

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

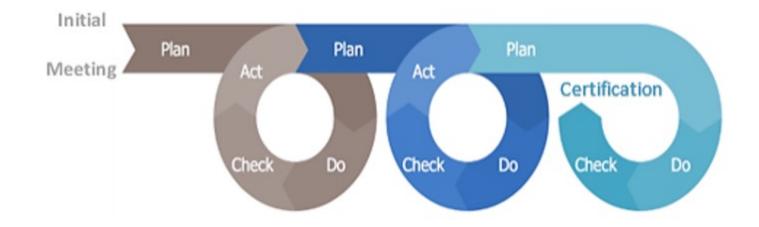
- As the regulator MCA is open to consider any well documented and evidenced alternative approaches to assist projects to meet the regulatory requirements.
- MGN 664 which outlines our risk-based process.
- As part of this process MCA is happy to provide guidance and advice of how to approach certification.
- 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 <u>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</u>





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
- <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/748455/Maritime_</u> <u>Coastguard_Agency_fees_2018.pdf</u>
- 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.

