



Maritime &
Coastguard
Agency

Consultation Document:
MGN 653 (M) Electric Vehicles Onboard
Passenger Ro-Ro Ferries

October 2021

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Section 1: Overview of this consultation

Aim

- 1.1. This consultation seeks your views on the draft Marine Guidance Note MGN 653(M) Electric Vehicles Onboard Passenger Ro-Ro Ferries. The increase in electric vehicle (EV) numbers in the UK has led to increasing demand for transit of EV onboard passenger Ro-Ro ferries (Ro-Pax). Currently there are limited requirements specific to the charging of electric vehicles onboard UK vessels. However, noting the increasing popularity of electric vehicles it has become apparent that there is a potential for users of these vehicles to expect charging to be available onboard, and for operators of such vessels to consider offering this facility. This marine notice provides guidance for the safe carriage and charging EVs

Views sought

- 1.2. Your views are sought in the following areas:
 - a) any content which you believe to be inaccurate;
 - b) any typographical errors;
 - c) any non-statutory advice with which you disagree;
 - d) any content you believe is unclear;
 - e) any content you think is inappropriate to include, and should therefore be omitted;
 - f) any content which has been omitted which you believe should be included;
 - g) the proportionality of the guidance and any content you believe is overly restrictive or any content that you believe is not going far enough.
- 1.3. A full list of consultation questions is contained in Section 5 of this consultation.

Deadline for responses

- 1.4. Responses are welcomed from 25 October 2021 until 23:45 on 20 December 2021

Section 2: Areas for consideration

- 2.1 As increasing numbers of EVs are being transported on Ro-Pax ferries there is a need to provide guidance on the safety aspects associated with their carriage. This includes, fire safety elements, electrical hazard risks, the increased risk from carriage of damaged EVs (accident recovery) and the safe charging of electric vehicles while onboard Ro-Pax vessels.

The guidance focuses on the charging of EVs on board which is the most novel aspect of the guidance. Further risks from EVs on Ro-Pax vessels are explored and the MGN gives guidance on how to manage these risks effectively.

This MGN has been developed following discussions with domestic Ro-Pax operators and in consultation with international marine authorities. It is expected that international legislation from the International Maritime Organisation (IMO) will be developed to advise or regulate on the carriage and charging of alternatively fuelled vessels in time however it is the opinion of the MCA that UK guidance is required in the short term to ensure the safety of Ro-Pax vessels, passengers, and crew.

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. A response form is also enclosed as a separate 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: Ro-Pax operators, class societies, electric vehicle owners that regularly sail on Ro-Pax ferries and Ro-Pax crew.

Duration

- 3.3. This consultation is open for 8 weeks from 25 October 2021. The deadline for responses is 23:45 on 20 December 2021.

Submitting your response

- 3.4. Consultation responses should be emailed to marinetechnology@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.

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

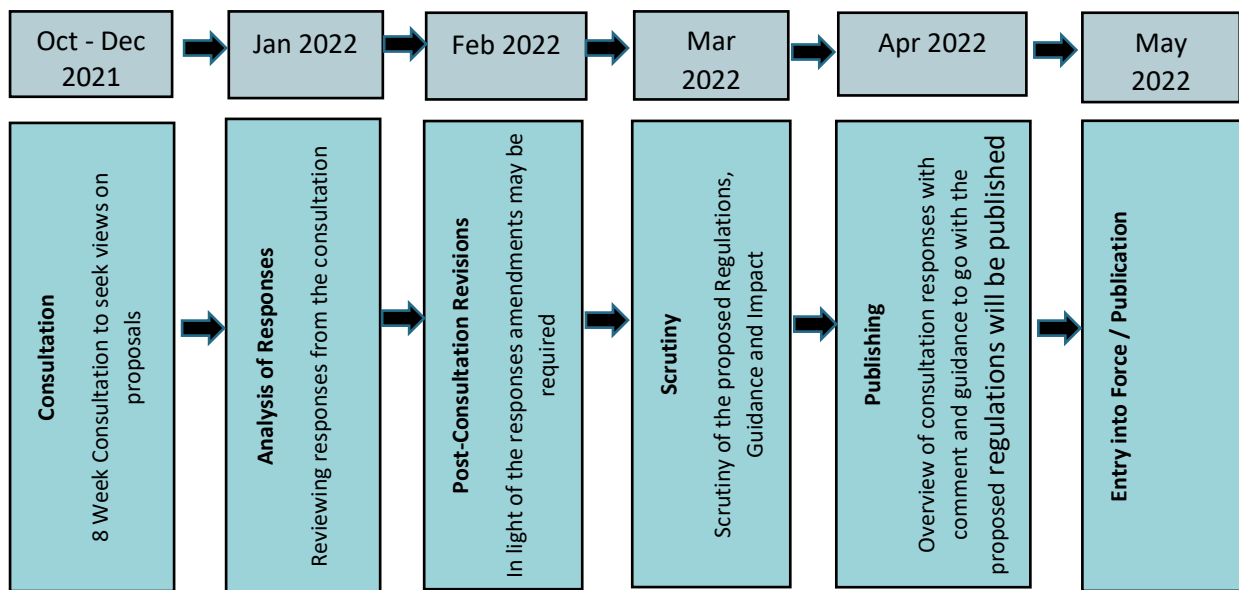
- 3.10. The MCA is carrying out this consultation to gather evidence. The consultation is being carried out in the public interest to inform the development of policy.
- 3.11. The MCA will use your contact details to send you information about the consultation, for example if we need to ask follow-up 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.
- 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 2022. Our aim is to publish an overview of the responses and the MCA's comments by late February 2022 which will be available from: www.gov.uk/government/publications
- 4.3. Where appropriate the draft Guidance, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
- 4.4. Our aim is for the MGN to come into force on **1st of May 2022** The Regulations will be published on www.legislation.gov.uk
- 4.5. Every effort will be made to publish the revised accompanying guidance on GOV.UK in advance of the MGN being published.
- 4.6. An overview timetable is below for reference:



Section 5: Response form MGN 653 – Electric Vehicles Onboard Passenger Ro-Ro Ferries

What is your name? _____

What is your email address? _____

What is your job title? _____

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) _____

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

Respondent Type

- Classification Society
- Government Agency/Department
- Individual
- Legal representative
- Protection & Indemnity
- Seafarer
- Ship Operator
- Ship Owner
- Trade Union
- Other
(please describe) _____

Size of Organisation

- Large business (over 250 staff)
- Medium business (50 to 250 staff)
- Micro business (up to 9 staff)
- Small business (10 to 49 staff)

Section 5.1 Consultation Questions

Is there any content which you believe to be inaccurate?

Are there any typographical errors?

Is there any non-statutory advice with which you disagree?

Is there any content you believe is unclear?

Is there any content you think is inappropriate to include, and should therefore be omitted?

Do you believe any content which has been omitted should be included?

Are you satisfied with the proportionality of the guidance and do you believe that any content is overly restrictive or does not go far enough?

Section 5.2

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

Please return completed response forms to mairnetechology@mcga.gov.uk

Alternatively, responses may be posted to:

Allan Love
Maritime Technology Branch, Bay 2/23
Maritime & Coastguard Agency
Spring Place, 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

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.
- 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:

.....

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 3/26, 105 Commercial Road
Southampton SO15 1EG

Or e-mail it to: consultation.coordinator@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.