

CONSULTATION COMMENTS

CONSULTATION ON MGN 581: FISHING VESSELS: Registration Surveys for Fishing Vessels of less than 15m built before 16 July 2007

| <u>Consultee</u> | <u>Consultation Comments Received</u> | <u>Responses</u> |
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| Nick Quarmby MCA | <p>The only substantive comment I have relates to the use of the matrix, and the inclusion of the general disclaimer that there is no guarantee of acceptance depending on the score obtained, and the fact the MGN then continues to propose that the buyer should engage the surveyor to make the comparison report.</p> <p>The issue is whether the buyer should be recommended to refer the potential purchase to MCA for consideration of the matrix score <u>before</u> they buy the vessel and engage the surveyor, or before they engage a surveyor to get a report upon which they would then base their decision whether or not to purchase the vessel.</p> <p>We do not currently have a matrix barrier to submitting existing vessels for registration, and it is not clear to me when we are going to apply the matrix during the registration process – if at all. Certainly, the MGN does not make this clear.</p> <p>The matrix is drawn up on the basis that an existing vessel is going to be assessed by an independent surveyor against an alternative build standard to Seafish, and this is not the process we are now</p> | <p><i>The Matrix is labelled as a guide and the MGN makes this clear. However, the wording in the MGN has been formalised to read:</i></p> <p>2.2 <i>Before purchasing a vessel the potential applicant is recommended to assess the vessel using the Matrix at Annex 1. <u>This matrix is a guide only</u>. If you identify a vessel you wish to purchase, you can use the matrix to calculate a points score for the vessel before you make a purchase. This matrix gives an indication of the construction standard of the vessel. The lower the number of points your vessel scores more likely it is to be registered as meeting the necessary standard.</i></p> <p>2.3 <i>Please note the Matrix is NOT used by the MCA as part of the process of considering the vessel for Registration, the decision of the MCA is based solely upon the Registration Survey Comparison Report. The purpose of the Registration Survey Comparison Report is to establish that the vessels construction standard is equivalent to the Seafish Construction Standards and that it has been adequately maintained over time. The Matrix is</i></p> |

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| | <p>pursuing, so is the matrix still relevant in its current form ?</p> <p>My view is that if the matrix is a going to be rigidly applied in the registration cycle it's application has to be formalised and applied at an appropriate point which causes least potential cost to owners.</p> | <p><i>therefore not a guarantee of either refusal or acceptance for Registration, it is solely for the potential purchaser to use as a guide to choosing a vessel.</i></p> |
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