



## Maritime & Coastguard Agency

### **SECOND Consultation on the Revised Technical Requirements Resulting from the Review of Standards for Older UK Passenger Ships**

#### **Aim**

1. This consultation seeks your views on the revisions to the proposed amendments to the technical requirements applicable to UK Domestic Passenger Vessels. The proposed revisions have themselves been revised following feedback from the first consultation. These requirements are intended to be applied retrospectively to the Domestic Passenger Fleet.
  
2. An initial consultation took place between 6 November 2018 and 29 January 2019. Respondents' comments have been considered and some changes have been made to the original proposals. Two workshops have been held with industry to discuss the review, the first during November 2018 and the second in March 2019 after the first consultation was complete. The intent of this second consultation is to seek your views on these revised proposals, both from the policy and cost perspectives. The government has noted all comments and costings provided in response to the first consultation, so there is no requirement for consultees who provided responses during the first consultation to repeat these. However, we are particularly interested to receive any additional comments, particularly on the revisions made to the proposals. Consultees who did not respond to the original consultation may wish to give their comments on the proposals as a whole in their latest form.
  
3. This second consultation comprises this consultation document, a respondent questionnaire and the draft of the implementing Regulations and associated (mandatory) Merchant Shipping Notices (MSNs). The draft Regulations are included for transparency and information. We are not seeking comments on the Regulations themselves as these need to take account of the wider government approach to (particularly merchant shipping) legislation and, if necessary, will be adjusted to implement the policy once it has been finalised. The Impact Assessment is not included with this second consultation, but it is being updated following the first consultation and will be published with the Regulations once these have been finalised, laid before Parliament and published on GOV.UK.

#### **Overview**

4. Your views are therefore sought in the following areas:
  - the regulatory proposals in their revised form;

- the feasibility of implementation for the revised proposals, where these differ from any views you may have expressed for the original proposals during the first consultation;
- any further modification that you would suggest for the proposed amendments.

5. This consultation will run for six weeks from **29 May 2019** until **10 July 2019**.

6. Following the conclusion of this consultation and consideration of the feedback, the draft Regulations and the impact assessment will be finalised including any revisions made as a result of this consultation.

### **Background**

7. A review of the standards applied to older domestic passenger vessels and how they compare with standards for new ships was conducted from 2016 onwards. The review aimed to identify key safety areas where revision of the technical standards applied to existing vessels could bridge the safety gap between old and new vessels.

8. The objective of the review was to provide suitable regulation for existing domestic passenger vessels which is comparable with modern regulations whilst being proportionate and pragmatic. The aim is to have a consistent domestic passenger ship safety standard irrespective of the age of the vessel.

9. The initial derivation of the proposed revised requirements was developed through working groups in conjunction with industry representatives during 2016 and stakeholder liaison continued with two workshops held in November 2018 and March 2019. The proportionality of the proposals and the magnitude of safety improvements expected to result from them have been reviewed, and some adjustments have been made.

10. Many operators have been proactive in increasing the safety of their vessels. It is intended, where possible, to include existing accepted arrangements when any regulatory amendments are implemented.

### **PROPOSAL A - Liferaft provision**

11. The current Regulations allow certain vessels to carry liferafts for fewer than 100% of the persons on board (60%) and for the remaining capacity to be made up with buoyant apparatus. This means that, in the event of an evacuation, up to 40% of persons on board may need to enter the water. This is out of step with requirements for new-build vessels.

12. **The original proposal** was to require all seagoing vessels and those operating on Category C and D waters to fit liferafts sufficient to accommodate 100%

of the persons on board. This would allow for the evacuation of all persons on board into liferafts, without the need to enter the water.

**Affected ships – ships on category C and D waters and seagoing ships not currently fitted with liferafts to accommodate 100% of the persons on board.**

**Revision 1: This proposal has not been revised after the first consultation.**

#### **PROPOSAL B - Lifejacket provision**

13. The Regulations for older ships do not currently require lifejackets to be carried on ships on Category B waters. For new ships MSN 1823 requires all vessels to carry lifejackets or buoyancy aids except those operating only on Category A waters (where depth is generally less than 1.5m). Category A waterways are narrow and shallow (less than 1.5m deep) and consequentially the evacuation philosophy is based in the fact that persons on board can be evacuated directly to the shore. This is not the case in category B waters, where the waterway will likely be wider and deeper. In the unlikely event of persons having to evacuate the vessel they may need to enter the water (as some category B vessels have buoyant apparatus as opposed to liferafts). If persons are entering the water then a lifejacket or buoyancy aid will greatly improve safety.

14. **The original proposal** was to require that vessels on Category B waterways carry buoyancy aids or lifejackets for 100% of the persons on board.

**Affected ships – ships on category B waters not currently carrying lifejackets or buoyancy aids.**

**Revision 2: This proposal remains in place, but a revision has been added to allow flexibility for owners/operators of vessels operating in Category B waters who can demonstrate to the relevant MCA surveyor's satisfaction that in an emergency, persons can be evacuated to the bank and do not need to enter the water. Exemptions granted will be subject to this condition. Further information will be provided in guidance issued by the MCA.**

#### **PROPOSAL C - Lifejacket lights**

15. The present Regulations for existing ships do not require the fitting of lifejacket lights, but lights are required for new ships (from 1<sup>st</sup> January 2018) on category C and D waters when a vessel operates at night.

16. **The original proposal** was to require that ships on Category C and D waters operating outside of daylight hours are fitted with lifejacket lights.

**Affected ships – ships on C and D waters that operate outside of daylight hours.**

**Revision 3: This proposal has not been revised after the first consultation.**

## **PROPOSAL D - Fire detection**

17. The present Regulations for existing ships do not require a fire detection system to be fitted in the machinery space – this is out of step with modern standards. A fire detection system would provide early awareness of any fire and hence a chance to swiftly extinguish the fire.

18. **The original proposal** was to require all enclosed machinery spaces and any passenger sleeping spaces on all vessels of Class III-VI(A) be fitted with a fire detection system. This would allow the early detection of fire in such spaces. Note that continuously manned machinery spaces would not require the fitting of additional detection under this proposal.

**Affected ships – all UK passenger ships of Classes III-VI(A) that have enclosed machinery spaces and/or passenger sleeping spaces without a fire detection system.**

### **Revision 4:**

a) This proposal has been clarified since the first consultation, which did not make clear whether fire detection systems would be required to meet Marine Equipment Directive (MED) standards. The proposal now is that such systems will not be required to meet MED standards provided they comply with the BS EN 54 standard.

b) The proposal has also been refined in that the requirement for a fire detection system will not apply in machinery spaces which are permanently manned while the ship is in operation.

## **PROPOSAL E - Fixed firefighting**

19. The present Regulations do not require the fitting of fixed firefighting systems within main machinery spaces for all ships. Fixed firefighting systems are a proven effective method of fighting fires within machinery spaces and are extensively required throughout modern standards.

20. **The original proposal** was to require a fixed firefighting system to be fitted in enclosed machinery spaces on all vessels of Class III-VI(A). Under this proposal, on smaller vessels with boxed engines the fixed firefighting requirement could be met with alternative arrangements (such as a permanently fixed fire extinguisher). Alternative arrangements would be conditional on the proviso that opening of the machinery space is not required to fight the fire, and that the surveyor is satisfied with the alternative arrangements.

**Affected ships - all UK passenger ships of Classes III-VI(A) that do not currently have a fixed firefighting system fitted in the machinery space or, in the case of small ships with boxed engine housings, an alternate means of fire-fighting that can be operated from outside of the space.**

**Revision 5:**

a) This proposal has been clarified since the first consultation, which did not make clear whether fixed firefighting systems would be required to meet Marine Equipment Directive (MED) standards. The proposal now is that such systems will not be required to meet MED standards but will need to be approved by the Secretary of State (via the Maritime and Coastguard Agency (MCA)).

b) The proposal has also been further refined in that the intention is now to amend the existing Merchant Shipping (Small Ships: Fire Protection) Regulations 1998 in such a way as to allow for any other firefighting medium which is not covered by the existing Regulation 8 (i.e., not water-based, gas based and high-expansion foam based) provided it is approved by the Secretary of State (via the MCA).

**PROPOSAL F - Containment of fire**

21. No requirements are currently in place for containment on the vessels affected by the Grandfather Rights proposals.

22. **The original proposals** were to:

- a) require that machinery spaces be enclosed by A class divisions insulated to A30 standard;
- b) require that galleys be enclosed by an A0 steel boundary;
- c) require liferaft stowage positions, embarkation stations and assembly stations not be located in way of the machinery spaces or other spaces with a high fire risk unless the boundaries between the high-risk areas and the liferaft stowage position, embarkation station or assembly station is insulated to the A-30 standard of fire protection;
- d) that liferaft launching stations be situated so as to avoid the ship's side in way of a machinery space or other space with a high fire risk unless the side of the ship is insulated to the A-30 fire protection standard.

**Affected ships – all UK passenger ships of Classes III-VI(A) that do not currently meet the fire containment proposals above.**

**Revision 6: These fire containment proposals have been dropped. It is considered that, after the improvements in fire detection and fixed firefighting have been implemented, the containment proposals will not achieve a proportionate additional increase in safety in relation to costs incurred by owners.**

### **PROPOSAL G - Mechanically powered fire and bilge pumps**

23. Current regulations allow the use of hand pumps for fighting fires and pumping bilges.

24. **The original proposal** was to require fire and bilge pumping capacity to be met with powered pumps. The requirement would cease the use of hand pumps to fulfil capacity and would mean that pumping could be achieved with a more efficient use of limited crew and without the possibility of asking passengers to 'man the pumps'. Noting that the engines and arrangements of many vessels may be unsuitable for fixed powered fire and bilge pumps, the proposal would allow for alternative arrangements for smaller vessels, such as additional portable bilge pumps and/or additional portable fire extinguishers.

**Affected ships - all UK passenger ships of Classes III-VI(A) for which emergency bilge pumps and fire pumps are specified.**

#### **Revision 7:**

**1. The element of the proposal which requires powered fire pumps has been dropped.**

**2. The proposal for powered bilge pumps remains unchanged.**

### **PROPOSAL H - Bilge alarms**

25. At present there is no requirement to fit bilge alarms in compartments where bilge water can accumulate. Such alarms allow the detection of water ingress and hence can help to prevent catastrophic flooding or foundering.

26. **The original proposal** was to require bilge alarms in all compartments containing propulsion machinery and in any other compartment where bilge water can accumulate.

**Affected ships - all UK passenger ships of Classes III-VI(A) that do not currently have bilge alarms.**

**Revision 8: This proposal has not been revised after the first consultation.**

### **PROPOSAL I - Damage stability**

27. Many existing vessels have no provision for post damage survivability. This means that these vessels are not required to survive relatively minor damage, such as a minor collision and subsequent hull failure.

28. **The original proposal** was to require all vessels operating on Category C and D waters and seagoing vessels to meet either the one-compartment damage stability standard or achieve compliance with the buoyancy test (110% buoyancy) standard through added buoyancy. Recognising the different operational environment of non-tidal Category C waters, it was proposed that ships in these areas could continue to operate with their existing requirements subject to a risk assessment carried out to an agreed standard and covering an agreed set of

minimum considerations. It was recognised that the determination of feasible options for providing a level of damage stability will be specific for each ship affected and is likely to require consultant review (this is reflected in the impact assessment).

**Affected ships - ships on category C and D waters and seagoing ships applying the heel test standard or that meet the buoyancy test standard by having a watertight deck.**

**Revision 9: While the damage stability requirements themselves have not been changed, the application of the obligations has been narrowed such that:**

**a) Class VI vessels have been entirely removed from scope. These vessels have inbuilt operational restrictions in their certification and are therefore limited to daylight only operations between April and October in favourable weather only.**

**b) Class V vessels operating in daylight on Category C non-tidal waters have been removed from scope. This revision reflects the operational environment of these vessels and the nature of other traffic in the area.**

**c) Class V vessels operating in areas of lower operational risk – as demonstrated by a risk assessment carried out to an agreed standard and covering an agreed set of minimum considerations - may be exempted from the new requirements.**

### **PROPOSAL J - Phase-in requirements**

29. **The original proposal** was to allow a period of two years following the making of the regulations to bring the requirements into effect. The necessary modifications would be required to have been made prior to the first survey of the vessel within two years of the application of the requirements.

30. With some of the proposals, a great deal of concern was expressed by operators during the first consultation about achieving compliance with some of the proposals within two years. The consensus for other proposals was that two years was not a problem. The view was also expressed that two years was too long.

**Revision 10: The two-year phase-in period proposal has been retained, but with the flexibility that this can be extended if the owner draws up an implementation plan which is agreed by the Secretary of State (via the MCA). This will be achieved by granting an exemption from the requirements of the Regulations during this additional period.**

***NB: This avoids unnecessary delay, but allows for flexibility where genuinely needed. It is also designed to avoid “clustering” where third parties (e.g., shipyards) are engaged by owners to carry out work required for compliance at a late stage in the phase-in period, as the risk associated with this is that***

***demand may outstrip supply, rendering some vessels non-compliant on the date the obligations come into effect.***

## **Next steps**

31. Once this consultation closes, we will review all responses. Taking into consideration the consultation responses overlaid on the responses to the first consultation, we will further review the proposals and amend where deemed necessary. The impact assessment will also be refined and finalised utilising stakeholder feedback. It is aimed for the revised Regulations (including transitional arrangements) to come into force in November 2019. At this point we will also publish any supporting guidance considered necessary.

32. The proposed technical amendments resulting from the review will be achieved through amending the following Statutory Instruments:

- The Merchant Shipping (Passenger Ship Construction: Ships of Classes III to VI(A)) Regulations 1998 (SI 1998 No. 2515)
- The Merchant Shipping (Life-Saving Appliances for Passenger Ships Of Classes III To VI(A)) Regulations 1999 (SI 1999 No. 2723)
- The Merchant Shipping (Fire Protection: Small Ships) Regulations 1998 (SI 1998 No. 1011).

## **Stakeholder involvement**

33. We recognise that responding to consultations can be time consuming but, as noted above, we would really value your feedback to help us determine the feasibility of the proposals and to assist in refining the requirements. However, there is no need to re-submit comments made during the first consultation, which we already hold on file, unless these need to be updated.

## **Consultation Questions**

34. When responding to the consultation we would be grateful if your response could include responses to the specific questions in Annex A.

## **Responding to this consultation**

35. Anyone may respond to this consultation and consideration will be given to all responses. We will be particularly interested to hear from operators of UK domestic passenger ships.

36. This consultation is open for six weeks from **29 May 2019** to **10 July 2019**. (Please note that the second of these dates is the **last day** for responses).

37. Consultation responses should be emailed to the MCA's Domestic Passenger Vessels e-mail address, [dpv@mcga.gov.uk](mailto:dpv@mcga.gov.uk). Any questions on the consultation should also be sent to this email address. 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. Comments on the conduct of the consultation i.e., how it has been run, presented, etc.) are also welcome, but should be sent to [consultation.coordinator@mcga.gov.uk](mailto:consultation.coordinator@mcga.gov.uk). Please note that the Consultation Co-ordinator is not a subject-matter expert and cannot answer questions on the content of the consultation or consider consultation responses.

### **Freedom of information**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

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/MCA.

The MCA will process your personal data in accordance with the data protection framework and, in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

### **Data Protection**

The MCA is carrying out this consultation to gather evidence. The consultation is being carried out in the public interest to inform the development of policy.

The MCA will use your contact details to send you information about the consultation, for example if we need to ask follow-up questions, as part of its functions as a government department. Your information will be kept secure and will not be used for any other purpose without your permission.

To find out more about how the MCA looks after personal data, your rights, and how to contact our data protection officer, please go to:

<https://www.gov.uk/government/organisations/maritime-and-coastguard-agency/about/personal-information-charter>

If you do not wish to remain on this list, please reply and let us know.

### **Conduct of this consultation**

This is about how the consultation was run, rather than what is being proposed in the consultation. This consultation has been conducted in accordance with the Cabinet Office Consultation Principles which can be found at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/492132/20160111\\_Consultation\\_principles\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf)

### **Feedback on conduct of consultation**

If you have any comments regarding how this consultation was run (not the subject matter of the proposals) please contact the Consultation Co-ordinator at [consultation.coordinator@mcga.gov.uk](mailto:consultation.coordinator@mcga.gov.uk).

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 at Annex B. These should be submitted to the Consultation Co-ordinator and are not affected by the deadline for this consultation. *Please note that the Consultation Co-ordinator does not have in-depth subject matter on the consultation, and therefore cannot act on subject-specific suggestions or respond to subject-related queries. All subject related responses to this consultation should be sent to the [dpv@mcga.gov.uk](mailto:dpv@mcga.gov.uk) address.*

If you require this consultation in an alternative format, please contact either the Consultation Co-ordinator or e-mail the [dpv@mcga.gov.uk](mailto:dpv@mcga.gov.uk) address.

### **List of Annexes and attachments**

Attachments:

1. Draft Statutory Instrument
2. Draft amended MSN 1699 Amendment 3 - main body
3. Draft amended MSN 1699 Amendment 3 - technical annex (yellow highlighted areas show changes)
4. Draft amended MSN 1670 Amendment 1 (yellow highlighted areas show changes)
5. Draft MGN (guidance)

Annex A: Questionnaire on the subject matter of the consultation

Annex B: MCA Consultation Feedback Form

**ANNEX A**

**QUESTIONNAIRE ON THE SUBJECT MATTER OF THE DOMESTIC PASSENGER VESSEL STANDARDS REVIEW CONSULTATION**

(to be returned to dpv@mcga.gov.uk)

***About you***

Your Name \_\_\_\_\_

Your e-mail address \_\_\_\_\_

Your Job Title \_\_\_\_\_

Are you responding as:

- an individual
- an organisation (if so, please provide name of organisation)

\_\_\_\_\_

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

<u>Respondent type</u>	<u>Size of organisation (in number of persons)</u>
<input type="checkbox"/> Vessel owner	<input type="checkbox"/> Large business (over 250 staff)
<input type="checkbox"/> Vessel operator	<input type="checkbox"/> Medium business (50 to 250 staff)
<input type="checkbox"/> Crew member	<input type="checkbox"/> Small business (10 to 49 staff)
<input type="checkbox"/> Individual	<input type="checkbox"/> Micro business (up to 9 staff)
<input type="checkbox"/> Government Agency/Department	
<input type="checkbox"/> Legal Representative	
<input type="checkbox"/> Trades Union	
<input type="checkbox"/> Domestic Passenger Vessel Representative Organisation (Please list members)	
<input type="checkbox"/> Other (please describe)	

**Comments on proposed revisions to the original proposals published in the first consultation (6 November 2018 to 29 January 2019)**

**PROPOSAL A – Liferaft provision**

1. Do you agree with Proposal A as described above? This proposal has not been revised following the first consultation. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL B – Lifejacket provision**

2. Do you agree with Proposal B as revised since the first consultation, described above? The revision concerns relaxation of the requirement for vessels on Category B waters, by way of an exemption under the Regulations, which can evidence the ability to achieve dry-shod evacuation to the bank in an emergency. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL C – Lifejacket lights**

3. Do you agree with Proposal C as described above? This proposal has not been revised following the first consultation. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL D – Fire detection systems**

4. Do you agree with Proposal D, as revised and clarified since the first consultation, and as described above? The revision is that that fire detection systems should not be required in machinery spaces which are permanently manned during operation. The clarification is that the fire detection systems to be required on vessels which are not already required to have Marine Equipment Directive (MED) systems need not be MED compliant, but that they will need to meet standard BS EN 54. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL E – Fixed Firefighting**

5. Do you agree with Proposal E, as revised and clarified since the first consultation, and as described above? The revision is that that Merchant Shipping (Small Ships: Fire Protection) Regulations 1998 should be amended to permit alternative firefighting mediums. The clarification is that fire detection systems required as a result of the new Regulations need not be Marine Equipment Directive (MED) compliant but should simply be of a kind approved by the Secretary of State via the Maritime and Coastguard Agency (MCA). Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL F – Containment of fire**

6. Do you agree that the measures originally proposed on the containment of fire (concerning insulated divisions) should be dropped? Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL G – Mechanically powered fire and bilge pumps**

7. Do you agree with Proposal G, as revised since the first consultation, and as described above. The revision is that the requirement for powered fire pumps has been dropped but the requirement for powered bilge pumps is to be retained in its original form. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL H - Bilge alarms**

8. Do you agree with Proposal H, as described above? This proposal has not been revised following the first consultation. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL I – Damage stability**

9. Do you agree with Proposal I, as revised since the first consultation, described above? The revision involves the narrowing of the application of the requirements, which are now to exclude from the scope of the requirements (i) Class VI vessels and (ii) Class V vessels operating on non-tidal Category C waters. Additionally, it is now proposed that Class V vessels operating in low risk tidal Category C waters may be permitted to continue to comply with existing damage stability requirements subject to a risk assessment. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**PROPOSAL J – Phase-in period**

10. Do you agree with Proposal J, as revised since the first consultation, described above? The revision adds a flexibility to allow an extension of the two-year phase-in period (by way of an exemption) where an owner produces an implementation plan which is agreed by the Secretary of State via the MCA. Please feel free to include amplifying comments in the free text area below the tick boxes.

- Yes, I agree
- No, I disagree

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**ANNEX B**

**MCA CONSULTATION FEEDBACK FORM**

(to be returned to [consultation.coordinator@mcga.gov.uk](mailto:consultation.coordinator@mcga.gov.uk))

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

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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 3/13, 105 Commercial Road  
Southampton SO15 1EG

Or e-mail it to: [consultation.coordinator@mca.gov.uk](mailto:consultation.coordinator@mca.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.**