

Statutory review of the Merchant Shipping (Safety of Navigation) (Amendment) Regulations 2011

SUMMARY OF CONSULTATION COMMENTS

| | Condor Ferries | RYA* | MMO** | UKHO*** | RNLI | UK Chamber of Shipping**** |
|--|---|------|-------|---------|---|----------------------------|
| 1a) How long did it take for your business to understand the amendment? What was the hourly cost to your business of doing so? | 2 hours, hourly cost £100 | - | - | - | - | - |
| 1b) Were there any unexpected costs when complying when the new regulations? | No (no vessels needed to be fitted with LRIT due to all voyages being within Area A1 and all vessels fitted with AIS) | - | - | - | No. We already have a small team, part of whose responsibility includes monitoring relevant changes to legislation. | - |
| 1c) Have any cost increases or savings been passed on to other businesses? | No costs and no savings resulted from this change. | - | - | - | No | - |
| The amendment required ships to carry Long Range Identification and Tracking systems (LRIT). 2a) Did you already have LRIT equipment installed? | Not required prior to the regulation or subsequent due to all routes with Area 1 (VHF coverage). | - | - | - | No, not applicable for our vessels. | - |
| 2b) Were you required to purchase any new equipment or upgrade | No (nil) | - | - | - | No | - |

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| existing equipment? If yes, how much did this cost? | | | | | | |
| 2c) What are the costs related to the maintenance / calibration of the system? How has this been funded? | None, N/A | - | - | - | N/A | - |
| 2d) Without the amendment would you have LRIT installed on your vessel? | No. Would not have installed LRIT as considered of negligible benefit. | - | - | - | No | - |
| 2e) If this amendment was repealed would you continue to operate with LRIT? | No. LRIT was removed from newly purchased vessel on her arrival in UK for service on international routes within A1. | - | - | - | No | - |
| 3a) Do you believe these regulations in conjunction with the requirement to report have had a positive impact on the safety of vessels at sea? | Yes. The reporting requirements have a limited positive benefit, AIS coverage provides the main benefit. | - | - | - | Yes. Anything that reduces the element of "search" in SAR will benefit safety. | - |
| 3b) Have you noticed any unintended impacts which have been brought about as a result of the regulation? | No | - | - | - | No | - |

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| 4a) Are there ways that the regulation could be improved or that the implementation of the regulation could have been done better? | No suggested changes, except that some reporting requirements could be reduced for vessels with operational AIS. | - | - | - | No | - |
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*RYA email reply: *Having studied the amendment to the SOLAS Convention requiring certain ships to be fitted with appropriate LRIT equipment when engaged on international voyages, the RYA is satisfied that this does not affect the recreational sector that it seeks to represent and therefore it is not in a position to comment or provide useful feedback in this instance.*

**MMO email reply: *I note that the questionnaire aims to “help to understand if these amendments resulted in any unexpected costs”. My understanding of this and the questions posed is that the aim is to assess business impact. The MMO does not have experience implementing the regulation in question and so is not in a position to provide relevant insights.*

***UKHO email reply: *We’ve read the attached questionnaire and don’t believe we are in a position to provide a useful response as it is not relevant for our organisation.*

****UK Chamber of Shipping email reply: *There was no feedback from our members other than mention that LRIT continues to provide a secure means of tracking ships and has an ongoing role in this respect. Clearly there are fitting costs associated with LRIT, although no information was forthcoming this time.*