



Maritime &  
Coastguard  
Agency

Consultation Document:

The Merchant Shipping (Additional Safety  
Measures for Bulk Carriers) Regulations 2021

June 2021

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## Section 1: Overview of this consultation

### Aim

- 1.1 This consultation seeks your views on a new Statutory Instrument (SI), the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 2021 ('the proposed Regulations'). The proposed Regulations would replace the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 1999 (SI 1999/1644) in order to implement the most up to date requirements of the International Convention for the Safety of Life at Sea, 1974 (SOLAS) affecting bulk carriers, primarily contained in Chapter XII of SOLAS (additional safety measures for bulk carriers).
- 1.2 The main objective of the proposed Regulations is to improve further the safety standards for bulk carriers. The Regulations will also include an ambulatory reference provision to ensure future amendments to SOLAS referred to in the proposed Regulations are given direct effect in UK law. A more detailed explanation of what this means can be found in section 2.3 of this document.
- 1.3 The updated requirements to Chapter XII of SOLAS agreed at the International Maritime Organization (IMO), and which the proposed Regulations seek to implement, include amendments to requirements for bulk carriers of double-side skin construction constructed on or after 1st July 2006, standards and criteria for side structures of bulk carriers of single-side skin construction and standards for owner's inspection and maintenance of bulk carrier hatch covers.
- 1.4 In addition, further standards relating to the protective coatings for the double-side skin spaces of bulk carriers have been agreed in the IMO. The requirements and standards are contained in IMO Resolutions which amend, or are referred to, in regulation 3-2 of Chapter II-1 of SOLAS (construction: structure, subdivisions and stability, machinery and electrical installations) and will be implemented by separate regulations implementing the updated Chapter II-1.

Further details on all the updates being implemented by the proposed Regulations can be found in section 2.7.

### Views sought

- 1.5 Consultees are invited to comment on any aspect of this consultation; however, you are specifically invited to respond to the consultation questions in section 5.1. A more in-depth explanation of the areas for consideration can be found in section 2.
- 1.6 A full list of consultation questions is contained in section 5 of this document.

### Deadline for responses

- 1.7 Responses are welcomed from 16/06/2021 Until 10/08/2021

## Section 2: Areas for consideration

### Background

- 2.1 Following the sinking of the MV Derbyshire in 1980 with the loss of 44 lives, there was a move to improve safety standards for bulk carriers and the seafarers who work on them. This process was initiated by the IMO with the introduction of new Chapter XII of SOLAS, which was implemented in UK law in 1999 by the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 1999 (SI 1999/1644). These Regulations were further amended in 2004 by SI 2004/2151 to implement further IMO updating resolutions, and again in 2018 by SI 2018/1221 to make minor amendments relating to the UK's exit from the EU.

Six resolutions have been agreed at the IMO since 2004 to further improve the safety standards for bulk carriers, but which have not yet been implemented into UK law. The UK supported these resolutions during IMO discussions and, as a signatory to SOLAS, the UK now has an obligation to implement these further updates.

Amendments to SOLAS Chapter XII, including damage stability and structural strength requirements, the standards and criteria for side structures of bulk carriers of single-side skin construction, and the standards for owner's inspection and maintenance of bulk carrier hatch covers, will be implemented in the proposed Regulations.

Amendments to SOLAS Chapter II-1 (regulation 3-2) relate to the performance standards for protective coatings for dedicated seawater ballast tanks in all types of ships and double-side skin spaces of bulk carriers, including amendments made to the standards since they came into force. These will be implemented in separate regulations that will be made to implement Chapter II-1 of SOLAS in the early part of 2022. However, because the subject matter affects bulk carriers, the new requirements form part of this consultation.

The proposed Regulations will revoke and replace the existing implementing Regulations (SI 1999/1644, and the instruments that amend it, SI 2004/2151 and SI 2018/1221) in order to update the legislation, satisfying the UK's international obligations and thereby improving the safety standards for seafarers and operators of bulk carriers.

- 2.2 The amendments to SOLAS affecting bulk carriers comprise mainly updates, clarifications and improvements to layout; however, there are several important substantive changes to the additional safety measures, listed below in paragraph 2.7. As the requirements for bulk carriers in SOLAS are implemented in UK law, intervention is necessary to implement these amendments so that the changes can also be reflected in UK law, and any benefits that they represent can be made available to UK industry.
- 2.3 The proposed Regulations include an ambulatory reference provision. This is a reference in domestic legislation to an international instrument (or part of it) which is 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). From a legal perspective, this will mean that any new amendments to provisions in SOLAS Chapter XII, and other Chapters of SOLAS that are referenced in the domestic implementing legislation will automatically become UK law when they enter into force internationally. No new or amending regulations will be required to bring these amendments into force in the UK, as is currently the case. From a practical perspective, this means that ship owners, shipbuilders and other interested parties can refer directly to the text of SOLAS Chapter XII (and any other requirements of SOLAS

that are referenced) to determine both the UK and international requirements. Where the international text is unclear or needs amplification - for instance, where it states that something is done 'to the satisfaction of the administration - guidance will provide the additional clarity required.

## Application of the Regulations

- 2.4 The proposed Regulations apply to sea-going bulk carriers of 500 tons or over, which are United Kingdom bulk carriers (located anywhere in the world) or non-United Kingdom bulk carriers, while in United Kingdom waters.

## Proposed Changes

- 2.5 The purpose of the amendments is to maintain a high standard of safety and to remove barriers to trade by ensuring a consistent standard of safety across all bulk carriers.
- 2.6 The following IMO resolutions would be implemented in the proposed Regulations:

### **MSC 170(79)**

#### **Amendments to SOLAS Chapter XII (came into force on 1<sup>st</sup> July 2006)**

- **Damage stability requirements applicable to bulk carriers** – Addition of bulk carriers of double-side skin construction of 150m or above constructed on or after 1<sup>st</sup> July 2006 to comply with the same requirements as single-side skin constructed vessels.
- **Structural strength of bulk carriers** – Addition of the requirement for double-side skin constructed bulk carriers constructed on or after 1<sup>st</sup> July 2006 to comply with the requirements for single-side skin constructed bulk carriers with regards to having sufficient strength to withstand flooding of any one cargo hold to the water level outside the ship.
- **Structural and other requirements of bulk carriers** – Provides technical details regarding the construction standards for bulk carriers of double-side skin construction.
- **Requirements for bulk carriers not being capable of complying with regulation 4.3 (MSC 170(79)) due to design configuration of their cargo holds** – amendment of survey reference to recognise enhanced programme of surveys.
- **Loading instrument** – Addition of the requirement for bulk carriers of <150m in length, constructed on or after 1<sup>st</sup> July 2006 to be fitted with a loading instrument capable of providing information on the ship's stability in the intact condition. This was already a condition for bulk carriers >150m in length.
- **Restrictions from sailing with any hold empty** – Addition of a requirement restricting vessels over 10 years old from sailing with any hold empty (loaded to less than 10% of the hold's maximum allowable cargo weight).

### **MSC 168(79) (took effect on 1<sup>st</sup> July 2006)**

- **Standards and Criteria for Side Structures of Bulk Carriers of Single-Side Skin Construction** – This resolution contains

the standards for side structures within the cargo area of single-side skin bulk carriers of 150m and above, carrying solid bulk cargoes having a density of 1780kg/m<sup>3</sup> and a further annex providing the renewal criteria for side shell frames and brackets in single-side skin bulk carriers not built in accordance with the standards for side structures in single-side skin bulk carriers (referenced and made mandatory in regulation 14 of Chapter XII - restrictions from sailing with any hold empty).

**MSC 169(79)** (took effect on 1<sup>st</sup> July 2006)

- **Standards for owner's inspection and maintenance of bulk carrier hatch covers** – This resolution contains the standards for owner's inspection and maintenance of bulk carrier hatch covers (referenced and made mandatory in regulation 7 of Chapter XII – survey and maintenance of bulk carriers).

The following resolutions will not be implemented in the proposed Regulations but will be implemented in separate regulations implementing Chapter II-1 of SOLAS, to come into force in the early part of 2022, apart from the amendments to Chapter XII contained in MSC.216(82), which will be implemented in the proposed Regulations.

**MSC 216(82)** (came into force on 1<sup>st</sup> July 2008)

#### **Amendments to SOLAS Chapters II-1 and XII –**

- Amends regulation 3-2 in Chapter II-1 of SOLAS, inserting new requirements relating to protective coatings for dedicated seawater ballast tanks in all types of ships and double-side skin spaces of bulk carriers in resolution MSC.215(82).
- Removes the requirement in regulation 6 of Chapter XII for double-side skin spaces and dedicated seawater ballast tanks arranged in bulk carriers of 150 m in length and upwards constructed on or after 1 July 2006 to be coated in accordance with the requirements of regulation 3-2 of Chapter II-1. This omitted requirement was replaced by the updated requirement in regulation 3-2 of Chapter II-1 (see above).
- Minor editorial amendments relating to references in Chapter XII to SOLAS regulation II-1/11 and regulation II-1/11.4, replacing them with regulation II-1/12. [These changes are implemented in the proposed Regulations.]

**MSC 215(82)** (took effect on 1<sup>st</sup> July 2008)

- Performance standards for protective coatings for dedicated seawater ballast tanks in all types of ships and double-side skin spaces of bulk carriers –  
This resolution provides the performance standard for protective coatings for dedicated seawater ballast tanks in all types of ships and double-side skin spaces of bulk carriers, which is mandatory as a result of the reference to it in the amendments to regulation 3-2 of Chapter II-1 (made by

MSC.216(82)). The resolution also includes an example daily log and non-conformity report and dry film thickness measurements.

**MSC 341(91)** (came into force on 1<sup>st</sup> July 2014)

- Amendments to the performance standards for protective coatings for dedicated seawater ballast tanks in all types of ships and double-side skin spaces of bulk carriers – This resolution made minor editorial amendments to the protective coating performance standards contained in MSC.215(82). The Reference to the ‘Guidelines on the enhanced programme of inspections during surveys of bulk carriers and oil tankers (resolution A.744(18), as amended)’ is replaced with a reference to the “International Code on the enhanced programme of inspections during surveys on bulk carriers and oil tankers, 2011 (2011 ESP Code) (resolution A.1049(27)).

## Summary of Options and Recommendation

2.7 As the proposed costs were below the £5m threshold per annum cost or benefit to business and the changes were non-contentious and non-controversial, the proposal is subject to a De Minimis Assessment (DMA).

2.8 The following options were considered:

- **Option 0. Do nothing.** This option is not viable as it would mean UK flagged bulk carriers would have a lower standard of safety requirements than their international counterparts and would also be in contravention of the UK’s international obligations, agreed in the IMO. The existing rules for bulk carriers are implemented in the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 1999 (SI 1999/1644). No substantive updates have been made to this legislation since 2004, although there have been some IMO resolutions to make amendments to SOLAS, which affect bulk carriers. The majority of these IMO resolutions came into force between 2006 and 2008 so the existing UK legislation is now at least 13 years out of date with other international rules for bulk carriers.
- **Option 1a. Revoke and replace existing SI 1999/1644 (with corresponding revocations in relation to the instruments amending it - SI 2004/2151 and where applicable SI 2018/1221).** This option will provide a greater degree of safety to vessels and seafarers on UK flagged bulk carriers and foreign vessels operating in UK waters. This option will also satisfy the UK’s obligations as a signatory to SOLAS and bring the UK legislation up-to-date and in line with its international counterparts. The amendments to SOLAS relating to protective coatings would be implemented in separate regulations implementing updates to Chapter II-1.

**Option 1b. Revoke and replace the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 1999 (SI 1999/1644) against a second counterfactual.** We have analysed the measure against zero compliance with current SOLAS requirements. There would be a negligible expected cost imposed on industry as a UK bulk carrier requires marine insurance in order to be able to operate in UK waters, or the waters of the

majority of other jurisdictions; therefore, vessels would need to be compliant with the proposed Regulations in order to be able to obtain the insurance needed.

- **Option 2. Revoke and replace SI 1999/1644 (and make corresponding revocations in relation to SI 2004/2151 and SI 2018/1221) and include an ambulatory reference provision.** This option will provide a greater standard of safety to vessels and seafarers on UK flagged bulk carriers and foreign vessels operating in UK waters. This option will also satisfy the UK's obligations as a signatory to SOLAS and bring UK legislation up-to-date and in line with its international counterparts. The inclusion of an ambulatory reference provision will enable UK industry to refer to the most up-to-date international legislation in this area (where referenced in the Regulations) and ensure that the Regulations remain up to date with the requirements for bulk carriers in SOLAS. The amendments to SOLAS relating to protective coatings would be implemented in separate regulations implementing updates to Chapter II-1 and would also be subject to an ambulatory reference provision.
- **Option 3.** Encourage voluntary application. Option 3 would be non-viable as it would result in the issues brought up in the counterfactual option 0, including the UK not fulfilling its obligations as a signatory to SOLAS. This would have a negative impact on the UK's standing in the IMO, and on its reputation in maritime affairs. This option could also result in UK flagged bulk carriers having a lower level of safety requirements than their international counterparts, causing additional safety concerns for owners, operators and crew working on UK flagged bulk carriers. It would also result in the UK being unable to enforce the safety standards that this policy seeks to implement.

2.9 The preferred option is **Option 2**

## Supporting Information

2.10 **Marine Notice:**

It is intended to publish a Marine Guidance Note (MGN) to replace MGN 144<sup>1</sup> relating to the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 1999 (SI1999/1644) (attached to this document as Annex B).

2.11 **Offences and Penalties Table:**

The Maritime and Coastguard Agency (MCA), 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 which, like in many other regulatory regimes in the UK, 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.

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<sup>1</sup> MGN 144 is available at <https://www.gov.uk/government/publications/mgn-144-ms-additional-safety-measures-for-bulk-carriers-reg-1999>



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 notices, are 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 general policy approach, in line with the MCA's published enforcement policy, is to use these civil sanctions whenever possible before using criminal offences. The MCA is aware that other legislation provides a means of introducing new civil sanctions, and this is currently the subject of a formal review.

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. To this end, criminal offences are included in the proposed Regulations and are set out in the table below.

There are no changes to the current offences and penalties, which remain, although some new offences have been created.

Provision/offence	Liability	Penalty
regulation 8(1) or (2) (surveys of bulk carriers constructed on or after 1 <sup>st</sup> July 1999) <i>Breach of 8(2) - new offence</i>	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 9(1) (surveys of bulk carriers constructed on or before 1 <sup>st</sup> July 1999)	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), (3) or (4) (damage stability requirements applicable to bulk carriers) <i>Breach of 10(3) - new offence</i>	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) or (3) (structural strength of bulk carriers constructed on or after 1 <sup>st</sup> July 1999) <i>Breach of 11(3) - new offence</i>	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 12(2), (3) or (4) (structural and other requirements for bulk carriers) <i>Breach of 12(3) and (4) - new offences</i>	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(1), (3) or (4) (information on compliance with the requirements for bulk carriers)	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.
For bulk carriers to which regulation 14 applies (solid bulk cargo density declaration), regulation 14(1) or (2)	Shipper	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 15(1) or (2) (loading instrument) <i>Breach of 15(2) - new offence</i>	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 16 (water level detectors)	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 17 (pumping systems)	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 18(2) (restrictions from sailing with any hold empty) <i>Breach of 18(2) - new offence</i>	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.

## Section 3: Responding to this consultation

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

### 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 owners and operators.

### Duration

3.3 This consultation is open for eight weeks from Wednesday 16<sup>th</sup> June 2021 until Tuesday 10<sup>th</sup> August 2021. The deadline for responses is 23:59 Tuesday 10<sup>th</sup> August 2021.

### Submitting your response

3.4 Consultation responses should be emailed to [MEQA@mcga.gov.uk](mailto:MEQA@mcga.gov.uk). Any questions should also 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 published or disclosed in accordance with the access to information regimes

(these are primarily the Freedom of Information Act 2000 (FOIA) and 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. 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.

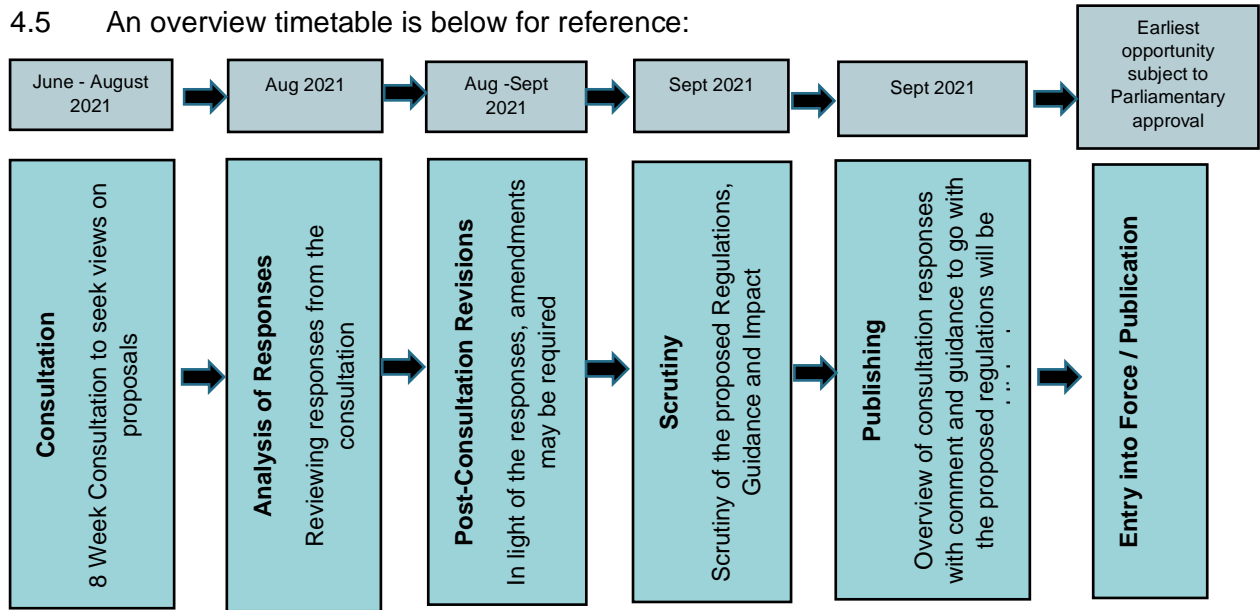
## Data Protection

- 3.8 The Maritime and Coastguard Agency (MCA) is carrying out this consultation to gather evidence to inform the development and implementation of policy and legislation as required by section 86 of the Merchant Shipping Act 1995. 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 the purposes of this information.
- 3.9 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.
- 3.10 Details about how the MCA looks after personal data, your rights 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>
- 3.11 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, until a post-implementation review has been completed.
- 3.12 If you do not wish to remain on this list, please let us know at [MEQA@mcga.gov.uk](mailto:MEQA@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 between 11/08/2021 – 24/08/2021. Our aim is to publish an overview of the responses and the MCA's comments by 15<sup>th</sup> September 2021, which will be available from: [www.gov.uk/government/publications](http://www.gov.uk/government/publications)
- 4.3 Where appropriate the draft Regulations/Guidance, accompanying guidance and impact assessment will be revised to take into consideration the consultation responses.
- 4.4 Our aim is for the Merchant Shipping (Additional Safety Measures for Bulk Carriers) Regulations 2021 to come into force at the earliest opportunity, subject to Parliamentary approval. The Regulations will be published on [www.legislation.gov.uk](http://www.legislation.gov.uk)

4.5 An overview timetable is 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

- Classification Society
- Government Agency/Department
- Individual
- Legal representative

Size of Organisation

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

- Protection & Indemnity
- Seafarer
- Ship Operator
- Ship Owner
- Trade Union
- Other

(please describe)

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### Section 5.1 Consultation Questions

5.1.1 - It is an assumption of the analysis that all UK flagged bulk carriers would already be compliant with the updated international requirements. Therefore, it is expected that the impacts of the proposed changes will be negligible. Do you have any evidence in support of, or to challenge, this rationale? If so, please provide evidence of likely costs implications for your business.

5.1.2 - Do you know of any costs that a vessel that is compliant with the current UK regulations would need to incur to be compliant with the proposed changes? If so, please provide any evidence.

5.1.3 - What are the key areas, if any, where costs and benefits may arise for your business due to the proposed changes?

5.1.4 - Do you know if any businesses will be disproportionately affected by the proposed changes?

5.1.5 - Do you know of any likely unintended consequences resulting from the proposed changes?

5.1.6 - What impact do you think the proposed changes will have upon safety standards? Please provide any evidence to support this.

5.1.7 - If you are an operator of a bulk carrier of double-side skin construction, what impact do you think the requirements to adhere to the same standards as single-side skin constructed bulk carriers, as outlined in this consultation document, have on you?

## Section 5.2

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

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

Alternatively, responses may be posted to:

Ship Safety Policy Lead  
Maritime and 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](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:

.....

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](mailto: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.**

**Annex A: Draft Regulations: The Merchant Shipping  
(Additional Safety Measures for Bulk Carriers)  
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