

Consultation Response Form

PART 1 – Information about you

Completion of this section is mandatory as it helps with our analysis of results. A note at the end of this form explains that we may be obliged to release this information if asked to do so.

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Company Name or Organisation (if applicable)	Royal Yachting Association

Please tick one box from the list below that best describes you/ your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Other Emergency Service (Police/Fire/Ambulance)
<input type="checkbox"/>	Member of MCA Staff
<input type="checkbox"/>	Member of a Coastguard Rescue Service team.
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?</p> <p>The Royal Yachting Association has in excess of 100,000 members. The RYA makes it quite clear through its publications that its role is to protect and promote recreational boating in all its forms and makes it equally clear what line it takes and what policies it adopts on issues that are likely to affect recreational boaters. The RYA committee structure is run by member volunteers who are advised by the staff and it is the committees that formulate policy for RYA Council approval.</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why:</p> <p>Nothing in this response need be regarded as confidential and is available for full publication.</p>	

PART 2 – Questions about the proposals

Question 1 (Chapter 1)

We have set out the changes that would affect the way the Coastguard needs to operate. Are there any other changes and pressures that should be taken into account in our plans for a modernised Coastguard service? Please provide supporting evidence for your comments.

The RYA welcomes the intent to make the best use of modern technology to implement a fully integrated network that is much more resilient, far more capable of managing incidents and can respond quickly when things go wrong. However, improving the quality of co-ordination will require change that focuses on outcomes rather than adherence to a number of sequential and often inflexible procedures which are now not sufficiently agile to deal with the increasing complexity and pressure of managing UK waters. In future, watch keepers will need to be able to assimilate information from multiple sources in real time and to use that data to build a shared intelligence picture. This will enable them to manage incidents, identify the correct SAR resources and deploy them in the most effective and timely manner.

In this context, the RYA believes that there are additional changes and pressures that must also be addressed as an integral part of the modernising proposals; these are discussed below.

Changes

Regulation and MCA Advice. The Coastguard has long since ceased to rely on coastal observation and visual contact for the management of incidents in UK waters. It is important therefore that these proposals are not hindered by the unintended consequences of existing regulations and MCA guidance for mariners that are better suited to legacy procedures that were created before the availability of the new technology underpinning these proposals. It would be wise to test the alignment of the proposals with the associated regulations and guidance to ensure that they are fully coherent; those which are no longer compatible with the new ways of working should be amended or cancelled.

Compulsory carriage of pyrotechnics. The Class XII exemptions and MGN 280 mandate the carriage of Flares for distress alerting on coded craft and for private recreational vessels over 13.7 metres in length. In fact, the RYA notes that both regulations mandate the carriage of different quantities and types of pyrotechnic which in itself lacks logic. These requirements no doubt remain from the days when coastal observation was an important part of managing incidents but clearly demonstrates where regulation and guidance will cease to be credible under the proposals. The case for this change is strengthened because there will be fewer collection points under these proposals and steps should now be taken to ensure that carriage is not mandatory. The RYA has produced a list of possible alternatives to the carriage of flares and would be happy to develop this with the MCA for all recreational craft.

Use of Technology. The recreational community is still very much in transition when it comes to the use of technology and this may affect the future accuracy of the marine intelligence picture if not fully considered as a factor in the proposals. Only DSC controlled VHF radios have been available since 2000, but many vessels still have non-DSC controlled sets that have many years of serviceable life left. AIS is not mandated generally on vessels below 300GT and there would be considerable congestion drawbacks if it was; furthermore, CERS and LRIT are convention sized ship technologies. Last but not least, many coastal mariners never leave Sea Area A1 and many are unlikely to carry EPIRB. For these reasons the new system must be reinforced by voice communications for safety, urgency and distress calling.

Concurrent review of assets. The RYA believes that a number of assets are critical to maintaining and improving the management of SAR services and importantly, their delivery. The provision and structure of these should be discussed in the proposals as they may influence the intended outcome either now or in the future. The main factors are:

- **SAR-H.** The RYA understands that it is still the intention to create a single harmonised service across the 12 UK bases in the future. Given that the contract will cover a 25-30 year period and is a major component of the SAR capability, reassurance should be given that SAR- H provision will be future-proofed against any changes to the joint management structure or the proportion of military/civilian aircrew.
- **RNLI.** The RNLI not only plays a pivotal part in the execution of Search and Rescue as a 'first responder', but is a key provider of 'local knowledge' in the management of an incident. The consultation makes no mention of the key role that the RNLI plays in search and rescue incidents, how the relationship with RNLI is to be managed under the proposals and what agreements there are for its deployment both now and in the future.
- **Review of GMDSS.** The RYA is aware that the International Maritime Organisation is conducting a scoping exercise to establish the need for a review of the elements and procedures of the GMDSS. This in itself is intended to explore the opportunities to introduce new technologies which may require changes to procedures and regulations governing carriage requirements, shore side capability and area coverage. The possible impact of this study on the proposals should be examined.

Pressures affecting the proposals

Our general observation is that the numbers of recreational boaters in UK Sea Area 1, both UK and foreign flagged, and with skippers of all levels of experience, is likely to continue to grow steadily and thus the relative proportion of incidents to which the Coastguard has to respond is unlikely to decline. This fleet will be exposed to the identified 'changes' and to more extreme weather conditions. In addition, there will be increased congestion from Offshore Renewable Energy Installations and Marine Conservation Zones. As a result, the Coastguard will have to maintain and extend its scope of maritime information and safety services to avoid the wasteful precautionary deployment of assets.

The RYA is aware that recent large-scale projects, including Fire Brigade centralisation of command and control, and NHS computerisation, have foundered on problems of achieving the promised performance from the changes in technology. The consultation document does not make it clear that the risks to the project, including the technological risks, have been adequately assessed and documented. If this has been done, or once it is done if it is not yet complete, then RYA believes that the publication of the project risk assessment will be of crucial importance to the consultation process.

In summarising our response to Question 1, the RYA believes that as the Coastguard moves from the analogue to the digital age, supporting regulation and advice must be properly aligned to encourage the coastal seafarer to do the same, the technical infrastructure must be capable of supporting the change proposals and the Coastguard must be able to provide navigational advice to all mariners even in the most congested areas. Additionally, arrangements are needed for the migration of valuable SAR data held locally, for example CG66 databases, and its effective national redeployment by MOCs.

Question 2 (Chapter 2)

We have explained the current Coastguard structure and the potential weakness in that structure in the face of increasing demand. Are there other strengths or weaknesses in the current arrangements that we should be taking into account? Please provide supporting reasons for your comments.

The RYA fully understands that the Coastguard is a vital national emergency service that exists to respond to a variety of incidents, but it is more than just that. The Service is also an important part of the UK's international GMDSS obligation that not only includes the coordination of SAR operations with the minimum delay but also includes navigational advice, the promulgation of Maritime Safety Information (MSI) including weather information and weather warnings and the provision of general communications. In this context, the RYA understands that the modernisation proposals are intended to improve the real time co-ordination of national SAR activity but the proposals must be able to handle all GMDSS procedures which will form the bulk of the routine workload. There are therefore a number of strengths that must be retained and weaknesses that must be addressed.

Operational Strengths

Within the recreational sector, provision of the following Coastguard operations is the most essential;

- Monitoring our seas and the provision of information and advice to mariners,
- Co-ordination of all national maritime and coastal Search and Rescue,
- Provision of an emergency response capability with SAR helicopters, RNLI, the Volunteer Coastguard Service and other declared rescue organisations.

Voice Communications. A vital part of GMDSS (which of itself is not mandatory for recreational craft or vessels under 300GT) is the generic provision of a voice service for MSI, general communications, navigational advice and the specific use of VHF16 for safety, urgency and distress calling. We have already mentioned in response to Question 1 that the recreational boating community will use different types of technology dependent on their experience and where they sail and although communications equipment will improve with time, perennial installation and maintenance issues mean that the tried and tested method of establishing voice communication on VHF16 throughout GMDSS Sea Area A1 is a particular strength of the current system that must remain a high priority. As identified in MGN 324 and other MCA guidance over the years, the use of broadcast telephony capable of being received by all vessels within range has many safety management advantages over mobile telephone or other one-to-one communications.

Weather Forecasts. A major strength in the current provision of MSI is the VHF weather forecasting routine which provides a valuable service for coastal mariners at sea. Automation might simplify the process, but its provision must be maintained until there are viable alternatives, which is not currently the case (see below). The RYA and MCA with assistance from the Met Office have invested a great deal of effort over the past six years improving both the timing and content of VHF weather information broadcasts. It would be unreasonable and possibly irresponsible to terminate them as part of the modernisation without addressing the significant shortfalls in general communications, NAVTEX and broadband coverage which we comment on next.

Operational Weaknesses

VHF and NAVTEX Coverage. It is well known that there are gaps in VHF and NAVTEX coverage around the coast of UK, particularly Scotland. If the intention is to move to a truly

integrated management service for the whole of the UK coast then the proposals should seek to address these substantial legacy weaknesses. In addition, the RYA is also aware that the current VHF aerial network established in the 1970s is obsolescent and must be upgraded if even the current level of service is to be maintained. This reorganisation provides an ideal opportunity not only to improve the management of the service, but to close gaps in the communications coverage.

Availability of VHF Channels. Apart from channel 0, the Coastguard is allocated channel 67 as its primary working channel, two secondary working channels (10 and 73) for routine traffic and three duplex channels (23, 84 and 86) for MSI. The RYA is aware that there is a shortage of channels and that a number of channels are required so that transmissions from adjacent aerials do not interfere with each other. Furthermore, those channels that are used for MSI are often required for incident management. Not only does this preclude the dedicated allocation of these channels for automated MSI services, there is no assurance in the consultation that co-ordination of the entire network can be managed with so few frequencies.

Mobile Internet. The RYA is aware that the UK Met Office is consulting on what weather information is most useful to people who enjoy leisure marine activities and how they obtain weather information when undertaking marine activities. However, as far as the recreational fleet is concerned, Mobile/3G communication is not currently an alternative to VHF for coverage reasons, nor is robust, weather-proof equipment readily available in the market place. Further, the availability of affordable mobile Internet access is not currently an option at sea.

Volunteer Management. The MCA already has a significant volunteer workforce, they are well trained and equipped yet their management appears to be disorganised at times. The current form of the MCA may be able to sustain these shortcomings without a noticeable degradation of service and this may not therefore be considered a weakness. The new structure proposed puts even greater emphasis on this role and these cracks may quickly become a critical competency gap. We would suggest that for any proposal to have the greatest chance of success it would be useful to assume volunteer management is an operational weakness.

Accuracy of data and statistics. The RYA notes that data and statistics are used to support various aspects of these proposals, particularly the loading pattern by month and the demand pattern by hour of the day. However we are also aware that for a number of years the SAR data have been incomplete. There is therefore concern that the workload volumes shown in chapter 2 which combine emergency and non-emergency demand could mask important trends. It is not apparent, for example, what the distribution of incidents that require the deployment of assets and a high level of management might be and whether in fact these incidents show a different demand trend that is not addressed by these proposals.

Question 3 (chapter 3)

Under our proposals we would establish two Maritime Operations Centres handling emergency messages 24 hours a day, supported by a number of sub-centres operating at times of peak demand linked by a national network of radio connections and information sources. In your view, does this provide an appropriate and effective approach to Search and Rescue coordination response? Please provide supporting reasons for your comments.

It is understandable that the MCA wishes to amend the operating hours of the sub-centres to reflect actual demand. However, the proposals do not indicate whether the sub-centres will be, or even need to be, re-activated outside their normal operating hours in the event of a significant incident.

Further, the RYA is concerned that the wording of this question only refers to the 24/7 handling of emergency messages, not the entire spectrum of safety, urgency and distress activity. These omissions must be addressed.

Clearly the transition to the new structure must be seamless from the users' point of view and we are pleased to note a continuing commitment not only to deliver search and rescue services to the highest standards, but also a clear intent to improve co-ordination of the service that the Coastguard provides. However, the new structure must be able to cope with differing levels of technology and the absence of equipment such as AIS, EPIRB, SART, NAVTEX, DSC, etc in recreational use by UK vessels and foreign vessels visiting UK waters for a number of years to come.

In our response to question 1, we have already mentioned that a substantial number of older recreational VHF sets are not fitted with DSC controllers and will still be serviceable for many years. Given the perceived drawbacks and because of the relatively poor uptake of DSC, it has been impossible both in the UK and elsewhere in Europe to completely discontinue an appropriate variation of a dedicated watch on Channel 16. This will need to be supported by the MOCs.

As part of the service, a great many recreational boaters gain comfort from exchanging safety messages with the Coastguard, particularly to test the functionality of their VHF sets by initiating a radio check. Another safety message that many have exchanged with the Coastguard in the past is an intended passage plan; the migration of this service will need careful planning and we are pleased to see that the CG 66 scheme now includes a comprehensive 'details' card that can be passed to a shore contact that is concerned with the safety of vessel and crew. This will ensure that the CG66 scheme is more robust.

Any approach to Search and Rescue should recognise the importance of maintaining and enhancing a safety culture on the part of vessel operators and the impact of changes on operator' attitude will need careful managing and probably cannot be achieved within the planned time frame of these proposals. In the meantime the MOC and supporting daytime sub-centres must be able to handle peak demand at any time day or night and the inevitable requests for routine assistance.

Question 4 (Chapter 4)

Our proposals for Maritime Operations Centres and sub-centres locate these around the UK coastline and makes use of the MCA current estate. What is your opinion on the proposals for the location of these Centres and sub-centres? Please provide supporting reasons for your comments. Do you have particular comments or information about factors that should influence the choice of sites for sub-centres in either Belfast or Liverpool, or either Stornoway or Shetland?

The RYA feels that it is beyond its remit to make detailed comment on the location of sub-centres, but it does understand that the final choice will be made by the MCA, dependant on a number of parameters, political pressures, the opinion of other consultees and stakeholders and the reasoning set out in the consultation paper. However, it appears logical to capitalise on the best use of current assets that provides adequate accommodation in the first instance.

Nonetheless, we would observe that there are likely to be greater synergies between the recreational boating public and MRCC staffs where these are centred on the greatest volumes of traffic and where home ports are located; this approach would have the great advantage of keeping close to the stakeholder communities. Fishermen and yachtsmen have many anecdotes of being asked questions by MRCC staff during incident working that reveal ignorance of size, speed, distance, manoeuvrability and so forth. These could be reduced by proper use of computerised

data bases of vessel data information, notably CG66, but relationships with the communities will always be the fundamental plank on which mutual confidence rests.

Finally, we would add that given the unique situation in Northern Ireland, careful consideration should be given to the merits of retaining a physical presence there to ensure that optimum co-ordination of current and future cross-border agreements and services can be maintained on an all-island basis.

Question 5 (Chapter 4)

In your view, are the new roles and responsibilities for Coastguard officers at different levels in the proposed structure appropriate to the tasks that need to be delivered? Please provide supporting reasons for your comments.

The question focuses on how the new service is to be delivered rather than what the service delivers. As such, the RYA believes that it is beyond its remit to make any comment on this aspect of the proposals.

Question 6 (Chapter 5)

Under these proposals the regular Coastguard working in Maritime Operations Centres and sub-centres will draw more heavily on the local knowledge of geography, community and coastal risk provided by the network of local volunteer HM Coastguard Rescue Teams and increased liaison with partner SAR organisations. Do you agree that this is the best way to ensure the availability of such knowledge? Please provide supporting reasons for your statement.

Much has been made of the value of 'local' knowledge and we have commented elsewhere on the reality that the Coastguard has ceased to rely on observation and visual contact. Given the length of the coastline and the fact that there are only 18 MRCCs distributed unevenly about the UK, it may be impossible for each to have a detailed local knowledge of the entire coastline in their individual sectors. *That said, it is a fact that the perception about the value and retention of local knowledge in areas where MRCC are to be closed or reduced to daytime working has been and continues to be a highly emotive topic. It is also true that the MCA public meetings have for the greater part failed to convince the boating public that the proposals properly address this issue. This matter must be properly addressed if public confidence in the proposals is to be retained.*

Although, it is a weakness of the current system that local databases are not networked, it would appear to the RYA that it is more important for the 'dispatcher' to have a good working knowledge of their areas of responsibility; the dispatcher only needs what is necessary to manage incidents. In the context of the 'dispatcher', 'local knowledge' is more the product of information supplied by mapping systems, databases, and the ability of watchkeepers to interpret what they see on the computer screen so that for example they can distinguish between features with the same name.

If local knowledge is to be readily available then the proposals should specifically cover the matter of communications between the MOCs, daytime MRCCs and the local Coastguard Rescue Teams. Communications between them must be highly reliable, readily available and cover all areas where the rescue teams operate. Furthermore, communications must be compatible with those of the other emergency services, which are also in the process of being updated, to ensure seamless coverage when vehicles and teams move from one area to another.

It must also be recognised that in addition to the volunteer Coastguard Rescue Service and partner SAR organisations, there are a number of other important sources of local knowledge such as harbour masters and authorities, the police, local emergency services and local users of the coast and sea such as yacht clubs, fishermen and diving groups. The proposals should seek to formalise a collaborative arrangement with these groups and where they exist, representative organisations such as the RYA, as they may well provide valuable information that can also contribute to the richness of the overall picture.

Question 7 (Chapter 5)

In your opinion, will the proposed strengthening of management for the Coastguard Rescue Service organisation, including the introduction of 24/7 on-call Coastal Safety Officers, provide a more resilient response service to those in need in UK coastal areas? Please provide supporting reasons for your comments.

It is beyond the RYA's remit to make detailed comment on the management of the Coastguard Rescue Service. Clearly, it must be fully integrated into the overall Coastguard management structure and above all the service must be properly trained, equipped, motivated and supervised if it is to contribute to greater resilience.

Any further comments you may wish to make:

Thank you for inviting the RYA to comment on the MCA's proposals for modernising the Coastguard service to meet the challenges of the 21st century.

Notwithstanding the budgetary pressures of the current economic climate, it would appear that there is a case for moving to a nationally networked system which provides an integrated maritime intelligence picture capable of responding to all incidents wherever they may occur. However, the Coastguard also performs a number of other valuable duties that some might suggest are not an integral part of the Coastguard's core activity of managing search and rescue, but are nonetheless important for the safety of the recreational boating community and coastal mariner alike. These must be managed effectively during and beyond the transition so that Coastguard officers and the mariner community they serve all move into the 21st Century together; they cannot simply be abandoned without a significant increase in the risk to safety of life at sea.

The RYA notes and supports the clear continued commitment to deliver Search and Rescue services to the highest standards. As such the RYA stands ready to assist and to play an appropriate part in helping to meet this objective.