



IMO MEMBER STATE AUDIT SCHEME
AUDIT OF THE UNITED KINGDOM OF GREAT BRITAIN
AND NORTHERN IRELAND

14 TO 28 OCTOBER 2021

INTERIM REPORT

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1 Introduction

1.1 The IMO Member State Audit Scheme creates a basis to assess the extent to which a Member State complies with its obligations set out in the various IMO instruments to which it is a Party. In addition, *the IMO Instruments Implementation (III) Code* (resolution A.1070(28)) stipulates a number of principles a Member State should adhere to in order for its maritime administration to deliver on its obligations and responsibilities, with respect to maritime safety and protection of the marine environment, and to be capable of improving its performance in the discharge of its duties.

1.2 This report has been drafted in accordance with the *Framework and Procedures for the IMO Member State Audit Scheme* (resolution A.1067(28)).

1.3 The remote audit of the United Kingdom of Great Britain and Northern Ireland (hereinafter referred to as “the UK”) was undertaken from 14 to 28 October 2021, by four auditors drawn from Thailand, the United States of America and the IMO Secretariat. The scope of the audit included the flag, coastal and port State obligations of the UK in relation to the applicable IMO instruments to which it was a Party.

1.4 The audit team was appointed by IMO on 17 March 2020 and amended on 1 September 2021.

1.5 The pre-audit questionnaire (PAQ) and additional pre-audit information (based on the model in annex 3 of document C 125/6/1), as provided by the UK, was submitted to the audit team members on 3 August 2021. The PAQ and the additional pre-audit information are major documents for the preparatory work of the audit team prior to the remote audit.

1.6 The Memorandum of Cooperation (MoC) signed between the UK and IMO, concerning participation in the IMO Member State Audit Scheme, was signed on 17 March 2020.

1.7 The detailed audit timetable and programme regarding the audit of the UK was confirmed on 5 October 2021.

1.8 The opening meeting was held remotely, on 14 October 2021. Those entities of the State that are involved in the implementation and enforcement of the provisions of the various mandatory IMO instruments and which were represented at the meeting were:

- .1 The Department for Transport (DfT);
- .2 The Maritime and Coastguard Agency (MCA);
- .3 The Marine Accident Investigation Branch (MAIB);
- .4 The General Lighthouse Authorities (GLA);
- .5 UK Hydrographic Office (UKHO);
- .6 The Met Office;
- .7 The Office of Communications (Ofcom);
- .8 The Foreign, Commonwealth and Development Office (FCDO); and
- .9 The Ministry of Justice (MoJ).

1.9 The closing meeting was held remotely on 28 October 2021.

1.10 The following report provides a detailed account of the findings and the evidence on which the findings are based. Additional information on the findings, along with the corrective actions provided by the State can be found in the appendices to this report.

2 Background

2.1 The current remote audit of the UK was undertaken using fully the principles established under the *Framework and Procedures for the IMO Member State Audit Scheme* (Framework and Procedures) and the III Code, taking into account the decision of C 125 on the use of remote audit mechanism under the existing Framework and Procedures. This report sets out the outcome of this audit in the format adopted under section 7.2 of the Procedures for the Scheme.

3 Members of the Audit Team

.1	Mr.	Name	(United States of America)	Audit Team Leader
.2	Mr.	Name	(Thailand)	Audit Team Member
.3	Dr.	Name	(United States of America)	Observer Auditor
.4	Mr.	Name	(IMO Secretariat)	Audit Officer

4 Involved Officials from the Member State

- .1 Miss. Name, Head of Domestic Survey Operations, MCA;
- .2 Mr. Name, Chief Examiner, MCA;
- .3 Ms. Name, Cargoes, Safety & Pollution Prevention Lead, MCA;
- .4 Ms. Name, CSSF Programme Manager, MCA;
- .5 Mr. Name, Head of Hydrography and Meteorology, MCA;
- .6 Mr. Name, Chief Inspector, MAIB;
- .7 Mr. Name, Technical Manager, International Relations, MCA;
- .8 Mr. Name, Chief Advisor, Maritime Policy, Quality and Casualty Investigation, Cayman Islands;
- .9 Mr. Brian Johnson, Chief Executive, MCA;
- .10 Ms. Name, Transport Manager, Met Office;
- .11 Ms. Name, Director of Finance and Audit, MCA
- .12 Miss. Claire Hughes, Director of Her Majesty's Coastguard, MCA;
- .13 Cpt. Name, Examiner of Masters and Mates, MCA;
- .14 Cpt. Name, Harbourmaster & Registrar of Ships & SPC, Guernsey;
- .15 Mr. Name, Head of Hydrographic Programmes, UKHO;
- .16 Mr. Name, Single Point of Contact (SPC), British Virgin Islands;
- .17 Mr. Name, Spectrum Policy Manager, Ofcom;
- .18 Mr. Name, Chief Executive Officer, Bermuda;
- .19 Mr. Name, Senior Lead Auditor, MCA;
- .20 Ms. Name, Head of Legal Services, MCA;
- .21 Mr. Name, Global Director, Safety & Compliance, Cayman Islands;
- .22 Mr. Name, Assistant Director, Ship Standards, MCA;
- .23 Mr. Name, Technical Authority Marine, Associated British Ports (ABP);
- .24 Mr. Name, Investigations Support Data Manager, MAIB;
- .25 Mrs. Name, Lawyer, MCA
- .26 Ms. Name, SPC, Falkland Islands;
- .27 Mr. Name, Ag CEO & Captain of the Port & SPC, Gibraltar;
- .28 Mr. Name, SPC, Monserrat;
- .29 Mrs. Julie-Anne Wood, Assistant Director, HMCG Policy and Standards, MCA;

.30 Miss. Katy Ware, Director of UK Maritime Services, UK Permanent Representative to the IMO;

.31 Miss. **Name** UK Deputy Single Point of Contact, MCA;

.32 Ms. **Name** Head of International Survey Operations, MCA;

.33 Mr. **Name** Lawyer, MCA;

.34 Ms. **Name** Maritime Compliance Policy Officer & SPC, Saint Helena;

.35 Mr. **Name** Technical Manager, MCA;

.36 Mr. **Name** OBE, Group Director Marine Safety, Engineering & Marine Associated British Ports (ABP),

.37 Mr. **Name** Head of UK Regulatory Compliance Investigations Team, MCA;

.38 Mr. **Name** Principal Inspector of Marine Accidents, MAIB;

.39 Mr. **Name** Technical Account Manager, UK Met Office;

.40 Mr. **Name** Director of Navigational Requirements, Trinity House;

.41 Mr. **Name** Principal Surveyor & SPC, Isle of Man;

.42 Rear **Name** Chief Executive, UKHO;

.43 Mr. Peter Mizen, Chief Coastguard, MCA;

.44 Ms. Petra Wilkinson, Director, DfT;

.45 Mr. **Name** Spectrum Group Director, Ofcom

.46 Mr. **Name** Assistant Director, Technical Services (Operations), MCA;

.47 Cpt. **Name** Nautical Policy Lead, MCA;

.48 Mr. **Name** Head of External Monitoring and Assurance, MCA;

.49 Mr. **Name** Assistant Director, MCA;

.50 Mr. **Name** Assistant Director & UK SPC, MCA;

.51 Mr. **Name** OBE, Head of the Office of the Chairman and Chief Exec, MCA;

.52 Mr. **Name** Principal Marine Surveyor – Tyne, MCA;

.53 Mr. **Name** SPC, Bermuda;

.54 Mr. **Name** Head of International Liaison, MCA;

.55 Ms. **Name** SPC, Anguilla;

.56 Mr. **Name** Lead Project Lawyer, MCA;

.57 Mrs. **Name** Environmental Lead, ABP;

.58 Mr. **Name** Head of Counter Pollution & Salvage, MCA;

.59 Cpt. Stanley Richard-dit-Leschery, Maritime Standards Manager & SPC, Jersey;

.60 Mr. **Name** Secretary of State Representative, MCA;

.61 Mr. **Name** Head of Radio Spectrum and Technical Standards, MCA;

.62 Mr. **Name** Senior Maritime Surveyor, MCA;

.63 Mr. **Name** Deputy Director for Maritime, DfT;

.64 Mr. **Name** Harbour Master -Southampton, ABP;

.65 Ms. **Name** Head of Inspection Operations, MCA;

.66 Mr. **Name** Head of Scientific Analysis Group, UKHO;

.67 Ms. **Name** SPC, Cayman Islands;

.68 Ms. **Name** Senior Service Manager (Records Management), MCA;

.69 Ms. **Name** SPC, Turks & Caicos;

.70 Mr. **Name** Head of Internal Audit and Assurance, MCA;

.71 Mr. **Name** VTS Manager, MCA; and

.72 Ms. Yvonne Shields-O'Connor, Chief Executive, Commissioners of Irish Lights;

5 Acknowledgement

5.1 The auditors wish to express their considerable thanks to the Maritime and Coastguard Agency and other entities of the State for their fullest cooperation during this audit. In particular, thanks are due to Mr. **Name** Assistant Director and Superintendent for Deaths and the Single Point of Contact (SPC), and Miss **Name** UK Deputy Single Point of Contact, for their efforts during the preparation for this audit and for its facilitation.

6 Scope, objectives and activities of the Audit

6.1 The Scope of the audit addressed flag, coastal and port State obligations of the UK.

6.2 The objectives of the audit were:

- .1 to determine the extent that the UK met the obligations imposed upon it through its adoption of the following applicable mandatory IMO instruments:
 - .1 the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1974);
 - .2 the Protocol of 1988 relating to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS PROT 1988);
 - .3 the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, as amended (MARPOL 73/78);
 - .4 the Protocol of 1997 to amend the International Convention for the Prevention of Pollution from Ships, as modified by the Protocol of 1978 relating thereto (MARPOL PROT 1997);
 - .5 the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW 1978);
 - .6 the International Convention on Load Lines, 1966 (LL 1966);
 - .7 the Protocol of 1988 relating to the International Convention on Load Lines, 1966 (LL PROT 1988);
 - .8 the International Convention on Tonnage Measurement of Ships, 1969 (TONNAGE 1969); and
 - .9 the Convention on the International Regulations for Preventing Collisions at Sea, 1972, as amended (COLREG 1972);
- .2 to determine the effectiveness of the implementation of these objectives; and
- .3 to seek and verify the administrative and technical oversight methodology applied by the UK after the extension of the mandatory IMO instruments to the Crown Dependency (CD) of the Isle of Man; and the British Overseas Territories (OTs) of Bermuda, the British Virgin Islands, the Cayman Islands and Gibraltar. In doing so, to consider the degree of alignment of the laws and regulations deriving from the provisions of the mandatory IMO instruments, as may be applicable to the CD and each OT, including the verification of compliance with the relevant provisions by them, as have been undertaken by the UK, all of which should be consistent with the requirements of the III Code.

6.3 The audit was conducted using the programme set out at annex 1. The methodology used was to establish through a series of virtual visits, interviews, examination of written records and databases, the objective evidence which would determine the extent to which the maritime administration achieved the objectives.

6.4 The programme followed a process which sought initially to determine the strategy for the implementation of the applicable IMO instruments, the review processes in place and the arrangements for continual improvement. Following this, an examination of the national legislation in place and which provides the instruments with force of law was undertaken. The processes by which the State develops and makes known its interpretations, policies and instructions regarding these instruments, as well as the practical implementation of these arrangements were also reviewed.

6.5 An opening meeting was conducted virtually on Thursday, 14 October 2021, in accordance with the procedures and agenda and list of attendees is attached as annex 2. At the closing meeting, which was held virtually on Thursday, 28 October 2021, a draft interim report was tabled to assist in focusing discussion and the next steps to be taken.

7 Overview and general maritime activities of the State

General

7.1 The maritime administration of the UK is divided between nine entities. Annex 3 sets out in diagrammatic format the general structure of the entities involved.

7.2 The Department for Transport (DfT) is a ministerial department of the Government of the UK. DfT has the overall responsibility for maritime policy and compliance, including policies related to infrastructure, environment, security and trade. DfT's organization chart is shown in annex 3. DfT was sponsoring, among other arm's-length bodies, the Maritime and Coastguard Agency (MCA) and the Marine Accident Investigation Branch (MAIB).

7.3 The Merchant Shipping Act 1995, conferred rights and powers to the Secretary of State. By virtue of the Interpretation Act 1978, this meant one of HM Principal Secretaries of State. Despite there only being one Secretary of State in law, in practice, each Secretary of State exercised powers in respect of their own specific portfolio. At the time of the audit, the rights and powers conferred on the Secretary of State by the Merchant Shipping Act 1995 were exercised by the Secretary of State for Transport.

7.4 MCA was an Executive Agency established by DfT. MCA was responsible, through the Secretary of State for Transport, for the implementation of the majority of provisions emanating from the mandatory IMO instruments, relevant to national maritime legislation and safety policy. Its core responsibilities included coordinating search and rescue (SAR) through HM Coastguard, acting as lead authority responder for maritime emergencies, preventing maritime pollution and responding to pollution incidents, monitoring ship movement within the waters of the UK, administering the UK Ship Registry, enforcing compliance with maritime rules, regulations and best practices, undertaking the survey and inspection of ships flying the flag of the State, checking the safety and quality of ships and welfare, certification and training of seafarers operating under the Red Ensign, overseeing the implementation and enforcement of the mandatory IMO instruments by the Red Ensign Group (REG) and working with DfT on policy advice for Ministers.

7.5 At the time of the audit, MCA employed 1,380 personnel across the UK, of whom 128 were flag State surveyors/inspectors/auditors, 105 were Port State Control Officers (PSCOs) and investigators. MCA's organizational chart is shown in annex 3, as well as the offices maintained by MCA across the UK.

7.6 MAIB was a functionally independent branch of DfT, and was responsible for investigating marine accidents involving ships flying the flag of the State worldwide and all ships in UK territorial waters.

7.7 The General Lighthouse Authorities (GLAs) were responsible for the operation of all Aids to Navigation (AtoN) in the UK. At the time of the audit, there were three GLAs, namely Trinity House, Commissioners of Irish Lights, and Northern Lighthouse Board. Each GLA was responsible for AtoN in their respective areas. Trinity House was a charity organization responsible for AtoN in England and Wales, the Channel Islands and Gibraltar. Commissioners of Irish Lights was a non-profitable organization responsible for AtoN in Ireland and Northern Lighthouse Board was a charity organization responsible for AtoN in Scotland. The powers and responsibilities of GLAs were regulated by the Merchant Shipping Act 1995. The costs for the services provided by GLAs were met from the General Lighthouse Fund (GLF). The income provided to GLF came from "light dues" which were charged on commercial shipping at the ports of the UK. The Secretary of State for Transport has a duty to ensure the effective management of GLF and enable the adequate provision of AtoN at the minimum cost.

7.8 The UK Hydrographic Office (UKHO) was an Executive Agency and Trading Fund of the UK Ministry of Defence (MoD). UKHO was tasked with discharging the UK's hydrographic obligations under SOLAS 1974, by providing hydrographic services for waters under the national responsibility of the UK. In particular, UKHO was responsible for the collection and compilation of hydrographic data and its publication and dissemination; preparation and issuance of nautical charts and nautical publications, where applicable; promulgation of notices to mariners to ensure that nautical charts and publications were up-to-date with safety information; and providing advice on areas requiring surveying. Additionally, UKHO advised the UK Government on hydrographic policy matters and represented the UK at international fora, including the International Hydrographic Organization. Furthermore, UKHO acted as coordinator for North-West Europe (NAVAREA One), coordinating, collating and issuing long-range navigational warnings and NAVAREA warning bulletins to cover the whole of NAVAREA.

7.9 The Met Office was an Executive Agency sponsored by the Department for Business, Energy and Industrial Strategy (BEIS), and the UK National Meteorological Service provided weather and climate related services. The Met Office represents the UK at the World Meteorological Organization (WMO).

7.10 The Office of Communications (Ofcom) was an independent regulator established by statute to regulate communications. Ofcom regulates radiocommunications through the powers conferred to it by the Wireless Telegraphy Act 2006 and participates in the development of international agreements relating to maritime radio and, where appropriate, implements those obligations including:

- .1 the management of radio spectrum and investigation of interference;
- .2 ship and coast radio station licensing; and
- .3 administration and management of Maritime Mobile Service Identities (MMSI), and reporting to the ITU MARs database.

7.11 The Foreign, Commonwealth & Development Office (FCDO) was the ministerial department that incorporated the relationship with OTs and oversaw the extension of all treaties for the Government of the UK.

7.12 The Ministry of Justice (MoJ), a ministerial department within UK Government, was responsible for overseeing the relationship between the Government of the UK and the UK CDs and OTs.

Crown Dependencies and British Overseas Territories

7.13 MCA had the responsibility for the oversight of implementation of maritime legislation and guidance; and to maintain oversight in relation to the III Code with stakeholders across the UK and REG.

7.14 The UK Government concluded MoUs with each OT and CD for operating Category 1 Shipping Registries. In accordance with the MoUs concluded with the OTs and CDs, UK was responsible, among others, to:

- .1 monitor the implementation of the common strategies and policies; and the REG Quality Objectives for Category 1 members;
- .2 provide each OT and CD with advice of any changes to relevant technical requirements agreed within the framework of a maritime convention; and
- .3 provide advice to the OTs and CDs on any proposed maritime legislation that they have drafted.

Strategy

7.15 The UK Government developed an overall strategy to ensure that its international obligations and responsibilities as a flag, port and coastal State are met. At the time of the audit, a strategy entitled "United Kingdom National Maritime Strategy for the IMO Instruments Implementation Code" (UK IIIC Strategy), eighth revision, dated August 2021, was in effect. UK IIIC Strategy was developed as a focused element of the Maritime 2050 strategy developed by the UK Government in 2018, as a high-level vision for the maritime sector. UK IIIC Strategy did not cover the obligations and responsibilities of the relevant OTs and CDs. OTs and CDs developed their own overall strategy using a common structure, taking into account the overall strategy developed by the UK Government.

7.16 UK IIIC Strategy was developed by MCA under the supervision of the UK Maritime Steering Committee (UK-MSC), a coordinating body formed by MCA. UK-MSC comprised of representatives of the following UK government departments, non-departmental public bodies and sponsored bodies:

- .1 Chief Executive of MCA;
- .2 Deputy Director of DfT;
- .3 Single Point of Contact for the IMSAS audit of the UK;
- .4 Chief Executive of UKHO;
- .5 Chief Executive from one of the GLAs, representing all GLAs;
- .6 Chief Inspector of MAIB;
- .7 Director of Ofcom;
- .8 Chief Executive of Met Office; and
- .9 Chief Executive from one of the port authorities, representing all port authorities.

7.17 UK-MSC, chaired by the Chief Executive of MCA, aimed to advise and assist the UK Government to achieve full compliance with the III Code and the mandatory IMO instruments. In accordance with the terms of reference establishing UK-MSC, UK-MSC aimed to:

- .1 oversee the development of UK IIIC Strategy;
- .2 establish a mechanism to monitor international maritime standards and obligations and provide guidance and/or recommendations on their appropriateness to the Government of the UK;
- .3 ensure maritime compliance requirements and strategies were appropriately communicated;
- .4 ensure domestic legislative arrangements were in place;

- .5 ensure and enhance awareness and cooperation between the UK Government and respective independent entities within the UK, to develop a collaborative approach to demonstrate compliance with the III Code and the mandatory IMO instruments;
- .6 assist relevant stakeholders in achieving and maintaining an effective ability to implement and enforce the relevant mandatory IMO instruments;
- .7 achieve, maintain and improve overall performance and capability as a flag, port, and coastal State by continuous monitoring, review and evaluation; and
- .8 seek to eliminate causes of actual and potential non-compliance by monitoring and providing recommendations to the relevant stakeholders.

7.18 Maritime 2050 strategy made a number of short term (one to five years), medium term (five to 15 years) and long term (15 years and beyond) recommendations relevant to the implementation and enforcement of the III Code and the mandatory IMO instruments. Among others the Maritime 2050 strategy made the following recommendations:

- .1 the UK government will develop proposals to replace the Merchant Shipping Act 1995;
- .2 the UK government will consider if the existing secondary regulatory regime is fit for purpose on an ongoing basis and explore opportunities to reduce burdens to business;
- .3 the UK government will continue to support GLAs in safeguarding shipping and seafarers, and encourage further improvements at international level through the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA); and
- .4 the UK government will review its mariner training and certification regimes to ensure they are fit for purpose and reflect the realities of roles on modern ships whilst maintaining a basis in traditional mariner skills and facilitating continuous improvement.

7.19 The performance of UK IIIC strategy is monitored through the key performance indicators and objectives, established by the Business Plan of each entity involved. The MCA 2021-23 Business Plan included, among others, the following key performance indicators and objectives:

- .1 Counter Pollution and Salvage Officer engaged in incident response within 10 minutes of activation and, where appropriate, other specialist counter pollution support personnel engaged within 30 minutes of incident activation in at least 95% of cases;
- .2 implement all MAIB recommendations with target dates within the reporting period;
- .3 maintain UK flag State performance in the Paris Memorandum of Understanding (MoU) White list;
- .4 develop Digital and Technology Roadmaps for Survey and Inspection, UK Ship Register and HM Coastguard;
- .5 replace the Search and Rescue Planning Tool for HM Coastguard; and
- .6 SAR helicopters will be available to launch from each base location for at least 98% of the time.

7.20 OTs and CDs developed their own strategies using similar arrangements, which included sharing the same vision statement *"UK, CDs and OTs working together to successfully contribute to continuous enhancement of global maritime safety and protection of the marine environment"*. MCA, under a formal arrangement, was responsible for monitoring, supporting and evaluating the strategies developed by OTs and CDs. Each has a separate and independent Maritime Steering Committee. The REG Conference meet on an annual basis, and the REG Technical Forum meets on a bi-annual basis.

Legislation

7.21 The UK operated on a dualist system. Thus, an international treaty did not automatically form part of UK domestic law, and its terms were not treated as binding by the UK courts, unless the treaty obligations intended to be binding on individuals were fully transposed into domestic legislation. Notwithstanding the above, some treaty obligations were implemented by way of European law which was then saved into UK domestic law after the withdrawal of UK from the European Union and was referred to as retained EU law.

7.22 IMO conventions and protocols were incorporated into UK domestic law by either primary or secondary legislation. Sections 85 and 86 of the Merchant Shipping Act 1995 provided for the Secretary of State to enact secondary legislation for the implementation of the mandatory IMO instruments relating to most areas of ship safety. Other provisions of the Merchant Shipping Act 1995 cover the implementation by secondary legislation of IMO instruments relating to pollution prevention. Not all IMO instruments were implemented into UK domestic law by way of secondary legislation made by the Secretary of State, or in a few cases by way of retained EU law.

7.23 Primary legislation was passed by Parliament following scrutiny and debate. Secondary legislation was made by ministerial authority, in exercise of powers in primary legislation (except Orders in Council, which are exercisable by Her Majesty through the Privy Council). Secondary legislation can be made through negative resolution procedure or affirmative resolution procedure. Most maritime secondary legislation was subjected to the negative resolution procedure.

7.24 Under the negative resolution procedure, secondary legislation laid before the Houses of Parliament becomes law on the day the Minister signs it and automatically remains law unless it is objected to within 40 days of being laid. If the legislation is objected to and a resolution of either of the Houses of Parliament is passed for annulment of the instrument within that period, the instrument must be revoked.

7.25 Under the affirmative resolution procedure, secondary legislation must be actively approved by both Houses of Parliament.

7.26 The UK did not transpose into domestic legislation provisions of the mandatory IMO instruments which contained State obligations. Such provisions were implemented through policy or guidance documents such as Marine Guidance Notices and Instructions to Surveyors.

7.27 In case where the primary or secondary legislation provided no ambulatory references, amendments to IMO instruments need to be transposed into domestic law through secondary legislation. In some instances, secondary legislation provided amendments to IMO instruments to be incorporated into domestic law through Merchant Shipping Notices.

7.28 At the time of the audit, not all amendments to the various mandatory IMO instruments were incorporated into domestic legislation and some amendments were not correctly incorporated into domestic legislation. (See FD-1)

Records and improvement

7.29 The various government bodies involved in the implementation and enforcement of the mandatory IMO instruments kept their records in accordance with the rules and regulations stated in the Public Records Act 1958/67, the General Data Protection Regulation (EU) 2016/679, the Freedom of Information Act 2000 and the Constitutional Reform and Governance Act 2010, which constitute the general archiving law of the State. All entities involved had well-documented systems in place defining the controls needed for identification, storage, protection, retrieval and disposition of records.

7.30 Each government entity involved in the implementation and enforcement of the mandatory IMO instruments operated a management system which included processes for critical self-examination, review, root-cause analysis of non-conformities and continuous improvement in the services and oversight that they provided.

7.31 All government entities were required to maintain some form of corporate risk register that covers all primary activities. The corporate risk registers were fed into cross-government risk registers and form part of short, medium and long-term department and ministry strategies and objectives. Each government department had a business plan which set out objectives which included continuous improvement and identification and correction of weak points.

7.32 Finding

- .1 **Although draft legislation was developed, the transposition of amendments to the applicable mandatory IMO instruments into domestic legislation had not been carried out before they entered into force internationally. Furthermore, discrepancies were noted in relation to the implementation of SOLAS 1974, regulation V/14.2, to passenger ships under 500 GT engaged on international voyages (SOLAS 1974, article 1; SOLAS 1974, regulation V/14.2 and III Code, paragraph 8.1). See Form A, FD-1.**

Corrective action

Root cause

7.33 Observation

None

8 Flag State activities

8.1 The Maritime and Coastguard Agency (MCA) was primarily responsible for implementing and enforcing the mandatory IMO instruments relating to flag State activities, including surveys under MARPOL and equipment on board ships flying the flag of the State. Its responsibilities included registration of ships, survey and certification of ships, delegation of authority, monitoring of recognized organizations (ROs), training and issuance of certificates to seafarers under STCW 1978 Convention, flag State inspections, enforcement and conducting marine safety investigations.

8.2 At the time of the audit, 1,200 ships on international voyages were entitled to fly the flag of the UK and were entered into the shipping register maintained by MCA. The State also had a number of domestic ships including a fishing fleet.

Implementation

8.3 The implementation of the provisions of the applicable mandatory IMO instruments was systematically conducted by MCA through policies, national legislation and guidance. MCA maintained a large number of Marine Guidance Notes (MGNs), Marine Information Notes (MINs) and Merchant Shipping Notices (MSNs). MSNs contained the technical detail of mandatory regulations and were mandatory for ships under UK legislation. MINs tended to give information that was valid for a short period of time, such as timetables for MCA exams, or relevant to a small group of people, such as training establishments or equipment manufacturers.

8.4 All M-notices containing guidance and other publications, as well as internal documents had an expiry date and required a positive action by the document owners to review. The expiration of the M-notices was monitored through an automated system.

8.5 All exemptions and deviations from, and equivalents to, the requirements of the applicable IMO instruments were examined and approved by MCA.

8.6 Regarding the requirements of the relevant mandatory IMO instruments which are left "to the satisfaction of the Administration", the UK had addressed them through the issuance of Merchant Shipping Notices or Marine Guidance Notes, or Instructions to Surveyors. Where an instance of "satisfaction of the Administration" has not been pre-determined, the UK had in place an internal governance process for the provision of guidance which results in updates to the relevant documents for ongoing consistency of application.

8.7 With regards to STCW 1978, the UK was included in the IMO White List and provisions were in place for its effective implementation, including the submission of the independent evaluation and reporting dispensations to IMO. Provisions for fitness for duty and watchkeeping arrangements and adoption of Manila 2010 amendments were in place.

Delegation of authority

8.9 The delegation of authority was regulated through the Merchant Shipping Act 1995, the retained EU Regulation (EC) 391/2009 and formal agreements that MCA concluded with ROs. The Retained EU legislation contained provision for enforcement. The Merchant Shipping (Recognised Organisations) (Amendment) (EU Exit) Regulations 2019 saved the recognition of ROs for the purposes of UK when UK withdrew from the EU.

8.10 The Administration granted full, partial, and limited authorizations to the following International Association of Classification Societies' (IACS) members:

- .1 American Bureau of Shipping (ABS);
- .2 Bureau Veritas SA (BV);
- .3 Nippon Kaiji Kyokai (CLASS NK);
- .4 DNV AS;
- .5 Lloyd's Register (LR); and
- .6 RINA Services S.p.A (RINA)

8.11 Furthermore, the UK authorized a seventh IACS member, for a trial period, for ships registered under the Isle of Man registry.

8.12 The UK collaborated with REG Category 1 Administrations to ensure that survey and certification delegations were carried out to the agreed standards through a comprehensive risk-based programme of monitoring and assurance visits and audits. This programme included vertical contract audits, specialist and concentrated monitoring campaigns, remote

and continuous monitoring, British Committee's monitoring visits, and British Certification Committee liaison meetings. The oversight programme complied with Part 3 of the RO Code.

Enforcement

8.13 The legal basis for enforcement of flag State requirements was stipulated through the Merchant Shipping Act 1995. The Act provided the basis for suspension of the certificate of registry in cases of contravention of the provisions of the applicable mandatory IMO instruments and there were cases of such suspensions applied through the powers of the Administration.

8.14 MCA maintained a dedicated Regulatory Compliance Investigations Team (RCIT) to investigate all significant non-compliance identified by MCA surveyors. RCIT initiated criminal proceedings for all significant non-compliances that met the Code for Crown Prosecutors.

8.15 MCA maintained direct oversight of ships flying the flag of the State through routine audit, survey and inspection by MCA surveyors. At the time of the audit, MCA maintained three levels of oversight - the Standard, the Alternative Compliance Scheme (ACS) and the Enhanced Authorization Scheme (EAS).

8.16 The Standard oversight involved the surveys of structural, mechanical and electrical requirements of international conventions being delegated to ROs with MCA surveyors conducting General Inspections and the relevant Safety Equipment, ISM, ISPS and MLC activities, as necessary.

8.17 EAS was available for ships, other than passenger ships, categorized by MCA as 'low' or 'standard' on the risk profiling matrix, which carried out international trade and to which the principal maritime conventions applied and which were operated by existing shipping companies in the UK Ship Register, whose ships were eligible for Enhanced Authorization. Under EAS, MCA surveyors conducted only flag State inspections at intervals based on the risk profiling of the ship.

8.18 ACS was available to all UK registered ships other than passenger ships, which trade internationally, and which fulfilled the eligibility criteria. The eligibility criteria required, among others, that the ship has not been detained within the previous 36 months, and during any port State control inspection within the previous 12 months no inspection report had recorded more than five deficiencies. Under ACS, MCA surveyors conducted ISM, ISPS and MLC activities, as necessary, and attended docking surveys based on a statistical sample.

8.19 The Administration ensured prompt and thorough casualty investigation and timely response to deficiencies and alleged pollution incidents.

Flag State surveyors

8.20 For the recruitment of flag State surveyors, MCA used a recruitment framework entitled "Success Profiles" similarly used within the civil service involving a number of recruitment steps. All flag State surveyor vacancies were advertised on the UK Government portal for civil service jobs. At the time of the audit a vacancy for a "Marine Surveyor 'S' Level" was advertised through the above-mentioned portal.

8.21 Flag State surveyors were classified into four disciplines. The "Nautical" flag State surveyor which held a recognized certificate of Competency under regulation II/2 of the Annex to STCW 1978 without limitations; the "Engineer" flag State surveyor which held a recognized certificate of Competency regulation III/2 of the Annex to STCW 1978 without limitations; the "Naval Architect" flag State surveyor which held a degree accredited by RINA/SNAME, and

considered as meeting the academic qualification requirements for a Chartered Engineer; and a “Ship” flag State surveyor which held a degree accredited by IMarEST/MechE, considered as meeting the academic qualifications for a Chartered Engineer.

8.22 For the recruitment of new flag State surveyors, in addition to the above qualifications a minimum of three-year experience in a managerial role on board ship or in a technical capacity of responsibility within the maritime industry was required.

8.23 A scheme entitled “Marine Surveyor Development Scheme” (MSDS) was used for establishing, administrating and monitoring the training for flag State surveyors. New flag State surveyors were required to complete an initial core training which involved theoretical and practical courses including observing at least three inspections covering requirements under SOLAS 1974, MARPOL, STCW 1978 and LOAD LINES 1966. In addition, they were required to follow non-core training based on an initial review upon recruitment. The performance of new flag State surveyors was evaluated by a review panel after eight months.

8.24 The training, completed tasks and authorizations of each flag State surveyor was monitored through a centralized electronic record.

8.25 All flag State surveyors were required to undergo continuation training every five years to update their knowledge and demonstrate their proficiency. Furthermore, they were required to demonstrate that they performed specified tasks (e.g. five ISM audits) within the last five years.

8.26 At the time of the audit, MCA issued identification documents to each flag State surveyor, which was valid for one year. The identification document contained the surveyor's photograph and listed the functions that he/she was authorized to carry out under the Merchant Shipping Act 1995.

Evaluation and review

8.27 MCA had in place administrative processes and procedures to carry out evaluations of its performance, as part of their quality management system which was certified in accordance with ISO 9001:2015 standard. Furthermore, MCA maintained a corporate risk register that covered all primary activities. The corporate risk register was fed into cross-government risk registers and form part of short, medium and long-term department and ministry strategies and objectives. Additionally, MCA had a business plan which set out objectives which included continuous improvement and identification and corrections of weak points.

Investigation of maritime accidents

8.28 Part XI of the Merchant Shipping Act 1995 and Merchant Shipping (Accident Reporting and Investigations) Regulations 2012 provided the legal framework for the investigation of maritime accidents. Moreover, section 108A of, and Schedule 3A to, the Merchant Shipping Act 1995 enabled the Secretary of State to give safety directions where there has been an accident involving a ship which has given rise to a pollution risk or threat to the safety of persons.

8.29 The Marine Accident Investigation Branch (MAIB) was responsible for the investigation of marine accidents and incidents according to Merchant Shipping Act 1995 and the Merchant Shipping (Accident Reporting and Investigations) Regulations 2012. MAIB was a functionally independent branch of the DfT.

8.30 MAIB inspectors were recruited under four main disciplines: nautical, engineering, naval architect and human factors. Nautical were required to hold a STCW A-II/2 unlimited certificate of competency or STCW Deck Officer (Fishing Vessel) Class 1 certificate or Royal Navy equivalent. Engineering applicants were required to hold a STCW A-III/2 certificate of competency or Royal Navy equivalent. Naval architect applicants were required to hold a relevant degree and be a chartered engineer. A human factors applicant was required to hold a relevant degree and have relevant experience.

8.31 Newly recruited MAIB inspectors were required to follow an accreditation process to become fully trained inspectors. As part of the accreditation process, inspectors were required to attend Cranfield University's Fundamentals of Accident Investigation and Marine Applied Accident Investigation courses to obtain a post-graduated certification of education.

8.32 At the time of the audit, MAIB employed 22 investigators including the Chief Inspector and Deputy Chief Inspector.

8.33 The investigation of marine accidents was conducted following MAIB's Investigation Procedures Manual. Each safety investigation was overseen by a Principal Inspector, who reported to the Deputy and Chief Inspector. Reports of safety investigations were drafted and reviewed internally before undergoing a 30-day consultation period during which all investigation stakeholders provided comments on the report. Reports were published on the gov.uk area for MAIB, and communicated to IMO, as appropriate, in compliance with the Casualty Investigation Code. In cases where a report was not published within a year of the accident anniversary, an interim report, highlighting the basic facts and status of the investigation was issued. In cases where urgent safety message were necessary, a safety bulletin was issued by the Chief Inspector.

8.34 Findings

None

8.35 Observations

None.

9 Coastal State activities

Implementation

9.1 The State performed various coastal State functions via HMCG; the UK Hydrographic Office (UKHO); the Met Office; the General Lighthouse Authorities (GLAs); the Office of Communications (Ofcom), and the Statutory Harbour Authorities. Additional entities such as the Royal National Lifeboat Institution (RNLI) provided declared search and rescue assets in support of the State.

9.2 The Maritime and Coastguard Agency (MCA) had the overall responsibility for coordinating all coastal State activities through Memoranda of Understanding (MoUs) signed with other entities involved. The oversight functions of MCA were mainly performed by MCA contract managers, Key Account Owners, Policy Leads in the UK Maritime Services Directorate (UKMS) and HMCG.

Radiocommunication services

9.3 MCA's UKMS and, in particular, Radio Standards and Technical Services Unit (RSTSU) worked in partnership with Ofcom, in relation to SOLAS 1974, regulation IV/5. Ofcom derived its power from the Communications Act 2003 and was responsible for implementing the requirements of the Wireless Telegraphy Act 2006. It was also responsible for the UK radio spectrum regulation and management, which includes among others, the licensing of ships and coastal station transmitters, the management and issuance of the Global Maritime Distress and Safety System (GMDSS) identities to ships and coast stations, the investigation of interference, including GMDSS frequencies, and the enforcement against illegal use of radio spectrum.

Meteorological services and warnings

9.4 The Met Office and the MCA had an MoU, which sets out the responsibilities of the Met Office as METAREA I coordinator, including preparation of the meteorological forecasts and warnings, space weather warnings, and their respective delivery. Additionally, the MoU detailed the data that can be provided into MCA Search and Rescue Planning software, the Aeronautical Rescue Coordination Centre (ARCC), and for pollution modelling.

9.5 The Met Office as METAREA I coordinator broadcasted MSI via the International Enhanced Group Call Service to METAREA I. Two HMCG MRCCs (Shetland and Humber) shared the role of NAVTEX coordinator. Messages were provided to the NAVTEX coordinator by the Met Office (METAREA) in the correct format for transmission.

9.6 UK encouraged companies to volunteer their vessels to the World Meteorological Organization's (WMO) Voluntary Observing Ship Programme via the Met Office. Ship reports received by the Met Office were circulated globally to other national Met services via the WMO Information System. Observations were also used within the Met Office as input to the Numerical Weather Prediction models to produce forecasts to meet the requirements of SOLAS 1974.

9.7 Weather routing was not provided by the Met Office or MCA but was available through private services.

Search and rescue (SAR) services

9.8 The Coastguard Act 1925 enabled the UK Government to determine the responsibilities of HMCG. These responsibilities and authorities were derived from statements made at the House of Commons (HC Deb 09 March 1992 vol 205 cc409-10W), which stated that HMCG was accountable for the initiation and coordination of civil maritime SAR within the UK SAR region.

9.9 At the time of the audit, HMCG operated a network of nine maritime rescue coordination centres (MRCCs), one joint rescue coordination centre (JRCC) and one maritime rescue sub-centre MRSC. HMCG maintained a continuous monitoring of VHF and MF DSC frequencies in GMDSS A1 and A2 sea areas, operated a COSPAS-SARSAT MCC and Single Point of Contact (SPoC). HMCG was receiving INMARSAT and IRIDIUM distress alerts and was part of the UK terrestrial 999 emergency telephone system. Through the network of RCCs and RSCs, HMCG coordinated maritime search and rescue units (SRUs), which were operated by charitable organizations, and aeronautical SRUs (helicopters, drones and fixed wing), operated by private companies under contract to HMCG.

9.10 Gibraltar Port Authority and the Port Authority of the Cayman Islands did not have in place plans nor conducted periodic exercises to test their effectiveness in cooperation with passenger ships in the event of an emergency. (See FD-2)

Hydrographic services

9.11 As mentioned in paragraph 7.26, the UK generally discharged obligations under the mandatory IMO instruments that contained State obligations through policy documents without making provisions in domestic legislation. SOLAS 1974, regulation V/9, in relation to the collection and compilation of hydrographic data and the publication of nautical information necessary for safe navigation was implemented through guidance notes providing information to mariners.

9.12 MCA delegated the responsibility for data validation and updating of nautical charts and products to UKHO. The MoU concluded between MCA and UKHO covered all activities associated with hydrography, including the preparation, publishing and updating of hydrographic products within waters under the jurisdiction of the UK, the provision of the national coordinator for navigational warnings, and the collection and dissemination of hydrographic information.

9.13 MCA, supported by the UKHO, was responsible for the collection of hydrographic data through the UK Civil Hydrography Programme (CHP), the performance of high-resolution wreck investigations, sea bed grab sampling and overseeing the activities of UKHO in relation to the production of charts and other publications. All data collected by MCA were communicated to UKHO for validation and further processing.

9.14 The UK CHP survey specifications were prepared in accordance with the IHO Standards for Hydrographic Surveys (S-44) and technical input was provided from UKHO, other maritime administrations, hydrographic offices and other MCA and CHP stakeholders.

9.15 MCA also concluded MoUs with other public sector partners such as National Network of Regional Coastal Monitoring Programme (of England) and Centre for Environment, Fisheries and Aquaculture Science, to maximize survey effort. This multi-disciplined marine data gathering programme was targeted at areas of highest navigational safety risk.

9.16 The prioritization of the UK survey activity was performed in collaboration between UKHO and MCA and was completed two years prior to the commencement of the required surveys. UKHO maintained the survey prioritisation models based on a range of inputs, such as depth, survey quality, shipping density and seabed mobility. These were used to identify the areas that needed to be surveyed as a priority, combined with human experience, particularly within UKHO. These initial plans were then qualitatively assessed by the UK Civil Hydrography Working Group early each year. As a result, UKHO produced individual hydrographic instructions for each survey project, which were communicated to the approved contractors. The contractors had to complete and deliver the survey within the programme year. All survey data were validated to ensure that all specifications and international standards had been met before being communicated to the UKHO charting teams.

9.17 UKHO produced paper, raster, electronic charts and all the associated publications for the UK and its Overseas Territories. All publications were maintained through UKHO website, including the issuance of weekly notices to mariners, bulletins and ENC updates. At the time of the audit, the UK had a 100 percent coverage for all chart types and scale bands across all areas within its scope. UKHO was also the primary charting authority for 71 coastal states and many bilateral arrangements were in place for producing or reproducing charts globally.

Ships' routing, ship reporting systems and vessel traffic services

9.18 Merchant Shipping (Vessel Traffic Monitoring and Reporting Requirements) Regulations 2004 designated MCA as the competent authority for Vessel Traffic Services (VTS). Under this capacity MCA was, among others, responsible for:

- .1 leading on the formulation of national policy for issues related to VTS; providing advice to the UK Government on legislation concerning the operation of VTS;
- .2 assessing the need for coastal VTS within territorial waters outside the areas of jurisdiction of Statutory Harbour Authorities;
- .3 establishing VTS authorities for coastal VTS;
- .4 establishing and reviewing training standards for all VTS personnel;
- .5 providing accreditation to organizations involved in VTS training and conducting a regular review of training and training standards;
- .6 providing guidelines for VTS personnel and equipment levels; and
- .7 auditing and reviewing the performance of coastal VTS, recommending and facilitating improvements, where necessary.

The above functions were mainly performed by the HMCG Navigation Department.

9.19 VTS was arranged into two categories - port or harbour VTS and coastal VTS. Port or harbour VTS managed vessel traffic to and from or within a port or harbour, while coastal VTS managed vessel traffic passing through a sea area. At the time of the audit, 22 port or harbour VTSs and two coastal VTSs were in operation. The coastal VTSs were operated by HMCG. In addition to the VTS, the UK established a number of Local Port Services (LPS) for coordination services within the area by dissemination of information to vessels, berth or terminal operators and other stakeholders.

9.20 Statutory Harbour Authorities, regulated under the Harbours Act 1964, were responsible for assessing the need and type of VTS, or the need for LPS, within their own port limits, in accordance with the Port Marine Safety Code (PMSC). Where it was decided that a VTS was required, the Statutory Harbour Authority became a VTS Authority.

9.21 HMCG operated a Channel Navigation Information Service (CNIS) from Dover MRCC. CNIS maintained radar surveillance over a large area of the Dover Strait Traffic Separation Scheme (TSS) and made regular VHF safety broadcasts to ships. Identified COLREG breaches were reported to the MCA Enforcement Unit for further investigation and action.

9.22 MCA established the "UK VTS Policy Steering Group" formed by all VTS Authorities, pilots, MoD, UKHO, training organizations, British Ports Association (BPA) and the United Kingdom Major Ports Group (UKMPG) to provide a formal consultation platform on issues related to VTS and as a feedback mechanism for the review of policies, instructions and guidance provided. The UK VTS Policy Steering Group met every six months.

9.23 MCA provided guidance and instructions concerning the establishment and operation of VTS and LPS through MSN 1796, MGN 438 and MGN 401, which took into consideration the recommendations provided by resolution A.857(20) and MSC/Circ.952. Furthermore, MCA established and implemented a training scheme for VTS operators following relevant recommendations of resolution A.857(20) and MSC/Circ.952.

9.24 The State had two reporting systems adopted by IMO, namely the Western European Tanker Reporting System (WETREP) and the Dover Strait/Pas-de-Calais (CALDOVREP). Under WETREP, tankers carrying heavy oil were required report, directly by electronic means to MRCC Falmouth, when entering the Western European Particularly Sensitive Sea Area. Under CALDOVREP, ships over 300 GT were required to report to either Dover MRCC (South

West Lane) or CROSS Gris Nez (North East Lane), before proceeding through the service area.

9.25 In the event that a ship failed to provide a report, in accordance with IMO regulations, contact was established with the ship and she was informed of entering a mandatory reporting area. The ship was then questioned as to why it had not made a report and, at this point, the report was taken. Failure to make a report at this particular juncture was communicated to the relevant flag State jurisdiction at the earliest opportunity.

9.26 The State also operated a voluntary Marine Reporting (MAREP) scheme in Fair Isle and Pentland Firth, the Minches, the Kyle of Lochalsh, the Isles of Scilly and the Dover Strait (for ships of less than 300 GT). Under MAREP ships were required to report to the appropriate Coastguard station at least one hour before entering the route and on final departure. In the event that a qualifying ship was observed in a reporting area and had not made a report, the ship was proactively contacted by the overseeing MRCCs.

9.27 In addition, the UK had 14 IMO adopted traffic separation schemes, six IMO adopted recommended routeing measures, nine IMO adopted "Areas to be Avoided" and five IMO adopted "Precautionary Areas".

Automatic Identification System (AIS)

9.28 At the time of the audit HMCG operated 61 AIS land stations, following applicable international standards and recommendations of the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA). The stations covered the entire coastline of the UK and received and recorded all AIS signals within 40 nm from the coastline. The stations could transmit messages such as type 12 (Addressed Safety-related message), 13 (Safety-related Acknowledgement message), 14 (Safety-related Broadcast message), and 21 (Aids-to-Navigation report). All data received from AIS stations were stored for 20 years. HMCG shared AIS data with other UK Government Authorities, who used them for the investigation of incidences and accidents.

Aids to navigation (AtoN)

9.29 Under Section 198(1) of the Merchant Shipping Act 1995 GLAs were responsible for inspection of all lighthouses, buoys and beacons under Local Lighthouse Authority management. In addition, Section 195(1) of the Act of 1995 invested GLAs to supervise and manage all lighthouses, buoys and beacons within their areas. DfT retained executive responsibility for discharging the UK's international obligations concerning AtoN.

9.30 At the time of the audit, a Framework Document was in place between DfT and GLAs, which provided guidance and instructions about the respective duties and statutory responsibilities under the UK domestic legislation. Each GLA was responsible for providing and maintaining AtoN for general navigation in their respective areas to the limits of the EEZ.

9.31 Under the UK Government's Port Marine Safety Code, all AtoN maintained by Harbour Authorities and any other existing Local Lighthouse Authorities were required to be maintained in accordance with the availability criteria laid down by GLAs and were subject to annual reviews. Those AtoN had to comply with the guidelines and recommendations as laid down by IALA. GLAs also required Harbour Authorities and any other existing Local Lighthouse Authorities to ensure that any third party AtoN, within their area of responsibility were likewise established and maintained to the same standards. GLAs also required those responsible for local AtoN, which lay outside Statutory Harbour and Local Lighthouse Authorities' areas of jurisdiction, e.g. AtoN established and maintained by government entities, to establish and maintain their AtoN to the same standards

9.32 In order to provide a seamless service across the State, three GLAs developed common criteria and policy documents. GLAs followed the relevant IALA standards, recommendations and guidelines including the guidelines for the assessment of availability of AtoN. GLAs had key members in all IALA committees and IALA Councils, sharing their expertise and experiences with other IALA Member States.

9.33 Each GLA operated its own AtoN maintenance system using its own servicing teams or contractors. AtoN casualties were reported through the appropriate navigation warning process through UKHO and through the GLAs own warning process.

9.34 At the time of the audit, GLAs operated seven ships in order to provide risk response to new dangers to navigation and to provide engineering support/maintenance to their AtoN. The number and capability of GLA ships were established through a Fleet Review agreed by the UK Government in 2018.

9.35 Each GLA performed a review of the volume of traffic and degree of risk in its respective area every five years, which was published as a tri-GLA document. The process was standardized across GLAs and included the use of both objective (traffic analysis) and subjective (annual user consultation meetings) considerations. From the peer and risk assessed reviews, the requirements for AtoN were kept up-to-date, including whether they were the right specification, were in the correct position, or whether new marks were required, or marks can be removed. Additionally, internal GLA reviews were conducted for particular areas or locations outside of the five yearly review process when new dangers or changes in traffic patterns and/or densities made it appropriate to do so.

Oil spill response

9.36 The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 required harbour authorities to prepare plans to clear oil spills from their harbour and for those plans to be compatible with the National Contingency Plan (NCP), which provided a strategic overview for responses to marine pollution from shipping and offshore installations.

9.37 The responsibility for combatting pollution was shared between the port and harbour operators within the ports, and MCA was responsible elsewhere. As part of the approvals process for ports, harbours and oil handling facilities, MCA required contingency plans to detail, among others, the contract they hold with an accredited third-party Tier 2 Marine Oil Spill Response Organization.

9.38 MCA was a category one responder under the Civil Contingencies Act 2004 which established a comprehensive framework for emergency planning and response, ranging from local to national level. Under this role, MCA prepared and maintained a set of emergency plans, which were developed in cooperation with other Civil Contingencies Act responders to ensure the overall effectiveness. The emergency plans provided for planning in case of a major incident of marine pollution from shipping or offshore installations.

9.39 MCA conducted a number of exercises to test the effectiveness of the emergency plans developed. In February 2018 exercise SHEN was held in Aberdeen to test of the UK National Contingency Plan for marine pollution from shipping and offshore installations. The scenario revolved around the release of oil from a sub-surface well head in the North Sea, 30nm from the UK shoreline. The evaluation of the various response groups was performed by independent evaluators. As a result of the evaluation several recommendations were made to the NCP arrangements tested during the exercise.

9.40 Furthermore, a multi-agency exercise “CELTIC DEEP”, took place in October 2020 to test the UK’s response to a major shipping incident within the UK Exclusive Economic Zone (EEZ). The exercise was designed to activate the strategic, tactical and operational levels of the various response organisations and included the involvement of MCA’s Office of the Chairman and Chief Executive, the DfT and the Parliamentary Under-Secretary of State for Aviation and Maritime.

Enforcement

9.41 Any observed contravention of COLREG 1972 was brought to the attention of the offending ship and it was formally recorded as an incident. Serious breaches of COLREG 1972 were reported to the relevant flag State and, for ships flying the flag of the State, this was shared with MCA RCIT and MCA Survey and Inspection.

9.42 All counter pollution reports were investigated by the duty Counter Pollution and Salvage (CPS) Officer, who would engage with other members of the team and with external resources, where appropriate, to investigate incidents, their causes and impacts. Cases that necessitated further investigation were communicated to an appropriate investigating body to consider follow-up action.

Evaluation and review

9.43 The UK did not maintain a unified evaluation system. Each entity exercising coastal State duties had their own performance monitoring and development programmes. MCA, UKHO, and the Met Office implemented a certified ISO 9001 quality management system which provided for the continuous monitoring and review of their performances.

9.44 HMCG conducted regular operational standards performance reviews, with an annual programme for all aspects of HMCG, by an independent standards team. Operational delivery outcomes and findings were monitored for corrective actions to be completed within an agreed time frame. Furthermore, HMCG had external audit reviews by the UK Government Internal Audit Agency (GIAA) and peer reviewing with Crown Dependencies (CD). Additionally, HMCG provided statistical data on incidents so that trend analysis could be conducted to identify problem areas.

9.45 Training and exercises conducted by HMCG for SAR and counter pollution incidents were subjected to operational learning reviews by separate teams or independent entities. Key learning points and improvements identified were incorporated into future delivery and updates to any policies, operational detail, or standard operating procedures.

9.46 Findings

- .1 The maritime administration had not ensured that plans for cooperation with SAR services in the event of an emergency had been developed between the SAR services, companies and passenger ships calling regularly at ports within the State (SOLAS 1974, regulation V/7.3; III Code, paragraph 47). See Form A, FD-2.**

Corrective action

Root cause

9.47 Observations

None.

10 Port State activities

Port State control (PSC)

10.1 The Merchant Shipping (Port State Control) Regulations 2011, permitted the undertaking of PSC inspections on foreign ships in UK waters. All UK regulations which implemented the mandatory IMO instruments were made applicable to UK ships wherever they were located and foreign ships located within waters under the jurisdiction of the UK. The UK was a member of the Paris Memorandum of Understanding (Paris MoU) on PSC and the instructions and guidelines issued by the MoU were followed by the port State control officers (PSCO).

10.2 PSCOs were drawn from the core surveyor workforce and were qualified in accordance with the requirements of the Paris MoU with a continual updating of their knowledge.

10.3 All PSC inspections were entered into the database which was made available to the public, through the Paris MoU web portal.

10.4 All members of the Paris MoU were given annual commitments concerning PSC on an annual basis. The UK worked towards this annual commitment.

Reception facilities

10.5 The responsible entity for the provision of port reception facilities was MCA according to the Merchant Shipping and Fishing Vessel (Port Waste Reception Facilities) Regulations 2003. Regulations were applicable to any port /harbour or terminal within the UK and required every port authority and terminal operator to provide waste reception facilities adequate to meet the needs of ships normally using the port or terminal in question, without causing undue delay to ships.

10.6 The ports/terminal operators developed a port waste management plan (PWMP) to demonstrate that they fulfilled all the requirements of domestic and international regulations and that the facilities and infrastructure was available to meet the needs of ships normally using the port/terminal without causing undue delays. PWMPs were approved by MCA and reviewed every three years or with every significant change by the local MCA Marine Offices.

10.7 MCA monitored the Port Reception Facilities module in the IMO Global Integrated Shipping Information System (GISIS) and alleged inadequacies were scrutinized. In some cases, additional audits were carried out by the local MCA Marine Offices.

10.8 Port Reception Facilities module in GISIS were adequately updated by relevant information.

Register of fuel oil suppliers

10.9 MCA was responsible for maintaining the registry of local fuel oil suppliers which was published on its website. All batches of fuel oil imported to the State were tested for their quality. The local suppliers were requested to provide delivery notes which was monitored by MCA.

Dangerous goods and grain loading

10.10 MCA was the competent authority responsible for the IMDG Code. The transport by sea of dangerous goods and the implementation of the IMDG Code in the UK was regulated through the Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997. The above regulations were updated through a Merchant Shipping Notice (MSN 1906) issued by MCA on a two-year cycle to ensure that the latest version of the IMDG Code was applied.

10.11 MCA had an MoU with the Office for Nuclear Regulation (ONR) which undertook package approvals and approvals of radiation protection programmes on behalf of MCA.

10.12 MCA surveyors carried out inspections of dangerous goods containers. In this respect MCA provided guidance to its surveyors through Instructions to Surveyors (MSIS 21 and MSIS 38)

10.13 All ports were required to follow the Port Marine Safety Code which established a domestic standard for all aspects of port marine safety and aimed to enhance safety for those who use or work in ports, their ships, passengers and the environment. The Port Marine Safety Code provided for release of emergency responses and medical first aid relevant to incidents involving dangerous goods and for the training of shore-based personnel engaged in the handling of dangerous goods.

10.14 MCA was the competent authority for instigating and agreeing tripartite agreements in relation to the IBC Code and under the IMSBC Code. The Merchant Shipping (Prevention of Pollution from Noxious Liquid Substances in Bulk) Regulations 2018 were the principal UK legislation which set out the requirements for the carriage of bulk liquid chemicals by ships. Furthermore, the Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997 gave general effect to the IBC Code for products listed in Chapter 17 of that Code.

10.15 The transportation by sea of solid bulk cargoes and bulk grain cargoes were regulated by the Merchant Shipping (Carriage of Cargoes) Regulations 1999. The regulations included requirements for the provision of information on the cargo in advance of its loading and set out the obligations of the shipper. Additionally, regulations specified control measures for cargoes which may liquify and require the provision of information on the chemical properties of the cargo which may create a potential hazard. MCA was the competent authority for the implementation of the above regulations, largely through the Cargoes, Safety and Pollution Prevention Team and also through the MCA's survey and inspection regime.

10.16 The Merchant Shipping (Prevention of Pollution from Noxious Liquid Substances in Bulk) Regulations 2018 (NLS Regs) provided for the implementation of MARPOL Annex II. Ports where chemical cargoes and tank washings were discharged were required, by the Merchant Shipping and Fishing Vessel (Port Waste Reception Facilities) Regulations 2003, to provide waste reception facilities adequate to meet the needs of the ships that normally used the port or terminal in question, including where those ships were chemical tankers discharging NLS cargo (and tank washings).

Enforcement

10.17 The discharge of waste outside of port/terminal reception facilities were monitored by aerial surveillance under the authority of the MCA's Counter Pollution Team and satellite tracking and entries in the ships' cargo record book were inspected as part of the survey and inspection regime.

10.18 Potential non-compliant discharges were followed-up by HMCG and the Duty Counter Pollution and Salvage Officer and passed onto the Regulatory Compliance Investigations Team, where necessary. Both foreign chemical tankers visiting UK ports and chemical tankers

flying the flag of the State were subject to the MCA's survey and inspection regime (survey requirements as set out in the NLS Regs and PSC inspections).

Evaluation and review

10.19 MCA implemented a certified ISO 9001 quality management system which provided for the continuous monitoring and review of their performance. Furthermore, MCA had external audit reviews by the UK Government Internal Audit Agency (GIAA).

10.20 Findings

None

10.21 Observations

None.

11 Comments

11.1 In order to ensure a consistent review of each Member State's activities falling within the III Code, all items from the verification index, which closely follows the requirements of the III Code, have been verified and the outcome provided in appendix 2 to this report.

Areas of positive development

11.2 Areas of positive development include:

- .1 The MCA has adopted and implemented a Post Implementation Review (PIR) process to review adopted regulations after they have been implemented and enforced for some time. The process aimed to assess if the objectives of a regulation have been achieved and whether the objectives are still relevant.
2. To ensure data is gathered to the highest possible quality, the MCA and UKHO established and implemented a rigorous quality control scheme that involved visits to survey vessels during scheduled operations and meticulous data verification.
3. The MCA, in collaboration with the REG Category 1 Administrations, have developed a well established risk based system and methodology for the continual oversight of ROs acting on behalf of the Administration in compliance with Part 3 of the RO Code.

Areas for further development

11.3 Areas for further development include:

- .1 The UK's monitoring programme, and the additional legal and technical support provided by the UK Government over the last five years, has resulted in considerable improvement in the implementation of mandatory IMO instruments. However, the importance of a continued commitment and drive to achieve full compliance in all areas is critical to embedding a sustainable well-managed maritime sector.

Public Interest/Operational Sensitivity

Public Interest/Operational Sensitivity

Public Interest/Operational Sensitivity

APPENDIX 2

ASSESSMENT OF AREAS RELATED TO THE III CODE (VERIFICATION INDEX)

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
COMMON AREAS		
STRATEGY		
3.1	An overall strategy exists to ensure that international obligations and responsibilities as a flag, port and coastal State are met	Yes
3.2	Methodology established to monitor and assess that the strategy ensures effective implementation and enforcement of relevant international mandatory instruments; and	Yes
3.3	Continuous review of the strategy undertaken to achieve, maintain and improve the overall organizational performance and capability as a flag, port and coastal State	Yes
GENERAL		
4	Means in place to ensure compliance with relevant international rules and regulations in respect of maritime safety and protection of the marine environment	Yes
4	National legislation exist to give effect to the provisions of relevant IMO instruments	Yes
INITIAL ACTIONS (NATIONAL LEGISLATION)		
8	Public Interest/Operational Sensitivity	
8.1	Capability to promulgate laws which permit effective jurisdiction and control in administrative, technical and social matters over ships flying its flag	Yes
8.2	A legal basis in place for the enforcement of national laws and regulations, including the associated investigative and penal processes	Yes
8.3	Sufficient personnel with maritime expertise to assist in the promulgation of the necessary national laws and to discharge all the responsibilities of the State, including reporting as required by the respective conventions	Yes
COMMUNICATION		
9	Strategy, including information on relevant national legislation, communicated to all concerned	Yes

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
RECORDS		
10	Records established and maintained	Yes
10	Records are legible, readily identifiable and retrievable	Yes
10	Documented procedure defining controls on identification, storage, protection, retrieval, retention time and disposition of records	Yes
IMPROVEMENT		
11	Demonstrates continual improvement of measures giving effect to conventions and protocols accepted	Yes
11	Improvement made through rigorous and effective application and enforcement of national legislation, as appropriate, and monitoring of compliance	Yes
12	A culture exists providing opportunities to people for improvement of performance in maritime safety and environmental protection activities	Yes
13	Action taken to identify and eliminate causes of any non-conformities in order to prevent recurrence	Yes
13.1	Non-conformities reviewed and analysed	Yes
13.2	Implementation of necessary corrective actions monitored	Yes
13.3	Reviews of corrective actions taken	Yes
FLAG STATE SPECIFIC REQUIREMENTS		
IMPLEMENTATION		
15.1	Policies implemented through national legislation and guidance	Yes
15.2	Responsibilities within the Administration assigned to update and revise any relevant policies adopted	Yes
16	Resources and processes capable of administering a safety and environmental protection programme in place	Yes
16.1	Administrative instructions to implement applicable international rules and regulations issued	Yes
16.2	Resources in place to ensure compliance with the requirements of IMO instruments, through an independent audit and inspection programme	Yes
16.3	An audit and inspection programme independent of any administrative bodies is in place, for requirements of STCW 1978, as amended	Yes
16.3	Training, assessment of competence and certification of seafarers are in accordance with the provisions of STCW 1978	Yes
16.3.2	STCW certificates and endorsements accurately reflect the competencies of the seafarers, using the appropriate terminology	Yes
16.3.3	Impartial investigation capabilities ensured	Yes

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
16.3.4	Ability exists for certificates or endorsements to be effectively withdrawn, suspended or cancelled	Yes
16.4	Resources in place to ensure the conduct of investigations into casualties and adequate and timely handling of cases of ships with identified deficiencies	Yes
16.5	Resources in place to develop, document and provide guidance of requirements found in relevant mandatory IMO instruments	Yes
17	Ships entitled to fly the flag of the State are sufficiently and efficiently manned	Yes
DELEGATION OF AUTHORITY (as far as applicable)		
18.1	The Administration determines that recognized organizations (ROs) have adequate resources	Yes
18.2	Formal written agreements between the Administration and ROs in place	Yes
18.3	Specific instructions issued to ROs detailing action to be followed when a ship is unfit to proceed to sea	Yes
18.4	ROs provided with all appropriate instruments of national law and interpretations thereof	Yes
18.5	ROs required to maintain records and give the Administration access to them	Yes
20	An oversight programme established or participation in such a programme ensured, with adequate resources	Yes
20.1	Authority exercised to conduct supplementary surveys	Yes
20.2	Supplementary surveys conducted, as necessary	Yes
20.3	Staff available with requisite knowledge to carry out effective oversight of ROs	Yes
21	Nominations of surveyor(s) regulated, as appropriate	Yes
ENFORCEMENT		
22	All necessary measures to secure observance of international rules and standards by ships entitled to fly the flag of the State and by entities and persons under its jurisdiction so as to ensure compliance with their international obligations	Yes
22.1	Legal/administrative mechanism exist to prohibit ships from sailing for non-compliance	Yes
22.2	Periodic inspection of ships entitled to fly the flag of the State to verify that the actual condition of the ship and its crew is in conformity with the certificates it carries	Yes
22.3.1	Surveyors ensure that seafarers assigned to the ships are familiar with their specific duties	Yes
22.3.2	Surveyors ensure that seafarers assigned to the ships are familiar with ship arrangements, installations, equipment and procedures	Yes

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
22.4	Surveyors ensuring that ship's complement, as a whole, can effectively coordinate their activities in an emergency situation and perform functions vital to safety or to the prevention or mitigation of pollution	Yes
22.5	Penalties of adequate severity to discourage violation of international rules and standards exist in national laws and regulations	Yes
22.6	Capability to institute proceedings – after an investigation has been conducted – against ships which have violated international rules and standards, irrespective of where the violation has occurred	Yes
22.7	Penalties of adequate severity to discourage violations of international rules and standards by individuals issued with certificates or endorsements under their authority exist in national laws and regulations	Yes
22.8	Capability to institute proceedings – after an investigation has been conducted – against individuals holding certificates or endorsements who have violated international rules and standards, irrespective of where the violation has occurred	Yes
23	Control and monitoring programme developed and implemented	Yes
23.1	Prompt and thorough casualty investigations, with reporting to IMO, provided	Yes
23.2	Statistical data collected and trend analyses conducted	Yes
23.3	Timely response to deficiencies and alleged pollution incidents reported by port or coastal States	Yes
24.5	Training and oversight of the activities of flag State surveyors and investigators ensured	Yes
25	Appropriate corrective measures to bring own ships into compliance with the applicable international conventions can be taken	Yes
26	Provision for flag State or RO to determine international certificates only issued to ships meeting all applicable standards	Yes
27	International certificate of competency or endorsement only issued after it has been determined that the person meets all applicable requirements	Yes
FLAG STATE SURVEYORS		
28	Responsibilities, authority and interrelation of all personnel who manage, perform and verify work relating to and affecting safety and pollution prevention defined and documented	Yes
29	Personnel responsible for, or performing surveys, inspections and audits on ships and companies covered by the relevant IMO mandatory instruments appropriately qualified	Yes

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
32	Personnel have appropriate practical and theoretical knowledge of ships, their operation and the provisions of the relevant national and international instruments necessary to perform their duties as flag State surveyors obtained through documented training programmes	Yes
33	Personnel assisting surveyors have education, training and supervision commensurate with the tasks they are authorized to perform	Yes
35	Documented system for qualification of personnel and continuous updating of their knowledge as appropriate to the tasks they are authorized to undertake	Yes
37	Identification document issued for the surveyor to carry when performing his/her tasks	Yes
FLAG STATE INVESTIGATIONS		
38	Casualty investigations conducted by suitably qualified, impartial investigators, competent in matters relating to the casualty	Yes
38	Qualified investigators provided, irrespective of the location of casualty or incident	Yes
39	Individual investigators have working knowledge and practical experience in those subject areas pertaining to their normal duties	Yes
39	State has ready access to expertise in listed areas: navigation and the Collision Regulations; flag State regulations on certificates of competency; causes of marine pollution; interviewing techniques; evidence gathering; and evaluation of the effects of the human element	Yes
40	Any accidents involving personal injury necessitating absence from duty of three days or more and any deaths resulting from occupational accidents and casualties investigated, and the results of such investigations made public	Yes
41	Ship casualties investigated and reported in accordance with the relevant IMO conventions, and the guidelines developed by IMO	Yes
41	Investigation reports forwarded to IMO together with the flag State's observations	Yes
EVALUATION AND REVIEW		
42	Performance evaluated with respect to the implementation of administrative processes, procedures and resources necessary to meet their obligations as required by the conventions to which they are party	Yes

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
COSTAL STATE SPECIFIC REQUIREMENTS		
IMPLEMENTATION		
46.1	Policies implemented through issuance of national legislation and guidance	Yes
46.2	Responsibilities assigned to update and revise any relevant policies adopted	Yes
47	Public Interest/Operational Sensitivity	
48.1	For radiocommunication services;	Yes
48.2	For meteorological services and warnings;	Yes
48.3	For search and rescue services;	Yes
48.4	For hydrographic services;	Yes
48.5	For ship routeing;	Yes
48.6	For ship reporting systems;	Yes
48.7	For vessel traffic services; and	Yes
48.8	For aids to navigation	Yes
ENFORCEMENT		
49	All necessary measures taken to ensure observance of international rules when exercising the rights and fulfilling the obligations as a coastal State	Yes
50	Control and monitoring programme considered, developed and implemented	Yes
50.1	Statistical data collected and trend analyses conducted	Yes
50.2	Mechanisms for timely response to pollution incidents established	Yes
50.3	Cooperation with flag States and/or port States in investigation of maritime casualties	Yes
EVALUATION AND REVIEW		
51	Performance periodically evaluated in respect of exercising its rights and meeting its obligations under the applicable international instruments	Yes
PORT STATE SPECIFIC REQUIREMENTS		
IMPLEMENTATION		
54.1	Policies implemented through issuance of national legislation and guidance	Yes
54.2	Responsibilities assigned to update and revise any relevant policies adopted	Yes

Paragraph of III Code	REQUIREMENT OF III CODE	COMPLIANCE ACHIEVED
		COMMENT
55	Legislation, guidance and procedures established for the consistent implementation and verification of the rights, obligations and responsibilities of the State contained in the relevant international instruments to which it is a party, in general;	Yes
56.1	For provision of appropriate reception facilities or capability to accept all waste streams regulated under the instruments of the Organization;	Yes
56.2	For port State control activities; and	Yes
56.3	For keeping a register of fuel oil suppliers	Yes
ENFORCEMENT		
57	All necessary measures taken to ensure observance of international rules when exercising the rights and fulfilling the obligations as a port State	Yes
59	No more favourable treatment put in place when carrying out port State control	Yes
60	Processes to administer a port State control programme established consistent with the relevant resolution adopted by the Organization	Yes
61	Port State control carried out only by authorized and qualified port State control officers in accordance with the relevant procedures adopted by the Organization	Yes
62	Port State control officers and persons assisting them free from any commercial, financial and other pressures and have no commercial interest, either in the port of inspection or the ships inspected	Yes
62	Port State control officers and persons assisting them not employed by or undertake work on behalf of recognized organizations or classification societies	Yes
62	Procedures implemented to ensure that persons or organizations external to the port State cannot influence the results of port State inspection	Yes
EVALUATION AND REVIEW		
63	Performance periodically evaluated in respect of exercising its rights and meeting its obligations under the applicable instruments of the Organization	Yes

APPENDIX 3
IMO MEMBER STATE AUDIT SCHEME

[Forms B]

ANNEX 1

AUDIT PROGRAMME

Day 1 Thursday 14 October - Common Areas					
Duration ¹	Activity	Participants	State entity and Location ²	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Opening Meeting	All auditors Member State representatives from: The Department for Transport (DfT), the Maritime and Coastguard Agency (MCA), the General Light House Authorities (GLA), the Marine Accident Investigation Branch (MAIB), Ofcom, the UK Hydrographic Office (UKHO), the MetOffice, Isle of man, Gibraltar, Bermuda, and Cayman Islands.	Remote	Video call: Speeches, introduction and presentation of the audit	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break				
13.00 - 14.00 UK 08.00 - 09.00 USA	Introduction: <ul style="list-style-type: none"> Overall maritime strategy Structure and responsibilities of entity(ies) comprising the maritime administration (Ministries and other agencies involved in implementation and enforcement of relevant IMO instruments) Processes for continual review Risk analysis and performance measurement/evaluation/improvement Controlling 	All auditors Member State representatives: Claire Hughes, Director of HM Coastguard <div>Name</div> Assistant Director, UK SPC <div>Name</div> Assistant Director, Technical Services <div>Name</div> Head of Maritime Governance, Improvement and Assurance Katy Ware, Director of Maritime Safety & Standards Julie-Anne Wood, Assistant Director HMCG Policy & Standards <div>Name</div> Head of UK Regulatory Compliance Investigations Team <div>Name</div> Lawyer <div>Name</div> Lawyer <div>Name</div> Lawyer, UK Maritime Services Brian Johnson, Chief Executive, MCA	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
14.00 - 14.15 UK 09.00 - 09.15 USA	Break, Debriefing and private meeting	All auditors			

¹ Indicated duration of audit sessions take into account increased time necessary for remote audit.

² Location applies only for on-site parts of the audit, if applicable.

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site / On-site/Hybrid)
14.15 - 17.00 UK 09.15 - 12.00 USA (with intermediate break of 15 min)	Legislation process: <ul style="list-style-type: none"> Legal basis for enforcement of IMO instruments through national laws: process for the integration of IMO mandatory instruments and their amendments into national law Promulgation of national laws and amendments: How a treaty is ratified/promulgated/implemented and enforced? (e.g. SOLAS) Relevant principal legislations under various ministries (SOLAS, MARPOL, STCW, LL, COLREG) Investigative and penal process, enforcement, assessment of fines and penalties Review of legislation, interpretations and guidance notes 	All auditors Member State representatives: <div> <div>Name</div> <div>Contact</div> </div> <div> <div>Name</div> <div>CSSF Programme Manager</div> </div> <div> <div>Name</div> <div>Director of Finance and Audit</div> </div> <div> <div>Name</div> <div>Head of UK Regulatory Compliance Investigations Team</div> </div> <div> <div>Name</div> <div>Assistant Director, Technical Services (Operations)</div> </div> <div> <div>Name</div> <div>Head of Maritime Governance, Improvement and Assurance</div> </div> <div> <div>Name</div> <div>Lawyer</div> </div> <div> <div>Name</div> <div>Lawyer, UK Maritime Services</div> </div> <div> <div>Name</div> <div>Lawyer</div> </div> <div> <div>Name</div> <div>Assistant Director, Ship Standards</div> </div> <div> <div>Name</div> <div>Head of Legal Services</div> </div> <div> <div>Name</div> <div>Assistant Director, Navigation Safety</div> </div> <div> <div>Name</div> <div>Deputy Single Point of Contact for the UK III Code</div> </div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
End of day 1	Debriefing and private meeting	All auditors			

Day 2 – Friday 15 October 2021 - Common Areas (Cont.)

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site / On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Improvement of performances of the State (common areas): <ul style="list-style-type: none"> Measures taken to give effect to ratified treaties Continual training programmes National and regional drills Rewards and incentive mechanisms Evaluation and review of State's performances 	All auditors Member State representatives: Katy Ware, Director of UK Maritime Safety and Standards, UK Permanent Representative to the IMO Claire Hughes, Director of HM Coastguard Julie Anne Wood, Assistant Director HMCG Policy and Standards Name Assistant Director MGIA, UK SPC Name Head of Internal Assurance and Audit	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site:
12.00 - 13.00 UK 07.00 - 08.00 USA	Break				
13.00 - 14.00 UK 08.00 - 09.00 USA	Reporting and records: <ul style="list-style-type: none"> Reporting and communication of information to IMO Records keeping 	All Auditors Member State representatives: Name Senior Service Manager (Records Management), MCA, Participant Name Head of International Liaison, Participant Name Technical Manager, International Relations, Participant Name Lawyer, Participant All auditors Name Assistant Director MGIA, UK SPC, Participant	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
14.00 - 14.30 UK 09.00 - 09.30 USA	Break, Debriefing and private meeting	All auditors			

Day 2 – Friday 15 October 2021 Afternoon session – Flag State activities

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site / On-site/Hybrid)
14.30 -17.00 UK 09.30 - 12.00 USA (with intermediate break of 15 min)	Review of policies for the implementation and enforcement of SOLAS 1974: <ul style="list-style-type: none"> • Implementation and enforcement • Safety, design and construction, stability, equipment approval • Survey and certification • Exemptions, equivalent, dispensations • Control measures, FSI, outcome of PSC inspections, review and improvement • Interpretations left to the “satisfaction of the Administration” • Reporting to IMO 	All auditors Member State representatives: <div> <div>Name</div> <div>Assistant Director, Ship Standards, Participant</div> </div> <div> <div>Name</div> <div>Lawyer, Legal Services, Participant</div> </div> <div> <div>Name</div> <div>Head of International Survey Operations, Participant</div> </div> <div> <div>Name</div> <div>Head of Radio Spectrum and Technical Standards, Participant</div> </div> <div> <div>Name</div> <div>Lawyer, Legal Services, Participant</div> </div> <div> <div>Name</div> <div>Assistant Director, Technical Services (Operations), Participant</div> </div> <div> <div>Name</div> <div>Head of Domestic Survey Operations, Participant</div> </div> <div> <div>Name</div> <div>Assistant Director, MGIA, Participant</div> </div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
End of day 2	Debriefing and private meeting	All auditors			

Day 3 – Monday 18 October Flag State activities (Cont.)

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Review of policies for the implementation and enforcement of MARPOL: <ul style="list-style-type: none"> Implementation and enforcement Environment protection measures, , enforcement Survey and certification Exemptions, equivalent, dispensations Control measures, FSI, review and improvement Interpretation Reporting to IMO 	All Auditors Member State representatives: Name Lawyer Name Lawyer, UK Maritime Services Name Assistant Director, Navigation Safety Name Head of UK Regulatory Compliance Investigations Team Name Cargoes, Safety & Pollution Prevention Lead Name Clean Ship Operations Policy Lead Name Head of International Survey Operations Name Assistant Director, Technical Services (Operations) Name Head of Domestic Survey Operations	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break	All auditors			
13.00 - 14.30 UK 08.00 - 09.30 USA	Review of policies for the implementation and enforcement of STCW 1978: <ul style="list-style-type: none"> Implementation and enforcement of STCW Training assessment and certification Dispensation Investigation into incompetence Review and improvement Reporting to IMO 	Auditors : GD, WC Member State representatives: Name Lawyer Name Chief Examiner Name Stretch, Stakeholder Liaison & Policy Manager Name Examiner of Master & Mates Name Head of Maritime Governance, Improvement and Assurance	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
13.00 - 14.30 UK 08.00 - 09.30 USA	Vessel Safe Manning <ul style="list-style-type: none"> Review of manning laws, regulations, policy and procedures Review of sample manning evaluations 	Auditors: JH, CH Member State representatives: Name, Seafarer Services Compliance and Policy Coordinator Name, Assistant Director, UK Single Point of Contact Name, Head of UK Regulatory Compliance Investigations Team Name, Examiner of Masters and Mates Name, Chief Examiner	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
14.30 - 15.00 UK 09.30 - 10.00 USA	Break, Debriefing and private meeting				
15.00 - 17.00 UK 10.00 - 12.00 USA (with intermediate break of 15 min)	Review of policies for the implementation and enforcement of COLREG 1972, TONNAGE 1969 and Load Lines 1966: <ul style="list-style-type: none"> Implementation and enforcement Equipment approval Exemptions, equivalent, dispensations Survey and certification Control measures, FSI, PSC, review and improvement Interpretations left to the "satisfaction of the Administration" Reporting to IMO 	All Auditors Member State representatives: Name, Assistant Director, Technical Services (Operations) Name, Assistant Director, Ship Standards Name, Lawyer, UK Maritime Services Name, Head of International Survey Operations Name, Head of UK Regulatory Compliance Investigations Team Name, Assistant Director, UK Single Point of Contact	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, records, procedures, workflows, etc.	Off-site
End of day 3	Debriefing and private meeting	All auditors			

Day 4 – Tuesday 19 October - Flag State activities (Cont.)					
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Introduction to RO and implementation <ul style="list-style-type: none"> Policy RO agreements Communication and instructions 	All Auditors Member State representatives: Name Lawyer Name Assistant Director Name Head of Domestic Survey Operations Name Head of Maritime Governance, Improvement and Assurance	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break				
13.00 - 14.00 UK 08.00 - 09.00 USA	Surveyor training and recruitment <ul style="list-style-type: none"> Process of recruitment of flag State surveyors and port State control officers (PSCOs) Qualification, training and continual improvement 	Auditors :GD, WC Member State representatives: Name Head of International Survey Operations Name Assistant Director, Technical Services Name Inspection Operations Policy Advisor	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
13.00 - 14.00 UK 08.00 - 09.00 USA	RO Oversight <ul style="list-style-type: none"> Monitoring mechanism and oversight programme Resources Evaluation and review 	Auditors :JH, CH Member State representatives: Name Head of Maritime Governance, Improvement and Assurance Name Assistant Director, UK Single Point of Contact Name Head of Domestic Survey Operations Name Senior Lead Auditor, MGIA	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
14.00 - 14.30 UK 09.00 - 09.30 USA	Break, Debriefing and private meeting	All auditors			
14.30 - 17.00 UK 09.30 - 12.00 USA (with intermediate break of 15 min)	Implementation of survey, policies for flag State inspections and surveys: <ul style="list-style-type: none"> • Policy on survey and inspection • Type of surveys • Exemption policies • FSI instructions • Certificate Forms • Survey/inspection checklist • IMO guidance • Enforcement of ships, owners, operators (examples) • Statistical analysis • Records • Reporting to IMO • Evaluation and review 	All Auditors Member State representatives: <div> <div>Name</div> <div>Assistant Director, UK Single Point of Contact</div> </div> <div> <div>Name</div> <div>Head of Domestic Survey Operations</div> </div> <div> <div>Name</div> <div>Technical Manager, International Operations</div> </div> <div> <div>Name</div> <div>Colchester MO</div> </div> <div> <div>Name</div> <div>Assistant Director, Technical Services</div> </div> <div> <div>Name</div> <div>Hull MO</div> </div> <div> <div>Name</div> <div>Head of International Survey Operations</div> </div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
End of day 4	Debriefing and private meeting	All auditors			

Day 5 – Wednesday 20 October Flag State activities (Cont.)					
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Casualty Investigation <ul style="list-style-type: none"> Program Overview Laws, Regulations, Policy, Procedures Investigator training and qualification Review of Sample Casualty Investigation Cases 	All Auditors Member State representatives: Name MAIB Name Principal Investigator of Marine Accidents, MAIB Name Chief Inspector, MAIB Name Assistant Director, UK Single Point of Contact Name Head of Maritime Governance, Improvement and Assurance	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break				
13.00 - 14.00 UK 08.00 - 09.30 USA	Casualty Investigation Continued	All Auditors Member State representatives: Name MAIB Name Principal Investigator of Marine Accidents, MAIB Name Chief Inspector, MAIB Name Assistant Director, UK Single Point of Contact Name Head of Maritime Governance, Improvement and Assurance	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
14.00 - 14.30 UK 09.00 - 09.30 USA	Break, Debriefing and private meeting				

Day 5 – Wednesday 20 October - Port State activities

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
14.30 - 17.00 UK 10.00 - 12.00 USA (with intermediate break of 15 min)	Implementation of PSC policies: <ul style="list-style-type: none"> • PSC legislation • Practical implementation • PSC officers (PSCOs) • Statistical analysis • Records • Reporting on detention • Evaluation and review 	All Auditors Member State representatives: <div> <div>Name</div> <div>Technical Manager</div> </div> <div> <div>Name</div> <div>Assistant Director MCA</div> </div> <div> <div>Name</div> <div>Head of Inspection Operations</div> </div> <div> <div>Name</div> <div>Head of UK Regulatory Compliance and Investigations</div> </div> <div> <div>Name</div> <div>Assistant Director, Technical Services</div> </div> <div> <div>Name</div> <div>Lawyer, Legal Services</div> </div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
End of day 5	Debriefing and private meeting	All auditors			

Day 6 – Thursday 21, October - Port State activities (Cont.)					
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Provision of port reception facilities Register of fuel oil suppliers	All Auditors Member State representatives: Name, Assistant Director, UK Single Point of Contact Name, Assistant Director, Technical Services (Operations) Name, Assistant Director, Ship Standards Name, Hazardous Cargo Advisor Name, Head of Inspection Operations Name, ABP Name, Harbour Master, Southampton Name, Lawyer Name, ABP Name, Clean Ship Operations Policy Lead Name, Clean Ship Operations Policy Lead	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break	All auditors			
13.00 - 14.15 UK 08.00 - 09.15 USA	Handling of dangerous goods (e.g IMDG, IMSBC, IBC, Grain Codes)	All Auditors Member State representatives: Name, Assistant Director, UK Single Point of Contact Name, Assistant Director, Technical Services (Operations) Name, Cargoes, Safety & Pollution Policy Lead Name, Head of International Survey Operations Name, Senior SEO Marine Surveyor (Southampton)	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation, live streaming of port operations and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
14.15 - 14.30 UK 09.15 - 09.30 USA	Break, Debriefing and private meeting				
14.30 - 16.00 UK 09.30 - 11.00 USA	Operational pollution response (port areas/ Coastal operations) and enforcement (Coastal operations)	All Auditors Member State representatives: <div>Name Assistant Director, UK Single Point of Contact</div> <div>Name Head of Counter Pollution and Salvage</div> <div>Name Cargoes, Safety & Pollution Policy Lead</div> <div>Name ABP</div> <div>Name SoSRep</div> <div>Name Harbour Master, Southampton</div> <div>Name Lawyer</div> <div>Name Lawyer</div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation, live streaming of VTS operations and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
16.00 - 16.15 UK 11.00 - 11.15 USA	Break, Debriefing and private meeting				
16.15 - 17.00 UK 11.15 - 12.00 USA	Coordination, training, drills Evaluation, review, and improvement Reporting to IMO	All Auditors Member State representatives: <div>Name Assistant Director, UK Single Point of Contact</div> <div>Name Head of Counter Pollution and Salvage</div> <div>Name ABP</div> <div>Julie Anne Wood, Assistant Director HMCG Policy and Standards</div> <div>Name Head of UK Regulatory Compliance Investigations Team</div> <div>Name SoSRep</div> <div>Name Harbour Master, Southampton</div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
End of day 6	Debriefing and private meeting	All auditors			

Day 7 Friday, 22 October, 2021 Morning Session – Coastal State activities					
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Coastal State activities Review of the policies for implementation Evaluation, review, and improvement	All Auditors Member State representatives: Name Assistant Director, UK Single Point of Contact Julie Anne Wood, Assistant Director HMCG Policy and Standards Name Head of UK Regulatory Compliance Investigations Team Name Assistant Director, Navigation Safety Peter Mizen, Chief of HM Coastguard Claire Hughes, Director of HM Coastguard	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc.	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break	All auditors			
13.00 - 14.00 UK 08.00 - 09.00 USA	Safety of navigation (VTS, AIS, navigational warnings), including training policies for VTS)	All Auditors Member State representatives: Name Assistant Director, UK Single Point of Contact Julie Anne Wood, Assistant Director HMCG Policy and Standards Name Head of UK Regulatory Compliance Investigations Team Name VTS Manager, MCA Name Assistant Director, Navigation Safety Peter Mizen, Head of HM Coastguard Claire Hughes, Director of HM Coastguard Name Spectrum Policy Officer, Ofcom Name Nautical Policy Lead Julie Ann Wood, Assistant Director, Policy etc Name Staff Officer, Vessel Traffic Management	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc	Off-site

14.00 - 14.15 UK 09.00 - 09.15 USA	Break, Debriefing and private meeting				
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
14.15 - 15.15 UK 09.15 - 10.15 USA	<p>Meteorological data and services</p> <ol style="list-style-type: none"> 1 Overview 2 Identification and Implementation of IMO requirements 3 Communications to IMO (if any) 4 Records 5 Evaluation and review of program 	<p>Auditors : JH, CH</p> <p>Member State representatives:</p> <p>Name Head of External Monitoring and Assurance</p> <p>Name , Key Account Manager - Met Office</p> <p>Name Met Office</p> <p>Name Head of Hydrography and Meteorology</p> <p>Name Met Office</p> <p>Name Met Office</p> <p>Name HM Coastguard - Staff Officer - Technical Services</p>	Remote	<p>Video call:</p> <p>Conducting interviews</p> <p>Documentary review with virtual live auditee participation and presentation</p> <p>Document and data review:</p> <p>Review of documented evidence, record sampling, procedures, workflows, etc</p>	Off-site
14.15 - 15.15 UK	<p>Aids to navigation</p> <ol style="list-style-type: none"> 1 Overview 2 Identification and Implementation of IMO requirements 3 Communications to IMO (if any) 4 Records 5 Evaluation and review of program 	<p>Auditors : GD, WC</p> <p>Member State representatives:</p> <p>Name Director of Navigational Requirements, Trinity House,</p> <p>Name Chief Executive Irish Lights, ,</p> <p>Name Principal Inspector of Marine Accidents, ,</p> <p>Name Trinity House,</p>	Remote	<p>Video call:</p> <p>Conducting interviews</p> <p>Documentary review with virtual live auditee participation and presentation</p> <p>Document and data review:</p> <p>Review of documented evidence, record sampling, procedures, workflows, etc</p>	Off-site
15.15-15.30 UK 10.15 - 10.30 USA	Break, Debriefing and private meeting				
15.30 - 17.00 UK	<p>Hydrographic services</p> <ol style="list-style-type: none"> 1 Overview 2 Identification and Implementation of IMO requirements 3 Communications to IMO (if any) 4 Records 5 Evaluation and review of program 	<p>Auditors : GD, WC</p> <p>Member State representatives:</p> <p>Name Head of External Monitoring & Assurance</p> <p>Name UK Civil Hydrography Manager, UKHO</p> <p>Name - Locke, Scientific Analysis Group Manager, UKHO</p> <p>Name Head of Hydrography and Meteorology</p>	Remote	<p>Video call:</p> <p>Conducting interviews</p> <p>Documentary review with virtual live auditee participation and presentation</p> <p>Document and data review:</p> <p>Review of documented evidence, record sampling, procedures, workflows, etc</p>	Off-site

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
15.30 - 17.00 UK 10.30 - 12.00 USA	Search and Rescue Services and Radio communication services	Auditors :JH, CH Member State representatives: <div>Name</div> Head of Radio Spectrum and Technical Standards Claire Hughes, Director of HM Coastguard Julie-Anne Wood, Assistant Director HMCG Policy and Standards Peter Mizen, Head of HM Coastguard <div>Name</div> Spectrum Policy, Ofcom <div>Name</div> Staff Officer, Technical Services <div>Name</div> Assistant Director, MCA	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc	Off-site
End of day 7	Debriefing and private meeting	All auditors			

Day 8 , Monday 25 October Oversight of Crown Dependencies and Overseas Territories

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
11.00 - 12.00 UK 06.00 - 07.00 USA	Administrative and technical oversight methodology of Crown Dependencies and Overseas Territories	All auditors Member State representatives: <div>Name Assistant Director, MCA</div> <div>Name Head of External Monitoring & Assurance</div> <div>Name UK DSPC</div> <div>Name CSSF Programme Manager</div> <div>Name Lead Lawyer, CSSF</div> <div>Name Katy Ware, UK PRIMO, Director of Maritime Safety and Standards</div> <div>Name Senior Lead Auditor, MGIA</div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc	Off-site
12.00 - 13.00 UK 07.00 - 08.00 USA	Break	All auditors			
13.00 - 14.10 UK 08.00 - 09.10 USA	Administrative and technical oversight of Isle of man	All auditors Member State representatives: <div>Name UK SPC</div> <div>Name SPC</div> <div>Name IoM Ship Register Legislation Manager</div> <div>Name Legal Representative</div> <div>Name Deputy Harbour Master</div> <div>Name Deputy SPC</div>	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc	Off-site
14.10 - 14.25 UK 09.10 - 09.25 USA	Break, Debriefing and private meeting				

Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
14.25 - 15.35 UK 09.25 - 10.35 USA	Administrative and technical oversight of Gibraltar	All auditors Member State representatives: Name Gibraltar SPC Name Maritime Administrator Name UK SPC Name Lead Lawyer, CSSF	Remote	Video call: Conducting interviews Documentary review with virtual live auditee participation and presentation Document and data review: Review of documented evidence, record sampling, procedures, workflows, etc	Off-site
15.35 - 15.50 UK 10.35 - 10.50 USA	Break, Debriefing and private meeting				
15.50 - 17.00 UK 10.50 - 12.00 USA	Administrative and technical oversight of Cayman Islands	All auditors Member State representatives: Name UK SPC Name Cabinet Secretary, NMSI/CWG Chair Name First Legislative Counsel Cmdr Name Commandant of Cayman Islands Coastguard Name Chief Advisor, Maritime Policy, Quality, and Casualty Investigation Name Global Director, Safety and Compliance Name Regional Director Europe, Middle East, Africa Name Lead Lawyer, CSSF Name CSSF Programme Manager	Remote		Off-site
End of day 8	Debriefing and private meeting	All auditors			

Day 9 and 10 , Tuesday and Wednesday 26 and 27 October					
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
Two working days	Any outstanding issues Drafting of findings, observations and consolidation of the draft audit interim report (DIR). Presentation of the (DIR) to the member state for review and any editorial or technical corrections	All auditors	Remote	MSA Module in GISIS, Video calls	Off site

Day 11, Thursday,28 October					
Duration	Activity	Participants	State entity and Location	Remarks on method of auditing	Interaction (Off-site/On-site/Hybrid)
14.00 - 15.30 UK 09.00 - 10.30 USA	Closing Meeting Submission of draft interim report including findings and observations, and draft executive summary report.	All auditors Member State representatives from: The Department for Transport (DfT); The Maritime and Coastguard Agency (MCA); The General Light House Authorities (GLA); Marine Accident Investigation Branch (MAIB); Ofcom; UK Hydrographic Office (UKHO); MetOffice; Isle of man; Gibraltar; Bermuda; and Cayman Islands	Remote	Video call: Presentation of the draft audit interim report, and next steps. Virtual live auditee participation and presentation.	Off-Side

Audit Team:

Mr.	Name	(JH)	(USA)	Audit Team Leader
Mr.	Name	(WC)	(Thailand)	Audit Team Member
DR.	Name	(CH)	(USA)	Observer Auditor
Mr.	Name	(GD)	(IMO Secretariat)	Audit Officer

Involved entities:

- .1 The Department for Transport (DfT):
- .2 The Maritime and Coastguard Agency (MCA)
- .3 The General Light House Authorities (GLA): (Trinity House, Commissioners of Irish Lights, and Northern Lighthouse Board)
- .4 Marine Accident Investigation Branch (MAIB)
- .5 Ofcom
- .6 UK Hydrographic Office (UKHO):
- .7 MetOffice
- .8 Foreign and Commonwealth Development Office (FCDO)
- .9 Ministry of Justice (MoJ)
- .10 UK- Maritime Steering Committee(UK-MSC)
- .11 Isle of man
- .12 Gibraltar
- .13 Bermuda
- .14 Cayman Islands

ANNEX 2

Agenda for the opening meeting

- .1 Introduction of the participants (ALL AUDITORS/ United Kingdom of Great Britain and Northern Ireland);
- .2 Background history and evolution of IMO Audit Scheme ;
- .3 Review and confirmation of the provisional audit programme ;
- .4 Audit standard;
- .5 Scope of the audit;
- .6 Objectives of the Audit;
- .7 Methods and Procedures used;
- .8 Official communication links;
- .9 Administrative arrangements;
- .10 Closing Meeting;
- .11 Procedures for audit findings and observations;
- .12 Confidentiality; and
- .13 Other items

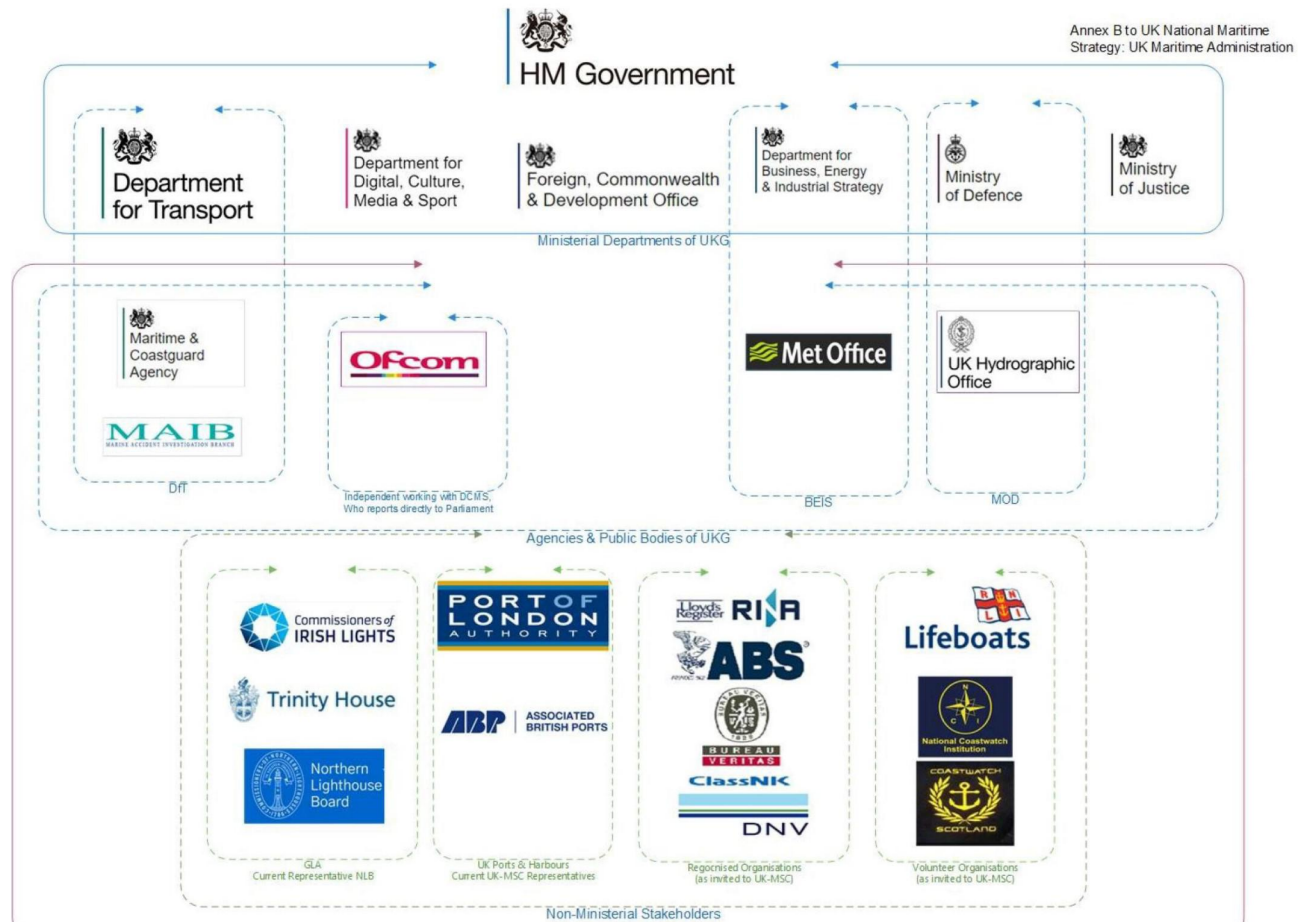
List of attendees to the opening meeting

- .1 CSSF Programme Manager
- .2 Chief Inspector, Marine Accident Investigation Branch
- .3 Chief Advisor, Maritime Policy, Quality & Casualty Investigation
(Cayman Islands)
- .4 Senior Business Relationship Manager, MCA ICT
- .5 Brian Johnson, Chief Executive, MCA
- .6 Director of Finance and Audit
- .7 CSSF Programme Officer
- .8 Claire Hughes, Director of Her Majesty's Coast Guard
- .9 , Harbourmaster, Registrar of Ships, Guernsey
- .10 , Chief Marine Surveyor, Gibraltar
- .11 Deputy SPC, Isle of Man
- .12 Chief Executive, Bermuda
- .13 SPC, BVI
- .14 Spectrum Policy Manager, OfCom
- .15 Senior Lead Auditor
- .16 Global Director, Safety & Compliance, Cayman Islands
- .17 Chief Executive, UK Hydrographic Office
- .18 CSSF Admin Support
- .19 SPC, Gibraltar
- .20 Chief Executive, Virgin Islands Shipping Register
- .21 Julie-Anne Wood, Assistant Director, HMCG Policy and Standards
- .22 Katy Ware, Director of UK Maritime Safety and Standards, UK Permanent
Representative to the IMO
- .23 Deputy Single Point of Contact
- .24 Parliamentary Counsel, Attorney General's Office, Bermuda
- .25 SPC, St Helena
- .26 , Deputy SPC, British Virgin Islands
- .27 , Head of UK Regulatory Compliance Investigations Team
- .28 , Principal Inspector of Marine Accidents, MAIB
- .29 Technical Account Manager, UK Met Office
- .30 Director of Navigational Requirements, Trinity House
- .31 , SPC, Isle of Man
- .32 Chief Executive, UK Hydrographic Office
- .33 Petra Wilkinson, Deputy Director, Department for Transport

- .34 **Name**, Associated British Ports
- .35 **Name** Assistant Director, Technical Services (MCA)
- .36 **Name** Head of Maritime Governance, Improvement and Assurance
- .37 **Name**, Assistant Director, UK Single Point of Contact
- .38 **Name**, Head of the Office of the Chairmen and Chief Executive
- .39 **Name** SPC, Bermuda
- .40 **Name** SPC, Anguilla
- .41 **Name** Associated British Ports
- .42 **Name**, Maritime Standards Manager and Pilot, Jersey
- .43 **Name**, SPC, Cayman Islands
- .44 **Name** SPC, Turks and Caicos
- .45 **Name**, Head of Internal Audit and Assurance
- .46 **Name**, Chief Executive, Irish Lighthouse Board

ANNEX 3

STRUCTURE OF THE MARITIME ADMINISTRATION







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Agency

Maritime and Coastguard Agency Organisational Structure

Version: September 2021

Updates: The HR Pay & Reward Team updates the Maritime & Coastguard Agency Organisational Structure Chart monthly and aims to publish shortly following the start of each month. If you notice any inaccuracies or out-of-date information with either the positions or structure of this chart, it is important to contact HR to let us know at

Personal Data: @mcga.gov.uk

Scope: The Organisational Structure Chart provides an MCA-wide view of corporate structure. All teams, position titles and grades should be referenced, including fixed term posts within projects and transitional teams

Staff Names: Senior management and senior responsible staff are included by name so that contact points for business units, operational areas and policy teams are available. Staff outside these roles will not be named on the Org Chart

Business Directory: The MCA Organisational Structure Chart is not intended for use as a business directory. To locate the name of an individual not included within this chart, please use Delve 'People Directory' (guidance available below), and the respective team site on Compass, or by searching on Microsoft Teams

Team Organisational Charts: If there is a particular business unit requirement for further details not within the scope of the corporate Organisational Chart (such as including all staff names, status, dates in post), a team-only chart can be separately maintained by the relevant area

Delve

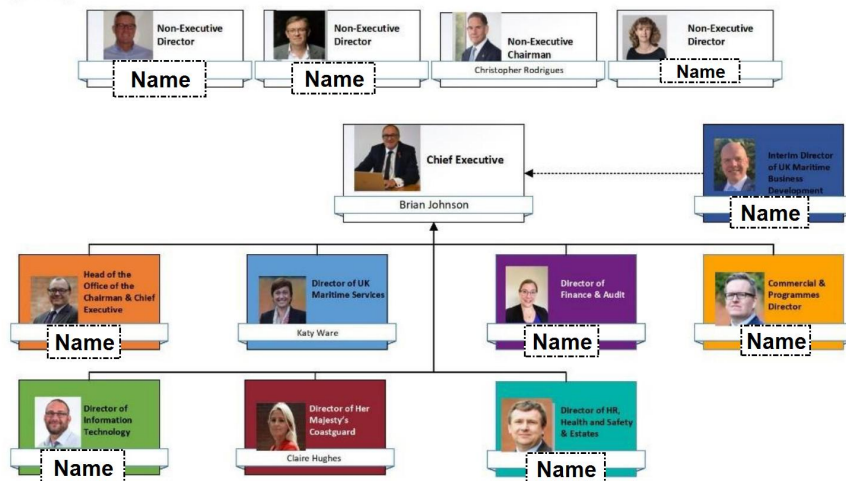
Delve Guidance

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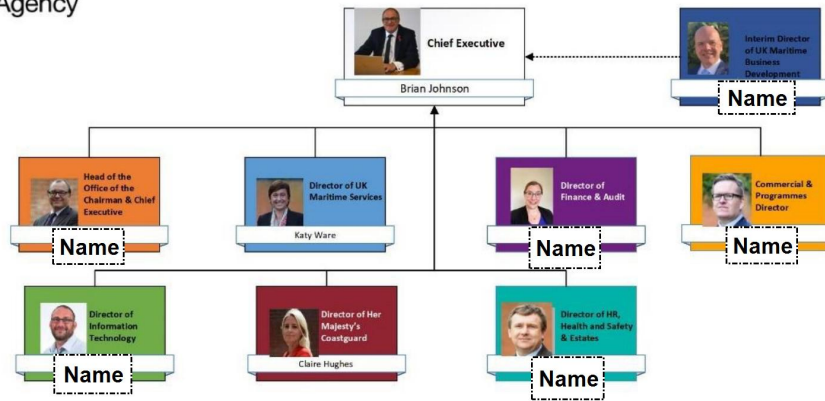
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The MCA Board



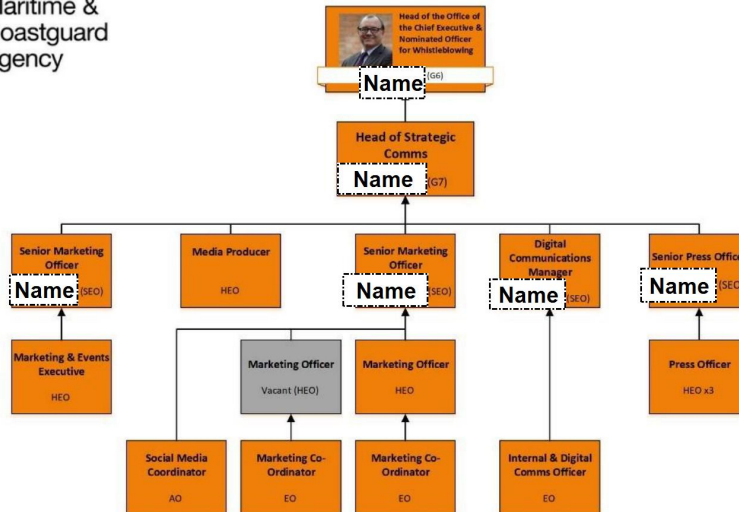
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The Executive Team



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Communications

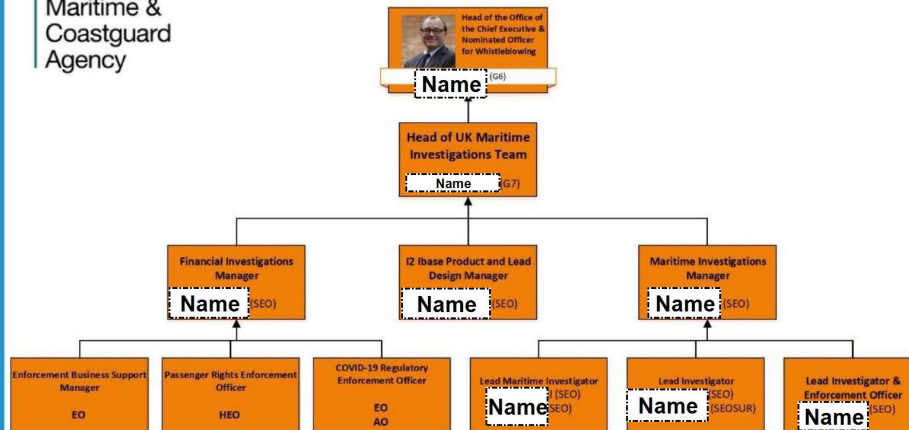


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Maritime Investigations Team

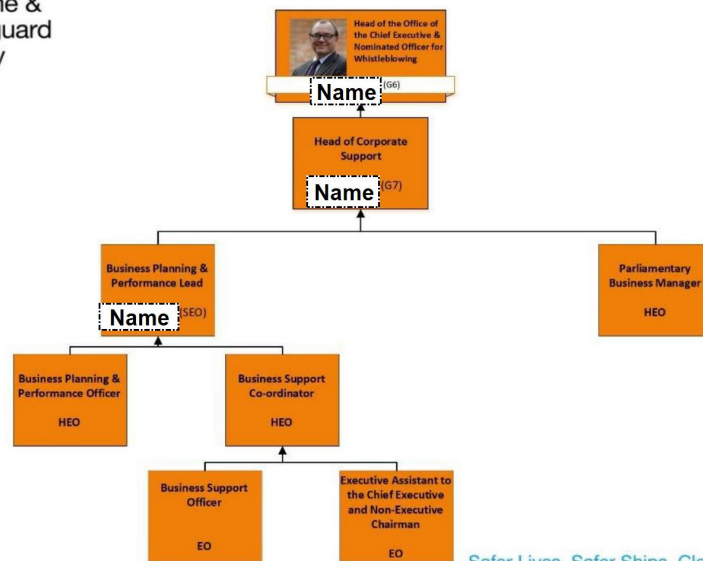


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Corporate Support

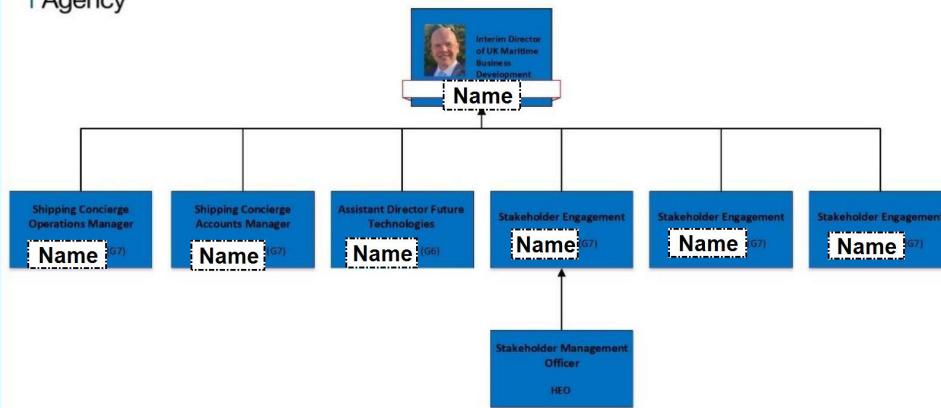


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UK Maritime Business Development

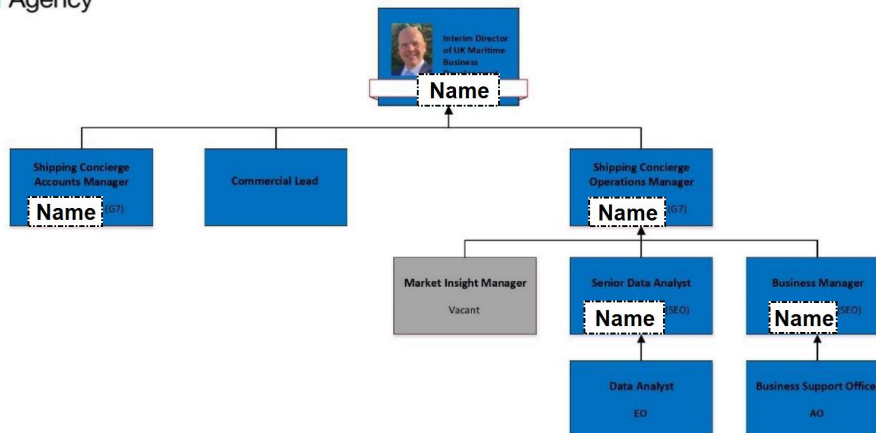


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UK Shipping Concierge

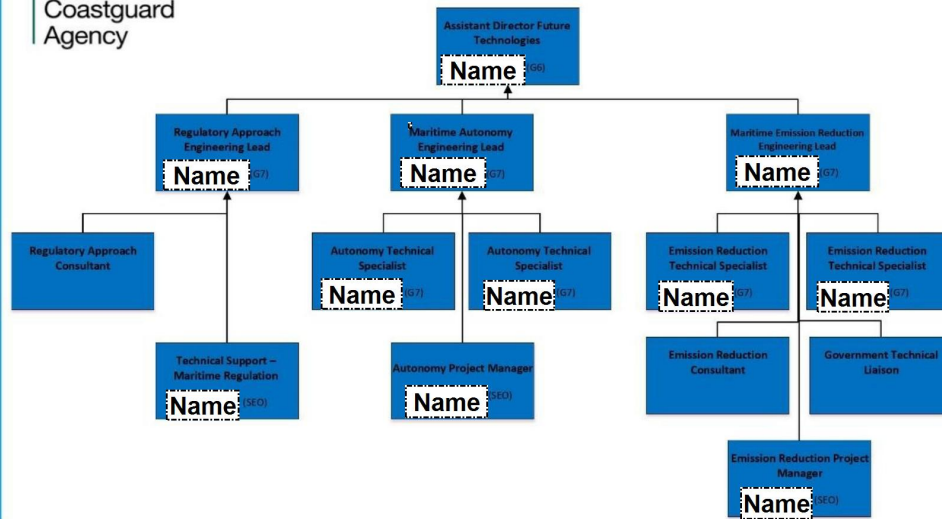


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Maritime Future Technologies

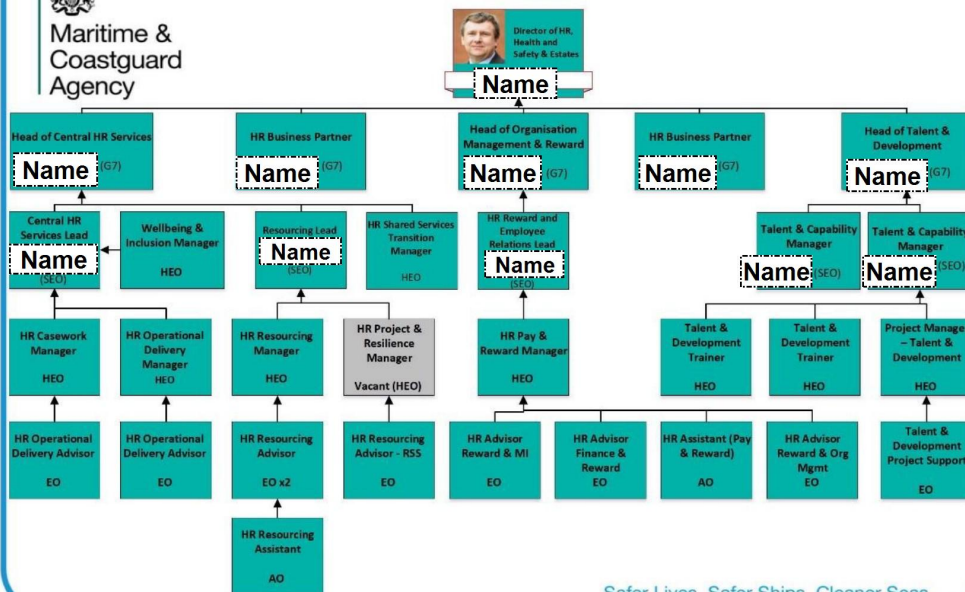


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Human Resources

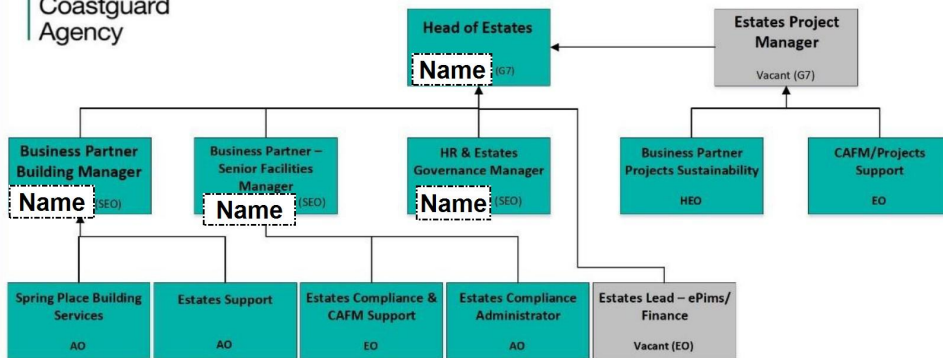


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Estates



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Health and Safety

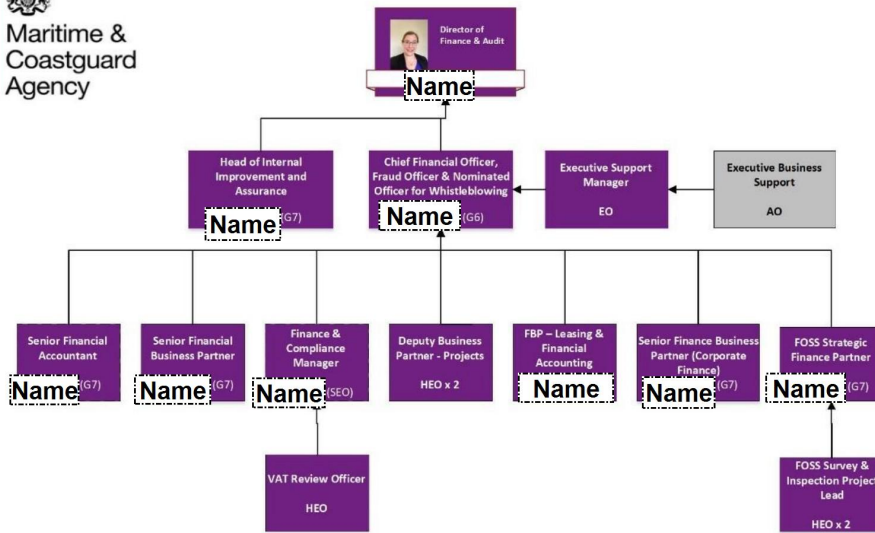


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Finance & Audit



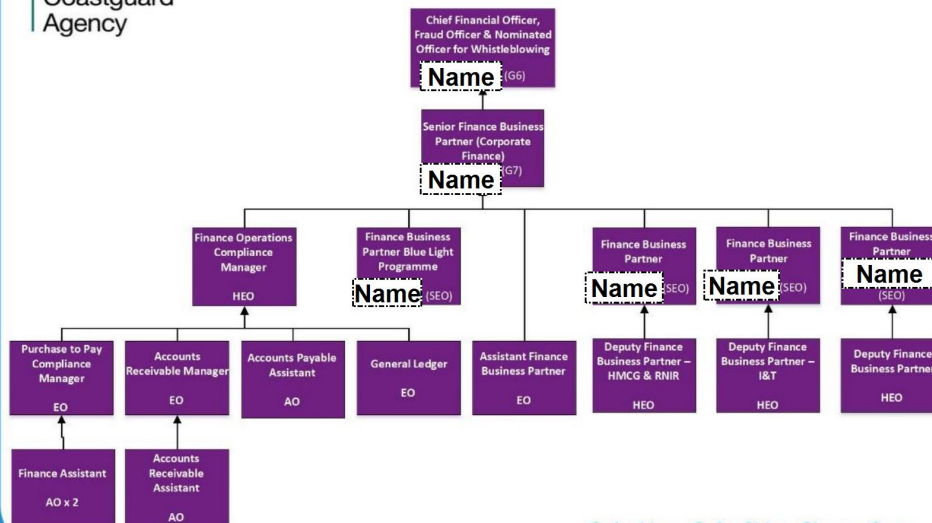
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Finance & Audit

Page 2

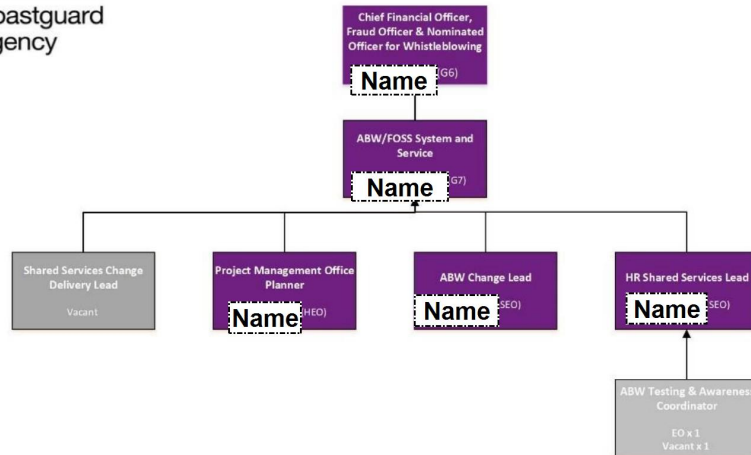


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ABW Core Team

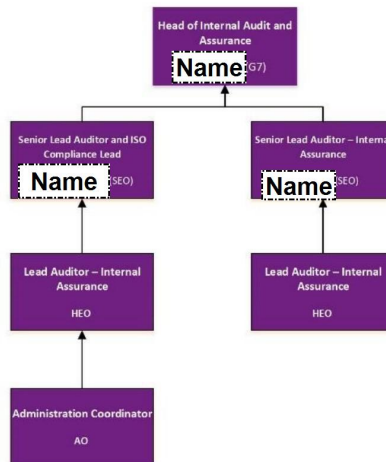


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Internal Audit & Assurance

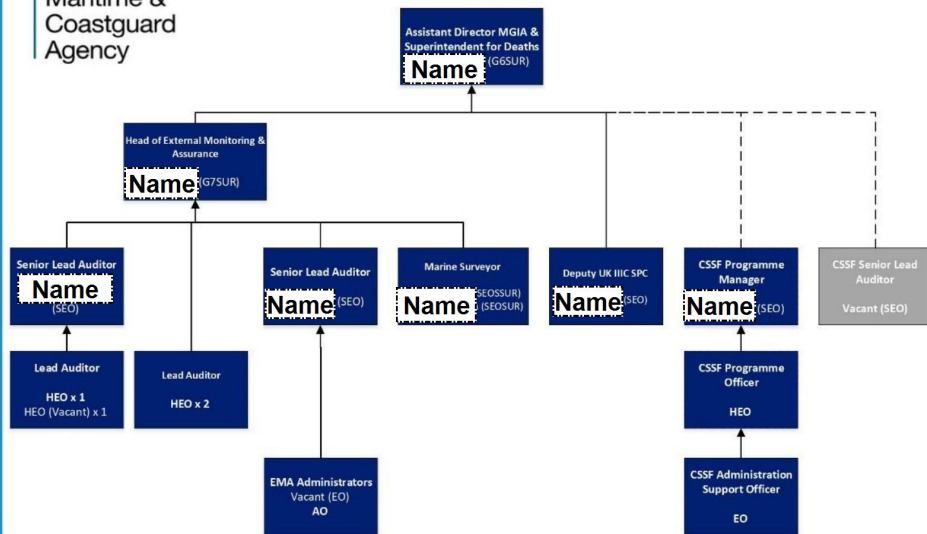


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Maritime Governance, Improvement & Assurance

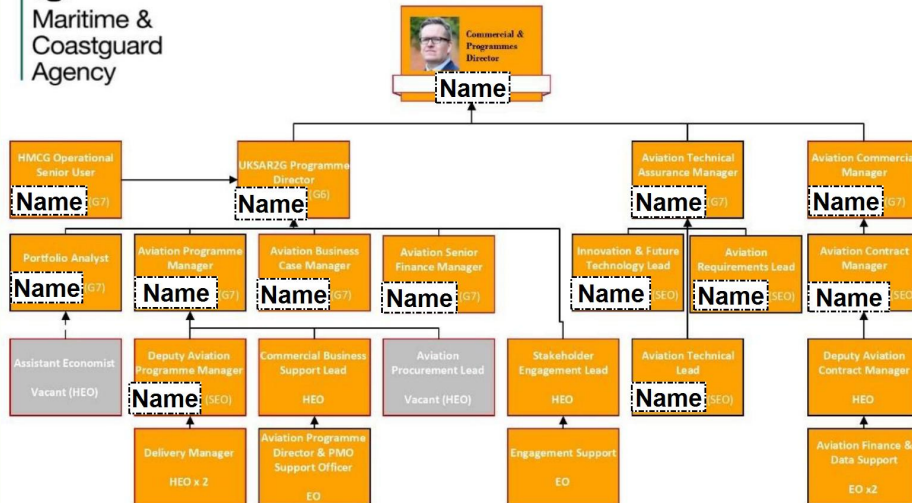


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Commercial & Programmes

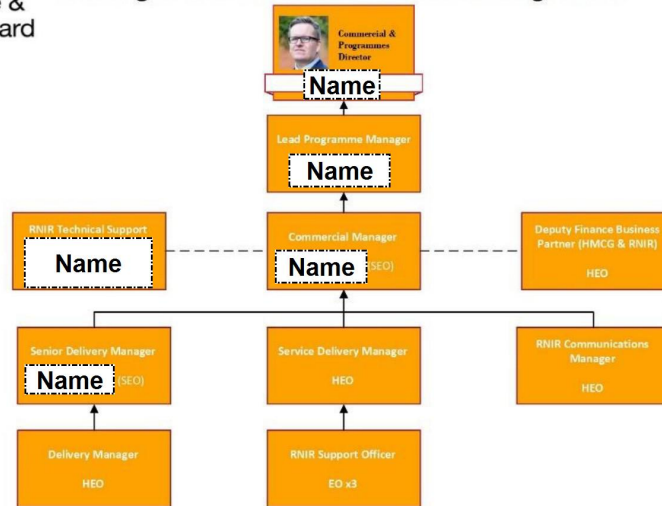


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Radio Network Infrastructure Replacement & Blue Light Technical Transformation Programme

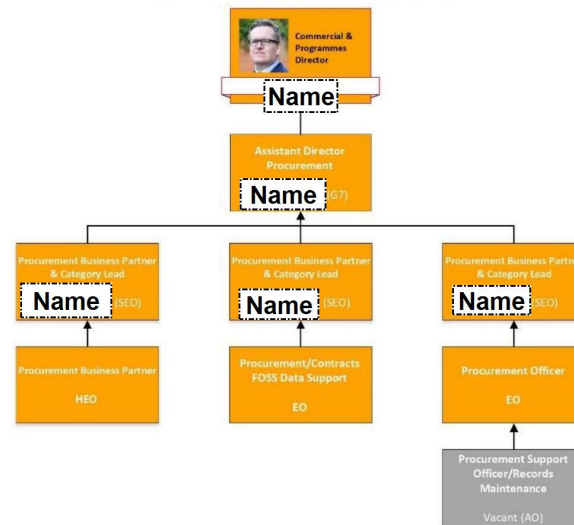


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Procurement & Contracts

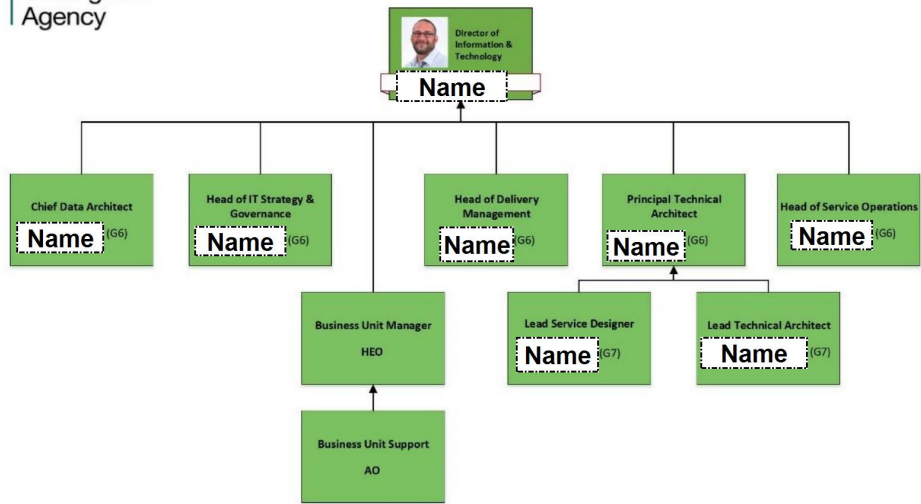


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Information Technology

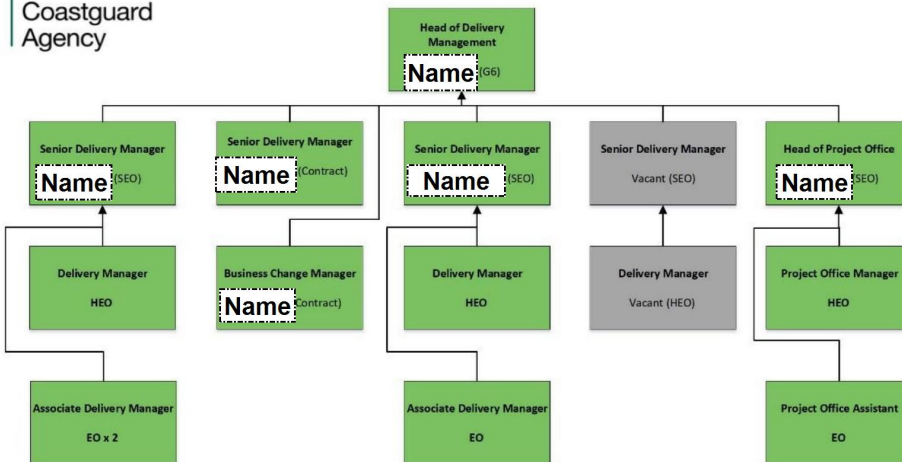


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IT Delivery Management

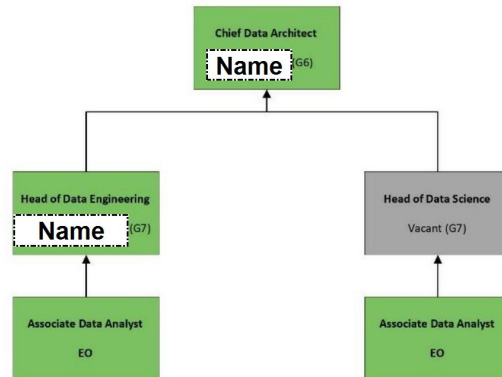


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IT Data Architecture

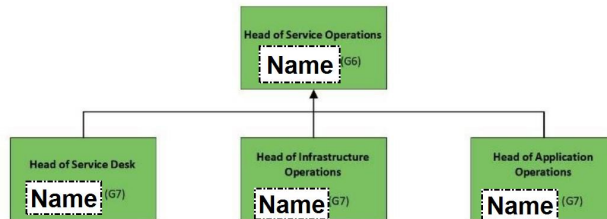


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Service Operations

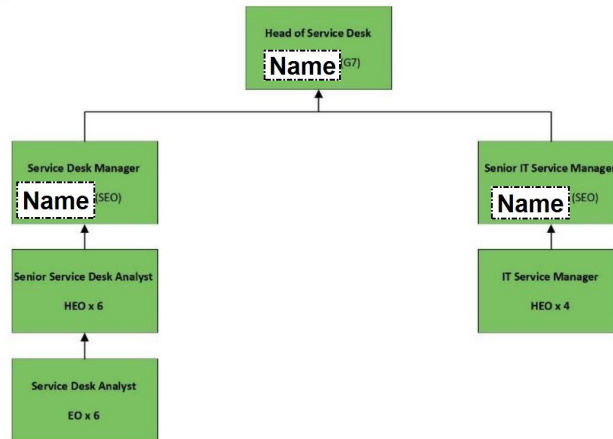


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Service Operations

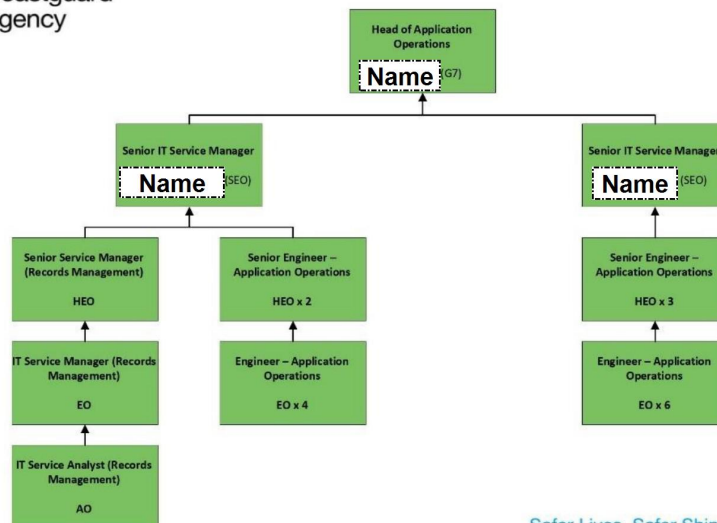


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Application Operations

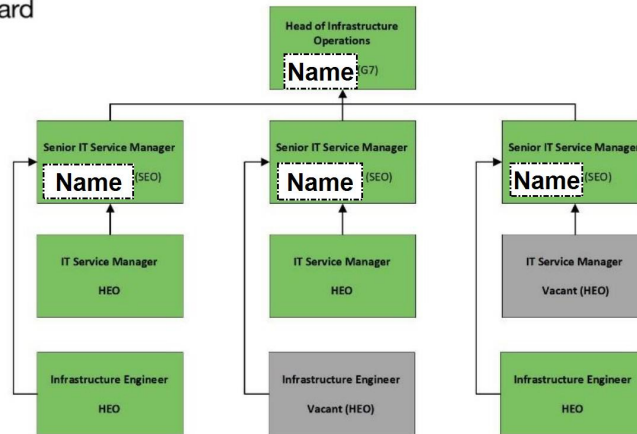


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Infrastructure Operations

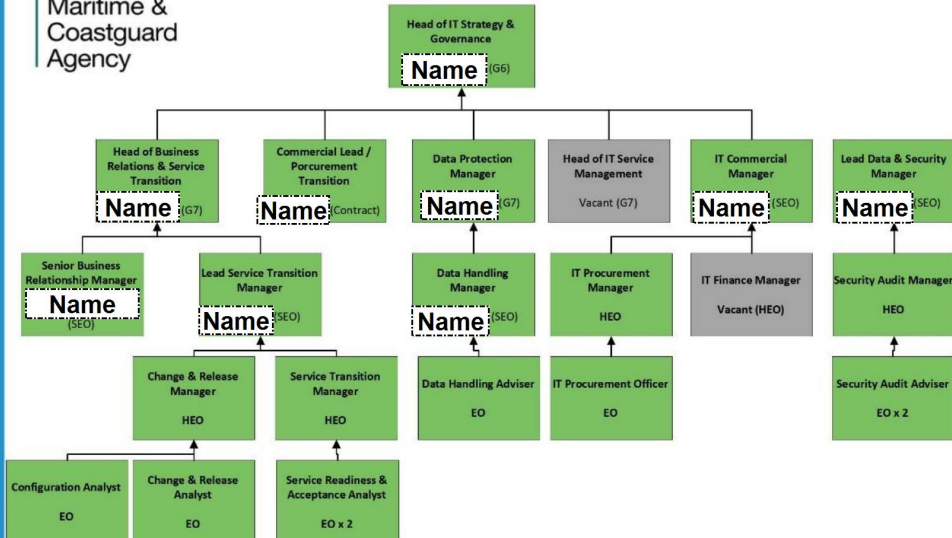


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IT Strategy & Governance

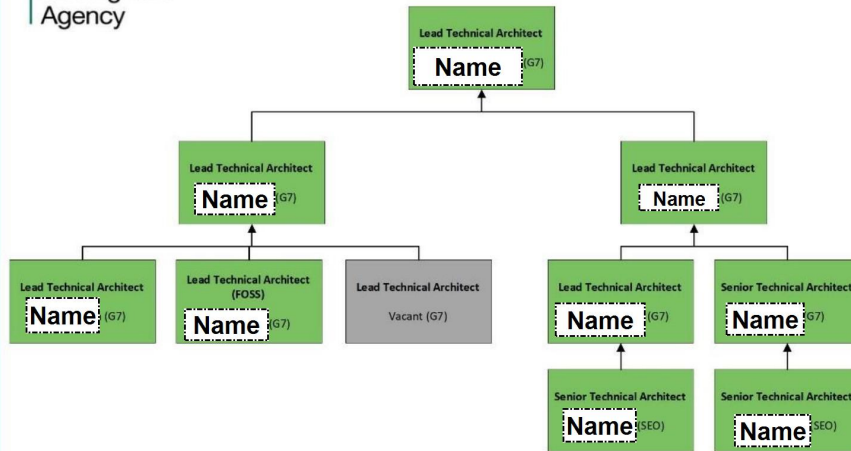


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Technology Office

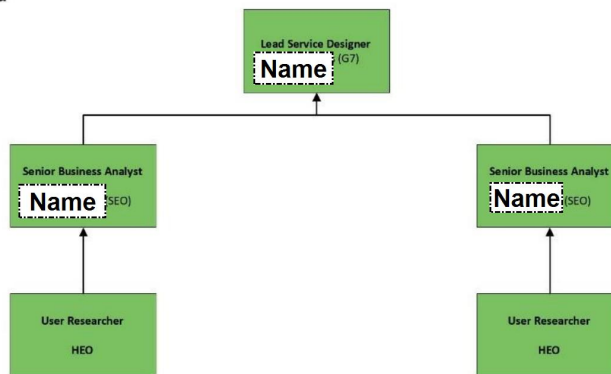


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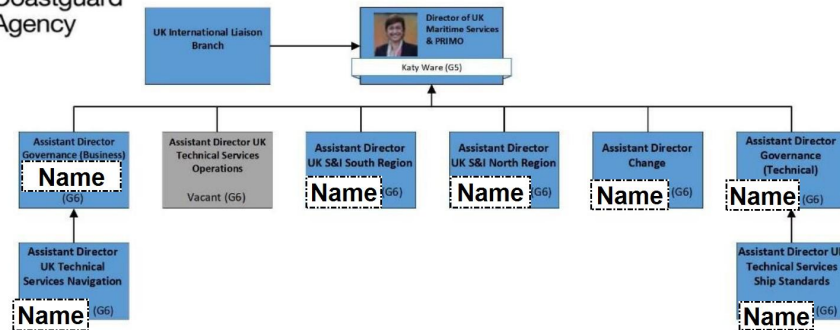
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Technology Office



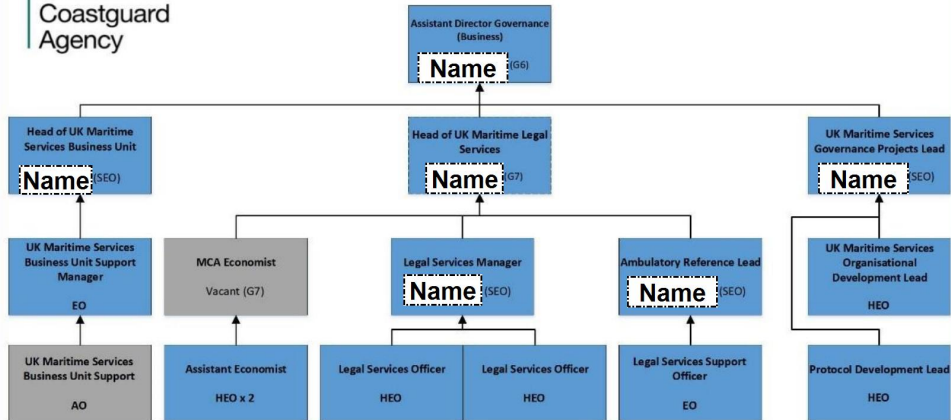
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Directorate of UK Maritime Services



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UK Maritime Services Business Unit

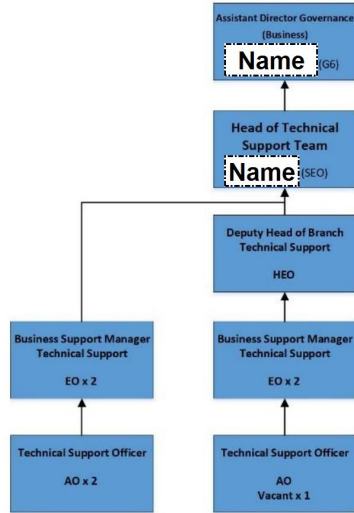


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UK Maritime Services Technical Support Team

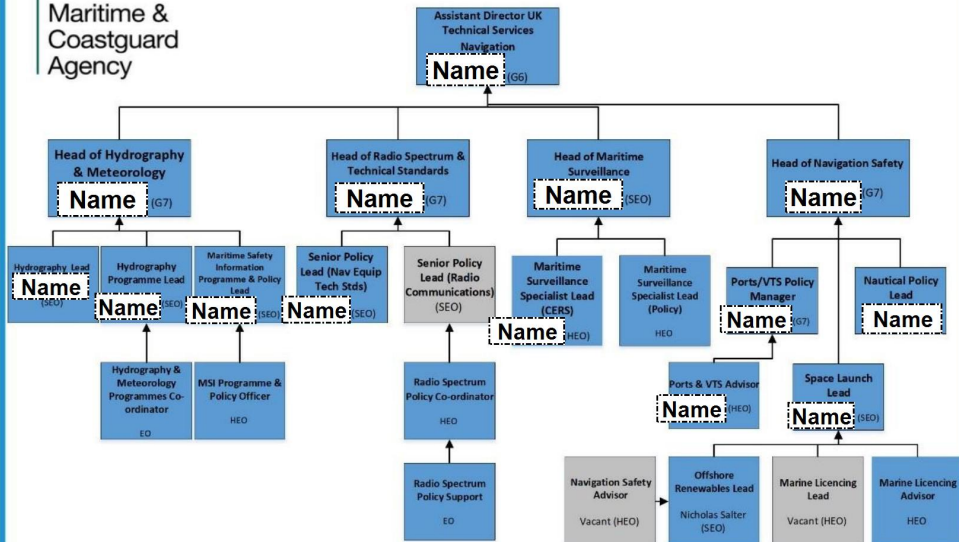


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Coastguard
Agency

UK Technical Services Navigation

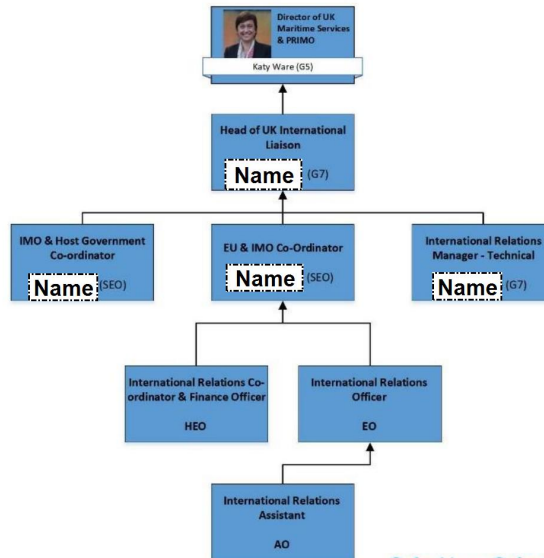


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UK International Liaison Branch

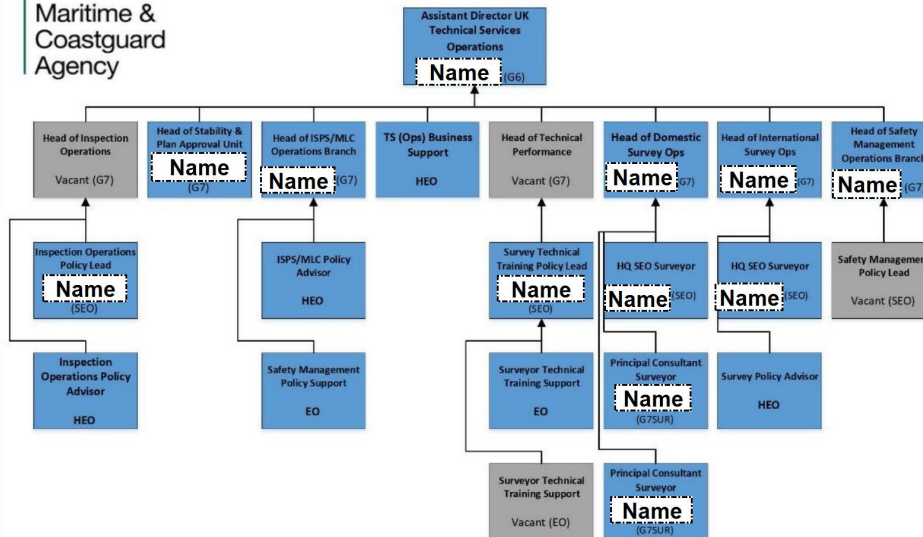


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Coastguard
Agency

UK Technical Services Operations

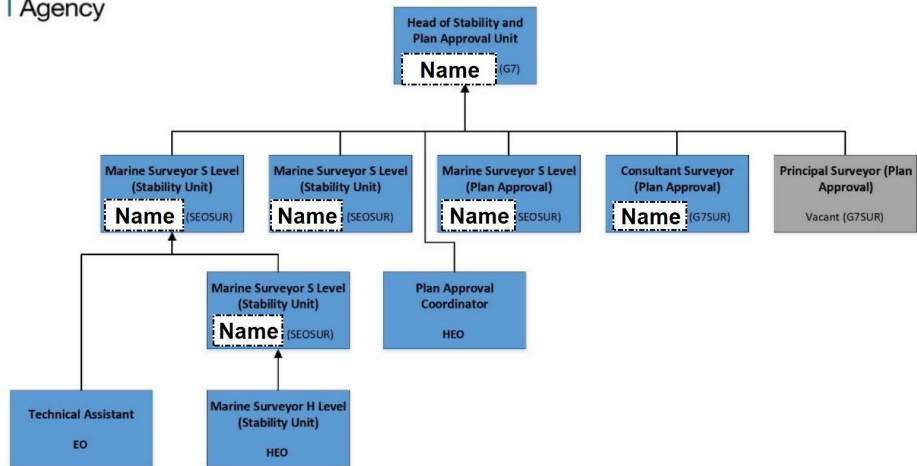


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Coastguard
Agency

Stability and Plan Approval Unit



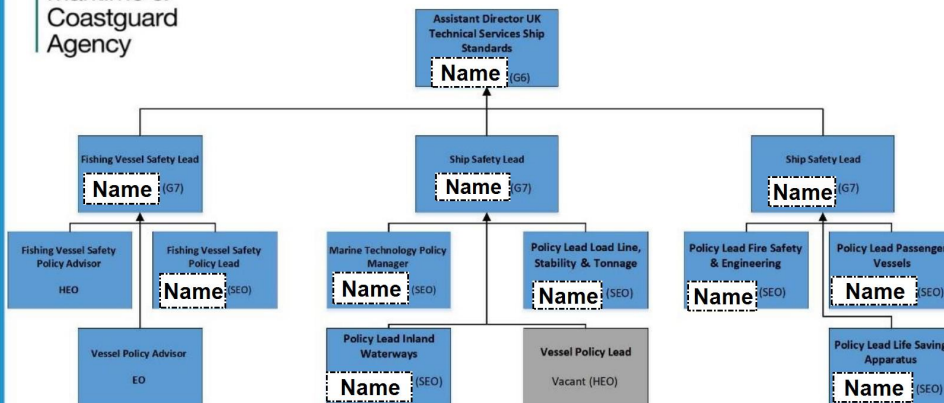
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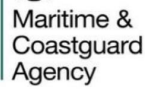
Maritime &
Coastguard
Agency

UK Technical Services Ship Standards

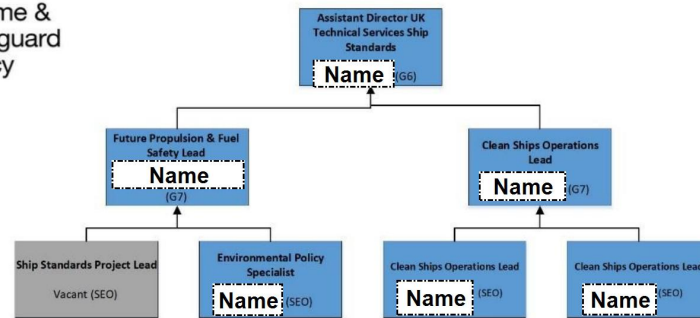
Page 1



Safer Lives, Safer Ships, Cleaner Seas

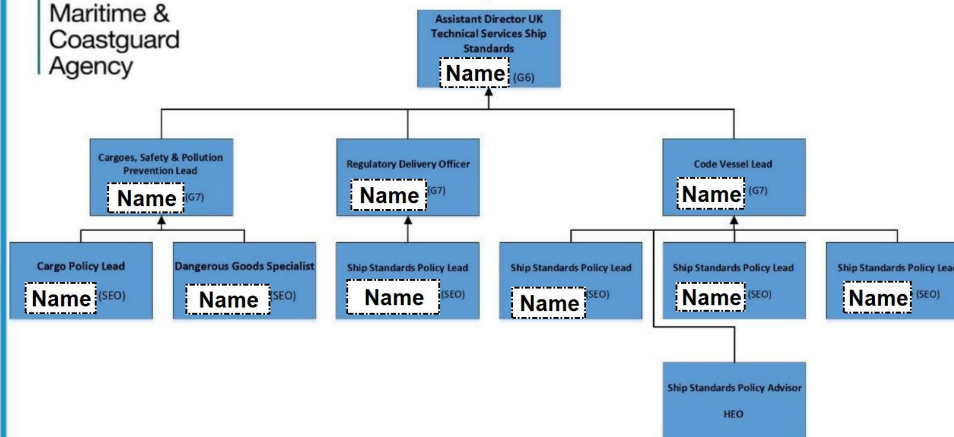


Page 2



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Page 3

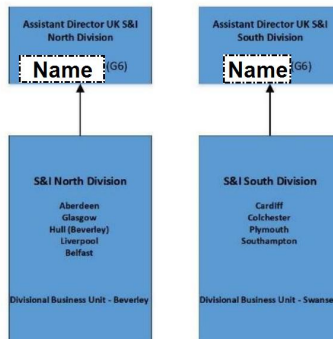


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Agency

Business Delivery UK Survey & Inspection

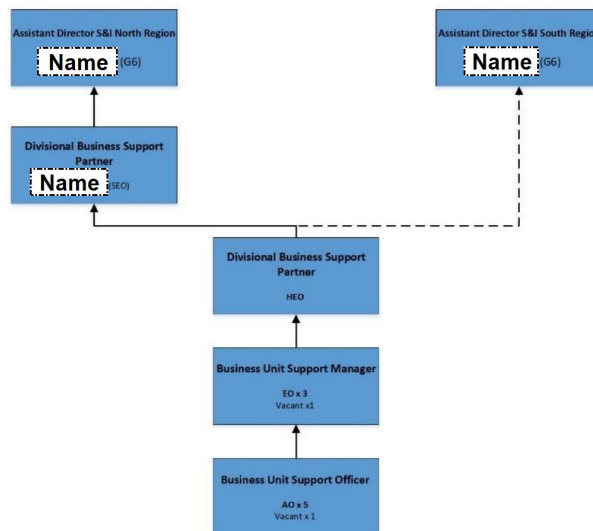


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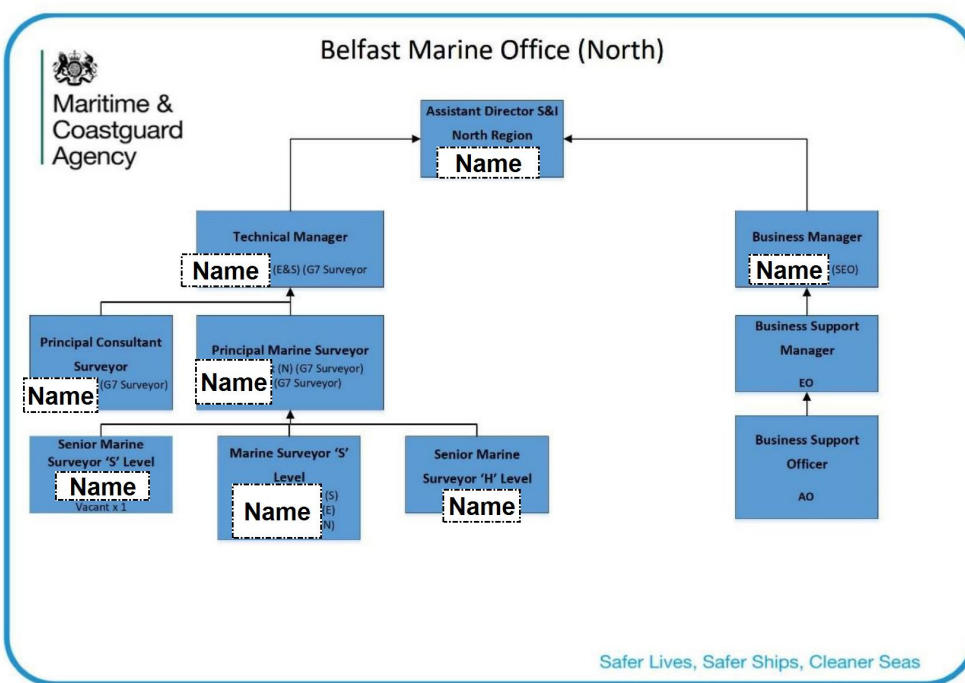
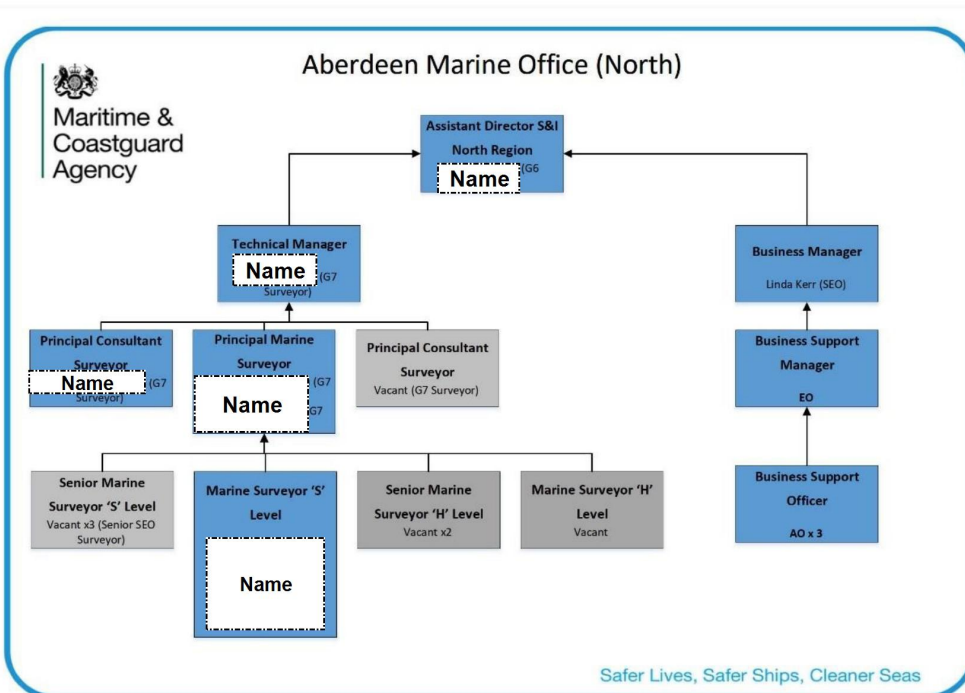


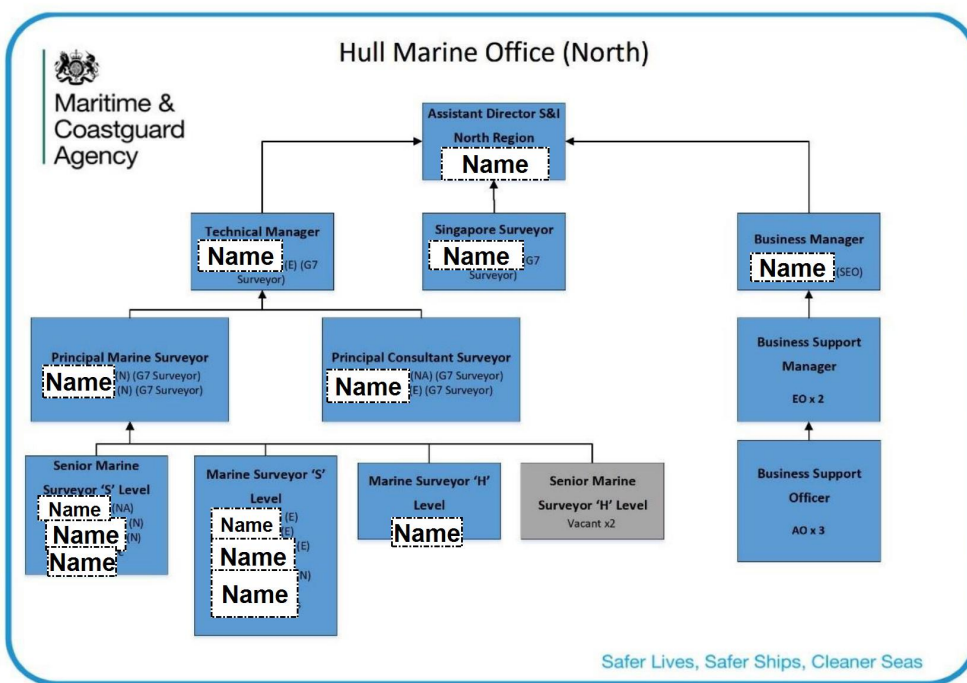
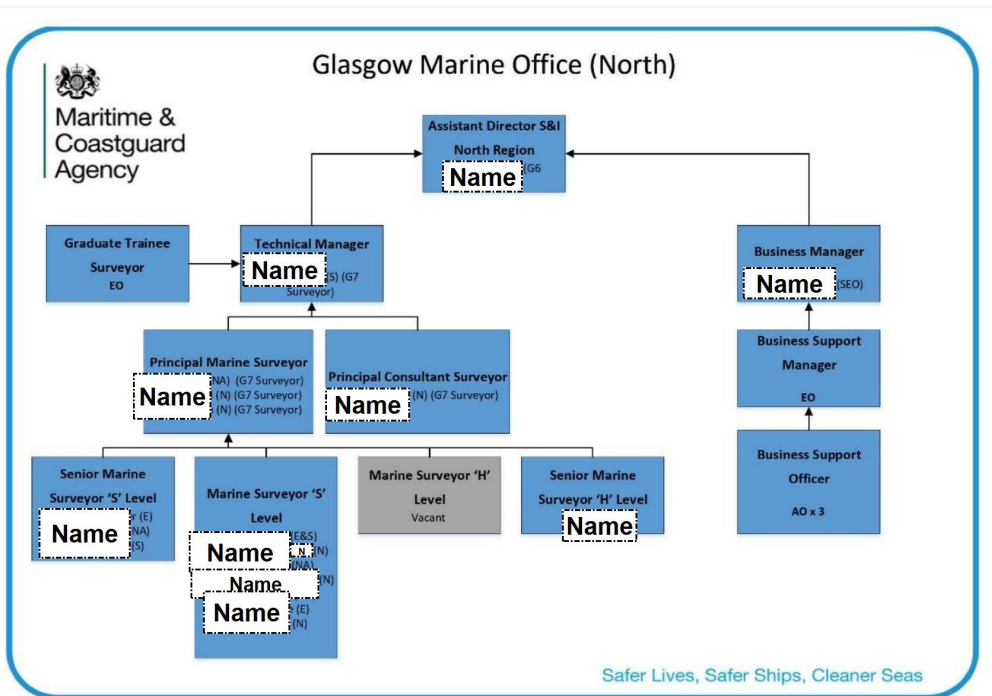
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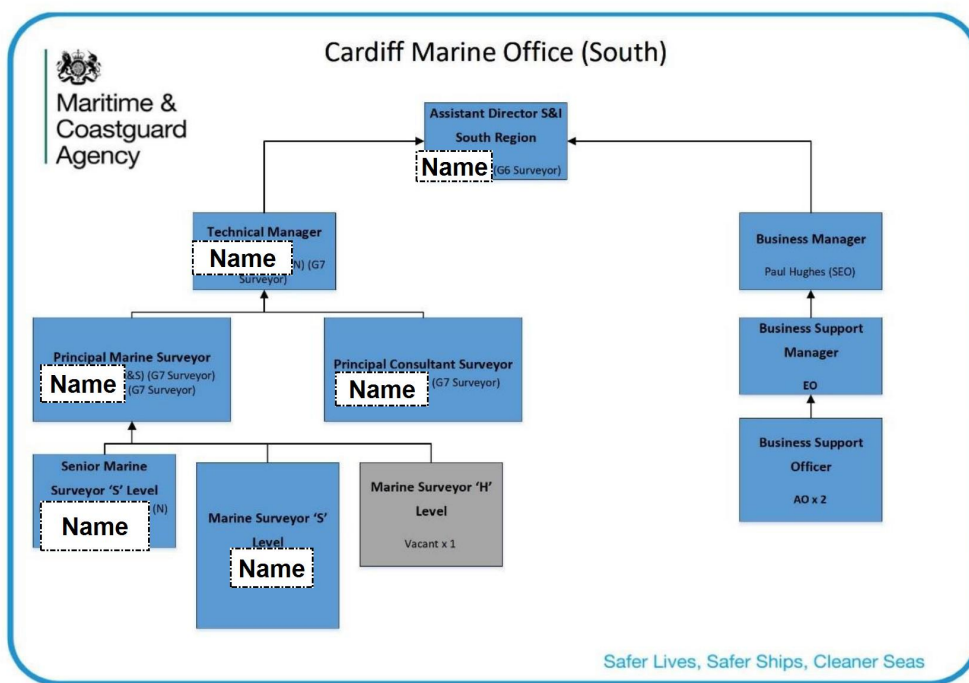
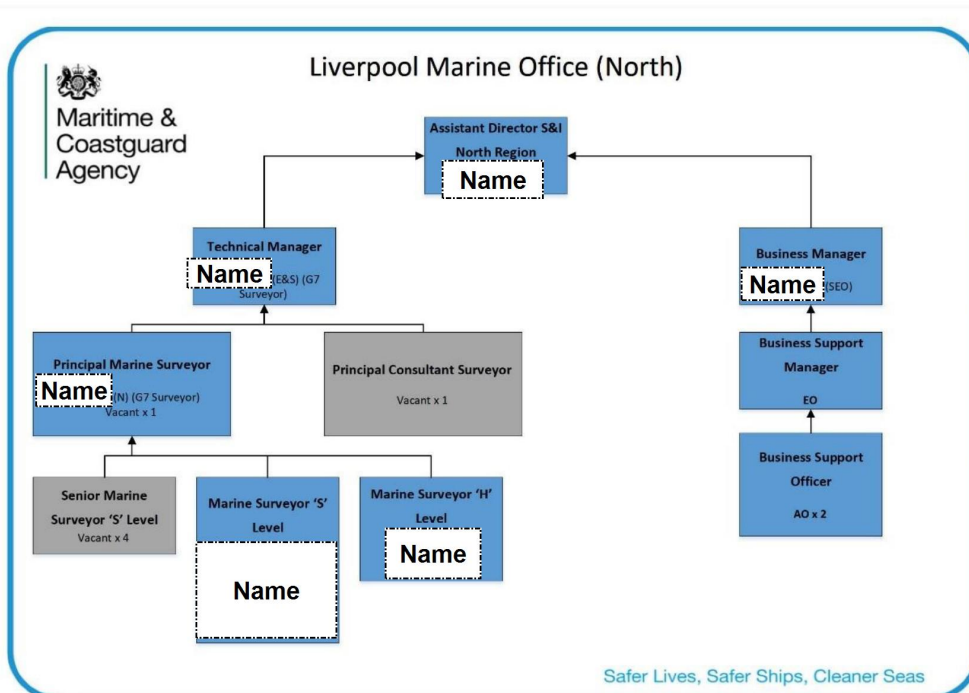
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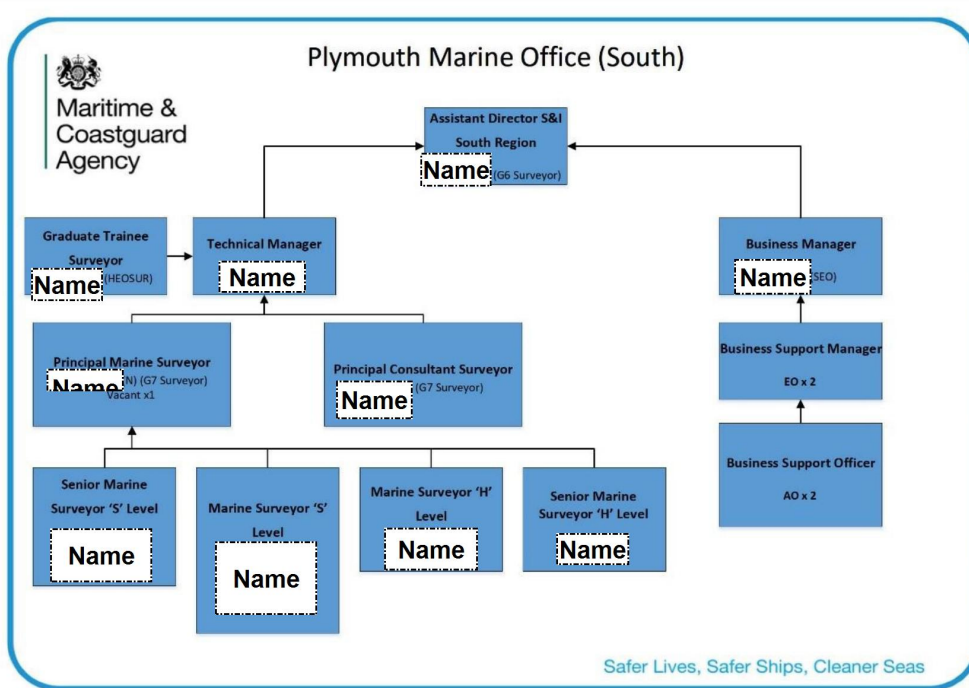
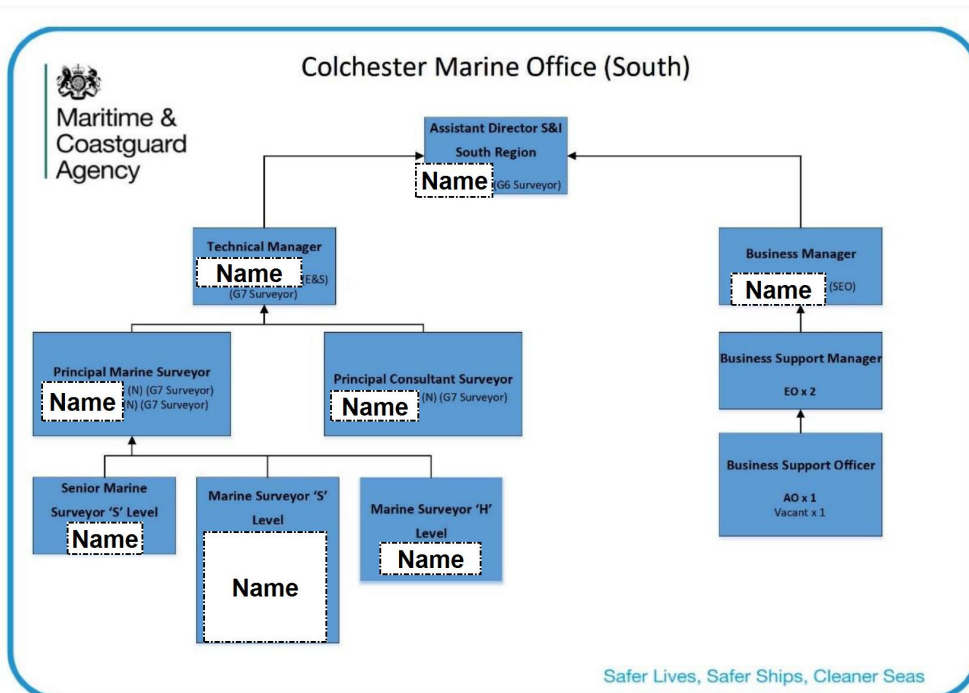


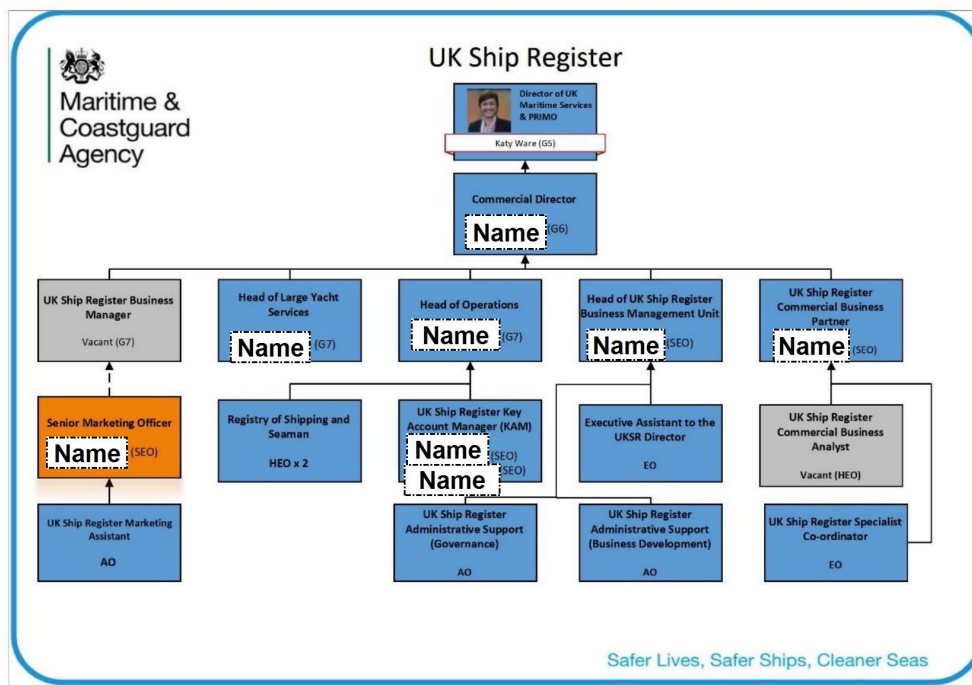
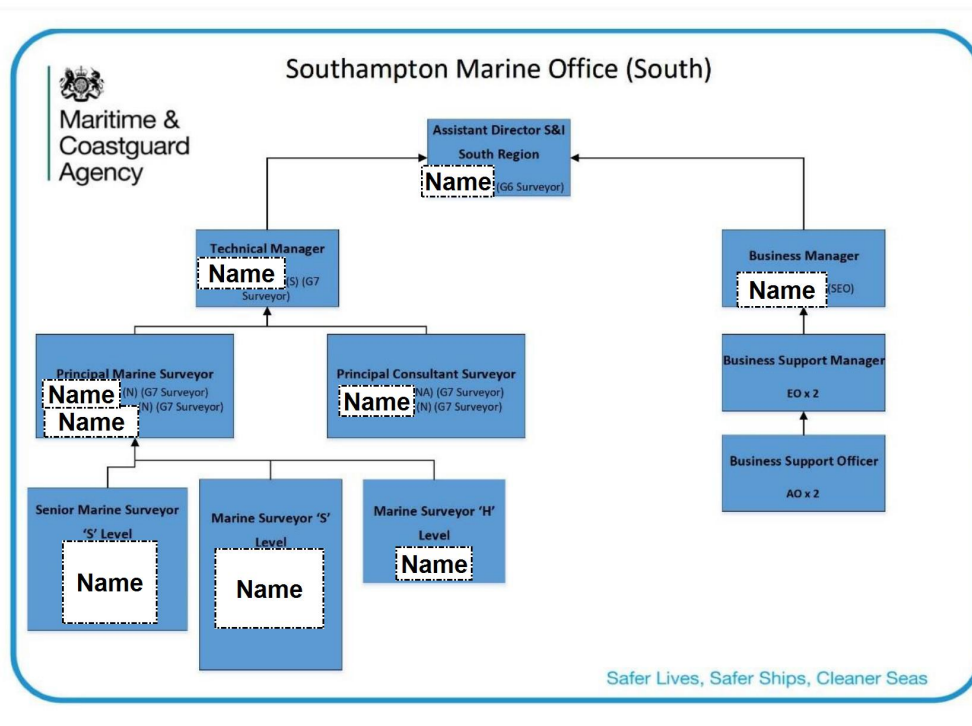
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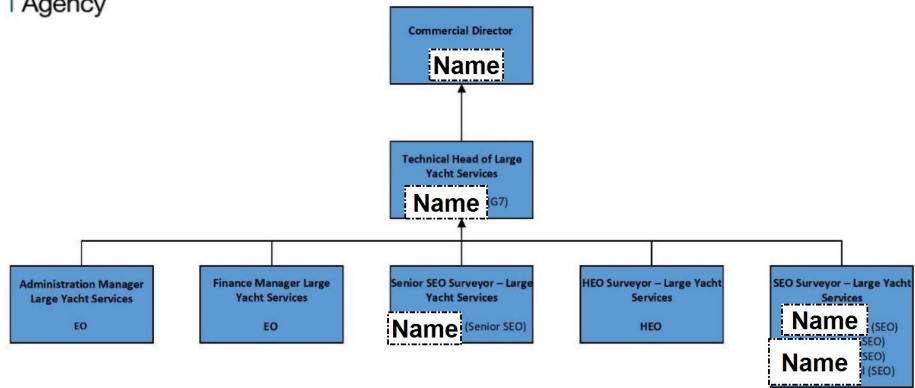






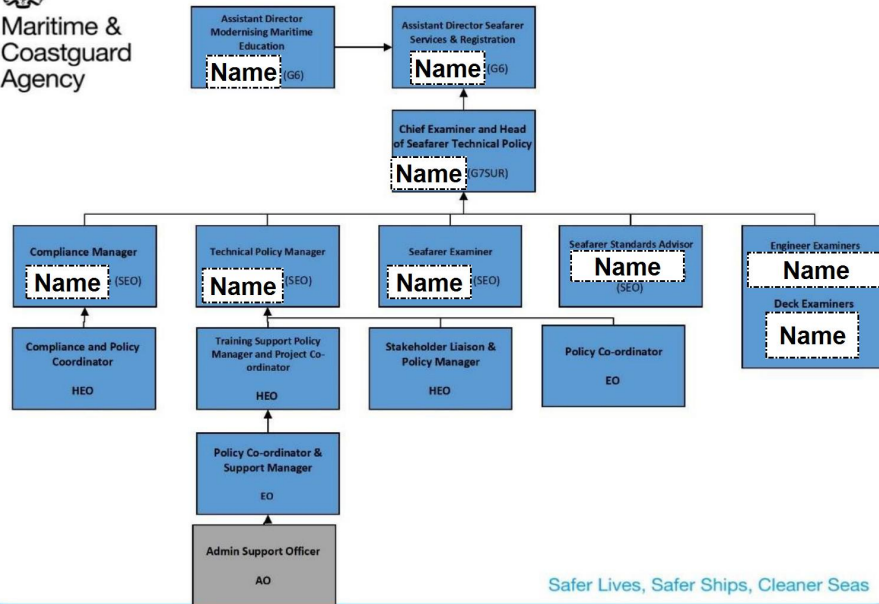


Large Yacht Services



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Seafarer Services Training & Certification

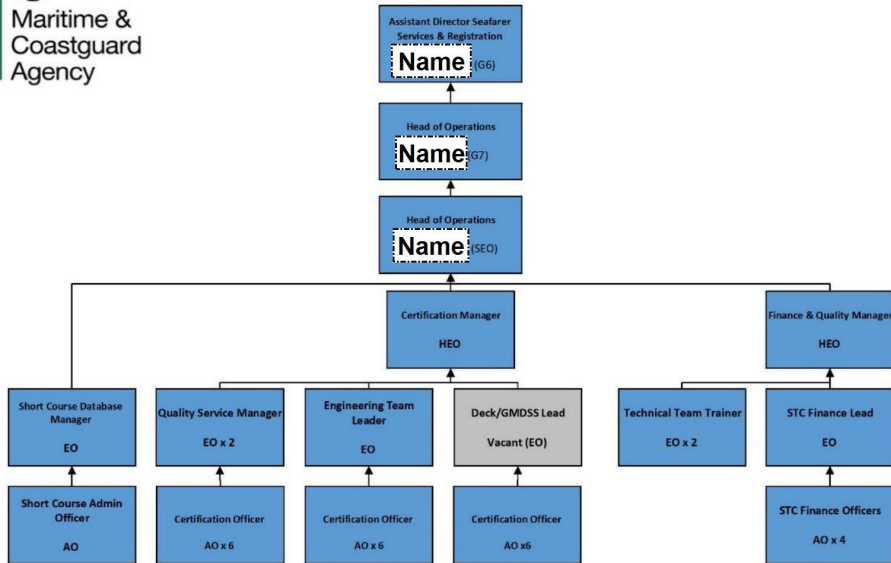


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Seafarer Services Training & Certification

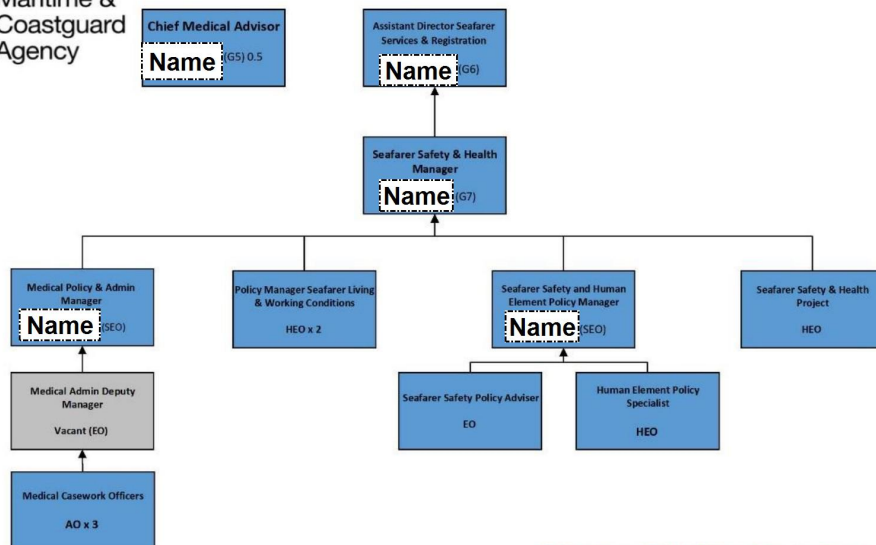


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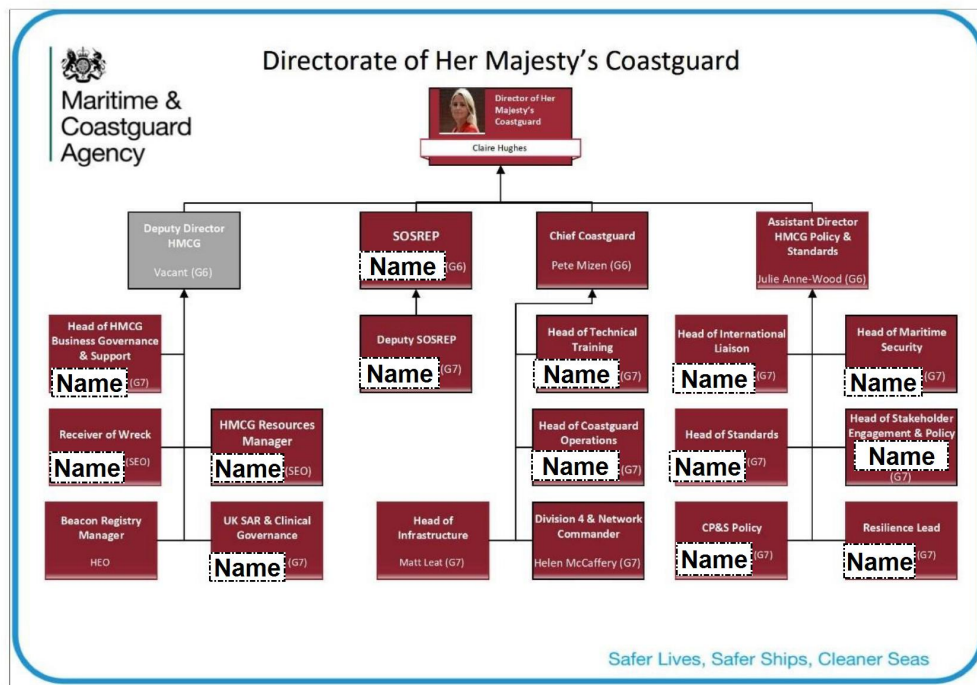
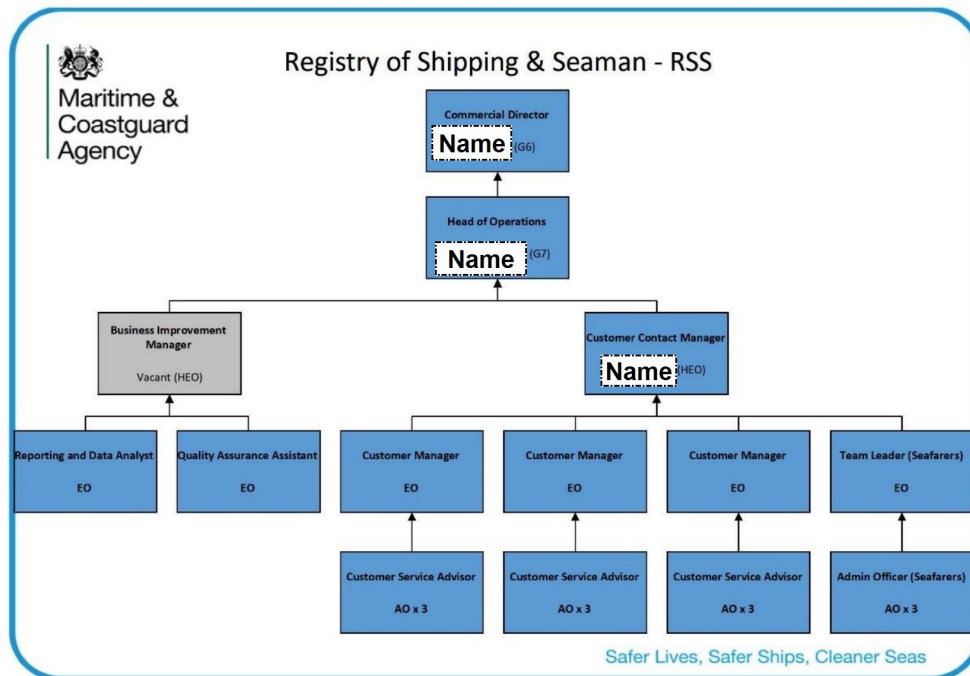


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Seafarer Services Safety & Health



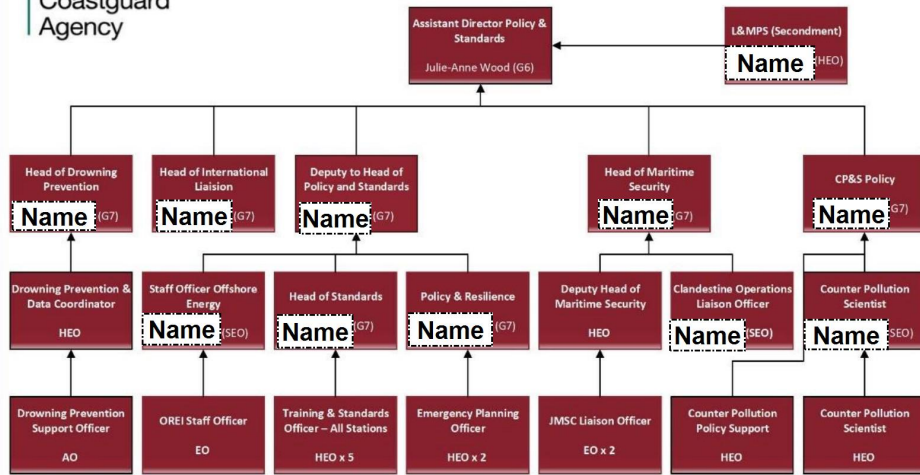
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HMCG Policy, International & Standards

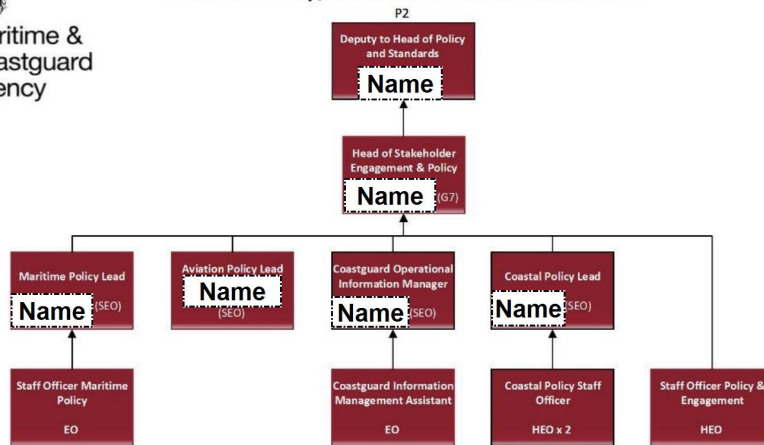


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HMCG Policy, International & Standards

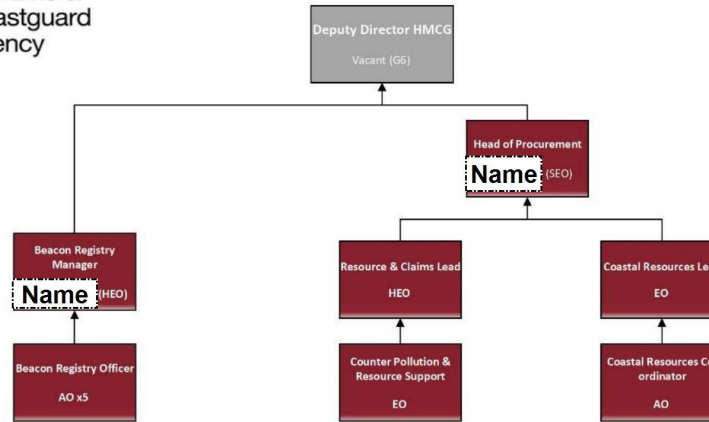


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HMCG Business, Governance & Infrastructure

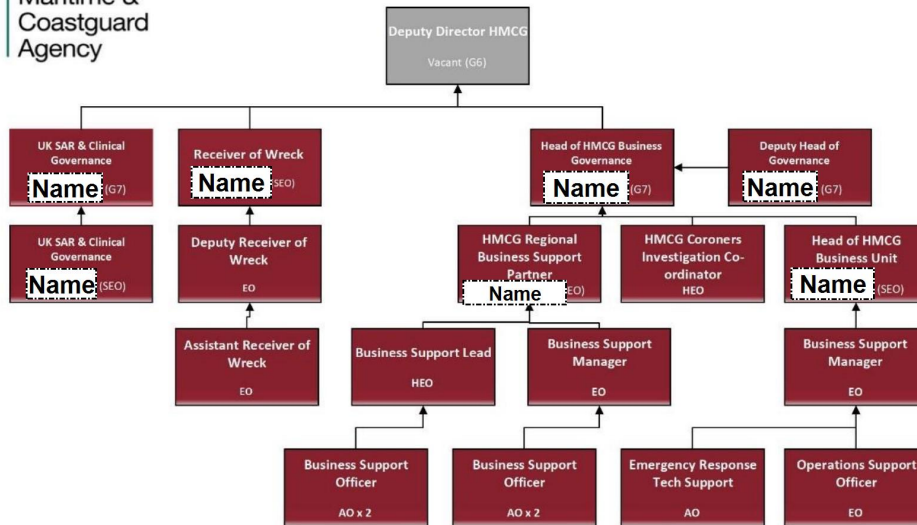


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HMCG Business, Governance & Infrastructure

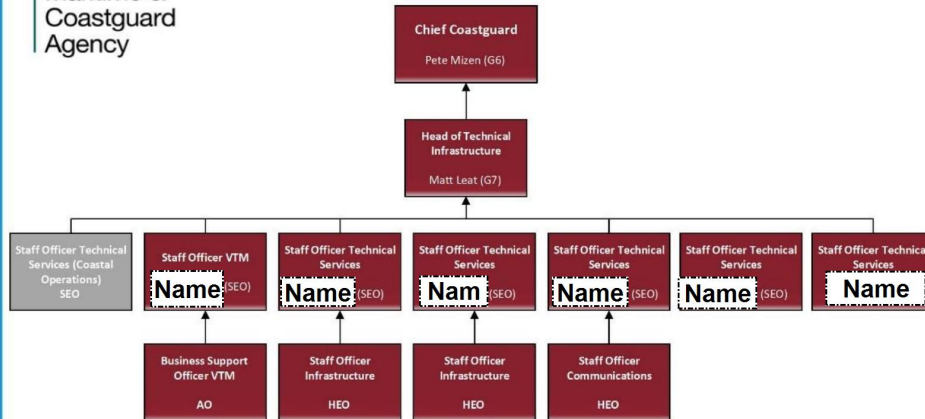


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HMCG Business, Governance & Infrastructure

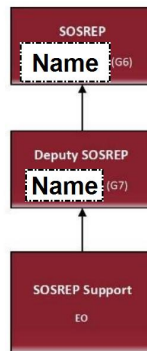


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SOSREP

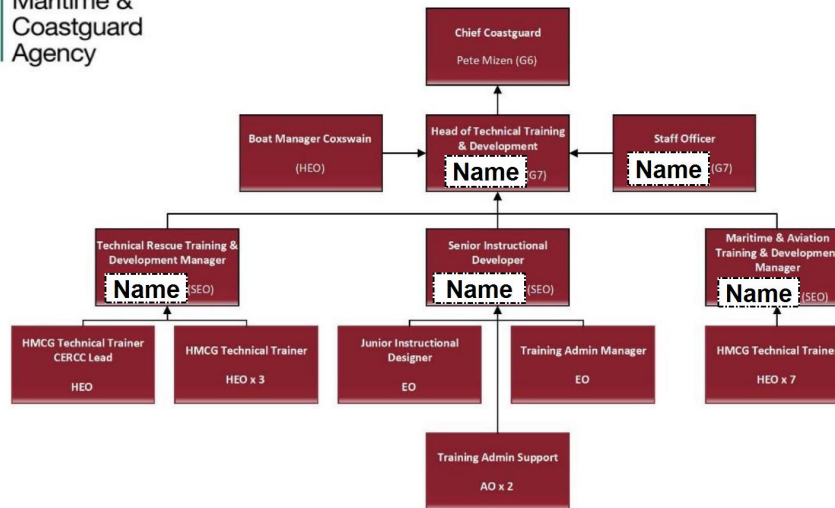


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Technical Training

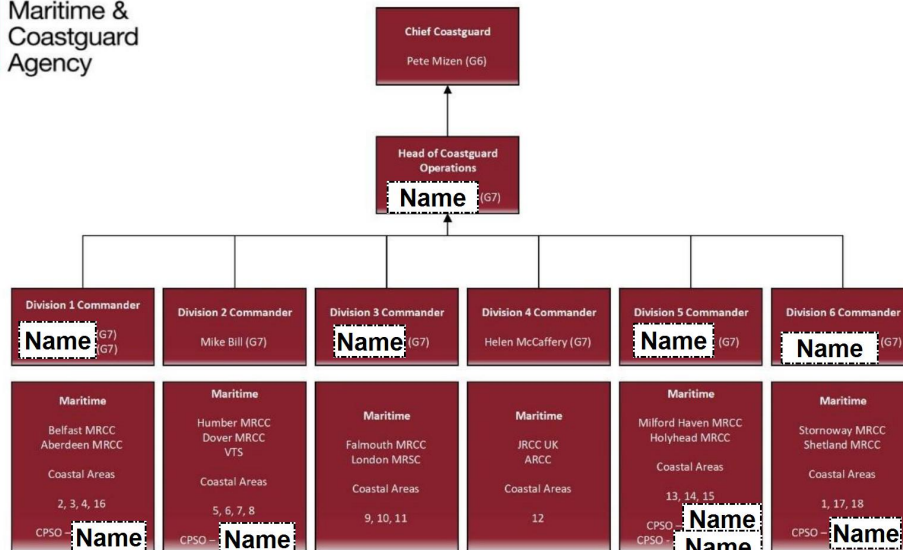


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Operational Overview

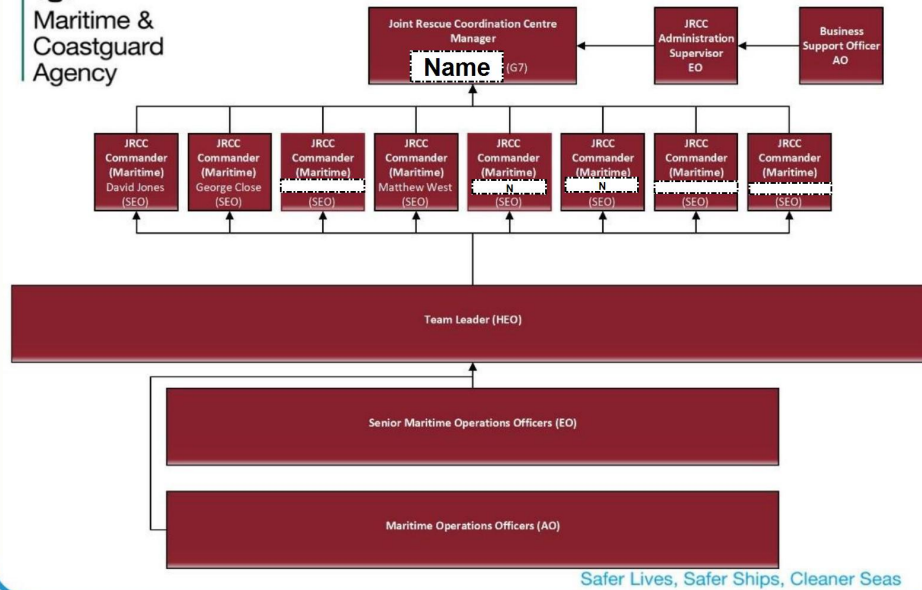


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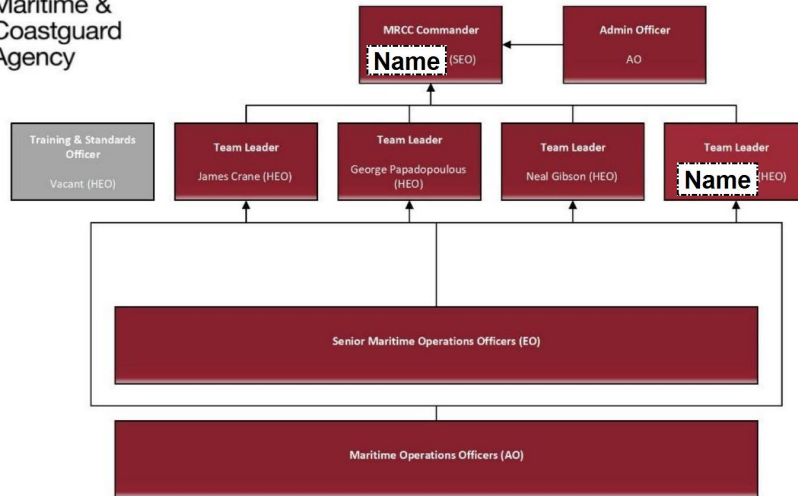
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Maritime Operations – JRCC (UK)



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Agency

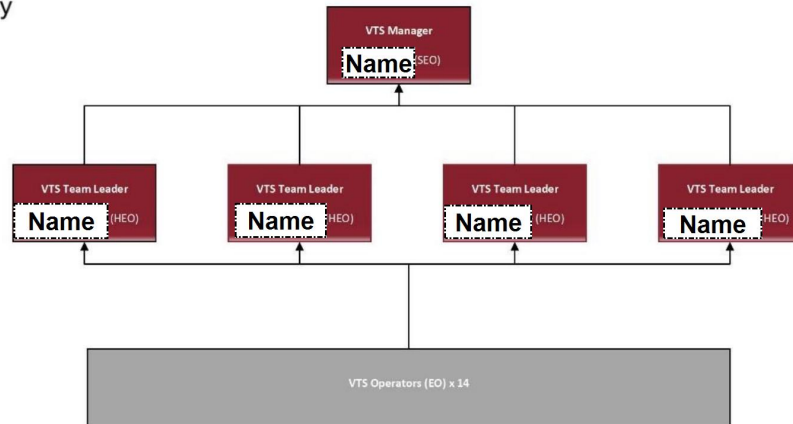
Maritime Operations - Dover





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Maritime Operations - VTS

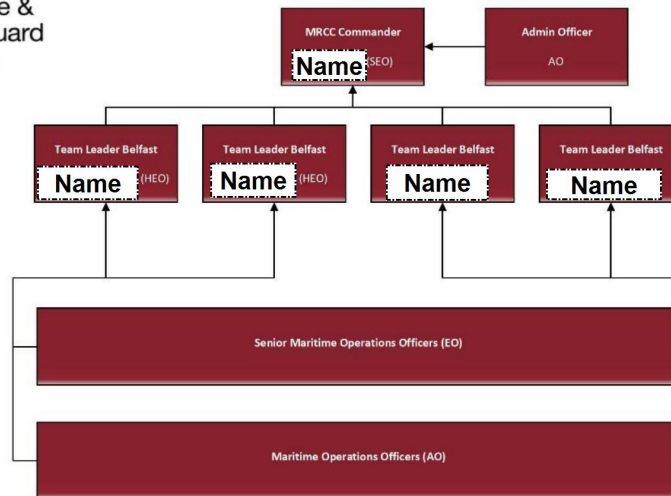


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Maritime Operations - Belfast

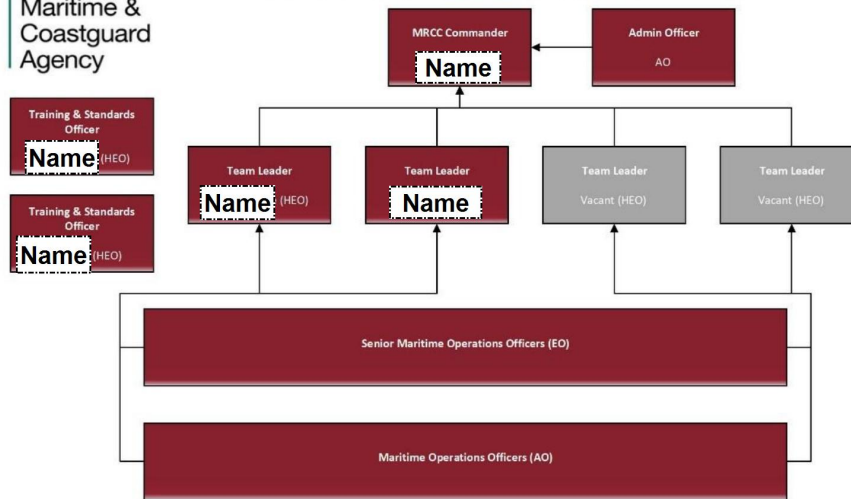


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Maritime Operations - Falmouth

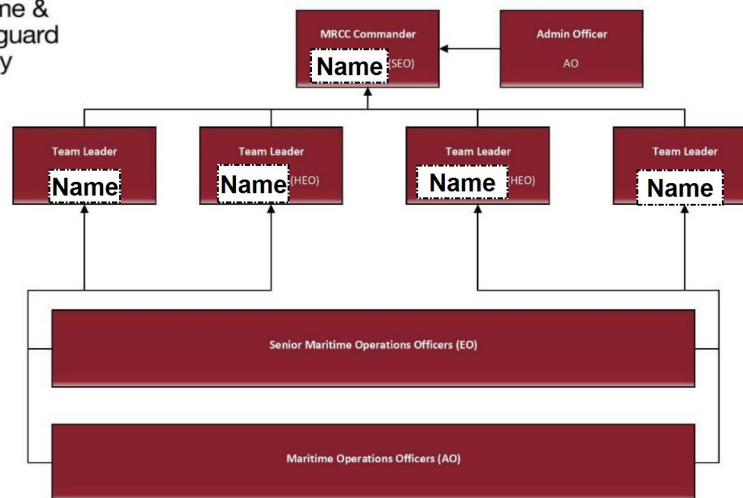


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Maritime Operations – Milford Haven

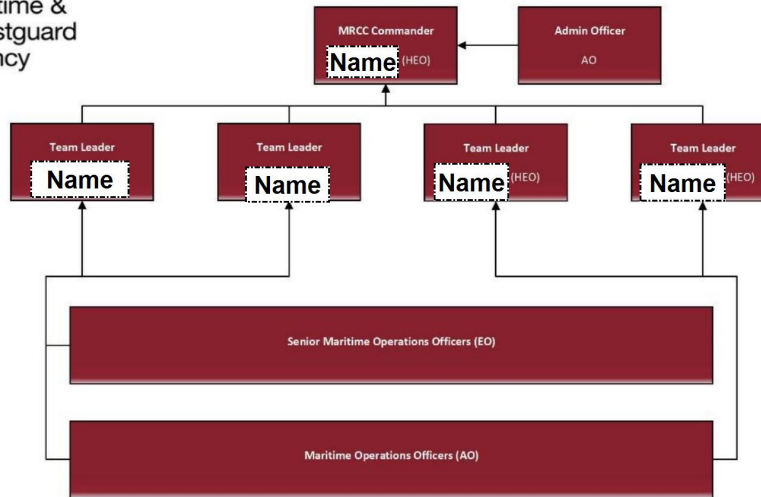


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Maritime Operations - Holyhead

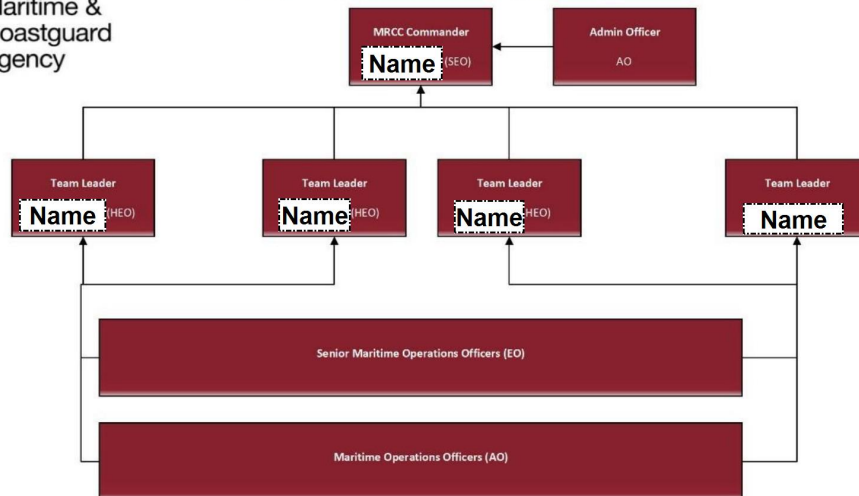


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Maritime Operations - Stornoway

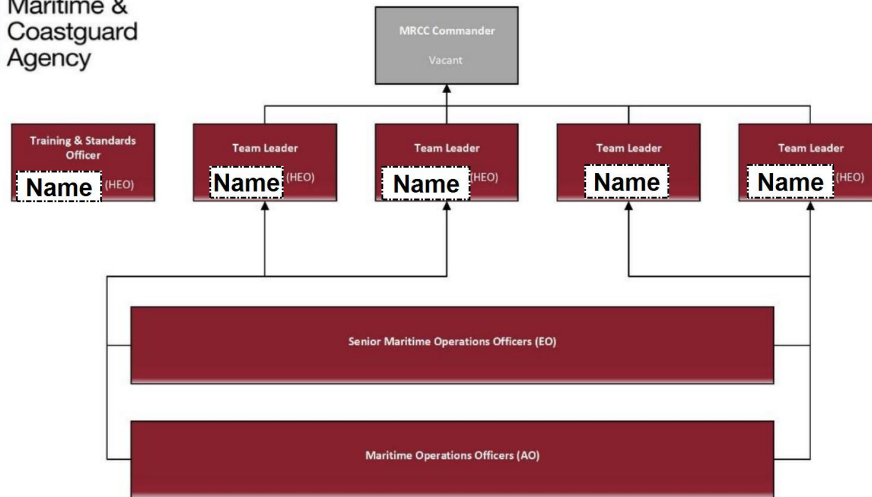


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Maritime Operations - Aberdeen

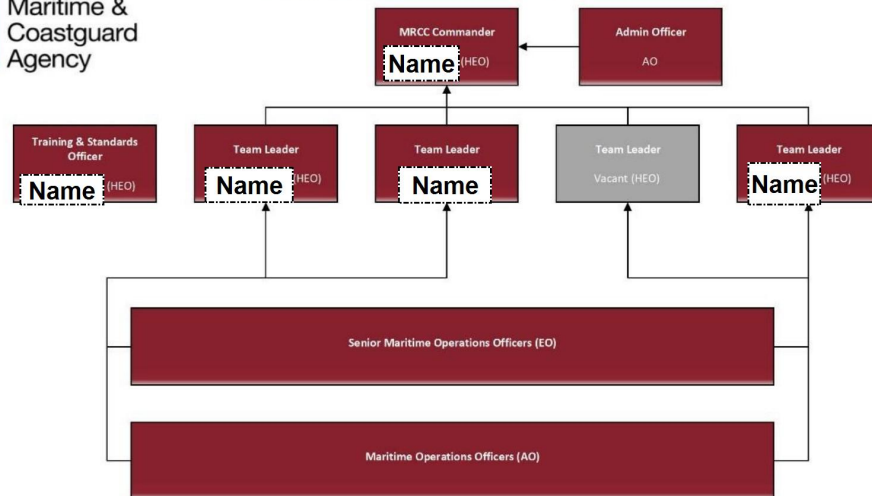


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Maritime Operations - Shetland

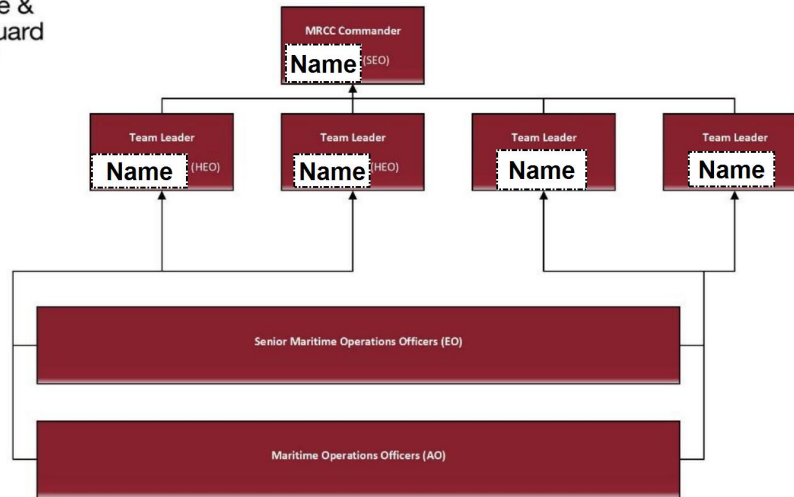


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Coastguard
Agency

Maritime Operations - Humber



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Maritime &
Coastguard
Agency

Maritime Operations - London

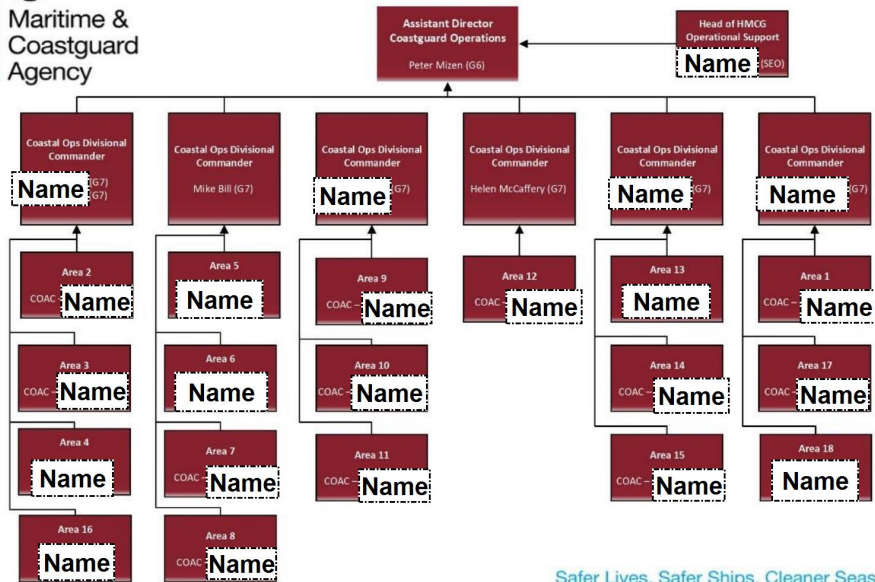


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Coastguard
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Coastal Operations Overview

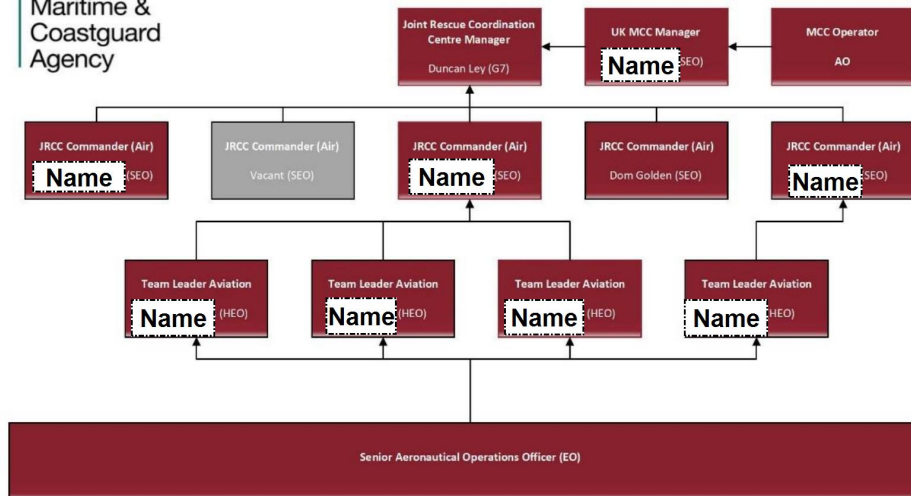


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ARCC Operations



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Coordinate Reference System: EPSG:3147
 Projection: WGS84 Pseudo Mercator
 Units: Meters
 Data Source: Ordnance Survey
 Map: HMSA-THETIS
 OpenStreetMap

- ★ Marine Office
- Satellite Office
- Port

MCA Marine Office Boundaries



www.gov.uk/government/organisations/maritime-and-coastguard-agency

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Personal Data

MapRef: MCAGE001_natl