



Maritime &
Coastguard
Agency

Consultation Document:

The Merchant Shipping and Fishing Vessels (Medical Stores) (Amendment) and Light Dues (Amendment) Regulations 2027

October 2026

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Section 1: Overview of this consultation

Aim

- 1.1 This consultation seeks your views newly proposed Regulations to amend the Merchant Shipping and Fishing Vessels (Medical Stores) Regulations 1995 (the 1995 Regulations). The purpose of the proposed Regulations is to refine the UK domestic legislation implementing medical stores regulations post the UK's exit from the EU.
- 1.2 The proposed Regulations will amend an item of assimilated law. The 1995 Regulations require the addition of an exemption clause allowing for tailored application of regulations, accommodating unique circumstances or challenges faced by certain ships or operators.

Views sought

- 1.3 Your views are sought on the proposed Regulations and a more in-depth explanation of the proposed Regulations can be found in Section 2 of this document. In particular, your views are sought on the associated costs, impacts and any potential unintended consequences of it.
- 1.4 A full list of consultation questions is contained in Section 5 of this consultation.

Deadline for responses

- 1.5 Responses are welcomed from **30/10/26 until 27/11/26**.

Section 2: Areas for consideration

Background

- 2.1 The Merchant Shipping and Fishing Vessels (Medical Stores) Regulations 1995 (“the 1995 Regulations”) and the Merchant Shipping (Medical Stores) (Amendment) Regulations 1996 (“the 1996 Regulations”) implemented Council Directive 92/29/EEC (“the Directive”) on the minimum safety and health requirements for improved medical treatment on board ships, relating specifically to the carriage of medicines and other medical stores.
- 2.2 The 1995 Regulations mandate:
- The provision of medical stores on board vessels to ensure the health and safety of crew members;
 - The types of medical supplies and equipment that must be carried, such as medicines, medical instruments, and first aid materials;
 - Requirements for the storage, maintenance, and accessibility of medical stores;
 - Procedures for record-keeping and reporting of medical incidents or treatments provided on board; and
 - Defined responsibilities for shipowners, masters, and other personnel regarding compliance with the regulations.
- 2.3 The 1995 Regulations are crucial for promoting the well-being of crew members and ensuring that vessels are adequately equipped to handle medical emergencies while at sea.

Proposed Changes

- 2.4 The 1995 Regulations and the 1996 Regulations implemented the Directive on the minimum safety and health requirements for improved medical treatment on board ships, relating specifically to the carriage of medicines and other medical stores. International requirements (Maritime Labour Convention Standard A4.1) specify that medical stores are to be carried but do not prescribe the detail of which stores must be carried. The Directive prescribed the detail which the EU believed to be appropriate. The UK is still bound by the former but not the latter, so since the UK’s exit from the EU, has more discretion as to which medications and medical apparatus to prescribe. The 1995 Regulations have no exemption provision and therefore offer no flexibility in terms of compliance. It is intended that the proposed Regulations will introduce a new provision to allow for an exemption to be granted in specific circumstances and subject to applicable conditions. Without this new provision, it will not be possible to permit more tailored medical stores requirements on board vessels by taking into account risks. If unchanged the 1995 Regulations could be considered disproportionate in some instances in relation to requirements for the carriage of medical stores. The new exemption provision would allow a wider range of factors to be taken into account in determining whether a particular item should be carried. These might include the vessel size, the proximity of medical facilities and whether the vessel operates in an area with good search and rescue cover.

2.5 The proposed Regulations amend the 1995 Regulations and any supporting published guidance by adding an exemption clause. While the basic standards remain the same, the exemption provision allows for tailored application of the 1995 Regulations, accommodating risk factors, such as the area of operation of the vessel and whether search and rescue facilities cover that area, and unique circumstances or challenges faced by certain ships or operators. The exemption provision also facilitates compliance for ships that may face difficulties meeting standard regulatory requirements due to size or technological limitations. Exemptions will only be issued when it is safe to do so.

2.6 The amendments proposed are outlined below:

2.6.1 Regulation 1 will be amended to allow for the definition of “dangerous substances” to be updated to reflect what is listed in the most recent MSN as well as updating the definition of “inland navigation”. A further few new definitions have been added which relate to “remotely operates unmanned vessels”.

2.6.2 Regulation 3 shall apply to United Kingdom ships other than:

- a) ships employed inland navigation;
- b) pleasure vessels used for non-commercial purposes and not manned by professional crews;
- c) tugs operating in harbour areas;
- d) remotely operated unmanned vessels.

2.6.3 A new regulation 11A will be inserted to create an exemption provision. The exemption provision will allow for a tailored application of regulations, accommodating unique circumstances or challenges faced by certain ships or operators. Exempting certain vessels from specific requirements will hopefully reduce some unnecessary costs and burdens associated with compliance.

2.6.4 An exemption can be applied for when

- When all risks have been considered and a particular medication or medical appliance is deemed unnecessary under the circumstances;
- compliance with the required stores under MSN 1905 is not practicable and would bring no safety benefit; (e.g. a stretcher on a small boat, where it could not be safely stowed and would not be useable in the event of an emergency).

NB: Any exemption granted will be valid for no longer than 5 years.

2.6.5 The Regulations also make an unrelated amendment to the Civil Partnership Act 2004 (Amendments to Subordinate Legislation) Order 2005 (S.I. 2005/2114) (the “2005 Order”). The amendment arises out of a failure by the Merchant Shipping (Light Dues) Regulations 2025 (S.I. 2025/278) (the “2025 Regulations”) to cite the necessary enabling power when it sought to amend the 2005 Order.

The 2025 Regulations revoked the Merchant Shipping (Light Dues) Regulations 1997 (S.I. 1997/562) (the “1997 Regulations”). The 2025 Regulations also revoked other legislation which had amended the 1997 Regulations as those provisions became redundant once the 1997 Regulations had been revoked. These revocations included a provision in the 2005 Order. However, as the 2025 Regulations did not cite the necessary power for this revocation, it has been necessary to re-make this revocation this time citing the correct power. For completeness, the previous purported

amendment to the 2005 Order made by the 2025 Regulations has also been revoked by these Regulations.

It should be noted that we are not consulting on the amendments to the Light Dues Regulations, this has been included for information only.

Summary of Options and Recommendations

- 2.7 Option 0 – “Do nothing” - The perpetuation of an inflexible and anomalous regime will reflect poorly on the Maritime and Coastguard Agency and Department of Transport (Department) and have a negative impact on industry, is therefore ruled out as an option.

Option 1 – Amend The Merchant Shipping and Fishing Vessels (Medical Stores) Regulations 1995 and any supporting published guidance by adding an exemption clause. An exemption provision allows for tailored application of regulations, accommodating unique circumstances or challenges faced by certain ships or operators. By exempting certain vessels from specific requirements, unnecessary costs associated with compliance can be avoided, while continuing to ensure the vessels carry the appropriate medical stores for the operations they are performing.

Option 2 – A complete overhaul of The Merchant Shipping and Fishing Vessels (Medical Stores) Regulations 1995. This outcome is not our preferred option as completely revising the Regulations would require significant time, resources, and effort from regulatory authorities, stakeholders, and industry players. This process could cause delays in implementation. While a comprehensive overhaul may seem like a comprehensive solution, it could present challenges in terms of time, resources, stakeholder engagement, and regulatory certainty, and is considered disproportionate to the task.

Supporting Information

- 2.8 As the costs and impacts are expected to be low, no formal Impact Assessment has been carried out although a De Minimis Options Assessment (DMOA) has been completed and is included at Annex C. This has been agreed to as the most appropriate assessment process given that the DMOA threshold of +/- £10m Equivalent Annual Net Direct Cost to Business (EANDCB) is not expected to be exceeded.
- 2.9 Offences and penalties have not been affected by this proposed amendment.
- 2.10 The proposed amendment is set out in **Annex A**.
- 2.11 The draft amended MSN 1905 (M+F) Amendment 6 is in **Annex B**.
- 2.12 The De Minimis Options Assessment is set out in **Annex C**.

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 operators of ships affected by the Regulations.

Duration

- 3.3. This consultation is open for 4 weeks from **30 October 2026**. The deadline for responses is **27 November 2026**.

Submitting your response

- 3.4. The preference is for consultation responses to be emailed to medical@mcga.gov.uk. Any questions should also be sent to this email address. You can also send in your response by post to: Maritime and Coastguard Agency, Spring Place, (Attn: Alison McCourt, Medical Administration and Policy Manager), 105 Commercial Road, Southampton SO15 1EG.
- 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.

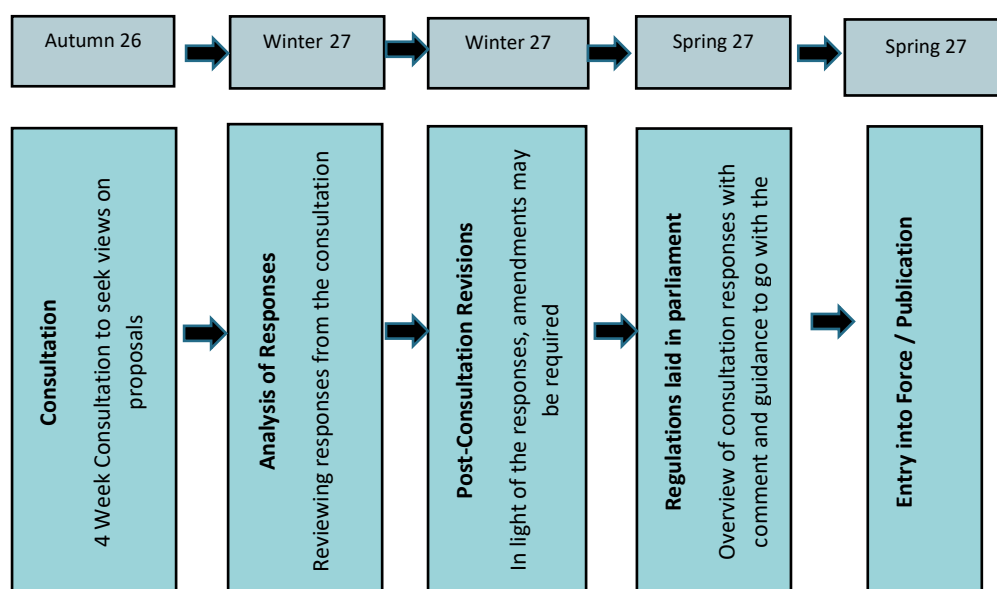
Data Protection

- 3.10. The MCA is carrying out this consultation to gather evidence to inform the development and implementation of policy and legislation under the enabling provisions of the Merchant Shipping Act 1995 Part IV Section 86. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain information that allows you to be identified, under data protection law, the MCA, as an Executive Agency of the Department for Transport, will be the Controller for this information.
- 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. You do not have to give us this personal information but if you do choose to provide it, it will not be used for any other purpose without your permission.
- 3.12. Details about how the MCA looks after personal data, your rights, how to complain, and how to contact our Data Protection Manager can be found on gov.uk at:

<https://www.gov.uk/government/organisations/maritime-and-coastguard-agency/about/personal-information-charter>
- 3.13. Your information will be kept securely on the MCA's IT system and any written responses will be held in a secure file and cabinet and kept for [up to five years].
- 3.14. If you do not wish to remain on this list, please let us know at medical@mcga.gov.uk

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 November/December 2026. Our aim is to publish an overview of the responses and the MCA's comments within 3 months of the end of the consultation, which will be available on www.gov.uk along with the consultation.
- 4.3. Where appropriate the draft Regulations, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
- 4.4. Our aim is for the Regulations to come into force during the Spring of 2027. The Regulations will be published on www.legislation.gov.uk
- 4.6. An overview timetable is below for reference:



Section 5: Response form

The Merchant Shipping and Fishing Vessels (Medical Stores) (Amendment) and Light Dues (Amendment) Regulations 2027

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

1. Do you agree that the documents are clear and free of typographical errors?

☐ Yes

☐ No (if you tick this, please provide detail in the space below, continuing on a separate sheet if necessary)

2. Do you agree that using an exemption provision will allow for a tailored application of the Medical Stores Regulations?

☐ Yes

☐ No (if you tick this, please provide detail in the space below, continuing on a separate sheet if necessary)

3. We anticipate that, occasionally, exemptions may be issued for carriage requirements which are considered impractical. Is your vessel subject to any requirements that you consider to be impractical and if so, do you agree that such an exemption would be useful?

☐ Yes, I agree

☐ No, I disagree (if you tick this, please provide detail in the space below, continuing on a separate sheet if necessary)

4. Do you believe there may be any additional administrative burdens as a result of the proposed changes to the Regulations? And do you have any suggestions as to how administrative burdens may arise?

Section 5.2

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

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

Alternatively, responses may be posted to:

The Maritime and Coastguard Agency (MCA), Bay 2/07, Medical Team, Seafarer Safety and Health Branch, (Attention: Alison McCourt), UK Customer Maritime Services, 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 [Consultation Principles 2018](#)

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) _____

2b. If you are representing a company, please indicate the size of your company:

- ☐ Micro (1-9 employees)
- ☐ Small (10-49 employees)
- ☐ Medium (50-249 employees)
- ☐ Large (250+ employees)

2c. 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.