



Maritime &  
Coastguard  
Agency

## Consultation Report: Under 15m Fishing Vessel Code of Practice

February 2021

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## Section 1: Introduction

1.1 In the last 10 years, there have been 46 fatalities on small fishing vessels which have resulted in a number of recommendations from the MAIB to improve safety. Some of these came into force in 2017 with the introduction of a new Code, MSN1871.

To address the other recommendations, the MCA have been developing a new Code of Practice for Small Fishing Vessels, proposing new requirements for new and existing vessels in the following areas:

- Construction, Watertight and Weathertight Integrity;
- Stability;
- Machinery
- Electrical Installations;
- Crew Protection;
- Man Overboard recovery.

1.2 This consultation sought views on the proposed Under 15m Fishing Vessel Code of Practice and the accompanying Impact Assessment. Particular attention was to be paid to the new requirements listed above.

The consultation was carried out between the 17 August 2020 to 8 November 2020. It can be found at: <https://www.gov.uk/government/consultations/consultation-on-a-revised-code-of-practice-for-the-safety-of-fishing-vessels-of-less-than-15m-length-overall> . A total of 38 responses were received: Not all respondents answered every question posed. Additional comments have been received on the contents of the Code has responses to these are contained in Annex A.

## Section 2: Key Findings

2.1 The objectives of the Small FV Code of Practice are twofold:

- to reduce the number of lives lost and the number/severity of accidents by improving safety standards on all UK fishing vessels
- by improving the safety and raising the standards of vessels under 15m through aligning more closely the standards of fishing vessels with small commercial vessels and workboats.

This will provide a single place to access information about the required standards expected in the manufacturing and maintenance which are less onerous than their larger counterparts.

2.2 The following are highlights of the key proposed changes within the Code. More in depth information on these are included in the Impact Assessment and the draft Code of Practice.

## **Survey and Inspection requirements.**

Currently, Small Fishing Vessels are only required to be surveyed at the time of construction or flag in, and thereafter only once every five years. There is no requirement for the vessel to be seen out of the water and therefore the hull condition may not be inspected.

It was proposed there will be a requirement that the vessel is seen out of the water once every five years at the renewal inspection prior to issue of its Small Fishing Vessel Certificate. An Out of the Water inspection is necessary to assess the construction, watertight and weathertight integrity. This may necessitate two visits to the vessel, to inspect the vessel in the water, if requirements, such as vessel stability or freeboard need to be checked. Comments were received that the likely costs of out of water inspections may mean additional costs to the owner, that MCA needed to be flexible as to when these inspections may take place to allow for vessel operation and questions over whether beach inspections were allowed. Suggestions were made that hull condition could be assessed without taking the vessel out of the water.

The MCA rewritten the Out of water inspection requirements to allow for vessels to be inspected any time prior to their first in water inspection to this new Code and then to be seen Out of Water again before the 5<sup>th</sup> anniversary of their previous Out of Water. The intent is to allow maximum flexibility to owners to arrange a suitable time and date to inspect vessels out of the water at no or as minimum extra cost as possible.

There is no evidence to suggest that vessels with different construction are less likely to suffer hull issues, only different issues. All vessels may suffer loss at sea due to water ingress and therefore an out of water inspection is required to consider this risk. In addition, items such as the rudder would need inspecting out of the water.

Out of water inspections on a beach or accessible muds would be allowed provided sufficient areas of the hull could be inspected.

Various suggestions for a phase in period were proposed. It was decided that a single phase in of two years, in common with previous Codes would allow owners to take advantage of any available funding to bring vessels up to the standard of the Code.

## **Construction, Watertight and Weathertight Integrity.**

Currently new vessels must meet the Seafish Construction and Outfit Standards on construction, watertight and weathertight integrity. Once the vessel has been registered, there is no requirement for any vessel to continue to meet these standards.

The proposed Code will require that any vessel registering as a new fishing vessel (after the entry into force of the new Code) continues to meet those standards through the life of the vessel. Additionally, any vessel that carries out a modification, must make those changes in accordance with the Construction and Outfit Standards.

There are no current standards for vessels already registered as fishing vessels. Based on a review of the Workboat Code and the Irish Small Fishing Vessel Code, a number of requirements for existing vessels were proposed.

Comments were made that requiring existing vessels in particular to comply with many of the new requirements would be expensive and mean vessels that have operated safely may be uneconomic.

The MCA has agreed that for the majority of the requirements for Construction, Watertight and Weathertight integrity, existing vessels not built to a standard need only demonstrate the vessels arrangements are fit for purpose. Vessels built to a Construction Standard need to continue to meet the standard to which they were constructed. When modifications are made, then regardless of vessel age, those modifications will need to be to the current Construction Standard

Comments were received that certain decked vessel types would have difficulty complying with the water freeing arrangements due to their design. The MCA has introduced an alternative arrangement for those vessels.

### **Stability**

The consultation proposed all new vessels under 12m will be required to comply with stability criteria relevant to their method of fishing whilst existing vessels under 15m must apply a stability assessment method to their vessel.

It was also proposed that all vessels will carry a Wolfson Freeboard Notice and that any vessel that changes its method of fishing after the introduction of the Code must comply with the stability criteria applicable to the proposed method of fishing.

There was support for measures for new vessels. However, comments were received that existing vessels should not be required to undertake a stability assessment unless modifications take place. Due to there being continued capsizes of vessels currently on the Register, the MCA considers it necessary to require all vessels currently on the Register to have a stability assessment. This will identify vessels potentially at risk and give a base line to others against which to assess the impact of any future modifications. The MCA has agreed that such assessment, be it Roll, Heel or Offset load tests can be carried out by owners and skippers, thereby removing the need to pay for consultancy services.

The MCA also proposed a freeboard of 300mm, below which vessel operation would be limited. Comments were received that a minimum freeboard should be considered. The revised Code will introduce a minimum freeboard of 200mm for decked vessels, below which the vessel is considered an open boat.

### **Machinery and Electrical Installations**

The new measures set out in the Chapter on machinery proposed to address and reduce incidents by requiring new vessels are maintained to the Seafish Construction Standard and existing vessels meet a minimum standard.

The consultation proposed new vessels will also be required to comply with a number of additional requirements in excess of the Seafish Construction Standards, which vary depending on whether the vessel is decked or open.

Comments were made that requiring existing vessels in particular to comply with many of the new requirements would be expensive and mean vessels that have operated safely may be uneconomic.

The MCA has agreed that for the majority of the requirements for Machinery and Electrical arrangements, existing vessels not built to a standard need only demonstrate the vessels arrangements are fit for purpose. Vessels built to a Construction Standard need to continue to meet the standard to which they were constructed. When modifications are made, then regardless of vessel age, those modifications will need to be to the current Construction Standard

### **Fire Protection**

The measures proposed are intended to prevent fires starting on small fishing vessels from occurring.

New vessels will be required to comply with a number of requirements in excess of the Seafish Construction Standards. The requirements placed on vessels will vary depending on their size and whether they are open or decked vessels.

Few comments were received on this section and were broadly supportive.

### **Protection of Personnel**

The Merchant Shipping and Fishing Vessels (Health and Safety at Work) Regulations 1997 require that owners and skippers must carry out risk assessments of work activities to minimise or reduce the risks of injury. However, it is the case that these accidents still occur and through measures to regulate activities to reduce the risks, persons on board fishing vessels will be working in a safer environment.

The proposed Code of Practice covers handrails, winch safety, emergency stopping mechanisms, safety training and numerous other aspects which historical incidents including MAIB investigations have identified these as a cause of injuries and fatalities. Comments were received that the issues of handrail heights should be considered given the potential interference with vessel fishing operations. However, MCA considers that the code already allows heights to be reduced or portable railings for such eventualities.

## Section 3: Summary of Responses

### Question Posed

**Q1.** Do consultees consider that the assessment of the application of additional requirements in the Code to new vessels is correct.

Consultees broadly agreed with this statement. However, there was comment regarding Out of water inspection and the cost to arrange, the cost of stability assessments for existing vessels, and the impact of requirements on existing vessels.

### MCA Response

As stated above, the MCA rewritten the Out of water inspection requirements to allow for vessels to be inspected any time prior to their first in water inspection to this new Code and then to be seen Out of Water again before the 5<sup>th</sup> anniversary of their previous Out of Water. The intent is to allow maximum flexibility to owners to arrange a suitable time and date to inspect vessels out of the water at no or as minimum extra cost as possible.

The MCA has agreed that Roll, Heel and offset Load tests can be conducted by vessel owners or skippers. This means that they can be done at no cost. In respect of the impact on existing vessels of additional requirements, the MCA has agreed that vessels built to a Standard should be maintained to that standard but that existing vessels not built to a standard or where a standard did not exist for a particular requirement, then the vessel will be accepted provided it or the requirement is fit for purpose.

### Question Posed

**Q2.** Consultees are invited to submit any additional evidence or other relevant information on the costs and benefits of the proposed Code (Option 1) that are identified in this IA.

One consultee raised the costs of Megger tests and taking a vessel out of the water in a yard for inspection. The costs of electricians to undertake electrical work was also raised.

Comment was also made on the need for the boat to be flexible to react to different fishing opportunities and switch between methods.

Consultees were concerned regarding the additional cost on existing vessels from complying with new requirements and that it may make them uneconomic.

A consultee also questioned the proposed benefits, in that the reduction of fatalities and injuries is uncertain, and many incidents have more than one cause.

A consultee also referred to the use of data on vessels of 15m and over to highlight the relative safety records of the fleet.

One consultee also raised the question of availability of inspections and the costs of lost fishing and how MCA will address this with the new Out of Water inspections.

### **MCA Response**

The MCA rewritten the Out of water inspection requirements to allow for vessels to be inspected any time prior to their first in water inspection to this new Code and then to be seen Out of Water again before the 5<sup>th</sup> anniversary of their previous Out of Water. The intent is to allow maximum flexibility to owners to arrange a suitable time and date to inspect vessels out of the water at no or as minimum extra cost as possible.

The MCA has agreed that for the majority of the Machinery and Electrical arrangements, existing vessels not built to a standard need only demonstrate the vessels arrangements are fit for purpose. In particular, Megger tests will now only be required when a vessel replaces its electrical systems.

The Small Fishing Vessel Certificate will list previous methods of fishing. Provided that the vessel is not undertaking a new method of fishing or has not undergone a stability test for the method it is proposing to undertake, then there is no need to inform the MCA when the method is changed.

Whilst MCA agrees that any reduction in accidents and injuries cannot be predicted with any accuracy, and that many incidents do indeed have contributory factors, the investigations into those incidents does provide sufficient evidence to identify how they may be prevented in the future through changes to legislation, on the basis that the current voluntary approach is not affecting the number and type of incident. By effecting these changes, it is likely that future incidents will be avoided through identification of at-risk vessels.

The MCA has agreed that for the majority of the requirements for Construction, Watertight and Weathertight integrity, as well as Machinery and Electrical arrangements, existing vessels not built to a standard need only demonstrate the vessels arrangements are fit for purpose. Vessels built to a Construction Standard need to continue to meet the standard to which they were constructed. When modifications are made, then regardless of vessel age, those modifications will need to be to the current Construction Standard. The MCA has also agreed that Roll, Heel and Offset Load tests can be carried out by owners or skippers, thereby removing the cost of employing a consultant.

The MCA is also providing a 2 year phase in period from the Date of Entry into force of the Code to allow for owners and operators to adjust to the new requirements and take advantage of any available funding to improve the vessel whilst the requirements are not mandatory.

The use of fatalities per 100,000 is an accepted means of measurement. In using this figure, it allows to equate the industry not just against land based activities but



also other marine activities, which the fishing industry is consistently seen as incurring greater injuries and fatalities. In addition, the MAIB Annual Report estimated, based on information from insurers, that only 13% of all accidents in fishing were reported.

Furthermore, Incidents relating to over 15m are being dealt with the introduction of MSN1872 and MSN1873 and tighter regulation of crew, whereas vessels under 15m remain lightly regulated.

The MCA already have in place a large team of Surveyors fully trained in the inspection of U15 FV's. The Surveyors are multi-disciplined, come from a variety of marine related backgrounds and are able to provide a wide range of advice and technical expertise to the Fishing Industry. Nationally we currently have 70 Surveyors trained in surveys of U15m fishing vessels and we are committed to grow this further in the future. Having already taken the 'specialised team' approach in the past, experience has shown us that having a larger number of qualified Surveyors, albeit multi-functional, is the most efficient and reliable way of meeting the demands of the U15m fleet.

### **Question Posed**

**Q3.** Consultees are invited to provide details of any additional costs and benefits of the proposed Code (Option 1) that have not been identified in this IA, and provide any additional evidence or other relevant information that is available on these costs and benefits

Consultees again raised the issue of costs of stability tests and costs to existing vessels which is addressed in MCA responses to questions 1 and 2

It was suggested annual percentage costs be added to the impact Assessment.

Two consultees also commented on need to be aware that the new requirements do not lead to a reduction in the number of new build vessels.

Concerns were also raised regarding Out of Water inspections, their cost and the availability of surveyors to conduct the inspections, which have been addressed in the responses to questions 1 and 2 above.

### **MCA Response**

Identifying annual percentage costs is not considered to be achievable. This would require knowledge of vessel overall costs which is not readily available. The use of likely individual costs is considered to be sufficient for consultees to identify the impact on their vessel. Using this, it is assumed consultees have commented on the impact on existing vessels, which the MCA has addressed.

The proposed Code only introduced minor additional requirements and is not considered to impact on the decisions of any owner considering this option. If fewer new builds are commissioned for this or other economic reasons, the new Code

raises the standards for vessels already on the Register to ensure that safety is improved, regardless of the age of the vessel

### **Question Posed**

**Q4.** Consultees are invited to comment on any of the assumptions that have been made in this IA and are invited to propose alternative assumptions and provide supporting evidence or other relevant information.

Comments were made regarding the Code covering all vessel sizes when the fleet is diverse in its composition. In addition, questions were raised regarding MCA surveyor's knowledge of vessel types and the costs to existing vessels.

Comment was made on the need to review lifting guidance and limits for maximum weights that can be carried. A comment was also made that the Wolfson Guidance should not be included within the Code.

### **MCA response**

The Code, like all Codes, are designed to be flexible and suit all sizes and types of vessels to bring them to a minimum standard. Not all requirements are applicable to all vessels, the requirements within the Code are significantly less for a 7m open vessel than for a 14.99 vessel. The MCA has introduced a provision whereby for many requirements, existing vessels need to demonstrate fitness for purpose and for vessels built between 2007 and the introduction of the Code, or to a Construction Standard, to be maintained to the standard they were built to.

Comments regarding the costs to existing vessels are addressed in the responses to Questions 1 and 2. As stated in the response to Question 2, the MCA already have in place a large team of Surveyors fully trained in the inspection of U15 FV's. The Surveyors are multi-disciplined, come from a variety of marine related backgrounds and are able to provide a wide range of advice and technical expertise to the Fishing Industry. Nationally we currently have 70 Surveyors trained in surveys of U15m fishing vessels and we are committed to grow this further in the future. Having already taken the 'specialised team' approach in the past, experience has shown us that having a larger number of qualified Surveyors, albeit multi-functional, is the most efficient and reliable way of meeting the demands of the U15m fleet.

The comment regarding lifting guidance will be transferred to the relevant section of MCA to consider. The MCA will also further consider maximum weights, although it is proposed in the revised Code that new vessels, engaged in bulk fishing or that carried 1000kg or more are required to have a Stability book and that any existing vessels which do not currently engage in that activity but wish to do so shall also comply.

A review on behalf of the Safety Committee of the Royal Institution of Naval Architects into the Wolfson Method concluded

*“If the proposals are implemented, they will not entirely remove the possibility of capsizing of fishing vessels in the future. However, they could be a major element in developing a greatly Enhanced safety culture amongst the fishing community that will lead to a reduction in fatal casualties. The additional information and understanding that will be provided by the Stability Notices, and on smaller vessels by the Freeboard Mark, together with relevant training will enable fishermen to be aware of when their vessel is in a hazardous condition, or a specific activity is leading to the development of a catastrophic situation. In this way the fishermen will be enabled to take responsibility for the safe operation of their vessel.”*

Together with the new requirements for Stability, the use of the use of the Wolfson Method is intended to not just provide evidence of the vessel’s stability and the effect of any changes to the vessel but also to raise awareness of stability and how activity may affect the vessel to give fishermen the information to potentially avoid capsize.

### **Question Posed**

**Q5.** Consultees are invited to propose alternative assumptions regarding the number of fishing vessels which would join or leave the UK flag each year of the appraisal period and provide supporting evidence or other relevant information.

One consultee raised the possibility that some would choose to leave the industry and fish without a licence and in an unregulated manner.

It was also suggested MCA should wait to assess the impact of the Code introduced in 2017 before introducing new requirements.

Comment was also made on the number of new builds, particularly of vessels under 7m have been decreasing in recent years and the need to MCA to consider this, in particular the number of surveys required.

Comment was also made that the long term effects of COVID 19 and leaving the EU should be factored into the IA.

### **MCA Response**

The MCA has addressed the issues of cost of the new requirements to existing vessels as set out in the responses to Questions 1 and 2. Should any in the Industry choose to fish unregulated, then they are likely to be subject to enforcement action by MCA or Fisheries Administrations.

The MCA, with this revision of the Code, is responding to MAIB recommendations it was not possible to address in previous revisions. Vessels incidents regarding the watertight and weathertight integrity, the stability and the machinery on board vessels continue to occur and this Code is designed to address these. However, MCA agrees that a period of stability regarding the Code of Practice is now desirable but is required to consider amendments if concerns regarding safety arise

MCA will consider the impact on new builds and the surveys undertaken as part of its review of MGN628 The Construction Standards for Fishing Vessels of less than 15m LOA, in 2021.

The impacts of COVID 19 and leaving the EU are unknown at this time and therefore cannot be included. In addition, these relate to factors that are not considered to be directly affected by this Code and are not appropriate for inclusion in the IA

### **Question Posed**

**Q6.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring new vessels and those that change their method of fishing to Category A to undergo a stability test and have a completed Stability Book.

It was suggested for certain unique fisheries, the Code would prevent any new builds.

The costs related to Stability Assessments were also considered to make some vessels uneconomic. In addition, comments were received that existing vessels should not be required to undertake a stability assessment unless modifications take place.

A comment was received which proposed real time measurement devices on board vessels.

Another concern was that the Code may prevent owners from employing multiple fishing methods during the year.

### **MCA Response**

The MCA has allowed for the Stability requirements for vessels destined for unique fisheries to be specially considered.

Due to there being continued capsizes of vessels currently on the Register, the MCA considers it necessary to require all vessels currently on the Register to have a stability assessment. This will identify vessels potentially at risk and give a base line to others against which to assess the impact of any future modifications. The MCA has agreed that such assessment, be it Roll, Heel or Offset load tests can be carried out by owners and skippers, thereby removing the need to pay for consultancy services.

The MCA is of the view that owners may choose to place real time stability measurement devices on their vessels, however, there is a risk that some may use the information provided by any monitoring equipment to push the vessel to its limits.

The Small Fishing Vessel Certificate will list previous methods of fishing. Provided that the vessel is not undertaking a new method of fishing or has not undergone a stability test for the method it is proposing to undertake, then there is no need to

inform the MCA when the method is changed to take advantage as available catch changes.

### **Question Posed**

**Q7.** Consultees are invited to submit any additional evidence or other relevant information on the additional costs of requiring new vessels and existing vessels changing their method of fishing to Category B to undergo a roll or heel tests.

Concern was raised by one consultee regarding what should be reported to MCA when making changes to gear.

Another consultee suggested that Roll and Heel tests need not be applied to vessels that can demonstrated a safe history of operation.

### **MCA Response**

The Code already sets out what should be reported to MCA in terms of modifications to a vessel. It will be required that all changes to methods not previously undertaken should be reported so that any impacts on the vessel stability can be considered.

Due to there being continued capsizes of vessels currently on the Register, which were not known to be unsafe, the MCA considers it necessary to require all vessels currently on the Register to have a stability assessment. This will identify vessels potentially at risk and give a base line to others against which to assess the impact of any future modifications. The MCA has agreed that such assessment, be it Roll, Heel or Offset load tests can be carried out by owners and skippers, thereby removing the need to pay for consultancy services.

### **Question Posed**

**Q8.** Consultees are invited to submit any additional evidence or relevant information on potential benefits of the proposed Code (Option 1) to Government.

Comment was received regarding the training and understanding of MCA surveyors relating to fishing vessels.

Another comment proposed that before any new Codes are introduced, the MCA should review the impact of the Code introduced in 2017.

Two consultees also commented that the costs relating to the new requirements should not push small scale fishermen out of the industry.

### **MCA Response**

As stated in responses to previous questions, the MCA already have in place a large team of Surveyors fully trained in the inspection of U15 FV's. The Surveyors are multi-disciplined, come from a variety of marine related backgrounds and are able to provide a wide range of advice and technical expertise to the Fishing Industry. Nationally we currently have 70 Surveyors trained in surveys of U15m

fishing vessels and we are committed to grow this further in the future. Having already taken the 'specialised team' approach in the past, experience has shown us that having a larger number of qualified Surveyors, albeit multi-functional, is the most efficient and reliable way of meeting the demands of the U15m fleet.

With regard to reviewing the impact of the Code introduced in 2017, the MCA, with this revision of the Code, is responding to MAIB recommendations it was not possible to address in previous revisions. Vessels incidents regarding the watertight and weathertight integrity, the stability and the machinery on board vessels continue to occur and this Code is designed to address these. However, MCA agrees that a period of stability regarding the Code of Practice is now desirable but is required to consider amendments if concerns regarding safety arise

The MCA has reconsidered the requirements for existing vessels, so that vessels built to a standard should be maintained to that standard and those not built to a standard should be fit for purpose. In addition, a phase in period of two years is provided for so that any available funding can be used to bring vessels up to any new requirements. The MCA, in preparation for the consultation, conducted an exercise to identify how the new requirements applied to vessels. As vessels get smaller, fewer requirements in the Code apply, therefore the impact on the smaller vessels is likely to be minimal.

### **Question Posed**

**Q9.** Consultees are invited to submit any additional evidence or relevant information on the impact of the proposed Code (Option 1) on insurance costs.

It was generally considered that there would be no impact on Insurance Costs.

### **Question Posed**

**Q10.** Consultees are invited to submit any additional evidence or relevant information on the impact of the proposed Code (Option 1) on small and micro businesses. In particular whether there are expected to be any disproportionate impacts for any particular group of vessels.

Concern was raised again that the costs, in particular for existing older vessels and smaller vessels would force some out of the Industry.

A comment was also raised regarding the need to avoid additional costs for new builds meaning a reduction in new build vessels.

Comment was also made that full Stability for vessels under 12m was expensive and not supported as it was not in relation to the earning capacity of the vessel, and if done, should have financial assistance.

Comment was also made that some owners will refit vessels when weather is inclement and that costs of lay up are large.

### **MCA Response**

The MCA has reconsidered the requirements for existing vessels, so that vessels built to a standard should be maintained to that standard and those not built to a standard should be fit for purpose. In addition, a phase in period of two years is provided for so that any available funding can be used to bring vessels up to any new requirements. The MCA, in preparation for the consultation, conducted an exercise to identify how the new requirements applied to vessels. As vessels get smaller, fewer requirements in the Code apply, therefore the impact on the smaller vessels is likely to be minimal.

The proposed Code only introduced minor additional requirements and is not considered to impact on the decisions of any owner considering this option. If fewer new builds are commissioned for this or other economic reasons, the new Code raises the standards for vessels already on the Register to ensure that safety is improved, regardless of the age of the vessel

MCA considers that the risk of a fishing method does not decrease as a vessel decreases in size. Therefore, regardless of vessel size, the vessel should apply the same stability requirements. It therefore becomes a business decision as to whether the owner wishes to build a vessel to enter that sector of the Industry.

MCA has introduced a new window for out of water inspections as set out in responses to Questions 1 and 2. It is the responsibility of the owner to ensure that he plans for his inspection properly and in good time. The MCA is not able to guarantee an available surveyor at short notice.

### **Question Posed**

**Q11** Consultees are invited to consider the Phase in Periods proposed in the Code of Practice at Sections 1.2.5 to 1.2.7, or to propose alternative options for a phase in period and submit any evidence on the impact of the phase in on the ability to meet the requirements by the end of the phase in period.

Comments were mixed between longer and short (1 year) phase in periods.

### **MCA Response**

To allow sufficient time to submit requests for available funding to bring vessels up to the required standard and to undertake work using that funding, a phase in period of two years, in common with previous versions of this Code is adopted.

### **Question Posed**

**Q12** Consultees are invited to submit any additional evidence or relevant information on the impact of the proposed Code (Option 1) on competition.

Costs to vessels already on the register were again the main issue raised. This is addressed in earlier responses.

## Section 4: Who Responded

Response from	Company
Steve Chandler	MCA Surveyor
Ken Ross	Vessel Owner
Roger Gee	MCA Surveyor
Bill Brock/Charlie Brock	Vessel Owners and South East Fishermen's Protection Association
Chris Venmore	Individual
David Fuller	MCA Surveyor
Reggie Cummins	Private Surveyor
John Macleod	Individual
Duncan Boag	MacDuff Ship Design
Geoff Blake	Ventnor Haven Fishery
David Galbraith	Individual
Alison McNab	Law Society of Scotland
Richard Blackhurst	Society of Consulting Marine Surveyors
Ian Balgowan	Individual
Will Claxton	Padstow Boatyard
Ron Graham	Whitehaven Fishermen's Co-operative
Gerald Statham	Individual
John Julian	Authorised Surveyor
Keith Patterson	MCA Surveyor
Archer Ginn	Individual
Cdr. Alan R. Macnaughton RNR ( Retd.), RD, C.Eng. FRINA	Individual
Ian Kelly	Northern Ireland Fishermen's Federation
Sean Friday	Marine Accident Investigation Branch
Beshlie Pool	South Devon and Channel Shell Fishermen Association
Malcolm Maclean	MCA Surveyor
Andrew Locker	National Federation of Fishermen's Organisations
Stella Dean	South Coast Fishermen's Council/Mudford and District Fishermen's Association
Derek Cardno	Scottish Fishermen's Federation
Ken Smith	Hook Marine
Sean Strevens	Cheetah Marine
Duncan MacInnes	Western Isle Fishermen's Association
Elaine Whyte	Clyde Fishermen's Association
Owen Brown	MCA Surveyor
Tony Morrall	Individual
Aidan Tuckett	Authorised Surveyor
Trevor Jones	WFA-CPC