



Maritime &
Coastguard
Agency

Maritime and Coastguard Agency – introduction.

CMDC round 4 briefing event.

Gwen Lancaster, HQ Consultant Surveyor.
12 July 2023.

Who are MCA

We are the UK Maritime Regulatory Authority

- The MCA is first and foremost a regulator, with responsibility for safety, standards and environmental protection.
- Agency under Department for Transport
- Work Includes Policy and Survey & Certification responsibilities
- 9 Marine Office (areas)
- A central team dealing with Exemptions, Equivalences and Alternative Design Arrangements (ADA)
- Appoint some work to Recognised Organisation or Certifying Authorities



What is (and isn't) the role of the MCA

What is the role

- To survey and certificate UK vessels, inspect UK vessels and foreign vessels in our waters.
- Where there is noncompliance with statutory requirements there is an established process for dealing with Exemptions, Equivalences & ADA.
- We have adapted this process to take into account innovative technology via a risk-based approach – as outlined in MGN 664.

What is *not* the role

- In the main Class Societies provide the detailed rules for structure and machinery.
- Where regulations require equipment to be type approved this is completed by nominated bodies.
- We are not Consultants.
- Free Advice - we are required to charge for our services on a cost recovery basis as a taxpayer funded service.



How MCA can help innovative projects

- As the regulator MCA is open to consider any well documented and evidenced alternative approaches to assist projects to meet the regulatory requirements.
- MGN 664 which outlines our risk-based process.
- As part of this process MCA is happy to provide guidance and advice of how to approach certification.
- Within our central team there are Specialists to consider these applications.



Marine Guidance Note: 664

Certification Process for Vessels using Innovative Technology

- MGN 664 is an outline of an approach you can take to make a risk-based submission. **It is an iterative and proportional to the risk**
- See MGN 664 online - <https://www.gov.uk/government/publications/mgn-664-mf-certification-process-for-vessels-using-innovative-technology/mgn-664-mf-certification-process-for-vessels-using-innovative-technology>



Recommendations from previous CMDC

- Projects should **engage early** with MCA.
- This will open up discussions about relevant means of complying with regulations to demonstrate compliance.
- Which will lead to engagement with key stakeholders outside the consortia.
- **Timeframes** – a risk-based approach is iterative; hence, we need time allowed to review each submission – more time than a conventional approval process.
- A danger of not engaging is that the evidence gathered may not be sufficient to support certification.



Key changes relating to MCA since start of CMDC

- As mentioned above since the beginning of CMDC 1 **we have published MGN 664** – which is currently under review with amendment 1 due out soon which will simplify some of the language based on feedback from industry.
- We have **established a team of specialists** for autonomy and emissions reductions who work closely with Surveyors to review risk-based submissions and work with CA's and Class/RO's as applicable.
- We also work closely with UK recognised organisations – **providing feedback on draft rules** – to enable us to decide how appropriate they are for intended applications.
- We are also **involved with IMO** to help formulate new regulations.
- We are **also developing the policy** to take innovative tech forward with the public consultation of **Work Boat Code Ed 3** and annexes on ROUV and electric/electric hybrid completed and in the process of final review before being published with associated regulations.
- We are also **working with other Administrations to create MOU's** to help enable agreement for vessels **under 24 m** to operate in each other's waters to reduce additional burdens on operators.



MCA fees

- **MCA as a regulator will charge fees in accordance with the Fee Regulations.** Current standard rate is £147/hour. These fees are established under UK law and are intended to reflect the cost-of-service provision - ensuring government neither profits nor makes a loss when carrying out chargeable work in line with HMT's 'Managing Public Money' guidance.
- [The Merchant Shipping \(Fees\) Regulations 2018](#)
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/748455/Maritime_Coastguard_Agency_fees_2018.pdf
- Work is **charged on a time basis**, not a fixed fee, hence the costs depend upon time MCA spends on a job. **MCA charge for time on the survey and certification processes which will include** areas such as MCA review of risk-based case(s) to support innovative technologies, associated plan approval processes, surveys and travel time (overseas surveys incur additional travel and subsistence costs) **for both the innovative and traditional elements.**
- MCA **require fees ahead of work** hence account should remain in **credit** for work to be undertaken.



MCA Fees – the challenge of estimating

- MCA cannot provide a fees estimate for innovative aspects .
- **As innovation projects will differ greatly from project to project and this is a newly emerging sector there is no direct guidance available on how much a project should cost, but in general terms the greater the deviation from normal vessel design and operation the greater the likely cost as risk-based cases become more complex.**
- **Whether a project comes to MCA via CMDC or is a stand-alone charity or an established shipping company we are obliged under the Merchant Shipping fees regulations to charge for survey and certification costs.** We do this by charging an hourly rate (147/hr) although there are some overtime rates etc.



Thank you
for listening.

