



Maritime &  
Coastguard  
Agency

## Consultation Document:

Implementation of the International Code for  
Ships Operating in Polar Waters (Polar Code)

March 2021

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### Annex A: Draft Regulations

### Annex B: Draft Marine Guidance Note (MGN 637)

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## Section 1: Overview of this consultation

### Aim

- 1.1. This consultation seeks your views on the implementation of the safety related requirements in the Merchant Shipping (Polar Code) (Safety) Regulations 2021. The International Code for Ships Operating in Polar Waters (Polar Code) was agreed in the International Maritime Organization (IMO) and is mandatory under both the International Convention for the Safety of Life at Sea, 1974 (SOLAS) (Chapter XIV) and the International Convention for the Prevention of Pollution from Ships, 1973 (MARPOL). In accordance with its international obligations, the UK is now in the process of implementing the provisions of Chapter XIV of SOLAS and the safety provisions in the Polar Code (which is incorporated into SOLAS by reference to it in Chapter XIV) into domestic law.
- 1.2. The Polar Code applies to ships operating in polar waters. It covers the full range of design, construction, equipment, operational, training, search and rescue and environmental protection matters relevant to ships operating in the inhospitable waters surrounding the two poles. The proposed Regulations apply to United Kingdom ships, and also to non-United Kingdom ships commencing or ending a voyage in the United Kingdom and as part of that voyage operating in polar waters.
- 1.3. The proposed Regulations contain an ambulatory reference provision. This means that future amendments to Chapter XIV of SOLAS and the Polar Code, to the extent that these are referenced in the Regulations, will automatically become part of UK law when they enter into force internationally. No further legislation will be required to bring amendments into force in the UK unless the change is outside the scope of the matters referenced in the Regulations; this is expected to be rare. Associated benefits of this approach are detailed in this consultation package.

### Views sought

- 1.4. Your views are sought in broadly the following areas:
  - the likelihood of UK flagged vessels operating in polar waters in the future
  - whether the 'average per vessel' cost scenario associated with the Polar Code is broadly accurate;
  - whether retrofitting a vessel would indeed be uneconomical;
  - whether the proposed offences and penalties are appropriate; and
  - whether the proposed guidance to accompany the Regulations is broadly adequate and in the right format.
- 1.5. During the consultation phase of this legislation we ask that consultees provide, wherever possible, estimates of the costs and benefits of these Regulations. Although this assessment contains many estimates of the potential costs that industry could be faced with, there are still certain evidence gaps that exist. Primarily, evidence obtained through the consultation process is a key objective.
- 1.6. A full list of consultation questions is contained in Section 5 of this consultation.

### Deadline for responses

- 1.7. Responses are welcomed from the **17/03/2021** until the **12/05/2021**.

## Section 2: Areas for consideration

### Background

- 2.1. The move to develop a mandatory code followed the adoption by the IMO Assembly, in 2009, of guidelines for ships operating in polar waters (Resolution A.1024(26)), which were intended to address those additional provisions deemed necessary for consideration beyond existing requirements of the SOLAS and MARPOL Conventions. The Guidelines were recommendatory.
- 2.2. However, the safety of ships operating in the harsh, remote and vulnerable polar areas, and the protection of the pristine environments around the two poles, have always been matters of concern for the IMO. Trends and forecasts indicate that polar shipping will grow in volume and diversify in nature over the coming years. These challenges need to be met without compromising either safety of life at sea, or the sustainability of the polar environments.
- 2.3. Poor weather conditions and the relative lack of good charts, communication systems and other navigational aids pose challenges for mariners operating in polar waters. The remoteness of the areas makes rescue or clean-up operations difficult and costly. Cold temperatures may reduce the effectiveness of numerous components of the ship, ranging from deck machinery and emergency equipment to sea suction.
- 2.4. The Polar Code covers the full range of design, construction, equipment, operational, training, search and rescue and environmental protection matters relevant to ships operating in the inhospitable waters surrounding the two poles.

### Ambulatory Reference

- 2.5. An ambulatory reference for the purposes of this consultation is a reference in domestic legislation to an international instrument which is to be 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).
- 2.6. It is proposed that an ambulatory reference to the requirements for industry contained in SOLAS Chapter XIV and the Polar Code be included in the proposed Polar Code Regulations. The majority of the provisions in Chapter XIV and the Polar Code are cross-referenced in the Polar Code Regulations.
- 2.7. From a legal perspective, this means that future amendments to the referenced provisions of Chapter XIV of SOLAS and the Polar Code in the Polar Code Regulations will automatically become part of UK law when they enter into force internationally. No further legislation will be required to bring amendments into force in the UK unless the change is outside the scope of the matters referenced in the Regulations; this is expected to be rare.
- 2.8. From a practical perspective, this means that ship owners, shipbuilders, and other interested parties can refer directly to the text of SOLAS Chapter XIV and the Polar Code to determine both the UK and international requirements. Where the text of Chapter XIV or the Polar Code is unclear or needs amplification - for instance, where it is stated that something is to be carried out "to the satisfaction of the administration" - guidance will provide the additional clarity required. This approach avoids the need to refer both to UK legislation (which may be phrased differently to SOLAS and be organised differently) and the text of SOLAS to check compliance with international requirements.
- 2.9. This will simplify the regulatory framework for both industry and regulatory users. It will also provide legal clarity for ship owners, shipbuilders and other industry professionals/ interested parties as they will only have to refer to the internationally agreed text in relation to SOLAS Chapter XIV and the Polar Code, instead of having to refer to a UK version of those provisions.

## Proposals

- 2.10. The Polar Code is intended to cover the full range of shipping-related matters relevant to navigation in waters surrounding the two poles: ship design, construction and equipment; operational and training concerns; search and rescue; and, equally important, the protection of the unique environment and eco-systems of the polar regions.
- 2.11. The Code requires ships intending to operate in the defined waters of the Antarctic and Arctic to have a Polar Ship Certificate. Before a certificate can be issued, the ship must be assessed in respect of the anticipated range of operating conditions and hazards the vessel might encounter in polar waters. **This must be organised by the owner, manager and/or operators of the vessel.** The assessment must include information on identified operational limitations and plans or procedures or additional safety equipment necessary to mitigate incidents with potential safety or environmental consequences.
- 2.12. A Polar Water Operational Manual (PWOM) must be carried on board a ship to provide the owner, manager, operator, master and crew with sufficient information regarding the ship's operational capabilities and limitations in order to support their decision-making process.
- 2.13. The various chapters in part I-A of the Code (safety measures) each set out goals and functional requirements and include: ship structure; stability and subdivision; watertight and weathertight integrity; machinery installations; operational safety; fire safety/protection; life-saving appliances and arrangements; safety of navigation; communications; voyage planning; manning and training.
- 2.14. Chapter 12 of part 1-A of the Polar Code (manning and training) requires companies to ensure that masters, chief mates and officers in charge of a navigational watch on board ships operating in polar waters have completed appropriate training, taking into account the provisions of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) and its related STCW Code. Chapter 12 of the Code (manning and training) is being implemented through an amendment to the Merchant Shipping (Standards of Certification, Training and Watchkeeping) Regulations 2015 (S.I. 2015/782) and is the subject of a separate consultation.
- 2.15. Part II-A (pollution prevention measures) covers prevention of oil pollution, prevention of pollution from noxious liquid substances from ships, prevention of pollution by sewage from ships and prevention of pollution by discharge of garbage from ships. These provisions have already been implemented in UK law. This consultation addresses only the safety measures in the Polar Code.

## Summary of Options and Recommendation

There are effectively four policy options which have been considered:

- 2.16. **Option 0:** Do nothing, counterfactual; this is the baseline against which the three options below are assessed.

In this scenario the UK would not implement the Polar Code into UK law, leaving UK law unaligned with international standards. This would mean that the UK would not be fulfilling its obligations, as a responsible member of the IMO, to implement internationally agreed obligations into domestic law. Non-implementation would also render the UK non-compliant with the latest version of the SOLAS Convention, which the UK has ratified. Further, the UK has a duty and obligation under international law to implement amendments to international conventions that it has agreed to. Therefore, a failure to implement the new Convention provisions would mean that UK ships would not be compliant with international standards and would put at risk the UK "high flag" status. This option would not allow risk to be managed as far as is reasonably practicable. Future UK-flagged vessels could potentially be subject to

detentions, denial of entry or expulsion from polar waters of other port states due to lack of proper certification. Moreover, the UK has previously supported amendments to SOLAS at the IMO; this intensifies the obligation placed on the UK that further agreed amendments, when they come into force, should be implemented. Therefore, 'do nothing' is not a desirable option.

- 2.17. **Option 1:** Implement Chapter XIV and the Polar Code in full. The proposed Regulations implement the requirements of Chapter XIV of SOLAS, which incorporates the safety-related requirements for vessels in the Polar Code.

The proposed Regulations would provide UK flagged vessels, which are certified as Polar Code compliant, the ability to operate in polar waters. This option also provides the futureproofing of travel to polar waters, provides a set of standards for vessels and seafarers, which facilitate the protection of life and the preservation of the polar regions. Harmonising the UK with other IMO Member States prevents damage to the reputation of the UK on the international maritime stage and maintains the UK status as a respected flag State. The UK will be able to operate in polar waters in which UK-flagged vessels could otherwise be deterred from entering. Furthermore, the Code also creates a set of universal standards required for survival in the extreme environment of polar waters which should, in theory, prolong life before being rescued. This option could include full cross-referencing of Chapter XIV and the Polar Code, but reference to them would be static.

- 2.18. **Option 2:** (preferred option): Implement Chapter XIV and the Polar Code in full and include an ambulatory reference provision. The proposed Regulations implement the requirements of Chapter XIV of SOLAS and the Polar Code (as in option 1) but with the addition of ambulatory referencing. Ambulatory referencing ensures that future updates to Chapter XIV and the Polar Code, and which are referenced in the Regulations, are automatically incorporated into UK law when they come into force internationally. This will directly fulfil the main request of industry from the Red Tape Challenge, which was to address the delay in transposition of international requirements. The introduction of ambulatory referencing is not novel and has been adopted for a number of other measures. In addition, the international convention text would clearly remain subject to the same scrutiny as at present and could be supplemented by guidance in the UK as to interpretation as necessary. However, the introduction of ambulatory referencing would substantially reduce the regulatory and legal process surrounding the implementation in this country of international regulations.

Cross-referencing Chapter XIV and the Polar Code, together with ambulatory referencing:

- provide the legal certainty sought by industry to keep domestic legislation in step with international requirements;
- reduce the administrative burden for industry, as it can focus on the international text in technical areas, rather than also having to refer to national implementing legislation;
- meet the industry desire for copy-out text, and reduces debate on whether a provision has been "gold-plated"; and
- provide a level playing field between UK ships calling at foreign ports and foreign flagged ships calling at UK ports.

- 2.19. **Option 3:** Encourage voluntary application (non-regulatory option). Option 3 would be non-viable as it would result in all the issues brought up in the counterfactual Option 0 including: a lack of harmonisation between the UK and other IMO countries operating within the polar regions; UK flagged vessels potentially being sanctioned internationally for not meeting the specifications of the Polar Code; reputational damage to the UK for failing to implement international obligations.

## Manning and Training Requirements

- 2.20. Chapter 12 of the Polar Code (manning and training) is being implemented separately by way of an amendment to the Merchant Shipping (Standards of Certification, Training and Watchkeeping) Regulations 2015 (S.I. 2015/782). Therefore, the section in the Polar Code related to manning and training does not form part of this consultation.
- 2.21. Chapter 12 of part 1-A of the Polar Code (manning and training) requires companies to ensure that masters, chief mates and officers in charge of a navigational watch on board ships operating in polar waters have completed appropriate training, taking into account the provisions of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) and its related STCW Code.
- 2.22. Minimum requirements for the training and qualifications of masters and deck officers on ships operating in polar waters were adopted by the IMO's Maritime Safety Committee in November 2016. They became mandatory under the STCW Convention and the STCW Code from 1st July 2018. These amendments require compliance with the provisions of chapter 12 of part 1-A of the Polar Code. To ensure that operators, masters and deck officers are compliant with the Polar Code, the latest version of STCW and the Merchant Shipping (Standards of Certification, Training and Watchkeeping) Regulations 2015 must be used for the purposes of training.

## Offences and Penalties

- 2.23. The Maritime and Coastguard Agency, as the UK's maritime regulatory and enforcement authority, has responsibility for both delivering and enforcing the Government's maritime policy relating to ships, seafarers and the seas around the UK. The MCA's approach to breaches of maritime legislation relies on a range of civil and criminal remedies in which, like many other regulatory regimes in the UK, civil and criminal sanctions sit alongside each other to enable the MCA to take the most proportionate action in relation to a particular breach. The decision on what is the most proportionate approach is determined by matters such as the importance of the requirement being breached, the gravity of the contravention, the effect of the contravention on third parties etc.
- 2.24. MCA surveyors have enforcement and sanction powers which can be applied locally to ships calling at UK ports. The MCA's powers to use civil sanctions are primarily contained in the Merchant Shipping Act 1995 ("MSA"). These powers, including improvement and prohibition orders, are limited in scope and available only for specific purposes. Other than the power to detain a ship, it is not possible to replicate all the civil sanctions in the MSA in secondary legislation implementing international obligations or other policy objectives as there is no power to do so in the MSA. Because these civil sanctions are contained in primary legislation (the MSA), if they are needed, the sanctions will be enforced directly under the MSA. The policy approach, in line with the MCA's published enforcement policy, is to use these civil sanctions whenever possible before using criminal offences.
- 2.25. Maritime regulatory requirements govern both safety and pollution prevention. As such, their purpose includes the prevention of loss of life or injury to persons and the protection of the marine environment and adjoining coastlines. These very compelling objectives necessitate the availability of criminal sanctions in the more serious cases, and also provide a vital deterrent.



## Offences and Penalties Table

### 2.26. The Merchant Shipping (Polar Code) (Safety) Regulations 2021, Offence and Penalties.

Provision/offence	Liability	Penalty
regulation 7(8) (recording of alternative design and arrangements)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 10(2)(a) (performance standards)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 10(2)(b) (operational assessment)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 10(2)(c) (requirement to comply with chapters 2 to 11 of part 1-A of the Polar Code) in so far as it requires a ship to comply with chapters 2 to 10 of part 1-A of the Polar Code (safety measures)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 10(3) (compliance with polar water operational manual)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 11(2) (requirement for survey and certification before entering polar waters)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 11(3) (requirement to hold on board a valid polar ship certificate)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 13(2) (responsibilities of owner and master)	Owner and master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.

regulation 10(2)(c) (requirement to comply with chapters 2 to 11 of part 1-A of the Polar Code) in so far as it requires a ship to comply with chapter 11 of part 1-A of the Polar Code (voyage planning)	Master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, two years imprisonment or a fine or both.
regulation 11(4) (failure to have readily available for examination a valid polar ship certificate or equivalent certificate)	Owner and Master	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, six months imprisonment or a fine or both.
regulation 15(3) (falsification of polar ship certificate etc.)	Person responsible for the fraudulent activity	On summary conviction, a fine (up to statutory maximum in Scotland and NI) and on conviction on indictment, six months imprisonment or a fine or both.

## Supporting Information

- 2.27. To support those wishing to respond to this consultation, within the Consultation Package we have included a copy of the proposed Marine Guidance Note (MGN) and the draft implementing Regulations.

## Section 3: Responding to this consultation

- 3.1. There are specific questions highlighted in section 5 of this document and information on how to respond to this consultation document.

### Consultees

- 3.2. Anyone may respond to this consultation and consideration will be given to all responses. We will be particularly interested to hear from ship builders, owners, operators, shipyards and equipment manufacturers.

### Duration

- 3.3. This consultation is open for eight weeks from **17/03/2021**. The deadline for responses is **12/05/2021**.

### Submitting your response

- 3.4. Consultation responses should be emailed to [James.Hartley-Binns@mcga.gov.uk](mailto:James.Hartley-Binns@mcga.gov.uk). Any questions should be sent to this email address.
- 3.5. 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. Please also clearly state your name and your representative organisation in the response.

### Freedom of Information

- 3.6. 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.
- 3.7. 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.
- 3.8. 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.
- 3.9. 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

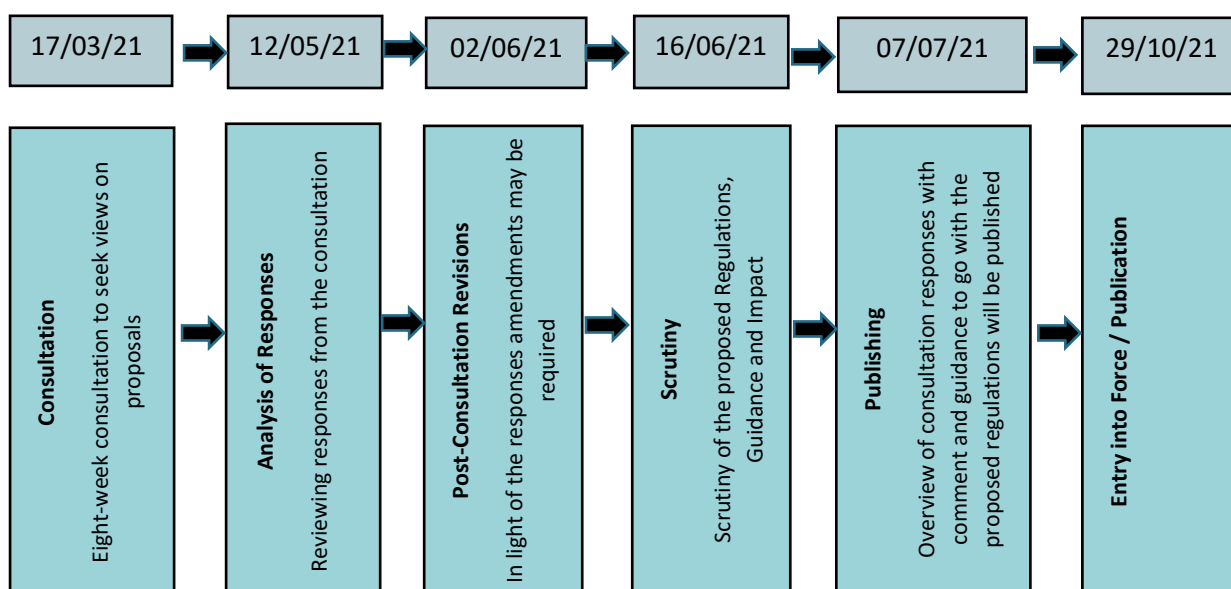
- 3.10. The MCA is carrying out this consultation, in the public interest, to gather evidence to develop the proposed regulatory framework and to inform the development of the associated policy.
- 3.11. The MCA will use your contact details to send you information about the consultation, for example if follow-up questions are needed in order to exercise its functions as a government department. Your information will be kept secure and will not be used for any other purpose without your permission.
- 3.12. 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.

## Section 4: Outline of plans beyond this consultation

- 4.1. 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.
- 4.2. We will be analysing the responses during January. Our aim is to publish an overview of the responses and the MCA's comments by the end of that month, which will be available from: [www.gov.uk/government/publications](http://www.gov.uk/government/publications)
- 4.3. Where appropriate, the draft Regulations and accompanying guidance will be revised to take into consideration the consultation responses.
- 4.4. Our aim is for the proposed Regulations to come into force on **28th April 2021**. The Regulations will be published on [www.legislation.gov.uk](http://www.legislation.gov.uk)
- 4.5. Every effort will be made to publish the accompanying guidance on GOV.UK in advance of the entry into force date.
- 4.6. An overview timetable is set out below for reference:



## Section 5: Response form

What is your name?

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What is your email address?

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What is your job title?

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**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)

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

Respondent Type

Size of Organisation

- |   |  |
|---|--|
| <input type="checkbox"/> Classification Society       | <input type="checkbox"/> Large business (over 250 staff)   |
| <input type="checkbox"/> Government Agency/Department | <input type="checkbox"/> Medium business (50 to 250 staff) |
| <input type="checkbox"/> Individual                   | <input type="checkbox"/> Small business (10 to 49 staff)   |
| <input type="checkbox"/> Legal representative         | <input type="checkbox"/> Micro business (up to 9 staff)    |
| <input type="checkbox"/> Protection & Indemnity       |  |
| <input type="checkbox"/> Seafarer                     |  |
| <input type="checkbox"/> Ship Operator                |  |
| <input type="checkbox"/> Ship Owner                   |  |
| <input type="checkbox"/> Trade Union                  |  |
| <input type="checkbox"/> Other                        |  |

(please describe)

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## Section 5.1 Consultation Questions

During the consultation phase for these proposed Regulations, we ask that consultees provide wherever possible estimates of the costs and benefits of this policy.

1. What do you believe the appetite for polar exploration under the UK flag will be in the next 10 years (please provide special reference to vessels affected by the proposed Regulations i.e. cargo ships of 500 Gross Tonnes (GT) or more, and to all passenger ship etc.)?
2. If you were to operate a vessel affected by the proposed Regulations within the polar regions, would you choose to do so under the UK flag? If not, please provide the reasoning why?
3. An indication from potential operators if these costs are realistic to what they believe they would face.

Is it reasonable to omit the itemised list of associated costings below, owing to the assumption of best practice and Life Saving Appliances Code requirements?

For example, cost associated with:

- machinery
  - windows on bridges
  - ice removal equipment
  - suitable clothing
  - cost of life-saving appliances and firefighting equipment
  - cost of enclosed or partly enclosed lifeboats
4. Potential operators - please could you indicate which costs are believed to be additional as a result of implementing the safety requirements of Chapter XIV and the Polar Code into domestic legislation? If you disagree with the items listed above, please state the reasons why.
  5. Industry have been aware of the IMO's intention to implement rules for operating in polar waters since 2010. Would it therefore be right to assume that in expectation of the implementation of Chapter XIV and the Polar Code, industry is generally compliant with the new international provisions?
  6. Do you agree with the assumption it would be uneconomical to retrofit a vessel to the Polar Code specifications and therefore it would be appropriate to assume every vessel operating with these regions would be a new vessel designed for this purpose, or a currently compliant vessel from another IMO white flagged country?
  7. Do you believe the costings which have been monetised (visible in table 1) provide an accurate representation of the cost incurred for those vessels operating under the UK flag operating within polar regions, as a direct result of the UK's implementation of the Polar Code domestically? If not, how would you expect the estimated costs to vary?

<b>Cost scenario</b>	<b>Per vessel (average) cost</b>
Group survival equipment <sup>3</sup>	£5,800
Polar Water Operational Manual PWOM <sup>3</sup>	£14,500
Polar Certificate and survey	£3,500
<b>Summary of cost (Nominal costs)</b>	<b>£23,800</b>

Table 1: Costs imposed on business due to the implementation of the Polar Code.

8. Potential operators - would you be able to provide any additional costs or benefits that have yet to be mentioned in this document?
9. Do you foresee any unintended consequences of the proposed Regulations, that have not previously been mentioned?
10. Do you consider the proposed offences and penalties to be appropriate in light of the requirements imposed by the draft Regulations? (see offences table)
11. Will the proposed offences and penalties provide an effective deterrent to counteract non-compliance?
12. Can you see any other benefits or drawbacks of using ambulatory referencing to implement updates to Chapter XIV and the Polar Code?
13. Do you agree with the decision to implement Chapter 12 of the Code (manning and training) by way of an amendment to the Merchant Shipping (Standards of Certification, Training and Watchkeeping) Regulations 2015? If not, why?
14. Is the proposed guidance to accompany the Regulations adequate and in the right format?
15. Do you believe that there is a better way of providing guidance for the Polar Code requirements?
16. Given that the Polar Code is 'goal' based, are the associated requirements transparent enough?



## Section 5.2

Do you have any additional comments to add to the response?

Please return completed response forms to [Marinetechnology@mcga.gov.uk](mailto:Marinetechnology@mcga.gov.uk)

Alternatively, responses may be posted to:

UK Technical & Ship Standards (*Polar Code Consultation Response*)  
105 Commercial Road  
Southampton  
SO15 1EG

## Section 6: Conduct of this consultation

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

### Consultation principles

- 6.2. 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf)

### Feedback on conduct of consultation

- 6.3. If you have any comments regarding the conduct of this consultation, please contact the Consultation Co-ordinator at [consultation.coordinator@mcga.gov.uk](mailto:consultation.coordinator@mcga.gov.uk).
- 6.4. 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.
- 6.5. If you require this consultation in an alternative format, please contact either the Consultation Co-ordinator or the named official conducting this consultation.

## MCA CONSULTATION FEEDBACK FORM

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

.....

2. 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) \_\_\_\_\_

3. Please indicate whether you accessed this consultation package through:

- Post
- Email
- Website

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

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

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

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

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

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

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

- Yes
- No

8. Were any representative groups, organisations or companies not consulted who you felt should have been?
- Yes  
 No

If yes, who? \_\_\_\_\_

9. 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:

UK Technical & Ship Standards (Polar Code Consultation Response)  
Maritime and Coastguard Agency,  
Spring Place, Bay 3/26, 105 Commercial Road  
Southampton SO15 1EG  
Or e-mail it to: [Marinetechnology@mcga.gov.uk](mailto:Marinetechnology@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.**