agency,
Spring Place, Bay 3/26, 105 Commercial Road
Southampton SO15 1EG

Or e-mail it to: consultation.coordinator@mcga.gov.uk

If you are happy to supply your name in case we need to contact you to discuss your views further, please enter it below (this is optional and your feedback will still be taken into account if you wish to remain anonymous):

Name _____

Tel. No. _____

Please note that the deadline for responses to the Consultation itself does not apply to the return of this form.