House of Commons
Transport Committee

The Coastguard, Emergency Towing Vessels and the Maritime Incident Response Group

Sixth Report of Session 2010–12

Volume I

Volume I: Report, together with formal minutes, oral and written evidence

Additional written evidence is contained in Volume II, available on the Committee website at www.parliament.uk/transcom

Ordered by the House of Commons

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The Transport Committee

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Summary

Her Majesty’s Coastguard provides an essential emergency service around the shores of the United Kingdom. The workload of the Coastguard has increased significantly over the past decade, as our coastlines have become busier and our seas more congested. Both the number of incidents to which the Coastguard has responded, and the number of deaths involved in such incidents, increased by more than 70% between 2000 and 2009. In December 2010 the Department for Transport launched a consultation into proposals, from the Maritime and Coastguard Agency (MCA), to modernise the Coastguard. The MCA proposes a significant reorganisation of the structure of the Coastguard, reducing the 18 Maritime Rescue Co-ordination Centres currently based around the UK coast down to three centres open on a 24-hour basis, and five other centres operating only during ‘daylight hours’. Ten existing regional MRCCs would close.

This came in the wake of two other Government announcements with implications for maritime safety. As part of the Spending Review in October 2010, the Government announced it would not renew the existing contract for the UK’s four emergency towing vessels (ETVs). A review of the Maritime Incident Response Group (MIRG), a national fire-fighting-at-sea capability, part-funded by the MCA, was also announced.

This Report examines these three separate, yet inter-related, proposals. Taken together, we consider the proposed changes to the co-ordination of the Coastguard and the potential loss of the ETVs and the MIRG to represent a significant restructuring of the country’s marine search and rescue and accident and pollution prevention capabilities. It is therefore regrettable the Department for Transport announced all three sets of proposals with no prior consultation whatsoever and did not consider their combined impact.

We cannot support the MCA’s proposals on the future of the Coastguard in their current form. The evidence we have received raises serious concerns that safety will be jeopardised if these proposals proceed. Our main concern about safety is the loss of local knowledge, or ‘situational awareness’, amongst coastguard officers that will inevitably occur under the proposals. Rationalising the number of MRCCs so drastically, in our view, will reduce the quality and rate of exchange of information, particularly at key points when information must be passed swiftly in order to save lives. We are not convinced by the MCA’s assertions that technology can, at present, adequately compensate for the loss of this knowledge. We are also concerned that the proposals risk placing too great a burden of responsibility on volunteer coastguards and pay insufficient attention towards the safety of leisure craft, small fishing vessels and the like (as opposed to the commercial shipping industry), and we have doubts about the statistics used by the MCA to justify its proposals to close several stations at night-time. We are not convinced that the concept of daylight-hour stations should be proceeded with in any future re-organisation of the Coastguard.

The strength of opposition against the modernisation proposals we have encountered is such that, if, as the Minister has said, this is a genuine consultation, the proposals cannot be given approval in their current form. The Government should withdraw its proposals and consult on revised plans that address the key issues we have identified: the implications of the potential loss of local knowledge for both safety and volunteering, and the application
of upgraded technology. The Government should also demonstrate that the alternative proposals put forward by coastguards have been properly considered when revising its plans for the future of the Coastguard.

We strongly condemn the decision to withdraw funding for Emergency Towing Vessels. The decision, which was made against the findings of an independent risk assessment, is unwise and short-sighted. It is, quite literally, inviting disaster. Our evidence strongly suggests that there is no suitable commercial alternative available to the ETVs. We urge the Government to reverse the decision to terminate the provision of ETVs through the MCA.

We recognise, however, that there is a strong case for finding other sources of income to help cover the costs of ETVs. We note that the Government is brokering discussions with the ETV working group in pursuit of a solution to this problem. It would be unacceptable for the UK shoreline to lie unprotected if no agreement has been reached by 30 September. In such a scenario, the Government should make exceptional provision by extending the ETV contract over the winter, giving the ETV working group a further six months in which to resolve the issue.

We oppose ceasing central funding to the MIRG, which we believe has played an important role in tackling fires at sea in the few years since its inception. Our evidence suggests that while ships’ crews have some training their skills do not match the expertise of the MIRG. It is equally clear that without MCA funding, the MIRG will cease to operate. Local fire services cannot and should not be expected to support a national strategy. We recommend that the Government adopt a rationalised MIRG model which is better calibrated to the risk and more cost-effective than the present arrangement.
1 Introduction

1. Her Majesty’s Coastguard provides an essential emergency service around the shores of the United Kingdom. Although not as high-profile as other emergency services, its interventions—to assist those in danger in our waters and on our cliffs and our beaches—can be just as critical. The workload of the Coastguard has been increasing. Our coastlines are far busier than ever, enjoyed by 200 million people a year, and our seas are becoming more congested.¹ There are clear signs that weather conditions are also becoming persistently more extreme, with significant weather events becoming more frequent and severe. The Coastguard responded to almost 22,000 incidents in 2009, a 76% increase since 2000. More than 400 people died during such incidents in 2009, a 71% increase over the same period.²

2. The structure and organisation of the Coastguard has recently been subject to considerable public and parliamentary scrutiny. In December 2010 the Maritime and Coastguard Agency (MCA)—the government agency responsible for maritime emergency response—published proposals to modernise the Coastguard which have proved to be controversial. This came in the wake of two other Government announcements with implications for maritime safety. As part of the Spending Review in October 2010, the Government announced it would not renew the existing contract for the UK’s four emergency towing vessels (ETVs). A review of the Maritime Incident Response Group (MIRG), a national fire-fighting-at-sea capability, part-funded by the MCA, was also announced.

Our inquiry

3. We held an evidence session with the Chief Executive of the MCA in February 2011, as part of our routine scrutiny of the Department for Transport’s executive agencies and associated bodies, at which the future of the coastguard service was discussed. As a result of that session, and the correspondence we received on the issue, we decided to launch a full inquiry into the Coastguard, ETV and MIRG proposals. We received written evidence from almost 170 individuals and organisations, including many serving coastguards. Oral evidence was heard during April and May 2011, at Westminster, Falmouth and Stornoway. We are grateful for all those who contributed evidence, both written and oral. We particularly thank all those who helped facilitate our visit to Falmouth, Clyde, and Stornoway Maritime Rescue Co-ordination Centres (MRCCs) on 18–19 May. The visit proved invaluable in helping us to learn about the operations of the MRCCs and to see an ETV first-hand. The visit also gave us a valuable opportunity to speak to coastguards directly about the Government’s proposals. We also received petitions from the Members of Parliament for Orkney and Shetland and Na h-Eileanan an Iar including thousands of signatures from their constituents opposing the possible closure of Shetland or Stornoway MRCC respectively.

¹ Maritime and Coastguard Agency, Protecting our seas and shores in the 21st Century: Consultation on proposals for modernising the Coastguard, December, 2010, Foreword by Mike Penning MP, p 3
² Department for Transport, Transport Statistics, November 2010
4. After we announced our inquiry, the Parliamentary Under-Secretary of State for Transport, Mike Penning MP—the minister responsible for maritime matters—announced a six-week extension of the consultation on the coastguard modernisation proposals. He said that the Government would not reach final conclusions or take decisions until it had considered this Committee’s Report, and that he would allow a further short period for consultation following the publication of our Report.3 We welcome the Minister’s decision to extend the consultation on the modernisation of the Coastguard until after this Committee has reported. It is encouraging that the Department for Transport recognises that proper parliamentary scrutiny can improve the quality of ministerial decision-making. For something as important as the reorganisation of the Coastguard—where lives are potentially at risk—it is imperative that any proposals are thoroughly scrutinised before implementation.

Coastguards giving evidence

5. From February onwards we received dozens of written submissions from both regular and volunteer coastguards from all over the UK, all of which expressed concerns about the Government’s proposals for the future of the Coastguard. Concerns were also raised on the floor of the House and in Westminster Hall and on 24 May the Minister, Mike Penning MP, gave an assurance to Parliament that coastguards had “the right not only to give evidence to the Select Committee, but to the consultation”. Staff should “feel confident”, he said, that they could express their views “robustly”.4

6. We wanted to give coastguards the chance to put their views to us in oral evidence and envisaged no difficulty in arranging this, given that we had received so much written evidence from them. However, when we informed the MCA of our plans the Minister instructed regular coastguards, who are employed as junior civil servants, not to give oral evidence. It soon transpired that this instruction also applied to volunteer coastguards. The Minister’s decision came at a late stage in our inquiry and had the potential to cause severe disruption to our work, but we were able to take oral evidence from serving coastguards who were union officials and to talk to coastguards informally, in private, at the MRCCs we visited.5

7. We were extremely disappointed that the Minister invoked rules which normally relate to senior civil servants to stop us from taking oral evidence from some of the serving and volunteer coastguards who had sent us written evidence. Regular coastguards have unique operational expertise and we wanted to hear their views on the record. The Minister’s action was justified on the basis that “a formal public hearing, in the full glare of the media spotlight, risks encouraging individuals to express personal views in a way that may be at odds with their personal obligations under their terms and conditions of employment”. In our view, the Minister should have shown more faith in the professionalism of the coastguards and stuck by his original commitment to the House to let them give evidence to the Committee.

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3 Ev 129; HC Deb, 14 March 2011, col 3WS
4 HC Deb, 24 March 2011, cols. 344WH, 378WH
5 Correspondence on this matter can be found at Ev 121, 129–31
8. Many coastguards also contacted us with concerns that they would be victimised if they contributed to our inquiry. We corresponded with Sir Alan Massey, the MCA’s Chief Executive, and the Minister about this and we welcome the assurances given by the Minister that this would not happen. We trust that we have no need to remind the MCA that any action taken against someone because they have provided oral or written evidence to a select committee may constitute a contempt of the House.
2 The Maritime and Coastguard Agency: funding

9. To understand the context of the recent Government proposals to modernise the Coastguard, and the decisions on emergency towing vessels and the Maritime Incident Response Group, it is necessary to understand recent budgetary pressures on the Maritime and Coastguard Agency. Unlike other DfT agencies, the MCA is not a trading fund; it is funded mainly by central Government. The MCA derives some income from services to shipping and seafarers, but this is a relatively small part of its resources (£11m in 2009–10). Its net operating cost was £134m in 2009–10.

10. Following the Spending Review, it was announced that the MCA’s programme budget will be reduced by 21% to £77m in 2014–15, its administration budget reduced by 33% to £10.3m in 2014–15, but its capital budget will increase by 60% from £6.2m in 2010–11 to £9.9m in 2014–15 (see Figure 1). To make the £20m cut to its programme budget, the MCA announced it would find £10m from the decision not to renew the emergency towing vessel contract, £2m from efficiencies, £340,000 from the decision to cease funding to the Maritime Incident Response Group and £7–8m from the restructuring of the Coastguard Service.

| Figure 1. MCA budget across the spending review period (net of income), £m |
|------------------|----------------|----------------|----------------|----------------|
|                  | 2010/11 | 2011/12 | 2012/13 | 2013/14 | 2014/15 |
| resource         | 131     | 119     | 125     | 101     | 87      |
| of which:        |         |         |         |         |         |
| programme*       |         | 106.9   | 113.8   | 90.2    | 77.0    |
| administration   |         | 12.9    | 11.9    | 11.0    | 10.3    |
| capital          | 6.2     | 9.3     | 9.5     | 9.7     | 9.9     |

* Includes SAR Helicopter (SAR-H) current contract costs, but excludes provision for a future contract beyond 2012

Source: MCA

7 The Maritime and Coastguard Agency was established on 1 April 1998, as an executive agency of the Department for Transport. The agency’s main roles are to provide a 24-hour maritime Search and Rescue service; prevent pollution from ships and minimise the effects of pollution incidents; and maintain the safety, security and environmental standards of commercial vessels flying the UK flag, and of foreign vessels visiting UK ports and waters, and the safety of seafarers serving on those vessels.


9 Written evidence (Ev 71) provided the Committee with a breakdown of programme (excluding SAR-H costs) and administration budgets for 2010–11 as published on the MCA intranet. The total resource budget was £111m, of which approximately £14m corresponded to administrative costs and £97m to programme costs. The percentage cuts cited here refer to these baselines.
3 Consultation on the future of HM Coastguard

11. The structure of Her Majesty’s Coastguard is currently based on 18 Maritime Rescue Coordination Centres around the UK (Figure 2), which are grouped into nine pairs (Figure 3). Watch-keeping staff in the MRCCs provide a 24-hour service to mariners and coastal users by receiving incoming distress calls and tasking appropriate resources to their rescue. The rescue unit personnel are often volunteer coastguards, either the MCA’s own 3,500 volunteers (part of the Coastguard Rescue Service) or members of the Royal National Lifeboat Institution or the National Coastwatch Institution (4,800 and 2,000 volunteers respectively).10

Figure 2: Maritime Rescue Co-ordination Centres by region

<table>
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<tr>
<th>Region</th>
<th>Centre</th>
<th>Area Covered</th>
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<tbody>
<tr>
<td>Scotland and Northern Ireland</td>
<td>Shetland MRCC</td>
<td>Shetland Islands, Fair Isle and the Orkney Islands</td>
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<tr>
<td></td>
<td>Stornoway MRCC</td>
<td>Arnamurchan Point to Cape Wrath, Barra Head to Butt of Lewis</td>
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<td></td>
<td>Aberdeen MRCC</td>
<td>Cape Wrath to Doonies Point</td>
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<tr>
<td></td>
<td>Clyde MRCC</td>
<td>Mull of Galloway to Ardnamurchan Point, including the Islands of Jura, Gigha,</td>
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<td></td>
<td></td>
<td>Islay, Arran, Coll, Tiree, Mull, Bute and Cumbrae</td>
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<tr>
<td></td>
<td>Forth MRCC</td>
<td>Doonies Point to Anglo-Scottish border</td>
</tr>
<tr>
<td>Wales and West of England Region</td>
<td>Belfast MRCC</td>
<td>Between Northern Ireland/Irish Republic borders at Lough Foyle and Carlingford Lough</td>
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<tr>
<td></td>
<td>Brixham MRCC</td>
<td>Topsham to Dodman Point</td>
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<td></td>
<td>Falmouth MRCC</td>
<td>Dodman Point to Marshland Mouth, Devon/Cornwall border</td>
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<tr>
<td></td>
<td>Swansea MRCC</td>
<td>Marsland Mouth to River Towy, Carmathen</td>
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<tr>
<td>East of England Region</td>
<td>Milford Haven MRCC</td>
<td>River Towy to near Friog</td>
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<td></td>
<td>Holyhead MRCC</td>
<td>Near Friog to Queensferry, River Dee</td>
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<td></td>
<td>Liverpool MRCC</td>
<td>Queensferry to the Mull of Galloway</td>
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<tr>
<td></td>
<td>Humber MRCC</td>
<td>Anglo-Scottish border to Haile Sand Fort</td>
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<tr>
<td></td>
<td>Yarmouth MRCC</td>
<td>Haile Sand Fort to Southwold</td>
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<tr>
<td></td>
<td>Thames MRCC</td>
<td>Southwold to Reculver towers, Herne Bay</td>
</tr>
<tr>
<td>Location</td>
<td>Coordination Area</td>
<td></td>
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<tr>
<td>------------------------</td>
<td>----------------------------------------------------------------</td>
<td></td>
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<tr>
<td>London Coastguard</td>
<td>Shell Haven Point, Egypt Bay to Teddington</td>
<td></td>
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<tr>
<td>Dover Coastguard</td>
<td>Reculver Towers to Beachy Head, Belle Tout</td>
<td></td>
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<tr>
<td>Solent MRCC</td>
<td>Beachy Head to Hants/Dorset border including Isle of Wight</td>
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<tr>
<td>Portland MRCC</td>
<td>Hants/Dorset border to Topsham</td>
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Source: House of Commons Library

Figure 3: Current structure of HM Coastguard coordination

Source: Department for Transport
12. The DfT launched its consultation on modernising the coordination of Her Majesty’s Coastguard on 16 December 2010. The Government argued that the current system, based on 18 MRCCs grouped into nine pairs, is not well placed to respond to current challenges because it has limited resilience and an uneven distribution of the workload, especially during busy periods. The MCA proposes to introduce a nationally networked system based on two Maritime Operations Centres (MOCs) equipped to manage all incidents wherever they might occur (Figure 4). These would be located at Aberdeen and the Southampton/Portsmouth area, with a 24-hour centre at Dover looking over the Channel traffic separation scheme. In addition, the proposals provide for five other sub-centres operating during daylight hours, located at Falmouth, Humber and Swansea, with a further two sub-centres at either: Belfast or Liverpool; and Shetland or Stornoway. Were these changes implemented, ten existing regional MRCCs would close. The MCA proposes to reduce staff numbers from 596 to 370 over a four-year period. By the end of March, the consultation had received over 1,200 submissions.

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11 Maritime and Coastguard Agency, Protecting our seas and shores in the 21st Century: Consultation on proposals for modernising the Coastguard, December 2010

12 HC Deb, 16 December 2010, c133WS

13 According to the consultation document, there is no existing Coastguard facility on the south coast suitable for conversion into a MOC, but the MCA has land at the Daedalus site at Lee-on-Solent which would be suitable for a new-build centre.

14 The proposals do not affect the small centre operated by the coastguard alongside the Port of London Authority on the Thames in London.

15 Coastguards stationed in the centres would fall by 243 from 491 to 248, but the number of regular Coastguards supporting the volunteers in the Coastguard Rescue Service would increase from 80 to 105. Headquarters staff would fall from 25 to 17.
Figure 4: MCA proposed structure for HM Coastguard coordination

13. The proposed changes to the system of coordination, job losses and cuts to the MCA’s budget come at a time of increased workload for HM Coastguard Service. The number of incidents to which the Coastguard has responded has risen every year since 2000, from 12,016 to 21,195 incidents in 2009. The number of deaths involved in such incidents increased from 236 to 403 over the same period.\footnote{16 Department for Transport, \textit{Transport Statistics}, November 2010.}
14. In this chapter, we examine the various arguments for and against the MCA’s modernisation proposals, and we make specific recommendations about how they can be improved. We conclude the section by giving our overall opinion of the proposals, based on the evidence we have received.

The consultation process

15. A theme throughout our inquiry has been the conspicuous absence of any prior consultation about the proposals with coastguards, unions, volunteers, stakeholders or the devolved administrations. No-one we spoke to formally or informally had been consulted on the detail of the plans. Murdo Macaulay, PCS Stornoway Branch, said: “[The consultation] has been done the wrong way round. We should have had this process as a service before we moved to a plan, not issue a plan and then move to this process in public as a service.” We found that the majority of coastguard officers do not object to modernisation per se, but they take issue with aspects of the current proposals and the manner in which the MCA has conducted the consultation. In oral evidence the Minister acknowledged that the proposals are “not perfect” nor “set in stone” and told us that he will “come out with different proposals” when the consultation closed. The Government has committed to make an announcement about the modernisation of the Coastguard before 19 July. We recommend that any revised proposals on the future of the Coastguard should be subject to a further short period of consultation. Decisions with such significant implications for maritime safety should not be made in haste. We do not consider this decision to be sufficiently time-critical to prevent further consultation on what we expect to be substantially revised proposals from those initially put forward.

16. The Minister has, on several occasions, publicly encouraged coastguards to submit alternative proposals for the future structure of the Coastguard to the MCA consultation. We also received several detailed alternative proposals as evidence to our inquiry. Although we are not in a position to analyse in detail all the alternative proposals we received, we have been impressed with the quality and comprehensiveness of the alternative proposals put forward by coastguards across the country. The willingness of coastguards to engage thoughtfully and constructively with both the consultation process and our inquiry is welcomed. We expect the Government to demonstrate that the alternative proposals put forward by coastguards have been properly considered when revising its own plans for the future of the Coastguard.

17. The consultation document was not accompanied by a published risk assessment. Sir Alan Massey, Chief Executive of the MCA, explained to us in February that risk assessments had been carried out at every stage of the preparation of the consultation document, but he had chosen not to publish them as there was no explicit requirement to do so. The MCA later published a risk assessment spanning several documents on 10

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17 Q 408
18 Q 407
19 Qq 548, 581
20 HC Deb, 7 June 2011, col 190W
21 Q32
February. We received detailed critiques of the risk assessment documents from several witnesses.22

18. Regrettably, the MCA also chose not to publish an impact assessment of the closures of Oban, Pentland and Tyne Tees stations in 2000 and 2001, as recommended by our predecessor Committee.23 It took a further request from us before the MCA produced an assessment of these closures. This found no evidence that the closures of the stations had affected the conduct of coastguard operations, although two fatal accident inquiries examining the actions of HM Coastguard were underway at the time of writing.24 Though the previous round of closures were of a different scale, it should have been obvious that an assessment of its impact would be essential information for evaluating the current scheme.

19. By failing to involve serving coastguard officers, unions, volunteers, stakeholders or the devolved administrations in the drafting of the current proposals for the future of the Coastguard, and by failing to publish a risk assessment of the current plans or an impact assessment of the previous round of closures until prompted, the MCA management has badly miscalculated. It has mishandled the consultation and made it appear opaque rather than clear and open-minded. It has appeared arrogant, and reluctant to open itself to proper scrutiny in the process. The atmosphere of disquiet and suspicion generated by this consultation process is of the MCA’s own making.

20. The strength of opposition against the proposals we have encountered is such that, if, as the Minister has said, this is a genuine consultation, the proposals cannot be given approval in their current form. Decisions on the future of the Coastguard must acknowledge and draw on the wealth of expertise of frontline officers as well as others whose contributions could and should have strengthened the original consultation document.

Savings

21. The Coastguard Service currently costs £35m a year to run with a further annual £6m of capital expenditure.25 The MCA calculated that to maintain the current structure with essential upgrades and compliance would cost £173m over the next four years (or £639m over 25 years) at net present value.26 By contrast, it calculates that its proposals would cost £153m over four years (or £516m over 25 years) at net present value. This represents a saving of £20m over the four years of the spending review period (or £123m over 25 years) at net present value.27 The Minister admitted that the savings represent a “tiny amount of

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22 Ev w12, w81; MCA 161 [Don’t Sink the Coastguards]
23 The Committee warned: “Until such an assessment has been undertaken the MCA’s claims that safety has not been jeopardised will be impossible to verify” (Fourteenth Report of Session 2003–04, The work of the Maritime and Coastguard Agency, HC 500, para 13).
24 Ev 122, Annex
26 The net present value is the value of a stream of future costs or benefits discounted at current prices. The term is used to describe the difference between the present value of a stream of costs and a stream of benefits. HM Treasury’s recommended discount rate for impacts up to 30 years is 3.5%.
27 The MCA expect to reduce their programme costs by £7.4m from 2014–15 onwards, and avoid excess capital costs of some £12.6m across the spending review period, hence a total saving of £20m over four years.
money”. The MCA argued that it is the inefficiency of the current system, not the prospect of a reduced budget that is driving change. Sir Alan Massey told the Committee this is shown by the fact that the modernisation project started well before the current Government took office.

**Local knowledge in coastguard stations**

22. Watch-keeping staff in the existing 18 MRCCs receive incoming distress calls (via the monitoring of emergency radio frequencies or by 999 calls) and task appropriate resources to their rescue. Coastguards currently have to sit an exam in local knowledge in order to make an effective response. Some MRCCs, such as Milford Haven, test their officers on a yearly basis. The current DfT Target is that appropriate rescue units, who are often volunteers, should be tasked within five minutes in 98% of incidents.

23. The consultation document rests on the assumption that local knowledge is best stored and shared in Geographic Information System (GIS) based format made available to all watch-keepers across the UK network as opposed to holding knowledge in local MRCCs. Sir Alan Massey told the Committee: “[Lord Donaldson] put some very strong arguments against local knowledge being held in people’s minds and that this needs to be better used across databases using modern geographic information systems because it is just too unreliable to leave it in people’s heads.” Philip Naylor, Director of Maritime Services at the MCA, admitted that though there will be a requirement for coastguard officers to have a degree of coastal knowledge and knowledge of the maritime domain, it is unlikely that it will extend to the level of detail that is currently set out. He also confirmed that the current DfT target that appropriate rescue units should be tasked within five minutes in 98% of incidents will still apply. While admitting that the MCA’s public meetings have for the greater part failed to convince the maritime public that the proposals properly address the issue of local knowledge, the Royal Yachting Association agreed that “it is more important for the ‘dispatched’ to have a good working knowledge of their areas of responsibility; the dispatcher only needs what is necessary to manage incidents.”

24. This position was disputed by all of the coastguard officers we spoke to, who felt that their role had been devalued by the proposals. Murdo Macaulay, of the PCS Stornoway Branch, told us: “We are responsible for the coordination of an incident; we are not simply call takers who take a call, put it on the map. We are responsible from the infancy of that incident until, essentially, it is closed.” Carol Collins argued that, “being a part of the community, being a team where you can draw on each other’s local knowledge is the key to it”. Some argued that databases cannot replace human local knowledge, or ‘situational

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28 HC Deb, 24 March 2011, col 380WH
29 Q68
30 Ev w116
32 Q 570
33 Qq 85-6
34 MCA 62
35 Q 415
36 Q 414
awareness’, of tidal anomalies and currents, technology black spots, or local geographical and logistical knowledge in relation to the types of rescues local teams attend, such as mud rescues and cliff edge falls. Databases, Google Earth and other GIS Systems will have difficulty recognising nicknames, colloquial place names and Gaelic spelling. In written evidence, Eric Greenough argued that the depth and familiarity of local knowledge hastens the tasking of the local coastguard team thus reducing their response time. Paul Kirby, of the PCS Liverpool Branch, argued that the new system created several “dog legs” in the system, which increases the possibility of losing contact with the person reporting the situation. Many doubt that local knowledge will effectively be migrated to the MOCs. We also heard concerns that on the west coast of Scotland, the widespread use of Gaelic would be a particular problem for staff at MOCs, a point which Sir Alan Massey conceded.

25. A geographic information system available to all watch-keepers across the UK network would be desirable, but we are not convinced that a database could replace the local knowledge of those coastguards who live and work in the communities in which they serve. The variety of place names, colloquialisms and local anomalies of the UK coast appear to us well nigh impossible to collate. We have serious concerns that insufficient local knowledge held by coastguards based in an MOC, perhaps hundreds of miles from an incident, will, in some cases, lead to the loss of crucial seconds and minutes during a rescue attempt.

26. It is clear from our inquiry that ‘local knowledge’ has a much broader meaning than simply possessing knowledge of local coastlines, topography and geographical features. It also encompasses a Maritime Rescue Co-ordination Centre’s (MRCC) intimate community ties, relationship with local emergency services and detailed knowledge of the appropriate voluntary teams to task to an incident. The current proposals would mean that operations room staff would largely lose situational awareness of this kind. We have not been persuaded that this loss would not diminish the speed and effectiveness of the Coastguard’s response to some emergencies.

Volunteers

27. Under the MCA’s proposals, the regular Coastguard will draw more heavily on the local knowledge provided by the volunteer Coastguard Rescue Service and increased liaison with partner search and rescue organisations. Michael Vlasto, Operations Director of the Royal National Lifeboat Institution (RNLI) told the Committee that he did not see

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37 MCA 46 [Bob Paul]
38 Ev 155
39 Ev w62
40 Ev w65
41 Ev w62
42 Ev w25
43 Qq 219, 520
44 Q 591
45 Maritime and Coastguard Agency, Protecting our seas and shores in the 21st Century: Consultation on proposals for modernising the Coastguard, December, 2010, p 34
the proposals as an increased burden on his organisation. Mr Vlasto added that only five out of 201 lifeboat stations around the country responded to the RNLI’s own consultation.\footnote{Qq 492–93, 501} However, the National Coastwatch Institution (NCI) argued that local knowledge will not cease as a result of the changes. Coastguard auxiliaries and NCI watch keepers are regularly assessed on their local knowledge.\footnote{Ev 145}

28. Others argued that it would be unfair for an MOC to place the burden of responsibility for local knowledge onto volunteers or expect them to do any of the work that is currently done in operations rooms.\footnote{MCA 49 [Simon Rabett]} A volunteer coastguard was concerned that he would receive a greater number of telephone calls under the proposals than at present, including at nighttime, perhaps only because coastguard officers based in the MOC required local information to locate an incident. This could deter volunteers from joining the service.\footnote{Informal discussion with volunteer coastguard during our visit}

We were also warned of the impact that station closures might have on volunteer recruitment and retention. Brian George, of the PCS Liverpool Branch, argued that the interaction between volunteers and the MRCC, which might involve school and community visits, is a vital relationship.\footnote{Q 522} In written evidence, the Northern Ireland Executive expressed its conviction that the existence of a staffed coastguard centre acts as a major factor in attracting and maintaining volunteers for the Coastguard Rescue teams, and that areas that lose their MRCC are in danger of losing many of their volunteers.\footnote{Ev w71}

Others warned that the previous round of station closures had damaged the relationship with volunteer groups. Alex Dodge, of PCS Shetland, told us of the feelings of mistrust towards her station among volunteers in Orkney following the closure of Pentland, while Murdo Macaulay, PCS Stornoway, told us that it had taken ten years to build a good working relationship with the volunteer teams on Oban following the closure of their local station.\footnote{Q 403}

29. We conclude that the MCA’s current restructuring proposals, by significantly reducing the number of operations centres, risk placing too great a burden of responsibility on volunteers. It would be unreasonable to draw too heavily on volunteer coastguards for the kind of local knowledge that is currently held by operations room staff, but which would be largely lost under these proposals. There is a risk that excessive demands could diminish the willingness of people to volunteer as a rescue coastguard.

30. We also conclude that the current proposals to close MRCCs have not adequately taken into consideration the role of the coastguard station as a recruiter and trainer of the network of local voluntary teams. The MCA should set out how this important function of the current MRCC structure will be maintained following any reorganisation.
Daylight hours

31. If the current proposals are implemented three Coastguard centres would be open 24 hours a day, in contrast to the 18 that are currently open on that basis. Five sub-centres would be open during daylight hours only. Sir Alan Massey said that “[B]roadly speaking, we are looking at early morning to mid-evening as opening hours because that covers the maximum spread of load”. According to figures presented in the consultation, 70% of incidents occur between 0900–1900hrs (peaking at 1500hrs with 2,500 incidents).

32. Many witnesses argued that the consultation document is based on flawed or misleading statistics. The figures are simply an incident count; there is no weighting as to the nature or severity or duration of the incident. The Royal Yachting Association told us that from these statistics, “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”. Others argued that though there are fewer incidents at night on the south coast of England, the same is not true for Scotland. Bob Skinley said: “Some of our severest incidents will happen precisely during the hours when the MCA thinks it is safe to close coastguard stations: at night, during the winter months, in the severest of weather conditions”. Matthew Mace argued that night-time incidents are more likely to last longer and be more complex because they are more likely to involve commercial vessels that only request assistance when they really need it.

33. Philip Naylor, MCA, denied that the statistics did not represent a national picture or that night-time incidents tend to be longer-lasting and more complex. He said: “While it might be accurate to say that an incident, for example, in Scotland might remain open for a number of hours, in fact the absolute level of activity is concentrated into, typically, three quite short bursts. In terms of the overall workload, the duration of such an incident is not an accurate reflection of the amount of work that would go into it.”

34. We are concerned that the MCA proposals regarding station closures and opening hours may be based on statistics that do not tell the whole story. The published figures show neither the seriousness nor duration of incidents. Any decision that is based on aggregated statistics may also fail to address regional differences. Robust empirical evidence should be the starting-point for any proposed restructure of an emergency service such as HM Coastguard. For the revised proposals to have greater integrity, we recommend that the MCA publish data for the number of staff hours per incident, disaggregated by region.

53 Q 50
54 Q 410
55 MCA 62
56 Ev w60
57 Q 413
58 Ev w85
59 Qq 553, 555
60 Q 551
35. Another major concern with the daylight hours sub-centre model is the risk of information being lost or missed during the handover period between the sub-centre and MOC. Capt. Kevin Richardson said: “Any person that has been involved in an emergency response to an emergency incident will tell you that a real point of weakness is when there is a transfer of either command and control or a transfer from the marine aspect of that incident to the land side aspect of that incident. That is the point at which things can go very wrong.”61 A recent Maritime Accident Investigation Branch report into the sinking of the fishing vessel Aquina found that the decision to hand over control of the incident between MRCC Clyde and MRCC Stornoway “caused a delay of 23 minutes in a rescue helicopter reaching the accident site”, although in this instance the MAIB considered it unlikely that the delay affected the three fatalities.62 Murdo Macaulay told us that, as a result of this incident, the MCA issued an operational advice note “which essentially said that, if at all possible, incidents should not be handed over because it was too dangerous”.63 Robert Paterson, Director of Health & Safety, Oil & Gas UK, added: “The key point for [the oil industry] is that offshore emergencies do not happen very often, but when they do they can be quite protracted. One of the things we would fear is the process of handing things over from a centre like Shetland to Aberdeen and back again, because that is when you lose information and things start to go wrong”.64 Jon Gifford, Honorary President of the NCI, said that the NCI would never allow an incident to be handed over between its own staff.65

36. Sir Alan Massey assured us that: “There is absolutely no question that we would do exactly as we do at the moment. Where there is an incident ongoing that is engaging a particular station in an intense way, we would not let them change watch; we would not try and take the incident off them. We would let that go to a logical position at which you could safely hand it off”. He added that it would be for the MOC to decide when the handover would take place.66 But we heard evidence that coastguards, unlike other emergency service personnel, are not contractually obliged to remain behind to facilitate a handover.67

37. The period of handover between the sub-centre and MOC has been identified as a potential weakness in the MCA’s proposals. If the MCA remains committed to the concept of daylight hour-only stations, it must demonstrate how the handover could be achieved safely.

Communications technology

38. The consultation document states that modern communications and information technology, including electronic mapping systems and satellite data, have the potential to gather information from many sources and locations to produce an integrated picture of what is happening and speed up decision making. It highlights the Automatic
Identification System (AIS), which provides real-time data about a ship’s location, cargo and destination up to 30 miles from the coast, and the development of Long Range Identification and Tracking, which allows ships to be tracked over much longer distances.68 We learned that the proposals are based on systems that are already set up in MRCCs.69 The technology used now will be upgraded, but not replaced by newer systems.70

39. Several submissions expressed concern that the proposals are aimed at the merchant maritime fleet, but do not adequately address the increase in leisure users or small-scale day boat fisherman around the shoreline who do not generally use systems such as AIS.71 Coastguards in Stornoway told us that only 4% of the casualties they dealt with related to commercial vessels.72 Appearing before us in Falmouth, the Royal Yachting Association argued that the boating community is in transition between longstanding analogue communication systems and digital systems, and that the majority of leisure craft are dependent on VHF radio.73 Smaller vessels are not required to carry all the systems on which the proposals are based.74 Rob Grose, Chairman, Truro & Penryn Harbour Forum, concluded, “We felt the actual report did not engage or mention the leisure industry at all”.75 We were told that “calling in” or traffic reports are a significant part of a coastguard’s daily interaction with marine users. Brian George of the PCS Liverpool Branch, told us: “The reporting-in of yachts, boats and small fishing vessels is a voluntary thing. They do not have to do it, but obviously we encourage it. We then have that information. If somebody goes missing, we have already got the information to hand”.76 Philip Naylor assured us that: “Our ability to hear the people that currently call us will be unchanged. Anybody that can currently contact us on a leisure craft or by telephoning us nationally will be able to do the same in the future as they do now”.77 But we heard concerns that leisure users, yachtsmen and fishermen may feel less inclined to report to a remote MOC.78

40. It appears to us that the current proposals pay more attention to the MCA’s statutory obligations towards the commercial shipping industry and far less to its obligations towards leisure craft and small boat users. Accidents involving commercial vessels represent only a small proportion of all those that the Coastguard manage. Revised proposals must show how the level of protection afforded to leisure users, small fishing vessels and the like will not be reduced as a result of any reorganisation of the Coastguard.

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68 Maritime and Coastguard Agency, Protecting our seas and shores in the 21st Century: Consultation on proposals for modernising the Coastguard, December 2010, p 13
69 Q 395
70 Ev w47; MCA 49 [Simon Rabett]
71 Ev w72
72 Q 420
73 Q 358
74 Ev w93
75 Q 328
76 Q 524
77 Q 611
78 Q 524
41. The MCA’s proposals rely heavily on the use of upgraded technology in the operations rooms. In its revised proposals, the MCA must be much clearer about the nature and benefits of technology being proposed and how it differs from the existing technology that is installed in the current MRCCs.

Resilience

42. The MCA consultation document argued that while some resilience is provided by the current system of coordination because the MRCCs in each pair are interoperable (apart from Shetland and Stornoway, where current telecommunications provide only a limited capability), there is no interoperability between pairs or nationally.79 We were told that the Integrated Coastguard Communications System is currently being updated to enable each station to ‘dial into’ three stations north and two south or vice versa, thus significantly strengthening resilience.80 Murdo Macaulay, of the PCS Stornoway Branch, said: “To now imply that we should take this bought-and-paid-for technology out of current stations, throw it in the bin, and move to another system or move to a system with less stations using exactly the same equipment we have just bought and paid for, does not seem to be a sensible use of money that has been spent on the project”.81

43. The MCA has not satisfactorily explained why creating interoperability across more of the current centres is not a better way of increasing resilience in the current system than the wholesale change it has put forward. We recommend that its future revised proposals demonstrate how improvements in interoperability will add to the improvements already being made with the updating of the Integrated Coastguard Communication System.

Conclusion

44. The MCA’s current proposals to modernise the Coastguard, as they stand, do not provide reassurance that the ability of the Coastguard to respond to emergencies at sea will be maintained at current levels, let alone improved. The evidence we have received raises serious concerns that safety will be jeopardised if the proposals proceed in their current form. We welcome the Minister’s assurances that the final proposals will be substantially different to those that were consulted on.

45. Our main concern about safety is the loss of local knowledge amongst coastguard officers that will inevitably occur under these proposals. Rationalising the number of MRCCs so drastically, in our view, will reduce the quality and rate of exchange of information, particularly at key points when information needs to be passed swiftly in order to save lives. We are not satisfied that this issue has been adequately addressed in the MCA’s proposals.

79 Maritime and Coastguard Agency, Protecting our seas and shores in the 21st Century: Consultation on proposals for modernising the Coastguard, December 2010, p 16
80 Ev w79
81 Q 396
46. In particular, we are not convinced that the concept of daylight-hour stations should be proceeded with. Whilst there is general acceptance that there is scope to rationalise the number of MRCCs, there is a strong case for any future re-organisation of the Coastguard to be based on 24-hour centres in order to provide swift and expert assistance to people on local coastlines and in local waters, whatever the time of day.

47. We are concerned about the potential implications of these proposals on volunteers and for the level of protection provided for leisure users. The nature and benefits of the upgraded technology proposed also requires clarification. The Government should withdraw its modernisation proposals for the Coastguard and consult on revised plans that satisfactorily address the key issues we have identified.
4 Emergency towing vessels

48. Emergency Towing Vessels (ETVs) were first introduced into service in 1994 on the recommendation of Lord Donaldson whose report into the prevention of pollution from merchant shipping followed the *Braer* and *Sea Empress* tanker disasters. Initially there were two ETVs stationed at Dover and Stornoway for the winter months only, but following a further review in 2000, the fleet was increased to four, providing cover on a 24 hour, year-round basis. All four tugs (stationed in the Dover Straits, the south west approaches, the Minches and the Fair Isle Channel) are owned by J. P. Knight, and have been under contract to the MCA since 2001.82

49. The key function of an ETV is to intercept a ship that has become disabled, secure a tow to bring the vessel under control and, if necessary, tow it to a location of safety. ETVs carry out further work in addition to towing, including fire fighting (supporting the delivery of MIRG operations, see chapter 5), pollution clean-up, search and rescue, guard ship duties, escort duties in the Minch, provision of a salvage platform, surveillance, traffic separation schemes (TSS) identification duties and assistance to other Government departments.83

50. In 2009–10, ETVs cost the MCA £12.2m.84 Under the present contract, if an ETV makes a connection (tow line) to another vessel it immediately goes ‘off contract’, and a commercial contract is negotiated between the ship company/owner/agent and J. P. Knight.85 The MCA recovers around 15% of the net value of such contracts.86 In 2009–10, MCA income from ETVs totalled £64,603.87

51. Following the recent Spending Review it was decided that the current ETV contract, which the Minister described as “flawed”,88 would not be renewed when it expires in September 2011. The Government believes that emergency towing operations are properly a matter for commercial ship owners and their insurers, using the services of commercial towing vessels, and that the decision to end the MCA contract will save £32.5m over the spending review period.89

Deployment

52. Sir Alan Massey told the Committee that in the last few years ETVs have been called to a real incident very few times.90 But evidence from J. P. Knight suggested that ETVs responded to as many as 180 taskings in one year, with 54 tows of disabled vessels and 10

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82 The Anglian Monarch, based in the Dover Straits, is co-funded by the French Government.
83 Ev 148
85 Ev w61
86 Q136. The cost of a tow is approximately £70,000–100,000 (Q55).
87 Ev 120
88 Q 563
90 Q 135
salvages of stricken vessels between 2006–2010. A breakdown of the frequency and nature of taskings of the four ETVs is shown in Figure 5.

**Figure 5: ETV activity, 2001–2010**

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* = no data available.

Source: J.P. Knight (Ev 151)

53. In written evidence, the law firm Holman Fenwick Willan LLP, argued that incident statistics are incidental to the primary function of ETVs, which is to provide a 24-hour preventative response to assist vessels in distress, well in advance of a situation becoming potentially dangerous. They argued that the statistics show either that the UK has been lucky in recent years, or that the ETV fleet has proven effective in fulfilling its preventative role.

54. We believe it is the latter. We heard on several occasions that the intervention of an ETV had helped prevent a serious incident from occurring. David Balston, Director of Safety & Environment for the Chamber of Shipping, told us that “there have been numerous occasions in recent years—a large number—which could have gone very badly wrong and perhaps didn’t go wrong because there were emergency towing vessels quickly on hand”. Carol Collins of the PCS Stornoway Branch described one example of the vital intervention of an ETV:

> At the end of last year I had an incident involving a commercial vessel called the Red Duchess, which almost ran aground on the island of Rum. The ETV was tasked and it took a bit of steaming time to get to the scene, so the Mallaig lifeboat managed to hold the ship, which was a small coaster laden with coal bound for Stornoway. For most of that day the lifeboat held that ship off the coastline of Rum. The tug got there literally in the nick of time. Just as it arrived I think the towline between the lifeboat and ship broke. Even when the ETV took that vessel in tow the line parted a couple of times. They got her in tow, and I think she came within half a mile of the coastline of Rum.
55. Giving evidence in Falmouth, Capt. Mark Samson argued that the role for an ETV is not simply a service to industry, but a service to the general public, saying: “This is actually the taxpayers of the UK wanting reassurance that there is a method to stop vessels going ashore on their beaches and causing environmental havoc, rather than the response of industry to actually salvage the property of individual ship owners”. Western Isles Council and Shetland Islands Council argued that any savings made from cancelling the contract would be wiped out by a single incident. The cost of cleaning up the Braer oil spill, for instance, was around £100m. Giving evidence in Stornoway, Cllr Foxley offered the analogy of leaving your house uninsured: “Most of us feel that sooner or later there will be a major catastrophic incident. Whether it be salmon farming, coastal tourism, bird life and wildlife on the west coast, for all these factors we will pay a very heavy price for the removal of the ETVs”.

56. The MCA commissioned a risk assessment on ETV provision, which concluded that “The United Kingdom appears to have little option but to continue its involvement in the contracting of Emergency Towing Vessels [...] In cost benefit terms, averting one major shipping disaster and environmental incident of the scale of the Prestige would justify a contract price far in excess of that currently being paid until its expiry in 2011 and beyond”. The Government’s decision is therefore directly at odds with a risk assessment that it commissioned itself.

57. When questioned, the Minister accepted that “in a perfect world” the ETV contract would have been renewed, but he emphasised the need to address the nation’s financial situation.

58. The decision to cease the MCA’s provision of the Emergency Towing Vessels, which was made without consultation and against the findings of an independent risk assessment, is unwise and short-sighted. It is, quite literally, inviting disaster. We are not convinced that anything has happened since Lord Donaldson’s report to lead to the conclusion that ETVs are no longer required. On the contrary, we have heard of several occasions on which the intervention of an ETV has averted a major incident. ETVs represent a prudent, and seemingly cost-effective, insurance policy for the British taxpayer. It would take just one major accident and any savings that had been made by the decision to cease the contract would be wiped out in a stroke. We urge the Government to reverse its decision to terminate the provision of ETVs through the MCA.

95 Qq 32, 347
96 Ev 139. A risk assessment of ETV provisions stated that the estimated costs of the Prestige incident, where the sinking was in deep sea many miles from land, and where ETV intervention could have delivered a very different outcome, are in the order of £650 million and rising (Marico Marine Group, ETVs Assessment of requirements, November 2008, p 3).
97 Q 447
98 Marico Marine Group, ETVs Assessment of requirements, November 2008, p 1
99 Q 559
Commercial tugs

59. The Government believes that emergency towing operations are properly a matter for commercial ship owners and their insurers, using the services of commercial towing vessels. But we have heard considerable evidence to suggest a commercial alternative is not viable. David Offin, the Managing Director of J. P. Knight, the contractor which provides the current fleet of ETVs claimed that 50% of the incidents to which the ETVs are called would not have been attended by a commercial operator in time.\textsuperscript{100} A more disinterested witness, Cllr Foxley of the Highland Council, told us that at three regional meetings of an ETV working group (comprising representatives from shipping and tug interests, salvage interests, insurance interests and local authority interest), “nobody in the room thought there were commercial alternatives available”.\textsuperscript{101}

60. One alternative put forward was the use of harbour tugs, but this idea was opposed by the majority of our witnesses. Capt. Kevin Richardson, President of the UK Harbour Masters Association, told us that an ETV is “a purpose-built, purpose-crewed, purpose-equipped piece of kit designed for a specific job. There is no way that harbour towage could substitute for that particular specialist tool”.\textsuperscript{102} An ETV has a 150-tonne bollard pull, much larger than harbour tugs, which range from 20 tonnes to around 100 tonnes.\textsuperscript{103} Harbour tugs and their crews, we were told, are not equipped or trained for salvage in bad weather on the open seas.\textsuperscript{104} David Balston of the Chamber of Shipping observed that:

In 1996, when the Sea Empress went aground off Milford Haven, the rescue was attempted by local harbour tugs from Milford Haven and not by ETVs. The result was 73,000 tonnes of oil spilt, with a clean-up bill of about £120 million, which in today’s money equates to about £200 million.\textsuperscript{105}

61. A major concern was that the commercial sector would not provide the same level of cover as the ETVs in their current stations. While commercial salvage operators might post a tug at Lands End for the winter months, because they know there is a reasonable possibility of it being needed, there is no market for private salvage in the waters off the north and west coast of Scotland.\textsuperscript{106} Scottish Ministers were unconvinced that there is a suitable commercial solution to the provision of ETVs in the vicinity of the Minch and Fair Isle Channel.\textsuperscript{107} The Highland Council added that for Shetland the nearest commercial large towing vessels on the east coast are based at Aberdeen, some 30 hours steaming time away.\textsuperscript{108}
62. Our evidence strongly suggests that there is no suitable commercial alternative to the Emergency Towing Vessels. A harbour tug has neither the ocean towage capacity nor the bollard pull that an ETV possesses. Unless the Government can provide a persuasive case that such capacity exists in appropriate form and at appropriate locations, it should recognise that the solution it has proposed is unviable and potentially reckless.

**Alternative funding sources**

63. In the absence of a commercial alternative, a better solution might be to find other revenue streams to help to pay for the ETVs. Several different sources of funding have been put forward. These include: renegotiating the existing contract so that the salvage payment percentage is greater than that at present (perhaps 50%); charging for escort duties through the Minches; and funding from Light Dues, the Crown Estate or marine insurance companies which provide cover for vessels which operate off the UK coast. There may also be capacity for income generation from activities which are ancillary to the ETVs’ principal purposes. Cllr Foxley suggested that there is work on behalf of both the UK Government and the Scottish Government that could be done by these ETVs, including border protection, Ministry of Defence work, hydrographic surveys or work for Marine Scotland.

64. The present ETV contract will be terminated on 30 September 2011. The Minister is clearly using the deadline as a way of driving forward negotiations with stakeholders. An ETV working group has been set up that is focused on looking for alternative funding arrangements for the retention of the current ETV provision. But Capt. Kevin Richardson and Capt. Mark Sansom believed that it would be impossible to find a solution before 30 September. The UK Harbour Masters Association urged the Government to make exceptional provision until a safe and effective alternative is considered. Cllr Foxley asked for an extension of six to nine months.

65. The Government is the guarantor of last resort for the protection of our marine and shoreline environment, and for the lives of those in peril on our seas. That duty, we conclude, would be best discharged by responsibility for the provision of Emergency Towing Vessels resting with the state. However, we recognise that there is a strong case for finding other sources of income to help cover their costs. We note that the Government is brokering discussions with the ETV working group in pursuit of a solution to this problem. But the indications we have received are that these discussions may take some time. It would be unacceptable for the UK shoreline to lie unprotected if no agreement has been reached by 30 September. In such a scenario, the Government

109 Ev w127
110 Ev 151
111 Q 451
112 Q 566
113 Qq 379, 384
114 Ev 140; Q 384
115 Ev 156
116 Q 452
should make exceptional provision by extending the ETV contract over the winter, giving the ETV working group a further six months in which to resolve the issue.
5 Maritime Incident Response Group

66. The Maritime Incident Response Group (MIRG), a partnership between the MCA and the Fire and Rescue Service (FRS), was formed in April 2006, to respond to incidents at sea for which fire-fighting, chemical hazard and/or rescue teams are required. The current arrangement is built around training and equipping 50 fire-fighters from 14 coastal fire and rescue services to tackle fires at sea.\(^\text{117}\) There is no statutory requirement for the MCA to provide a response capability for fires at sea, but the agency is required to co-ordinate a response.

67. The MCA provides around £500,000 in direct funding annually to support the MIRG provision (Figure 6), whilst the FRS collectively provides around £600,000.\(^\text{118}\) The approximate cost of providing a MIRG response (largely through wages and payments for training courses) has been calculated at around £40,000 for each FRS.\(^\text{119}\)

<table>
<thead>
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<th>Figure 6: MIRG costs to the MCA, £'000</th>
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<tr>
<td>MIRG costs</td>
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<td>FRS incident response costs invoiced to MCA†</td>
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<tr>
<td>Costs recovered‡</td>
</tr>
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\(^*\) estimated figure.
\(^†\) in addition to running costs.
\(^‡\) Any act of assistance that allows a ship to make port in safety is also an act of salvage, the costs of which can be recovered, but only if the MIRG attend at the request of the ships’ master.

Source: MCA

68. Following October’s Spending Review, it was decided that the arrangements for the MIRG should be reviewed. It is estimated that ending the MIRG provision would save the Department £340,000 annually.\(^\text{120}\) The money for a future service will no longer be included in the agency’s budget allocation from September 2011.\(^\text{121}\)

69. The Chief Fire Officers’ Association told us that the indication from the majority of fire and rescue services was that they would not be able to provide a response without MCA funding, and therefore they would withdraw from the MIRG group.\(^\text{122}\) Hampshire, Strathclyde, Cornwall and North Wales Fire and Rescue Services confirmed in writing that should there be a withdrawal of funding from the MCA, they would not have the capacity to absorb the extra costs, and could no longer declare the MIRG as a resource (while

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\(^\text{117}\) Lothian & Borders FRS recently withdrew their contribution to the MIRG.

\(^\text{118}\) The MCA budget breaks approximately down into: £75,000 for a fire liaison manager (whose role is to coordinate all of the arrangements for MIRG nationally, preplanning, training arrangements, and also to deal with incidents as they occur), a training budget of approximately £290,000 and equipment of £100,000 (Q 302).

\(^\text{119}\) Qq 302, 306

\(^\text{120}\) “Transport Spending Review Press Notice”, Department for Transport press release, 20 October 2010

\(^\text{121}\) Q 339. Revised from the original cut off date of April, 2011.

\(^\text{122}\) Q 298
Northumberland FRS said they would have to consider their position.\textsuperscript{123} Gary Walsh, Deputy Fire Officer, East Sussex FRS, told us:

If there was no funding coming forward from the MCA in terms of the MIRG response, then there is no statutory duty for a fire authority to undertake that work. Therefore, we would then suffer in terms of the funding of that response going forward. We would have to look within our operational budget to fund that, and the burden obviously will fall upon the local taxpayer to provide a national response to an incident.\textsuperscript{124}

70. Meryvn Kettle, former Project Manager for the National Fire-fighting at Sea project, argued that the potential result would be a return to the previous response situation that was deemed unacceptable by the 2003 ‘Sea of Change’ project.\textsuperscript{125}

**Deployment**

71. With a further incident occurring after the DfT’s original Spending Review announcement, the MIRG have attended a total of seven incidents at sea since its inception. The seven incidents are shown in Figure 7.\textsuperscript{126}

<table>
<thead>
<tr>
<th>year</th>
<th>vessel name</th>
<th>vessel type</th>
<th>incident</th>
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<tr>
<td>2006</td>
<td><em>MV Calypso</em></td>
<td>cruise</td>
<td>fire</td>
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<tr>
<td>2006</td>
<td><em>HT Blade</em></td>
<td>tug</td>
<td>fire</td>
</tr>
<tr>
<td>2009</td>
<td><em>Saline</em></td>
<td>cargo</td>
<td>fire</td>
</tr>
<tr>
<td>2009</td>
<td><em>MV Sea Charente</em></td>
<td>cargo</td>
<td>fire</td>
</tr>
<tr>
<td>2010</td>
<td><em>MS Oscar Wilde</em></td>
<td>ferry</td>
<td>fire</td>
</tr>
<tr>
<td>2010</td>
<td><em>Yeoman Bontrup</em></td>
<td>bulk carrier</td>
<td>fire</td>
</tr>
<tr>
<td>2010</td>
<td><em>FV Athena</em></td>
<td>fish factory</td>
<td>fire</td>
</tr>
</tbody>
</table>

Source: MCA

72. The Government has argued that the MIRG has not been involved in ‘any significant incidents’ and that there is “little evidence that MIRG has changed the outcome of ship fires”.\textsuperscript{127} But the Chief Fire Officers’ Association told us that there has been the potential for loss of life in each case that the MIRG had been deployed. Steve Demetriou, MIRG Lead Officer, Chief Fire Officers’ Association, told us that:

What [the risk assessment] quite clearly says is that, although there have been six incidents in that time period that the MIRG group has attended, actually some of those were significant incidents. There is clear evidence to show that MIRG did improve the arrangements or the set-up of the incident at that time, provided timely

\textsuperscript{123} Ev 145, w121, w130, w136, w172  
\textsuperscript{124} Q 298  
\textsuperscript{125} Ev 90  
\textsuperscript{127} “Transport Spending Review Press Notice”, Department for Transport press release, 20 October 2010
advice, equipment, and specially trained firefighters to assist the ship’s master in that time of need.\textsuperscript{128}

73. Mervyn Kettle described how, during the MIRG’s very first mission, a MIRG team was deployed to a serious fire on the cruise ship \textit{MV Calypso} in the English Channel with 480 persons onboard.\textsuperscript{129} The Chief Fire Officers’ Association added that during the most recent MIRG deployment to the large fish factory vessel \textit{FV Athena}, 81 persons were evacuated whilst the crew remained to contain the fire.\textsuperscript{130} Steve Brown of the Cornwall FRS told us that in the case of the \textit{Athena}, “I really believe and my professional opinion is that lives would have been lost on that vessel”.\textsuperscript{131} Cllr. Foxley believed that had the fire on the \textit{Yeoman Bontrup} not been put out it would have sunk at the berth. He argued that if that had happened, it would have put a super-quarry out of operation for three months, with major economic implications for the country.\textsuperscript{132}

\textbf{Ships crews}

74. The Government point out that all ships’ crews are trained in basic fire-fighting techniques.\textsuperscript{133} But the Chief Fire Officers Association and local FRS argued that current training standards for crews do not provide for the same level of response as that provided by the MIRG.\textsuperscript{134} Steve Demetriou claimed that evidence from Marine Accident Investigation Branch reports had shown that most crews might have a two to four day course in firefighting, but it was a very basic introduction to those skills.\textsuperscript{135}

\textbf{A rationalised MIRG}

75. A review of the requirements of the MCA to assist with incidents involving fire, chemical hazards and industrial accidents at sea was commissioned by the MCA and undertaken by BMT Isis Ltd in 2010.\textsuperscript{136} The review found that two to three incidents (to which a MIRG-type response would be beneficial) occur each year, and that eliminating the provision was not considered to be an option. The existing form of provision has inherent cost advantages because all the basic training and non-MIRG fire-fighter training time is funded through the Fire and Rescue Service as part of their routine operations.

76. The BMT Isis Ltd review found that the capacity of the MIRG as currently configured is excessive when set against the requirement that was determined by the study. The report estimated that if the strength of the MIRG is better aligned to the risk then the number of trained fire-fighters could be reduced by approximately 50%. We were told that the total

\textsuperscript{128} Q 288
\textsuperscript{129} Ev 90
\textsuperscript{130} Ev 134
\textsuperscript{131} Q 323
\textsuperscript{132} Q 441
\textsuperscript{133} “Transport Spending Review Press Notice”, Department for Transport press release, 20 October 2010
\textsuperscript{134} Ev 145, w121, w130, w136
\textsuperscript{135} Q 297
\textsuperscript{136} BMT Isis Ltd., \textit{Review of requirements of the MCA to assisting with incidents involving fire, chemical hazards and industrial accidents at sea}, Part 1, October 2010
cost of a rationalised MIRG, with half the number of team members across the 14 local FRS, could be reduced to £700,000, with the MCA contribution reduced by around £120,000 per year to £380,000 per year.\textsuperscript{137}

77. Though the Maritime Incident Response Group (MIRG) has been involved in only seven incidents, its intervention has been significant. Our evidence suggests that while ships’ crews have some training their skills do not match the expertise of the MIRG. It is equally clear that without MCA funding, the MIRG will cease to operate. The operations of the MIRG are a matter of national resilience and responsibility to fund them should not be left to the local taxpayer. We are concerned that, as with the Emergency Towing Vessels, the Government has again taken a decision driven by the impetus to reduce expenditure that runs against an independent risk assessment. We recommend that the Government adopt a rationalised MIRG model which is better calibrated to the risk and more cost-effective than the present arrangement.
Conclusion

78. The MCA hopes to save £20m a year by 2014–15 by restructuring the Coastguard Service, ending the state’s Emergency Towing Vessels (ETV) contract and withdrawing funding from the Maritime Incident Response Group (MIRG). The three separate proposals are interlinked. Throughout our inquiry, we have seen how each facility plays an important part in saving lives at sea or protecting the coastal environment. We heard how the Coastguard work closely with the ETVs and regard the vessels as a crucial asset. ETVs have been used to support the delivery of MIRG operations. The impact of the funding reductions to these three services should be considered as a whole.

79. Taken together, the proposed changes to the co-ordination of the Coastguard and the potential loss of the ETVs and the MIRG represent a significant restructuring of the country’s marine search and rescue and accident and pollution prevention capabilities. It is regrettable that the Department for Transport announced all three sets of maritime proposals with no prior consultation whatsoever and did not consider their combined impact.

80. We cannot support the MCA’s proposals on the future of the Coastguard in their current form. We oppose the withdrawal of funding for the ETVs because we feel there is no alternative in place, but we welcome efforts to find alternative revenue streams to cover their costs. We oppose ceasing central funding to the MIRG because local fire services cannot and should not be expected to support a national strategy. Whilst we recognise the pressure on the Government to make financial savings, we cannot support proposals that reduce maritime safety in this way.
Conclusions and recommendations

Introduction

1. We welcome the Minister’s decision to extend the consultation on the modernisation of the Coastguard until after this Committee has reported. It is encouraging that the Department for Transport recognises that proper parliamentary scrutiny can improve the quality of ministerial decision-making. For something as important as the reorganisation of the Coastguard—where lives are potentially at risk—it is imperative that any proposals are thoroughly scrutinised before implementation. (Paragraph 4)

2. We were extremely disappointed that the Minister invoked rules which normally relate to senior civil servants to stop us from taking oral evidence from some of the serving and volunteer coastguards who had sent us written evidence. Regular coastguards have unique operational expertise and we wanted to hear their views on the record. The Minister’s action was justified on the basis that “a formal public hearing, in the full glare of the media spotlight, risks encouraging individuals to express personal views in a way that may be at odds with their personal obligations under their terms and conditions of employment”. In our view, the Minister should have shown more faith in the professionalism of the coastguards and stuck by his original commitment to the House to let them give evidence to the Committee. (Paragraph 7)

Consultation on the future of HM Coastguard

3. We recommend that any revised proposals on the future of the Coastguard should be subject to a further short period of consultation. Decisions with such significant implications for maritime safety should not be made in haste. We do not consider this decision to be sufficiently time-critical to prevent further consultation on what we expect to be substantially revised proposals from those initially put forward. (Paragraph 15)

4. We have been impressed with the quality and comprehensiveness of the alternative proposals put forward by coastguards across the country. The willingness of coastguards to engage thoughtfully and constructively with both the consultation process and our inquiry is welcomed. We expect the Government to demonstrate that the alternative proposals put forward by coastguards have been properly considered when revising its own plans for the future of the Coastguard. (Paragraph 16)

5. By failing to involve serving coastguard officers, unions, volunteers, stakeholders or the devolved administrations in the drafting of the current proposals for the future of the Coastguard, and by failing to publish a risk assessment of the current plans or an impact assessment of the previous round of closures until prompted, the MCA management has badly miscalculated. It has mishandled the consultation and made it appear opaque rather than clear and open-minded. It has appeared arrogant, and reluctant to open itself to proper scrutiny in the process. The atmosphere of disquiet...
and suspicion generated by this consultation process is of the MCA’s own making. (Paragraph 19)

6. The strength of opposition against the proposals we have encountered is such that, if, as the Minister has said, this is a genuine consultation, the proposals cannot be given approval in their current form. Decisions on the future of the Coastguard must acknowledge and draw on the wealth of expertise of frontline officers as well as others whose contributions could and should have strengthened the original consultation document. (Paragraph 20)

7. A geographic information system available to all watch-keepers across the UK network would be desirable, but we are not convinced that a database could replace the local knowledge of those coastguards who live and work in the communities in which they serve. The variety of place names, colloquialisms and local anomalies of the UK coast appear to us well nigh impossible to collate. We have serious concerns that insufficient local knowledge held by coastguards based in an MOC, perhaps hundreds of miles from an incident, will, in some cases, lead to the loss of crucial seconds and minutes during a rescue attempt. (Paragraph 25)

8. It is clear from our inquiry that ‘local knowledge’ has a much broader meaning than simply possessing knowledge of local coastlines, topography and geographical features. It also encompasses a Maritime Rescue Co-ordination Centre’s (MRCC) intimate community ties, relationship with local emergency services and detailed knowledge of the appropriate voluntary teams to task to an incident. The current proposals would mean that operations room staff would largely lose situational awareness of this kind. We have not been persuaded that this loss would not diminish the speed and effectiveness of the Coastguard’s response to some emergencies. (Paragraph 26)

9. We conclude that the MCA’s current restructuring proposals, by significantly reducing the number of operations centres, risk placing too great a burden of responsibility on volunteers. It would be unreasonable to draw too heavily on volunteer coastguards for the kind of local knowledge that is currently held by operations room staff, but which would be largely lost under these proposals. There is a risk that excessive demands could diminish the willingness of people to volunteer as a rescue coastguard. (Paragraph 29)

10. We also conclude that the current proposals to close MRCCs have not adequately taken into consideration the role of the coastguard station as a recruiter and trainer of the network of local voluntary teams. The MCA should set out how this important function of the current MRCC structure will be maintained following any reorganisation. (Paragraph 30)

11. We are concerned that the MCA proposals regarding station closures and opening hours may be based on statistics that do not tell the whole story. The published figures show neither the seriousness nor duration of incidents. Any decision that is based on aggregated statistics may also fail to address regional differences. Robust empirical evidence should be the starting-point for any proposed restructure of an emergency service such as HM Coastguard. For the revised proposals to have greater
integrity, we recommend that the MCA publish data for the number of staff hours per incident, disaggregated by region. (Paragraph 34)

12. The period of hand over between the sub-centre and MOC has been identified as a potential weakness in the MCA’s proposals. If the MCA remains committed to the concept of daylight hour-only stations, it must demonstrate how the handover could be achieved safely. (Paragraph 37)

13. It appears to us that the current proposals pay more attention to the MCA’s statutory obligations towards the commercial shipping industry and far less to its obligations towards leisure craft and small boat users. Accidents involving commercial vessels represent only a small proportion of all those that the Coastguard manage. Revised proposals must show how the level of protection afforded to leisure users, small fishing vessels and the like will not be reduced as a result of any reorganisation of the Coastguard. (Paragraph 40)

14. The MCA’s proposals rely heavily on the use of upgraded technology in the operations rooms. In its revised proposals, the MCA must be much clearer about the nature and benefits of technology being proposed and how it differs from the existing technology that is installed in the current MRCCs. (Paragraph 41)

15. The MCA has not satisfactorily explained why creating interoperability across more of the current centres is not a better way of increasing resilience in the current system than the wholesale change it has put forward. We recommend that its future revised proposals demonstrate how improvements in interoperability will add to the improvements already being made with the updating of the Integrated Coastguard Communication System. (Paragraph 43)

16. The MCA’s current proposals to modernise the Coastguard, as they stand, do not provide reassurance that the ability of the Coastguard to respond to emergencies at sea will be maintained at current levels, let alone improved. The evidence we have received raises serious concerns that safety will be jeopardised if the proposals proceed in their current form. We welcome the Minister’s assurances that the final proposals will be substantially different to those that were consulted on. (Paragraph 44)

17. Our main concern about safety is the loss of local knowledge amongst coastguard officers that will inevitably occur under these proposals. Rationalising the number of MRCCs so drastically, in our view, will reduce the quality and rate of exchange of information, particularly at key points when information needs to be passed swiftly in order to save lives. We are not satisfied that this issue has been adequately addressed in the MCA’s proposals. (Paragraph 45)

18. In particular, we are not convinced that the concept of daylight-hour stations should be proceeded with. Whilst there is general acceptance that there is scope to rationalise the number of MRCCs, there is a strong case for any future re-organisation of the Coastguard to be based on 24-hour centres in order to provide swift and expert assistance to people on local coastlines and in local waters, whatever the time of day. (Paragraph 46)
19. The Government should withdraw its modernisation proposals for the Coastguard and consult on revised plans that satisfactorily address the key issues we have identified. (Paragraph 47)

**Emergency towing vessels**

20. The decision to cease the MCA’s provision of the Emergency Towing Vessels, which was made without consultation and against the findings of an independent risk assessment, is unwise and short-sighted. It is, quite literally, inviting disaster. We are not convinced that anything has happened since Lord Donaldson’s report to lead to the conclusion that ETVs are no longer required. On the contrary, we have heard of several occasions on which the intervention of an ETV has averted a major incident. ETVs represent a prudent, and seemingly cost-effective, insurance policy for the British taxpayer. It would take just one major accident and any savings that had been made by the decision to cease the contract would be wiped out in a stroke. We urge the Government to reverse its decision to terminate the provision of ETVs through the MCA. (Paragraph 58)

21. Our evidence strongly suggests that there is no suitable commercial alternative to the Emergency Towing Vessels. A harbour tug has neither the ocean towage capacity nor the bollard pull that an ETV possesses. Unless the Government can provide a persuasive case that such capacity exists in appropriate form and at appropriate locations, it should recognise that the solution it has proposed is unviable and potentially reckless. (Paragraph 62)

22. The Government is the guarantor of last resort for the protection of our marine and shoreline environment, and for the lives of those in peril on our seas. That duty, we conclude, would be best discharged by responsibility for the provision of Emergency Towing Vessels resting with the state. However, we recognise that there is a strong case for finding other sources of income to help cover their costs. We note that the Government is brokering discussions with the ETV working group in pursuit of a solution to this problem. But the indications we have received are that these discussions may take some time. It would be unacceptable for the UK shoreline to lie unprotected if no agreement has been reached by 30 September. In such a scenario, the Government should make exceptional provision by extending the ETV contract over the winter, giving the ETV working group a further six months in which to resolve the issue. (Paragraph 65)

**Maritime Incident Response Group**

23. Though the Maritime Incident Response Group (MIRG) has been involved in only seven incidents, its intervention has been significant. Our evidence suggests that while ships’ crews have some training their skills do not match the expertise of the MIRG. It is equally clear that without MCA funding, the MIRG will cease to operate. The operations of the MIRG are a matter of national resilience and responsibility to fund them should not be left to the local taxpayer. We are concerned that, as with the Emergency Towing Vessels, the Government has again taken a decision driven by the impetus to reduce expenditure that runs against an independent risk assessment. We recommend that the Government adopt a rationalised MIRG model which is
better calibrated to the risk and more cost-effective than the present arrangement. (Paragraph 77)

Conclusion

24. It is regrettable that the Department for Transport announced all three sets of maritime proposals with no prior consultation whatsoever and did not consider their combined impact. (Paragraph 79)
Formal Minutes

Tuesday 14 June 2011

Members present:

Mrs Louise Ellman, in the Chair

Steve Baker Paul Maynard
Julie Hilling Iain Stewart
Mr John Leech Julian Sturdy

Draft Report (The Coastguard, Emergency Towing Vessels and the Maritime Incident Response Group), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 80 read and agreed to.

Summary agreed to.

Resolved, That the Report be the Sixth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Written evidence was ordered to be reported to the House for placing in the Library and Parliamentary Archives.

[Adjourned till Tuesday 21 June at 10.00 am]
Witnesses

Tuesday 8 February 2011

Vice-Admiral Sir Alan Massey KCB CBE, Chief Executive, Philip Naylor, Director of Maritime Services, and Sue Ketteridge, Director of Finance and Governance, Maritime and Coastguard Agency

Tuesday 26 April 2011

Steve Quinn, President of Coastguard Section and David MacBeth, Assistant Secretary, Coastguard Section, Public and Commercial Services Union (PCS), Steve Todd, National Secretary, RMT (National Union of Rail, Maritime & Transport Workers), and Allan Graveson, Senior National Secretary, Nautilus International, Nautilus International and Prospect

Stewart Henderson, Offshore Development Manager, Svitzer, David Balston, Director of Safety and Environment, Chamber of Shipping, David Offin, Managing Director, J P Knight Caledonian & Anglian, J P Knight, Steve Jellis, President, British Tugowners Association (BTA)

Steve Demetriou, CFOA MIRG Lead Officer, Chief Fire Officers' Association, Mervyn Kettle, former Project Manager for the National Firefighting at Sea project, and Gary Walsh, Deputy Chief Fire Officer, East Sussex Fire & Rescue Service, East Sussex Fire Authority

Wednesday 18 May 2011

Steve Brown, Training and Development Manager, Cornwall Fire and Rescue Service, Andy Brigden, Maritime Manager, Cornwall Council, Captain Mark Sansom, Falmouth Harbour Commissioner, and Rob Grose, Chairman, Truro and Penryn Harbour Forum

Jon Gifford, Honorary President, National Coastwatch Institution, Gus Lewis, Head of Legal & Government Affairs, Royal Yachting Association, and Captain Kevin Richardson, President, UK Harbour Masters Association

Thursday 19 May 2011

Bob Skinley, PCS Shetland Islands Treasurer, Mrs Alex Dodge, PCS Shetland Islands Chair, Murdo Macaulay, PCS Stornoway Branch, Carol Collins, PCS Stornoway Branch, Public and Commercial Services Union (PCS)

Councillor Michael Foxley, Leader of the Administration, The Highland Council, Robert Paterson, Director of Health and Safety, Oil and Gas UK, Tom Piper, Co-ordinator, KIMO UK, Mr Angus Campbell, Leader, Comhairle nan Eilean Siar (Western Isles Council), Councillor Dr Jonathan Wills, Shetland Islands Council

Tuesday 24 May 2011

Michael Vlasto, Operations Director, Royal National Lifeboat Institute, Brian George, Liverpool Branch Chairman, and Graham Warlow, Milford Haven
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Save Stornoway Coastguard Campaign Team
Nautilus International
Coastguard Officer
John Whitford
Dennis Laird
The Chief Fire Officers Association
KIMO UK
Coastguard Watch Officer
Andrew Cattrell
Jack Hawker
Amanda Darling
Eileen Bell
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John Morrison
Simon Rabett
Jenny Robertson
George Henry
The Scottish Wildlife Trust
Small Isles Community Council
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Stein Moorings Association
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Royal Yachting Association
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Scottish Government
Murdo Macaulay
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The Hyperbaric Medical Centre (Diving Diseases Research Centre)
Welsh Assembly Government
Cornwall Council
Fal and Helford Special Area of Conservation (SAC) Management Forum
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Humber Coastguard
Oil and Gas UK
National Coastwatch Institution
MRCC Belfast Watchkeeping Staff
David Smith
David Mantripp
Carol Collins
The Highland Council
UK Harbour Masters' Association
Mr Davy Thompson, Senior Operational Coastguard Officer for North Wales and the Northwest Area
Coastguard Staff at Solent MRCC
The Conference of Yacht Cruising Clubs
Front line staff of MRCC Falmouth
Operations room and other staff at MRCC Stornoway and MRCC Shetland
Dick Holness
James Ralston
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Bruce Lack
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Oral evidence

Taken before the Transport Committee
on Tuesday 8 February 2011

Members present:

Mrs Louise Ellman (Chair)
Steve Baker
Mr Tom Harris
Julie Hilling
Kelvin Hopkins
Kwasi Kwarteng
Mr John Leech
Paul Maynard
Gavin Shuker

Examination of Witnesses

Witnesses: Vice-Admiral Sir Alan Massey KCB CBE, Chief Executive, Philip Naylor, Director of Maritime Services, and Sue Ketteridge, Director of Finance and Governance, MCA, gave evidence.

Q1 Chair: Good morning and welcome to the Transport Select Committee. Would you please like to identify yourselves with your name and your position? It is for our records.

Sir Alan Massey: Madam Chair, good morning. I am Sir Alan Massey. I am the Chief Executive of the Maritime and Coastguard Agency. On my right I have Mr Philip Naylor, who is my Director of Maritime Services, so he deals with all of the customer-facing aspects of the agency. On my left is Mrs Sue Ketteridge, who is my Finance and Governance Director.

Q2 Chair: Thank you, Sir Alan. I welcome you here this morning, and to your post. You have had an interesting start to your post, haven’t you? You have inherited, I think, a plan to cut back on half of the coastguard centres, causing a great deal of consternation. I don’t think you drew this up, Sir Alan, did you? Could you perhaps tell us how this plan came to be put together and the role you had in it?

Sir Alan Massey: Of course. Could I just start, though, by saying that we are very pleased to have a chance to be here? This is the first time my team and I have been before your Committee. We hope this is the basis for a constructive and positive relationship over the next months and years. From a personal perspective, I am particularly very pleased to be here at a relatively early stage in my tenure.

On the question you ask regarding coastguard modernisation, it is the case that the modernisation programme has been in gestation for at least two years, if not a little bit more, because it has been well regarded that the coastguard system needs to be modernised again. I would say, though, that since I have been in post a lot of personal focus has been put on how we deliver the best possible option. That is what we see reflected now in the consultation document that we put forward in December.

Q3 Chair: But you, in fact, are not the author of this document, are you? Is it correct that these proposals were drawn up before you took your post?

Sir Alan Massey: No, I am the author of the document, Madam Chair. My name is on it. My imprimatur is on it.

Q4 Chair: I know that your name is on it, but who put these proposals together? Are you responsible for the way in which they were put together and the nature of the consultation that took place before the document was put together?

Sir Alan Massey: As I said, the whole coastguard modernisation proposals have been in gestation for some time. It is in the last few months that they have actually crystallised into this.

Q5 Chair: Sir Alan, I want you to answer the question I am putting to you. A consultation document has been put together. A number of very major queries have been raised about it, including the way in which it was put together, and the nature or absence of the consultation that went before those proposals came together. I am asking you what your role was in this. You took post in July.

Sir Alan Massey: Yes.

Q6 Chair: I am asking you, are you the author of these proposals? I am not asking you if you are supporting the proposals. I am asking if you are the author of them.

Sir Alan Massey: Of course. Could I just start, though, by saying that we are very pleased to have a chance to be here? This is the first time my team and I have been before your Committee. We hope this is the basis for a constructive and positive relationship over the next months and years. From a personal perspective, I am particularly very pleased to be here at a relatively early stage in my tenure.

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Q7 Chair: You are responsible, but you are not the author of them, are you?

Sir Alan Massey: No. There is a team that has been putting together these proposals over, as I have said, two years or more.

Q8 Chair: Your Department has been asked to find a 33% cut over the comprehensive spending review period. Is that the reason for the plan to cut the coastguard centres involved?

Sir Alan Massey: No, not entirely. The coastguard modernisation programme has been in gestation long before the current Government took post.

Q9 Chair: Sir Alan, you have told us that, but I want you to answer the question I am putting to you. I am asking you if the plans that are now in front of us are
to do with trying to find part of, what, a £43.7 million saving over four years?

Sir Alan Massey: For my agency, I am required to find a 22% budget reduction in my programme between now and 31 March 2015. In seeking to find those savings, we have had to put forward a number of savings options. One of them does affect the coastguard modernisation programme.

Q10 Chair: So this is part of it.

Sir Alan Massey: It is part of an overall strategy to bring my expenses or my programme expenditure into line with the budget provision I have been given now for the comprehensive spending review.

Q11 Chair: Could you tell us what type of risk assessment was carried out before the proposals were put forward, and where we can read about it?

Sir Alan Massey: Yes. At every stage of considering what the various options were we have done a risk analysis. We always do. As an emergency service provider, it is absolutely second nature that we look at every possible change to what we are doing and assess the risks and impacts, and go forward on that basis. What you will be able to read, Madam Chairman, is that later this week we will be publishing what is effectively a compendium of all the risk assessments that have been done in relation to the future modernisation programme.

Q12 Chair: What does that mean? Does that mean risk assessment in relation to these proposals? It is normal that when a consultation of this nature is published there is also a risk assessment published. This has not been the case in this instance. Why is that, and what is it that is going to be published, even if it is late in the day?

Sir Alan Massey: What will be published is, as I say, a compendium of all the assessments that we have done. The assessments have been based, fundamentally, on the current system that we are operating. We run what is an effective but, in my view, not a terribly efficient system. Therefore we have assessed the risks that are embedded in that. How could it be made better? In particular, how could it be more resilient? The analysis then sets out a number of mitigation measures which will find reality in these proposals if they go forward as planned.

Q13 Chair: But why wasn’t this published in the normal way, with the consultation?

Sir Alan Massey: I am not familiar with a normal way of publishing risk assessments.

Chair: That is the normal way.

Q14 Paul Maynard: Clearly you have set out in your consultation document how the activity of coastguards has increased over recent years, how the areas of our shipping lanes have become busier, and how you have been called out on more incidents. Can you explain to me why, as a consequence of those increasing indicators, your answer to the challenge of the future is to shrink the number of operating bases co-ordinating them?

Sir Alan Massey: Yes, I can very easily account for that. Actually, you have to look at the system that we are operating at the moment, whereby we have a number of stations—18—around the coast. They are linked together in pairs but they are not linked together beyond the pairs. That means that, as incidents ebb and flow, either diurnally or across the seasons of the year, we have no capacity to distribute workload or to make better use of the coastguards that we have. If I can just give an example: last night I will have had between 70 and 80 highly professional, well-trained coastguards on watch. I have not checked the figures, but I doubt that they will have had more than a dozen incidents to deal with. Yet, in August, on a bank holiday, I would expect the number of incidents for those same number of watchkeepers to be around 150 to 160. So on the one hand, my work force is underemployed, and on the other hand it is out to a clench. We are seeking to find a way where we can cater for the expected rise in incidents by teamworking, networking, and better distributing workload.

Q15 Paul Maynard: Why could you not have improved the interoperability within the existing network? Why does improving interoperability require a reduction in the number of bases?

Sir Alan Massey: Because what we are seeking to achieve is a stronger critical mass of professional coastguard co-ordinators located in fewer locations but able, therefore, to exploit the economies of scale, and this critical mass issue, which allows big teamworking, using technology that is relatively simple to implement, but to give you a far better sense of, “Here’s my work force; here’s my load. Let’s deal with it,” rather than the way we are dealing with it at the moment.

Q16 Paul Maynard: What assessment has your organisation made of the impact of the closure of the Tyne, Oban and Pentland coastguard centres five or six years ago?

Sir Alan Massey: Sir, thank you for raising that particular point. It is a good one, because we closed those coastguard stations about 10 years ago. We always carry out thorough incident analysis after any incident has taken place. Having done that for all those three stations, we discovered not a shred of evidence to suggest that there is any linkage between cause and effect, either for the incidents happening or for their handling.

Q17 Paul Maynard: Have you published those assessments?

Sir Alan Massey: No, we haven’t, no.

Q18 Paul Maynard: Do you not think that would be helpful to publish alongside the consultation?

Sir Alan Massey: We can always do that. We can always go back and look at incidents, for example, those pertaining to what was the Pentland area, and provide what would effectively be a negative assessment.
Q19 Mr Harris: Sir Alan, you said that most people think that the coastguard is inefficient. Who are these people?
Sir Alan Massey: They might not use the word “inefficient”, sir, but I go round the coastguard stations, and as I ask them about their reactions to the current proposals, every single one of them so far has said, “Yes, we recognise that we are not in the best configuration that we could be; we recognise that you need to close some coastguard stations because it is not as effective as it could be.”

Q20 Mr Harris: So it is people who work in the coastguard stations who want this.
Sir Alan Massey: These are professional coastguards who understand the system. That is not necessarily what we are getting back from the public, and I can perfectly understand that, because their intimate knowledge of the coastguard operation would be relatively limited. But hearing it from my own coastguards, to say that the system needs to be modernised, I find quite encouraging.

Q21 Mr Harris: You expect, in response to consultation, that many of your own people will be responding saying, “Yes, please close these centres.”
Sir Alan Massey: We have yet to analyse all of the consultation responses that we have had. I am expecting quite a lot of critical appraisals of what we are doing, for other obvious reasons.

Q22 Mr Harris: Can I suggest that you are not going to get many positive responses from members of “C Watch MRCC Falmouth”?
Sir Alan Massey: No, nor indeed from many others.

Q23 Chair: I think that can be replicated from other areas as well. You started off now just saying that the coastguards are supporting the closure, and Mr Harris has given us an example where that is not the case. There are other examples too. It is a curious statement.
Sir Alan Massey: The difference I would draw, Madam Chairman, is that they all accept that modernisation is required, but they might not agree with what is in the proposals.

Q24 Chair: So would you then rephrase your statement to us? You did indicate before that the coastguards would agree with these plans. Now you are rephrasing that to say not necessarily these plans.
Sir Alan Massey: Madam Chairman, I didn’t say that. What I said was the coastguards would put their hands up and say, “We need to close stations; we are relatively inefficient and we need to change.” The sort of objections I am getting are to the detail of the issues that are being put forward in the proposals.

Q25 Chair: Including a detail of closure?
Sir Alan Massey: Yes.

Q26 Mr Harris: Can I just move on to the consultation itself, and I use the word “consultation” advisedly? You said you are not aware of the normal procedure for consultations. So before this consultation process started nobody drew to your attention the code of practice on consultation. Is that correct?
Sir Alan Massey: No, that is not the case. We did consult with the Cabinet Office and the department within the Department for Transport that deals with consultation processes. I was not specifically aware of the requirement to publish risk assessments.

Q27 Mr Harris: Yet the code of conduct says explicitly: “Estimates of the costs and benefits of the policy options under consideration should normally form an integral part of consultation exercises, setting out the Government’s current understanding of these costs and benefits.”
Sir Alan Massey: Yes, I am certainly familiar with that.

Q28 Mr Harris: Including risk assessments.
Sir Alan Massey: I am very familiar with that, but I didn’t see—did you say risk assessment in there?

Q29 Mr Harris: Presumably risk assessments would be included in the costs and benefits. I would suggest that a cost might actually be an increase in risk, but that is perhaps just me.
Sir Alan Massey: I didn’t read it that way. It is not explicit in the guidance, and I stand corrected if we have made a mistake.

Q30 Mr Harris: Is there a particular reason then why you are now going to publish your compendium of risk assessments?
Sir Alan Massey: Yes.

Q31 Mr Harris: If you don’t see the need for it, why are you publishing it?
Sir Alan Massey: Because we have been asked to do so within the public consultation process, and we are trying to be helpful; we are trying to be supportive; we are trying to get public support.

Q32 Mr Harris: Wouldn’t it have been more helpful to publish that information at the start of the consultation?
Sir Alan Massey: It may well have been, but it was not an explicit requirement. We will meet the requirement that people are now laying upon us and we have no hesitation in doing that because we have a clear conscience.

Q33 Mr Harris: Do you understand why people feel quite strongly that a risk assessment should have been published at the start of the consultation?
Sir Alan Massey: Do I understand? No. I don’t know why people have latched particularly on to a risk assessment. The nature of business, the nature of all of our policy making within this Department, or certainly within my Agency, is such that we are always analysing impact and risk. We don’t necessarily make that publicly explicit, but if there is a requirement for us to publish that data I can do that. In fact, we have undertaken to do that this week.

Q34 Mr Harris: Sir Alan, you said in your consultation document that you accept that the seas
are becoming busier, there are more vehicle movements, vessels are becoming larger and less manoeuvrable, and you are also saying that you don’t understand why people are concerned that a risk assessment was not published at the start of this consultation exercise. Is that correct?

Sir Alan Massey: I am sorry, but I don’t really see the connection directly between an explicit risk assessment and the work that we have done. But I am very happy to make a risk assessment explicit, which will mean pulling together, as I have said, a compendium of all the work that we have done up until now.

Q35 Mr Harris: But given that the job of the coastguard is to save lives—

Sir Alan Massey: Yes.

Mr Harris:—I would have thought that a risk assessment associated with the closure of a certain number of coastguard centres is a kind of obvious thing, isn’t it? You seem to be completely oblivious to this concern—a public concern—that when you close coastguard centres you may have an effect on risk.

Sir Alan Massey: I am sorry, but I am not oblivious to the public interest.

Q36 Mr Harris: I have just one last question. When I said that consultation was a generous term to use here, I am going to give you an example. Question 1, to which you have asked the public to respond—is this: “We have set out the changes that will affect the service?” Quite clearly that means this is not a consultation—underwritten by Ministers as well as by Ministers. You have just said Ministers were involved as well.

Sir Alan Massey: No. Ministers published the consultation. Ministers announced the consultation.

Q37 Mr Harris: Do you accept then that that question is rather loaded?

Sir Alan Massey: We might have used an alternative word. We might have said “alternative” rather than “other”, but the point is the Government has been very clear—

Q38 Chair: Why do you think you didn’t say “alternative”?

Sir Alan Massey: I don’t know. I can’t account for that slip in the lexicology. All I would say is—

Q39 Chair: Sir Alan, I think it is a little more than a slip in lexicology, as you put it. It is a pretty fundamental question isn’t it? If you are consulting genuinely on a proposal and you are asking people’s views and you say, “Do you have any other points?”, it is not lexicology, is it? It looks like intent.

Sir Alan Massey: The whole intent of the consultation—underwritten by Ministers as well as by my Agency—is that we have an idea, we have a proposal which happens to be what we think is the best approach to modernising the coastguard, but we are genuinely going out for a public consultation.

Q40 Chair: Who wrote the consultation? Who put those words together? Was it you or was it Ministers? You have just said Ministers were involved as well.

Sir Alan Massey: No. Ministers published the consultation. Ministers announced the consultation.

Q41 Chair: Who framed that question?

Sir Alan Massey: I did.

Q42 Chair: You framed the question?

Sir Alan Massey: I did, yes.

Q43 Chair: So it wasn’t the Ministry. It was you?

Sir Alan Massey: I framed the question. Ministers approved the documents.

Q44 Mr Leech: First of all, can I ask why the 18 stations are where they are at the moment?

Sir Alan Massey: Yes. They have evolved over time. When we moved, in about the 1970s, to a coastguard laydown that was reflective of the fact that we now have radio telecommunications that we had not had previously, we sort of collapsed the structure from well over 100 stations into 28. Since then they have reduced, for various pragmatic reasons over time, to the current 18, plus that small centre in London. They are there because they reflect, I suppose, a sensible, strategic geographic dispersal of our capacity around the UK coast. What we have now is a legacy structure.

Q45 Mr Leech: When it went down from 28 to 18, why were those decisions made to keep the current 18 rather than the 10?

Sir Alan Massey: I have to say I was not in post at the time, so I don’t know the actual rationale for that, other than it would have had to do with improving technology, which allowed stations to be linked for the first time. That was certainly to do with the Oban, Pentland and Tyne Tees closures at the turn of the millennium, but for other reasons I can’t account for that.

Q46 Mr Leech: Why has the decision been made to have two main national network stations and then five other substations? What is the rationale behind Aberdeen and Southampton/Portsmouth and then a combination of five others?

Sir Alan Massey: Can I split that into two: first of all the conceptual and then the actual choice of locations? Conceptually, we have an opportunity now to make better use of technology and far better use of the skills of our people by bringing together the coastguard co-ordination effort into two major centres. Technology allows us to do that without even much of a leap, to be perfectly honest. Bringing the teams together, as I discussed earlier, does allow for far better concentration of effort, economy of scale, use of critical mass, sharing of experience, all of the positive...
things about bringing people together in a common effort.
The choice of the Aberdeen and Southampton/Portsmouth areas was to do, first of all, with sensible geographic dispersal, so when you are getting bad weather or potential pandemics in the future in one part of the country the chances are you won’t get the same in another. We look for the maximum geographic dispersal. We wanted to place the main operating centres relatively close to areas of maritime concentration. We wanted them in areas of significant employment opportunity and what have you, so they became natural choices. Plus, there are benefits in locating a MOC in the north in a current building that has capacity to absorb that without too much extra cost. There is a question of value for money in this one as well. The whole notion behind the five centres—

Q47 Mr Leech: Why two? Why not one? Why not a call centre operation in India, for instance?
Sir Alan Massey: We did go through that analysis, and of course when you do the risk assessment on going down to one station you quickly find that putting all your eggs in one basket might not be that sensible. We thought at least a second centre would give us resilience. Resilience, of course, is what lacks most of all in what we have at the moment.

Q48 Mr Leech: Why these sub-centres around the country?
Sir Alan Massey: If you pursue the argument to its logical conclusions, you could probably do this from one location in the centre of England or the centre of the UK. We want, first of all, to mitigate the risk of failure by having at least two major centres. Beyond that, just looking at the diurnal loading, in other words the amount of work that derives from coastguard co-ordination during the day, it makes sense to disperse some of your effort and to spread amongst a regionally sensibly located organisation of smaller centres so that you have a bit more resilience. It is really as simple as that.

Q49 Mr Leech: Aberdeen has been picked for one of the major centres. My understanding of some figures that I have seen is that Aberdeen is the most expensive one to run, certainly more expensive to run than, say, the one in the Shetland Isles. If this is about cost savings, why go for the most expensive option?
Sir Alan Massey: Because part of the factoring in the cost equation is how much it would cost to establish the greater size of a maritime operation centre in Aberdeen as opposed to somewhere like Shetland. You also have to consider issues like the work force availability for recruiting and retention and you have to look at issues of telecommunications resilience. All of these factors played into the choice for Aberdeen. I will admit that there are also factors that militate against Aberdeen and one of them could well be this issue of cost of living or whatever else might be there, but we take a balance of factors. All of our judgments are based on a balance of factors.

Q50 Mr Leech: Can I just ask what the logic is about having the sub-centres only open in daylight hours, because my limited knowledge of Shetland would suggest to me that it would be open for 20 minutes in the winter and 20 hours in the summer? What is the logic behind that?
Sir Alan Massey: Daylight hours is a generic expression of the need or the intent to have these extra centres open to cover that part of the day when, traditionally, most incidents tend to happen: 70% of all coastguard incidents happen between the hours of 9 in the morning and 7 o’clock at night. We have not yet nailed the actual timings because we need to discuss that with our work force and, of course, we need to negotiate that with the unions too. But, broadly speaking, we are looking at early morning to mid-evening as opening hours because that covers the maximum spread of load.

Q51 Mr Leech: One final question, Chair. Just in relation to telecommunications failures, which you have mentioned, I understand that in the Shetland Isles there were some telecommunication failures last year which meant that they would not have been able to effectively do their job without local support there. Is it not the case that in certain locations, particularly the remote locations, whether it be Shetland and Orkney or the Western Isles, that there is a real danger that without that local base they may not be able to get the information passed on to the actual people going out?
Sir Alan Massey: I completely understand what you are saying, sir. We are in discussion with Shetland about the figures here. It depends what sort of telecommunications outage you are talking about. The overall reliability of telecoms in Shetland is 99.98%.¹

Q52 Mr Leech: I understand it was a lightning strike in November.
Sir Alan Massey: Yes. The lightning strike affected—

Q53 Mr Leech: They relied on people with radios on top of hills.
Sir Alan Massey: Yes, as we do as a fallback in all of our locations. But the telecommunications integrity is as close to 100% as one can get. We are with BT this week to talk about exactly that issue. It is 99.98% for the telecommunications reliability of the network as a whole. But, of course, we take particular interest in Shetland.

Q54 Mr Leech: But it is quite a bit less. It is still over 99%, but it is significantly lower in Shetland than it is in other parts of the United Kingdom.
Sir Alan Massey: It is. There are small, tiny, tiny percentiles of increased unreliability or increased risk, should I say, in Shetland and Stornoway because of the nature of their island location.

Q55 Mr Leech: But covering some of the most dangerous waters.
Sir Alan Massey: Not necessarily, not necessarily at all. The point stands that we need to look very

¹ See ev 120
carefully at how this plays in. There is a very high percentage of reliability.

Q56 Chair: You don't seem to have looked at the specialist roles of some of the stations. For example, Falmouth is the single point of contact within the UK for the majority of foreign search and rescue.

Sir Alan Massey: Yes, it is.

Q57 Chair: Have you taken account of that in your plans for Falmouth?

Sir Alan Massey: Yes, we have. Falmouth do a fantastic job of—

Q58 Chair: Then why do you want to change it?

Sir Alan Massey: Simply because the telecommunications equipment that they use there to do this worldwide role could be operated from anywhere. In the transition period that we have between now and the fulfilment of these proposals, if they go forward, there is plenty of time to relocate or train up expert staff in that sort of skill into one of the MOCs, because, frankly, if we go forward with this maritime operating centre on a 24/7 basis that is where we would want to terminate worldwide cover.

Q59 Chair: So you consider you have taken account of Falmouth's expertise in this particular role?

Sir Alan Massey: Yes, we have.

Q60 Chair: You have some options between different stations, to close or not. Can you tell me why Crosby in Liverpool was left off the initial plan, and you only had Belfast, and then you hurriedly—or somebody hurriedly—wrote Liverpool down? Why was that?

Sir Alan Massey: Madam Chairman, it depends how one describes an initial plan. The plan that went forward on 16 December was announced for consultation is the final plan that we all signed up to as the most equitable, sensible, pragmatic and practical way forward. But I won't deny that in the run-up to that period, and presumably over the two years before I joined, all sorts of different options had been put forward. What has gone forward now leaves, I think, exactly the right question open, because we could not come to a definitive answer on the balance of factors between, on the one hand, Belfast and Liverpool, and on the other, Shetland and Stornoway. It was, in my view, exactly the right thing to go forward with those questions to an extent still open and to hear from the public what they thought perhaps ought to be the factors that should carry the most weight.

Q61 Chair: I think you will find that Liverpool was added at a fairly late stage, and it rather looks like a last minute thought to put something down perhaps without meaning it. Am I wrong?

Sir Alan Massey: It was always in consideration as a station that could stay open. I won't deny that at one stage it did not feature in the final chosen list, but by the time we got to the point where the document was finalised and we agreed the way forward it was back in as an option, as was Shetland and Stornoway.

Q62 Gavin Shuker: If I can explain some of the consternation of this Committee, it is that you have stated that you are facing a busier job over the coming years than you have done in recent years and yet the response to that is to cut back on budgets. You stated that 22% of your budget would go by 2015. Is that correct?

Sir Alan Massey: By 31 March 2015, yes.

Q63 Gavin Shuker: How was that 22% figure arrived at?

Sir Alan Massey: I can pass to my Finance Director for the detail, but in principle it is a combination of a reduction against my programme budget and then a specific reduction against the administration budget. But, Madam Chair, may I pass the floor to Mrs Ketteridge?

Sue Ketteridge: Good morning. Yes, as Sir Alan has mentioned, the 22% is a combination of two things. It is a reduction in programme and also, in common with other Government Departments, it is a reduction in our administrative budget. The reduction in the level of administrative budget is 33%, again the same as it is across the rest of Government. So if you aggregate the two together, arithmetically, it comes out at 22%.

Q64 Gavin Shuker: What is the split between those two, roughly? Is admin round about a third of the savings there or about half of the savings?

Sue Ketteridge: It is just over a fifth.

Q65 Gavin Shuker: Can you or anyone on the panel explain to me your views on why it would be sensible to cut back on administrative costs in an agency that deals primarily with public safety?

Sir Alan Massey: It is quite difficult to deal with, because administration costs also involve areas in which we are quite productive. It is quite easy to see administration as the overhead, the unnecessary backroom staff. Actually, a lot of the regulatory business that we are involved in and the policy making falls also into the administration bracket.

Q66 Gavin Shuker: Just on the programme side then, how did you arrive at the specific decision to cut back in programme?

Sue Ketteridge: As part of the spending review, a number of options were considered, along with many others across the Department. Those recommendations were put to Ministers. Ministers took a view on priorities both within the Department and across Government. As a result of that, the measures that were announced on 20 October included a number relating to this agency. So we were not singled out or treated differently from the rest of the Department, or indeed anyone else that was subject to the spending review.

Q67 Gavin Shuker: I suppose the conclusion that many would come to in an environment in which coastguarding is effectively a growth industry currently would be that you would be arguing for an increase in your programme budget, despite any administrative savings that you might make.
Sir Alan Massey: I would not be doing that, sir, while I am highly conscious of the fact that, despite the best efforts of my excellent people, they are working in a structure which is fundamentally inefficient, for the reasons I have pointed out earlier.

Q68 Gavin Shuker: You are stating that these programme changes are not driven by the overall desire of this Government to reduce the fiscal deficit. They are driven by an assertion that this is the best way to provide coastguard activity in the future.

Sir Alan Massey: Yes, and best borne out by the fact that this whole modernisation project started well before the current Government took office and decided to address the fiscal deficit in that way. Again, every coastguard signs up to the notion that they are not as efficient as they might be and that coastguard station closures are needed.

Q69 Gavin Shuker: Just finally, if you did not have to find about £7.5 million each year in savings, what would you spend that money on?

Sir Alan Massey: I am afraid I can’t speculate. I have never been in a position of thinking where I could spend more money. I don’t know. I would have to go back to the book and have a look.

Q70 Kwasi Kwarteng: I would have thought most of the members of this Committee fully understand, given the nature of the fiscal position, that you are going to have to make savings. I think that is something that is self-evident. But if I can just rephrase a question that my colleague made in a slightly different way, if you are making savings, what is what you are doing, what do you think the biggest risks are, going forward? You run this Department. You are obviously having to deal with less money going forward. What are the biggest risks in that situation?

Sir Alan Massey: The biggest risks are to the integrity of service delivery across all of the range of things that the MCA is required to do. So I have got to mitigate against those to the extent possible and try and make the savings in such a way as to have the least impact on our output.

Q71 Kwasi Kwarteng: That is a very general answer. Is there any more specific detail you can give the Committee?

Sir Alan Massey: In terms of the savings that we are seeking to achieve from coastguarding, we are trying to mitigate against the inherent risk there of ending up with a coastguard that is no longer fit for purpose, by designing something that is even more fit for purpose than what we have at the moment.

Q72 Kwasi Kwarteng: You think there is a risk that it will not be fit for purpose as a consequence of these savings?

Sir Alan Massey: I think it is absolutely inevitable that whenever one goes into any sort of change programme there is always risk there, and we are very familiar with it. The key thing is to identify what the risks are, acknowledge them, publicise them if necessary, but certainly then design ways of mitigating it. The point at which I find I cannot mitigate a risk is the point at which I go back to the Department and say, “This just won’t work.” But at the moment, on coastguards in particular, I believe that we have a way forward that offers a better service—actually a safer service because of the resilience and the better use of professional skills, a reduced risk of skills fade—than we have at present.

Q73 Kwasi Kwarteng: How do you judge yourself? If after three or four years you have made these savings, how would you know or what sort of benchmarks will you look at to see that you have provided the service that people should expect?

Sir Alan Massey: We have a fairly well worked-up series of service standards against which we measure ourselves every year and that is reported in our annual report and accounts. We also have an intimate knowledge of statistics to do with search and rescue incidents and the provision of search and rescue in amongst a rather wider partners’ group. So it is not as if we are not quite cleverly and carefully audited to know the scene, and I can talk quite a bit about internal audit if you would welcome that. But I am pretty conscious that there are a lot of metrics against which my performance or the Agency’s performance is measured, and of course we will use that extensively as we go forward with the changes.

Q74 Kwasi Kwarteng: After this process of cuts or savings it will be very clear to you if you are actually doing your job well, and it will be clear to the members of the Department as well.

Sir Alan Massey: I think it will, and not just in emergency response. In emergency response, it becomes extremely clear very quickly, because statistics to do with accidents, fatalities and mishandled incidents are very easy to get hold of. But in regard to other areas of what we seek to achieve as well, such as ship surveying, ship inspections, pollution control, the whole gamut of what the agency is up to, we have a pretty sophisticated series of metrics, including customer surveys on which we are very much focused, to tell us how well we are doing. I would just make this point. I would never undertake any sort of change if I felt that it was going to make safety at sea any less sure than it is at the moment.

Q75 Kwasi Kwarteng: You said customer surveys. That is something you do all the time, is it?

Sir Alan Massey: Yes.

Q76 Kwasi Kwarteng: Are you happy with the responses you are getting?

Sir Alan Massey: Yes. I would like to have a 100% satisfaction survey. At the moment most of what we do gives us results of somewhere in the 80s, having started in the 60s and 70s. So we are making progress. That is the important thing for me. You will never please all the people all the time, but if I can see a continued uplift or increase in the levels of satisfaction we are achieving, then I will be satisfied. In one respect, being a regulator sometimes does not necessarily generate the customer response one would
always want, but again, we are working at trying to get a better balance there.

**Q77 Steve Baker:** Sir Alan, having grown up in Cornwall, I am very conscious of the importance of local knowledge, and I think in particular of coastal rescue and smuggling. I am very familiar with Falmouth—I see my hon. Friend the Member for Truro and Falmouth in the room. What would you say to those people in such areas who are most concerned about the loss of local knowledge?

**Sir Alan Massey:** I would say a number of things. If I may, again I will pass the floor to Philip Naylor here for a little more. Just in strategic terms, local knowledge is important—we acknowledge that as well—but it does not reside only in the coastguards, even though they are very proud of it, quite rightly so, and they are well exercised in it. But it resides in a number of different areas, and we need to be smarter about the way we capture, store, share and assess it, and the way that we draw on other sources for actually using it. But can I hand the floor to Mr Naylor?

**Philip Naylor:** Local knowledge means many things to many people, and to many people it means the knowledge that they have in their head, which requires them being able to recall that knowledge and apply it in a situation and then put it to good effect. But the type of local knowledge that we see as being of most benefit to our activities is of a very detailed nature which is highly specific to the type of incident that we are trying to deal with.

If I could give you an example, with many of our volunteers in the coastguard rescue service, the level of local knowledge that they have, is very, very proximate to the local communities within which they operate. It will go down to the level of detail, for example, of how to find a particular key to a padlock to get through a particular farmer’s field gate so they can get to a scene of a rescue. Similarly, with the Royal National Lifeboat Institution, the level of knowledge that theircrews and their boat coxswains have about the waters within which they operate is very, very detailed. That contrasts with the way that local knowledge is being projected through our coastguard rescue centre organisation, which is in relation to a coastguard officer on watch at the time being the recipient of a call, being in possession of knowledge that helps them then to initiate the tasking of assets and, if you like, in their own mind, I suppose, setting the scene for a particular rescue, based on knowledge either that they have or that they think they have.

I think there are two issues there. The first one is that we train coastguard officers to go through a process of gathering the facts, assessing the factors and working out what the issue is and what the facts are telling them about the type of rescue that they need to go through, without drawing on any particular knowledge that they may have gathered through their own experience. The second thing is—

**Q78 Chair:** Can I just stop you there, Mr Naylor? What you have just said appears to be entirely at odds with coastguard regulations, which state very clearly that “all grades of coastal officer should acquire a thorough local knowledge”, and then it details exactly what that means. It talks about very specific things such as navigational hazards, coastal features, shipping activity, potential problems. That emphasises the importance of very local knowledge as part of regulations, and you are now trying to distance yourself from that a bit. It doesn’t add up.

**Philip Naylor:** I don’t think that’s what I am doing at all, with respect, Madam Chairman, because the types of local knowledge you have just outlined are more general to a stretch of coastline, more in relation to the topography of a stretch of coastline, more in relation to the features that would appertain to a stretch of coastline, than to some of the very detailed aspects of local knowledge that are being projected as being relevant.

If I could just go on to make the point I was going to make, it is that there have been occasions over the last year or two where an individual, upon receipt of the call from the first responder, has made a very hasty assessment upon what they thought their local knowledge told them about the way an incident should be initiated, without going back to the training that we have given them about assessing the facts and the factors and assimilating an overall picture. They have rushed in and they have gone to the wrong place. They have made the wrong assumption about what they thought they knew.

In relation to the information which is contained in our instructions, clearly there needs to be a level of availability of information and knowledge of a stretch of coast that a coastguard officer will be working on. At the moment, with the way we are currently organised, with some regionally dispersed rescue centres, that tends to be through the history of the organisation gathered through inspection of charts and maps, and going out and looking at sites as a way of getting that local knowledge. That will continue to have a part to play in the future, but it won’t be the only way that an individual will get their local knowledge, because I think we are all aware of the way that there are now many ways of getting knowledge about topography, landmarks and significant features, whether by studying information that is out there on the web or by looking at charts and maps. I think it is one of those things that will change with the way individuals and generations gather and assimilate information that they can use.

**Q79 Steve Baker:** I am most grateful for your answer, which is very detailed. One of the things that strikes me—and I say this as a software engineer—is that it seems we are perhaps going to overuse technology and aggregate away or hide or obfuscate some of the rich knowledge that people have of areas. I hear what you say about going back to training around facts and factors, but if I can put a concrete example to you, what about the yacht that comes in at an unusual time in an unusual place and launches a boat, and somebody needs to go down and see if smuggling is happening? How are you going to capture the sort of knowledge such as, “Where should they go? Where’s a good landing place on this coastline at this state of the tide?” Is that all going to
be available in a computer system, or will someone know?

**Philip Naylor:** The particular example you give, of course, is not related to the work of the Maritime and Coastguard Agency. That is not the type of work in which our coastguard rescue centres are engaged. Whilst there is a degree of surveillance that we perform, it tends to be, because of the nature of the systems that we use, through AIS, with the much larger ships. What we are really looking for and the thing we are much more interested in is a ship which is in difficulty and at risk of jeopardising the lives of those on board, or indeed of the ship itself getting into difficulty and presenting a risk of pollution. But in terms of the very detailed and surveillance type activity, looking at, for example, some illegal act, that is not the business of the Maritime and Coastguard Agency.

**Q80 Steve Baker:** I perhaps remember my youth when I saw coastguards turning up in Land Rovers to look out over the sea at what was going on. I take it that doesn’t happen now.

**Philip Naylor:** Our rescue volunteers, which is by and large where our public face of the coastguard is projected, are certainly out there in their vehicles. They don’t use Land Rovers any more, but they are out there in their vehicles and they will continue to do so. The proposals that we have put forward work on the basis that we will continue to maintain and indeed develop our coastguard rescue service, but whether they are out there looking for one thing or another is a separate question.

**Q81 Steve Baker:** If I may, without dwelling on the particular example, do you think that you can use that voluntary force to develop and maintain the local knowledge which people are concerned might be lost?

**Philip Naylor:** Not only do I think we can maintain it, but we already have it, and it is used to extremely good effect on every occasion when a coastguard rescue team is deployed to effect a rescue.

**Q82 Chair:** Are you going to concentrate on using volunteers for local knowledge rather than other parts of the service? Is that the plan?

**Philip Naylor:** No more to the extent than we do already, because at the moment our coastguard rescue organisation is very heavily reliant on the people who effect the rescue, whether that is the coastguard rescue service effecting a coastal rescue, the RNLI or a lifeboat effecting a rescue at sea. The rescue, the business of saving the life, relies upon the knowledge that is in the heads of those individuals. The local knowledge that has been projected as being very important in relation to our coastguard rescue centre officers is to do with the initial assessment of the rescue and the decisions that are taken to task it at the outset.

**Q83 Chair:** Yes, but it is all about local knowledge. We will leave the question on that for the moment.

**Philip Naylor:** As I say, the most effective local knowledge is very local.

**Q84 Paul Maynard:** Forgive me for dwelling on local knowledge but, correct me if I am wrong, as I understand it, staff at the 18 existing co-ordination centres currently have to sit an exam every two years in local knowledge, and they have to pass that and get a pass of at least 80%. So local knowledge in the coastguard context has a very specific term and meaning. Are you able to confirm to me that staff at the two proposed co-ordination sites will also have to sit that exam every two years with a similar pass threshold, and that their level and detail of knowledge will thereby have to extend to a much greater range of coastline? How will that system be transferred under your new proposals?

**Philip Naylor:** The arrangements that we have for local knowledge at the moment are, I think it is fair to say, drawn from the past when our coastguard organisation was very widely distributed around a large number of very small stations, which essentially were look-out posts with a coastguard looking out to sea with a telephone and a bell. Many of the procedures that we have still relate to the way we did business in those days. What happened was radio came along and that allowed us to concentrate our coastguards into a smaller number of larger centres. The work that they now do in those rescue centres is not to look out to sea. They are not actually surveying the coastline in any meaningful sense. They tend to be waiting for calls to come in by 999 or by radio. To the extent that many of the procedures that we now have are, if you like, drawn from the way we were organised in the past probably gives an example of the extent to which modernisation of the coastguard service is now required to take us forward into the future. So, from looking out to sea and watching, we moved to radio, and we now are able to move to a much more networked system.

**Q85 Chair:** Could you answer the question that Mr Maynard has put to you?

**Philip Naylor:** Yes.

**Chair:** With a yes or a no.

**Philip Naylor:** There will be a requirement for coastguard officers to have a degree of coastal knowledge and knowledge of the maritime domain. I think it is unlikely that it will extend to the level of detail that you have explained, and it certainly won’t be as currently set out.

**Q86 Paul Maynard:** So we are losing the local knowledge test, to all intents and purposes. You are ceasing the 24-hour dedicated listening to a VHF line. We are also losing that crux of local knowledge that allows someone to know the difference between Blackpool in Lancashire and Blackpool in Devon, yet you are also trying to persuade me that you can still maintain the maximum five-minute call-out limit for getting to someone who has called in distress. How can you rationalise those two points? It strikes me that you are making it much much harder for that five-minute limit to still be maintained. Can you confirm the five-minute limit will still apply despite all these changes?

**Philip Naylor:** Yes, I can.
Q87 Paul Maynard: Furthermore, Sarah Newton, in her Westminster Hall debate, made it very clear that Falmouth had a particular international role, as the Chair mentioned earlier. I am struggling to understand why you are proposing to close Falmouth and move services and provision to an as yet unconstructed, unspecified location in either Southampton or Portsmouth when you already have somewhere that, as I understand it, is fit for purpose in Falmouth. What is the logic of that when you are facing 22% savings?

Philip Naylor: To begin to answer that question, following on from the explanation that Sir Alan gave in relation to the decision about the number of maritime operation centres we require, to handle our normal workload—

Q88 Chair: Mr Naylor, you have been asked a specific question about Falmouth. Can you give us an answer on that?

Philip Naylor: Well, the answer about—

Sir Alan Massey: Yes.

Q94 Mr Leech: So it is effectively a call centre style operation.

Sir Alan Massey: Yes, but I simply sound a note of caution, because my coastguards are very sensitive about being equated with people who just work in call centres, and I don’t mean to denigrate anybody here at all. They are very highly trained. It is a very complex, hugely demanding and stressful job they do when the call comes in, so it is more than a call centre per se.

Q95 Mr Leech: As someone who used to work for the RAC in a call centre, I think I do know a little bit about call centre operations. Could you give me any figures on the existing centres in terms of how many calls that come in that don’t get answered?

Sir Alan Massey: I think the answer to that is zero, but I will check.

Q96 Mr Leech: I am not aware of any 21st century call centre operation that has a zero call failure. Certainly, when I worked for the RAC in a pretty good call centre operation, dealing with emergency situations, there were still calls that failed. So the current system, you are telling me, has a zero call failure rate—

Sir Alan Massey: To my knowledge, yes.

Q97 Mr Leech: Let me just finish. You are proposing to bring forward a 21st century style operation that will bring everything up to date. What is the danger that we will have a situation where, as with all other 21st century call operations, some calls don’t get answered?

Sir Alan Massey: I don’t know.

Q98 Mr Leech: Has no assessment been done of this?

Sir Alan Massey: I have personally not been aware of the failed call issue being a factor at all. But if I may, Madam Chair, can I take that one away and do some investigations with my team?

Q99 Mr Leech: I think, clearly, there is an issue where it could be life or death situations where calls may go unanswered, as they do in every other call centre operation of which I am certainly aware.

Sir Alan Massey: It must be a factor, because of course, unless I can demonstrate 100% reliability of all of my telecommunications and radio infrastructure, I can’t guarantee that everything would be heard. But frankly, it is not an area that I have been made aware of, so I will go away and get some data.

Q100 Mr Harris: Mr Naylor, I am guessing you are not a fluent Gaelic speaker.

Philip Naylor: That is correct.

Q101 Mr Harris: Neither am I. Don’t worry about it; it happens to a lot of us. But, going back to local
knowledge, there are a lot of places, for example, in the Western Isles, that have colloquial and Gaelic place names. Gaelic is the first language of most people living in Stornoway, for example. I won’t even try to pronounce these names, but if a call comes in for an emergency at a particular location, which also happens to sound incredibly similar to an English-speaking ear, as it were, unless you have native Gaelic speakers based at your Aberdeen call centre, how can you guarantee that a confusion at that very early stage will not arise, with lives lost simply because the local knowledge of local place names has been lost?

**Philip Naylor:** I think we probably go back to the way that coastguards are trained at the outset because, of course, it is not just this idea of dealing with a very specific locality or language. Coastguards are dealing with international traffic on ships and all kinds of nationalities of crews on those ships. They are taught to gather the information at the outset from the caller, gather in the information that they require in order to pinpoint where the issue is, and, indeed, to look at some of the other issues such as being able to gather from systems in relation to the location of the vessel, whether it is from the vessel’s AIS or an individual, for example, who might have a mobile phone with a GPS signal. There are many ways rather than just relying on a thorough or intimate understanding of a particular accent or a particular language that allow a coastguard to do their job.

**Q102 Mr Harris:** I think you may be muddying the waters when you talk about the nationality of a particular ship that might be in trouble somewhere in The Minch, for instance. Whatever their nationality, they will be in trouble in a bit of British territorial waters where the local colloquial name will be well known to local people. I am picking on Gaelic particularly because for most people it is quite a difficult language to understand. Is it possible that someone in Aberdeen might pick up a call from a native Gaelic speaker talking about a particular location and not translate accurately that information? Is that possible? If it is possible, are you telling me that you are going to have native Gaelic speakers guaranteed to be employed 24 hours a day at Aberdeen?

**Sir Alan Massey:** None of our recruiting or appointing procedures or regulations provide for any sort of specific language skills or a particular local background. In principle, the entire population of the Stornoway and Shetland co-ordination centres could be Londoners. When we closed Tyne Tees in 2000, there was no evidence to suggest that any of the dialect or local topography issues became issues per se—

**Q103 Mr Harris:** Excuse me, Sir Alan, Gaelic is not a dialect. Gaelic is a language.

**Sir Alan Massey:** I accept that.

**Mr Harris:** It is a lot more difficult to understand than Geordie.

**Chair:** I think you had better concede that, Sir Alan.

**Sir Alan Massey:** I will concede that point and, clearly, no offence meant. The point is that we are a polyglot organisation. At the moment we do not have specific processes that say we need to have Gaelic speakers in Stornoway or we need to have Gaelic speakers in Shetland.

**Q104 Mr Harris:** But that is because you already have Gaelic speakers in Stornoway.

**Sir Alan Massey:** But that is only by chance, in truth. It’s only by chance.

**Q105 Mr Harris:** It is not by chance. It is because they were born there, they work there and they understand the local area.

**Sir Alan Massey:** Yes, but what I am saying is, the HR principles which underpin the way that we run the coastguard are blind to those sorts of issues. I come back to the point that Mr Naylor makes, which is a good one, in that we do train people to tune their ears to whatever it may be.

**Q106 Mr Harris:** I am sure that people in Stornoway have been reassured by those words, Sir Alan. I just need to go on to one very quick point. After the Braer disaster, Lord Donaldson recommended that the Government provide emergency towing vessels.

**Sir Alan Massey:** Yes.

**Mr Harris:** From 1994 they have been operating very successfully and very effectively in that area. Was he wrong to make that recommendation?

**Sir Alan Massey:** No.

**Q107 Mr Harris:** But you are withdrawing them now, and it is not part of your consultation.

**Sir Alan Massey:** No, it is not part of our consultation. The Government has decided that it is an incorrect use of taxpayers’ money to provide for those tugs. That is not to say that the tugs should not be provided, and indeed the risk analysis that we have done of the requirement for towing and salvage capabilities around the coast of the UK shows that there is still a risk and there needs to be some sort of capability.

**Chair:** The issue is how we now consult with those interested parties to come to arrangements that will provide for exactly this sort of capability.

**Q108 Mr Harris:** How are discussions with the private sector going?

**Sir Alan Massey:** Mr Naylor has been doing those on my behalf.

**Q109 Chair:** Can I just ask you, where can we read the risk assessment that has been done?

**Sir Alan Massey:** That will be posted this week as well.

**Q110 Chair:** And, coincidentally, it is announced today. That is going to be posted next week. It has not been previously, has it?

**Sir Alan Massey:** No. Again, we have not been under any explicit remit to post risk assessments, but we have done a risk assessment, because the contract for the ETVs was up for renewal, as you are aware, this September. So, as the normal process of rolling over contracts, one takes a look and says, “Is there a need for this?”
Q111 Chair: It will be published?
Sir Alan Massey: We will publish a risk assessment.

Q112 Mr Harris: Can I go back to my original question, which concerned the fact that Lord Donaldson recommended that the Government provide emergency towing vehicles? Do you think that Lord Donaldson was wrong to recommend that the Government provide those emergency tow vehicles?
Sir Alan Massey: No, I don’t think so at all. In 1994 that was a very good call.

Q113 Mr Harris: They were recommended long before 1994. It was only in 1994 that they finally got around to providing it. You are in discussions, then, with the commercial sector, to provide replacements for these. Is that right?
Sir Alan Massey: We are currently engaged in a series of discussions and negotiations, I suppose, with the maritime sector: that is the ship owners, the tug owners—

Q114 Mr Harris: If the commercial sector does not come forward with replacements for these vehicles, what happens then? Will the Government change its mind and keep these vehicles—
Sir Alan Massey: We don’t know yet, because we haven’t yet gone all the way through the consultations that we are having.
Chair: We moved on to the towing vessels, and there are other issues. A number of Committee members have indicated they want to speak. Does any member want to pursue the coastguard issue at this point?

Q115 Mr Harris: Sir Alan, you are aware of concerns that many people have, including your own employees, regardless of what you said at the beginning that most people think that it is an inefficient service. If something were to happen in the future after this reorganisation, if someone were to die, if a vessel were to go down, with needless lives lost, and a subsequent investigation concluded that those lives would have been saved without your reforms going ahead, would you be prepared to resign?
Sir Alan Massey: Yes. Can I qualify that? I would be prepared to take the responsibility, absolutely, with no compunction whatsoever. The question of whether I resign or not is an issue between my employer and me, but I would have no hesitation in saying—

Q116 Mr Harris: Actually it is not a question between your employer and you. It is a question for you. You don’t have to stay in your job if you don’t want to.
Sir Alan Massey: This is a hypothetical scenario. I would assume total responsibility, I have no issue with that at all. The question of what happens then I don’t know.
Chair: I just want to ask my Committee members. There are other issues we do need to get on to. I know there are a lot more issues to do with the coastguard matter. Does anyone want to ask about coastguards?

Q117 Julie Hilling: You said a little while ago that one in five people were dissatisfied with the service that they were receiving. I am just wondering if you could tell us what the issues are currently with that.
Sir Alan Massey: Yes. Around 80% plus of people responding to our customer surveys demonstrate satisfaction with what we do. The examples tend to be in seafarer certification, medicals, the quality of work that we do in terms of surveys for British shipping and what have you. We don’t actually have a satisfaction survey that goes to people whom we’ve rescued as a coastguard service of which I am aware. But I would imagine that the customer satisfaction response from those we have rescued would be relatively high. We don’t cover absolutely every area, but we do try our best with online surveys.

Q118 Julie Hilling: Forgive me for being sceptical, but I always struggle when people say we are going to have a better service when we make a massive cut in it, and you are talking about losing nearly half of the staff in the service. You said that currently it lacks resilience. How is that resilience going to be improved? I know we talked about this, but you still haven’t given me any faith that you are going to improve the system.
Sir Alan Massey: Again, Mr Naylor might want to fill in the detail but, fundamentally, we have a system now. Let me take an example. If Falmouth and Brixham had a massive lightning storm, which is possible, and they both went down, then we have completely lost the south-west sector. There is no way of connecting with the VHF aerials there that would pick up a distress message. The 999 calls we could reroute, unless there was a total disaster underground as well. But the VHF aerials, which mariners rely on, would go. I couldn’t connect with them. The future system will link all of those 154 aerials around the coast of the UK to both MOCs. The most significant of those aerials, 60 or so which receive digital selective calling services, would be routed into any station you wanted. We just don’t have that at the moment. If I lose a sector at the moment, then mariners are at peril.

Q119 Julie Hilling: This IT system, though, is not yet in place.
Sir Alan Massey: The system that we are proposing to link together is largely in place. We are currently in a radio equipment replacement programme that will refurbish our key ICT systems, including radios. So we have the wherewithal now to build a more resilient system. It is now a question of procuring and fitting the linkages that will pull the MOCs to the centre piece and establish the day centres around them.

Q120 Julie Hilling: Are you then going to have a period of trial before you actually close the other places?
Sir Alan Massey: Yes.

Q121 Julie Hilling: But how long is that trial going to be?
Sir Alan Massey: The overall transition period provides for almost four years. Four years, up until 31
March 2015, is the time we have to establish the MOCs, trial them, bench test and then reality test the communication systems and the concepts of operation, the way that people work. Only at that point will we feel confident to start to collapse gradually, in a graceful degradation, the systems around them.

**Q122 Julie Hilling:** So these jobs will not go until that period.

Sir Alan Massey: The consultation document, assuming that this is what the model will be, sets out our estimation of when stations will either revert to day only operations or will close. You will see that it is stepped, with the majority happening in year three/four.

**Q123 Julie Hilling:** So in terms of any financial savings in this financial year you are saying that you won’t be making any financial savings.

Sir Alan Massey: No. We have declared that, and that is accepted. The first year in which we anticipate making savings is year four of the spending review.

**Q124 Julie Hilling:** But will you not have an increased spend during this period then?

Sir Alan Massey: That is all catered for within our overall budget. There will be investment but it is relatively modest, in truth. The amount of investment in ICT—communications infrastructure—is less than £10 million and that can be absorbed against all sorts of other offsets. So, effectively, we have a zero line for the first three years against this coastguard modernisation and then we start to make savings of about £7.5 million per year.

**Q125 Paul Maynard:** Forgive me for returning to the issue of local knowledge but the more I hear the more worried I become. My constituency is Blackpool North and Cleveleys. The bulk of people who get into difficulty off the Falmouth coast are pleasure craft, swimmers and people on lilo’s who float out to sea. When a distress call comes in, they are often not able to describe specifically their location; they have no GPS signal. Their location is established, as I understand it, by the coastguard asking them to describe what they can see. Therefore, local knowledge is essential to identify where that individual is. Are you seriously telling me that, by removing the local knowledge requirement, as you have just explained, somebody in an office in either Aberdeen or Southampton will have sufficient local knowledge that, if that individual were to describe what they could see, they will be able to locate that person within your 10-minute limit? Are you seriously telling me that that is still the case?

Sir Alan Massey: Could I perhaps put that in the context of the 1,000 miles of coastline that Stornoway looks after or the 300-odd—

Chair: No. We want an answer to Mr Maynard’s question, which relates to this area.

Sir Alan Massey: Can I guarantee? The answer is no. If I could guarantee, that would be fantastic. But let me just put it into a more relative context: at the moment, Stornoway coastguard looks after over 1,000 miles of coastline, and I defy anybody to say that somebody coming ashore in a kayak in some very remote place would be able to describe his position. So local knowledge is not absolute—

**Q126 Paul Maynard:** Sorry, just hang on. Stornoway does not have 10 million visitors a year; Blackpool does. Are you seriously telling me that Aberdeen will have greater local knowledge than Liverpool will on that stretch that they have been catering for?

Sir Alan Massey: I am not pretending that that is the case at all. I come back to Mr Naylor’s explanation that this is a combination of issues and we set it all in a relative context. I cannot guarantee it today.

**Q127 Chair:** Sir Alan, we have got all of those things, and the purpose of this meeting is to focus our questions on the points that concern us.

Sir Alan Massey: Yes, I understand.

Chair: We have read what you have got to say about the whole thing and we have certain concerns that we are putting to you. I think, Mr Maynard, we will move on from that for the moment, but clearly you have registered your concern there. We do have other issues as well to raise with you. The question of emergency towing vessels was raised by Mr Harris. Mr Baker, did you want to ask something on that?

**Q128 Steve Baker:** I will ask the question very quickly. What effect will the loss of Nimrod have on your operations, please?

Sir Alan Massey: Currently the Nimrod gives us extended air cover out to the very westerly extremity of our search and rescue region, which is about mid-Atlantic. I have nothing in my own inventory that can go that far, although I use Cessnas that are used for other purposes to do that. We can call at the moment on the on-call Ministry of Defence asset, which is currently a C-130, when it is available. But it is fair to say that with the demise of Nimrod we do not have the extent of search and rescue top cover that we had before.

**Q129 Steve Baker:** I am just conscious that Nimrod has search water radar; Hercules does not. Is that important to the coastguard or not?

Sir Alan Massey: It depends entirely on the scenario.

**Q130 Steve Baker:** How often do you get a scenario that needs surface radar?

Sir Alan Massey: I would have to check. I don’t know.

**Q131 Mr Leech:** Currently, the emergency towing vehicles go and help all kinds of ships.

Sir Alan Massey: Yes.

Mr Leech: I presume the majority of those will be insured; some of those perhaps are not insured. How much money is actually claimed back from the insurance companies of the vessels that are supported?

Sir Alan Massey: I would not limit it to insurance companies, but I understand the thrust of the question.

Mr Leech: Well, insurance companies or the shipping companies themselves.

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1. See ev 120
Sir Alan Massey: Yes. Again, Mr Naylor has the detail, but in principle, if one of our tugs goes to provide a towage or salvage service to a ship, then it will inevitably result in an agreement between the tug and the ship owner and the setting up of a contract which will then result in a payment for that service. On the current contract, the Department for Transport or the MCA gets a small percentage of the net value of that contract at the end of the rendering of assistance.

Q132 Mr Leech: I can’t quite understand then why this service actually costs. With the costs that are got back, why does it not pay for itself?

Sir Alan Massey: Because, historically, we have never recovered, by that means, the full cost of providing a towage or salvage service to a ship, then it will inevitably result in an agreement between the tug and the ship owner and the setting up of a contract which will then result in a payment for that service. On the current contract, the Department for Transport or the MCA gets a small percentage of the net value of that contract at the end of the rendering of assistance.

Q133 Mr Leech: With respect, that is absolutely bonkers. Surely we should be ensuring that the work that is done by the emergency towing vehicles is being reimbursed from the shipping companies or their insurance companies. Why isn’t that happening?

Sir Alan Massey: I imagine it is rooted in the terms of the contract, which was clearly written some years ago. But the Government has taken us a step further now in the judgment that it is an incorrect use of taxpayers’ money to actually fund these ETVs in the first place. What we are seeking to establish now is some sort of arrangement or protocol whereby there will be commercial benefit for tug owners, for example, in stationing tugs in the sort of places that they are needed, on the basis that, yes, when they are called forward for a towage or salvage contract they are duly recompensed and it becomes commercially worth their while to do so.

Q134 Mr Leech: Why would it not have been possible just to ensure that the contract does make sure that it pays for itself?

Sir Alan Massey: Because, of course, in a perfect world you have no accidents at all—that could happen—and then we would never get recompense for the money that we have set forward as taxpayers.

Q135 Mr Leech: How many years in the last 100 years have there been no accidents and no requirement for any vehicles?

Sir Alan Massey: It is often not a question of there being no accidents. It is a question of whether your tug is in the right place at the right time. It is very interesting to note how very few times in the last few years the ETVs have been called forward for a real incident.

Q136 Mr Leech: If they had been called to incidents and they had been properly recompensed for the charges that they have incurred in doing their job, surely this could be done for no cost to MCA?

Sir Alan Massey: There are many dimensions to that question. I think Mrs Ketteridge can answer on the charging.

Sue Ketteridge: If I may. As has been discussed, the contract is about 10 years old. It is coming to the end. The contract provides that, if there is a commercial arrangement between the vessel being rescued and the ETV provider, then we do get a small percentage of that, but it is a commercial contract between those two parties, and I think it is about £300,000 to £400,000. It varies obviously because of the nature or the number of incidents where that applies. So it is about 15% that we would get back in that circumstance. In future—I think Sir Alan is absolutely right. It is about £10 million a year to provide that service. If you had maybe half a dozen or a dozen incidents where we provided a service and that arrangement were in place, you would be recovering at a hell of a rate—£1 million an incident if there were 10 incidents. It is clearly not plausible that we would be able to negotiate a contract that would enable that to take place. So, in future, as Sir Alan has mentioned, it has been decided by Government that it is more properly a strictly commercial arrangement between the insurer of the vessel or the owner of the vessel and a commercial provider. What we are looking to do, through the intervention that Mr Naylor has been leading, is to make sure that that capacity stays there in the market rather than being provided for by Government, therefore delivering a saving to Government.

Q137 Mr Leech: Can I just get this clear in my head? We pay private companies to be emergency towing vehicles, and to be on-call to be emergency towing vehicles, and then when they go out to jobs they get paid by the shipping company or the insurance company, and to be on-call to be emergency towing vehicles, and then when they go out to jobs they get paid by the shipping company or the insurance company and only a small proportion of that money comes back to us.

Sue Ketteridge: In the event—

Chair: Is that right?

Sue Ketteridge: If I can confirm—

Chair: Is that correct?

Sue Ketteridge: I am just about to answer, Madam Chair. In the event that a separate commercial arrangement is entered into, because there will be any number of vessels that may be on the scene, then what you have outlined is absolutely correct. If, however, the ETV is there on our behalf carrying out our activity, there is no transactional arrangement that takes place.

Q138 Mr Leech: Can you just clarify what you mean by “if it’s there”? I was talking about in the event of the emergency towing vehicle being sent out by yourselves to a ship in trouble. In those circumstances they would just do what they needed to do.

Sue Ketteridge: They would do what they needed to do for our purposes, and if at the end of that—and I am afraid I will have to defer to Mr Naylor, obviously, as Director of Maritime—in the event, they have done whatever it is we need them to do, if there is a separate arrangement that is entered into, then that is very much a separate arrangement. But that does not
take up until we have risk assessed whether or not that ETV can be released from our tasking.

Q139 Mr Leech: Would you accept that this is not a very good contract?
Sue Ketteridge: I think Government has accepted it is not a very good contract, which is why they are not renewing it.

Q140 Mr Leech: But would you also accept that if the contract was worded in a different way this could pay for itself through the insurance and shipping—
Sue Ketteridge: I think you are asking me to speculate, to be perfectly honest. I can’t speculate about a decision that hasn’t been taken.

Q141 Chair: Sir Alan, would you agree that this matter could be dealt with by a different contract?
Sir Alan Massey: I think we need to conclude the discussions with tug owners, ship owners and local communities to see what the best way ahead is, because your points are entirely cogent. At the rub of it is a system here that, if it could pay for itself, then why wouldn’t commercial tugs be interested in doing it? That would be a perfect solution for us because thereby we look around and see that the commercial interests are sorting out these sorts of issues, in the same way that we don’t have many Government recovery vehicles around the M25—it is a commercial arrangement.

Q142 Mr Leech: What happens, hypothetically, if there is a vessel in distress and there is no means of getting anyone from this vessel, there is no insurance or it is just a single vessel? There is no means of getting any money from the ship owner or anyone involved with the ship. Under a commercial arrangement, surely that would just sit there at the bottom of the sea or—
Sir Alan Massey: I don’t know. Could I perhaps ask Mr Naylor, with his experience?
Philip Naylor: Yes. I think your question is in relation to two parts. With regard to the first one, the vessel in distress, the first concern we would have as the Maritime and Coastguard Agency there is to save lives, to make sure that there was no loss of life on board.
The second question that then emerges of concern to us is to ensure that we prevent pollution from any oil on the vessel being spilled. To that extent, the emergency towing vessels have one purpose and one purpose alone, which is what was described by Captain Belton in his report, which is of the ETV principle, and that is that the only real purpose of an emergency towing vessel is to be able to get to a vessel which is at risk of being driven ashore by the wind, before it gets driven ashore—a disabled vessel. To that extent the ETV has a role to play, although, as has been described in other ways, it does rely upon that tug being in the right place at the right time to get to a disabled vessel.
From that point onwards the issue is one of preserving property or a salvage of property. Our concern is saving lives and preventing pollution, which is encapsulated in the strapline of the agency—“Safer Lives, Safer Ships, Cleaner Seas”. But, for the purposes of salvage, salvage is a commercial matter between the owner, the insurers and cargo owners.

Q143 Mr Leech: But if there is nobody to pay for it, potentially it might not receive any assistance in a completely commercial environment?
Philip Naylor: For a vessel which is disabled at sea, it is inconceivable with the international regulations to do with port state control and certification that a vessel would not be insured, but in your hypothetical case then it is conceivable that there would be no assistance rendered to that vessel, yes.

Q144 Chair: What has the reaction been of the French authorities to the decision to withdraw the Dover emergency towing vehicle?
Sir Alan Massey: I have not been party to their specific responses. We have received—
Q145 Chair: Have they responded?
Sir Alan Massey: There was a response to the Department for Transport. I saw a copy of a letter.
Q146 Chair: Wouldn’t you expect to know what their response was, if this is under your responsibility?
Sir Alan Massey: The arrangement that we have with the French is that they share the cost of one of the tugs and we station it then for alternate weeks.
Q147 Chair: But wouldn’t you expect to know what the response of the French has been to this issue, because this is your responsibility?
Sir Alan Massey: The French have sought further clarification of what we are seeking to achieve.
Chair: So you do know something then.
Sir Alan Massey: Yes, but that’s not—
Q148 Chair: Would you like to tell us properly then what it says, not that you don’t know? Now you are saying they are seeking further clarification. What is it they are saying?
Sir Alan Massey: The one letter that I have seen requested further clarification of what the Government’s intentions are. It was a letter in French. I haven’t actually seen the translation. I don’t know if Mr Naylor has seen more on that.
Q149 Chair: I just want to know how the French have reacted. You said you didn’t know, then there is a letter, now you know something in it, now it is all in French and you might not know. What are the French saying beyond that they want further clarification? Is that all you actually know?
Sir Alan Massey: To my knowledge it is seeking further clarification. Mr Naylor may know more.
Q150 Chair: To your knowledge, okay. That is all right. I think that tells us enough. We have also been told that a risk assessment carried out in 2008 showed that the Dover emergency towing vehicle cannot be easily replaced by a private sector provision. Is that correct?
Sir Alan Massey: I have not seen that risk assessment.
Chair: You have not seen it?
Sir Alan Massey: I have not seen that risk assessment.

Q151 Chair: I find that most surprising, if you are planning to make a change and you have not seen it. Can you tell us then why you want to wind up the Maritime Incident Response Group?

Sir Alan Massey: What the Government have said with regard to the Maritime Incident Response Group—

Q152 Chair: The Government or you? Have the Government directed you to wind that up?

Sir Alan Massey: It was part of the spending review settlement and so it was announced by Ministers.

Q153 Chair: Have the Government directed you to wind that group up?

Sir Alan Massey: Yes. It was part of the spending review settlement.

Q154 Chair: But have the Government directed you to do that?

Sir Alan Massey: The Government have directed us to review the arrangements for the MIRG to see how it could be provided in the future at no cost to Government.

Q155 Chair: Are you satisfied that winding it up won’t pose a risk to life?

Sir Alan Massey: We are rather hoping that we won’t necessarily end up with the position where the capability is wound up. We are currently negotiating with the chief fire officers and the fire authorities to discover where there is room now for just changing the way things are done in order to preserve some measure of capability but within the overall remit that was set by the spending review.

Q156 Chair: Have you undertaken a risk assessment?

Sir Alan Massey: Could I pass that to Mr Naylor, who has been leading this?

Chair: Mr Naylor, has a risk assessment been undertaken on winding up the Maritime Incident Response Group where the fire service work with you?

Philip Naylor: No risk assessment has been conducted on winding up the MIRG.

Q157 Chair: From what Sir Alan says, I gather you are looking now not at winding it up but possibly at changing it.

Sir Alan Massey: We are currently at a stage where we now want to negotiate and consult directly with our partners and the partners of the 15 fire and rescue services that are committed to the MIRG at the moment. We haven’t gone directly to them, although we have been engaging with their spokesman for some time now. We are just at the cusp of beginning to discover what is the art of the possible here.

Q158 Chair: So that means you are actually discussing the situation with the parties involved.

Sir Alan Massey: We will be as soon as we have clearance to negotiate directly with all of them, bearing in mind—

Q159 Chair: Who do you need clearance from?

Sir Alan Massey: We have asked Ministers to agree that we can now engage with the local authorities who are responsible for the 15 fire and rescue services, because since some of them sit in devolved administrations we just have to be absolutely clear about doing it in the proper way.

Q160 Chair: So you are waiting for Ministers to give you approval to talk to the people who are running the service.

Sir Alan Massey: Yes, we have asked Ministers to simply approve that we now go from the position we have been at the moment, which is to speak with their spokesman, and to directly negotiate, because we have to be careful to get that process right.

Q161 Julie Hilling: I think it is very interesting you say “rather hoping”. It seems to me that we are talking about emergency services here. So you are rather hoping that something will come out at the end of this. Would you like to talk a bit more about that, because that seems to me as not really very adequate?

Sir Alan Massey: Yes. Provision of fire fighting capability at sea is not a statutory requirement and we are unique, actually, among all of our neighbour nations in having something called the MIRG. The position we are in now is that there is no money available for MIRG on the basis that it has been set up at the moment. The money has been taken in spending review savings. What we need to do now is to see, based on what has already been invested in it in terms of equipment, techniques, procedures, concepts and training, whether there is some residual capability there that would be adequate for the purposes of saving life at sea. It is a moving target. We don’t quite know what the art of the possible might be, which is why I had to couch it in a word like “hope”.

Q162 Julie Hilling: And if there isn’t, because we know there are cuts for land-based services and everything else, are you saying this is then just abandoned?

Sir Alan Massey: I can’t make that judgment. Ministers will have to make that judgment. At the moment we are exploring what the options might be.

Q163 Julie Hilling: But the Government have said, “This has got to go”?

Sir Alan Massey: No, the Government have actually said that there is no more money and we are now to review arrangements to see in what form some sort of provision could be sustained.

Q164 Julie Hilling: There is no more money so therefore the service has got to go.

Sir Alan Massey: It might not necessarily. That is exactly what we are trying to seek to understand.

Q165 Chair: Will you be approaching the chief fire officers before the end of this financial year?
Q171 Mr Harris: You did it for the ETVs, but you didn’t do it for the coastguards and you are not doing it for the Maritime Incident Response Group. Is that right?

Sir Alan Massey: On the coastguards, I think we explained that we did risk assessments at every stage. We looked at each potential evolution from the current state to the future. We looked at the current risks and we saw how the migration to the new system would mitigate those risks. So we have done that.

Q172 Mr Harris: You have done it but you haven’t actually published anything.

Sir Alan Massey: No, because publication of an explicit risk assessment is not something that I have been mandated to do, but I can understand there is an appetite for it, which is why we are publishing those two risk assessments this week.

Q173 Mr Harris: Why did you do the risk assessment on the emergency vehicles but not on the Maritime Incident Response Group?

Sir Alan Massey: Because we are not at that stage, I don’t think, yet.

Q174 Mr Harris: So you will be doing one then?

Sir Alan Massey: It depends what happens with our future negotiations. We will sit down with the fire and rescue service partners and they will undoubtedly come up with their view of how things are and what they perceive the risks to be. We will come up with ours and we will come to some sort of sense that when we formulate the options for Ministers to take their judgments on this will be embedded in it. It is the stage we always go through.

Mr Harris: Thank you.

Q175 Chair: I want to turn to search and rescue helicopters. A statement on the current position in relation to a private bidder was issued at 7 o’clock this morning and has been followed by a ministerial statement. What can you tell us about that situation and, specifically, what can you tell us about the state of search and rescue at the moment? Are you satisfied with the way it is operating currently and what can you tell us about the statement that was issued earlier this morning?

Sir Alan Massey: Madam Chairman, in regard to the former, this news has only just broken and it is far too early for us to state any sort of position. This is under review by Ministers and I have no position. On the second point, I am entirely satisfied with the quality of service that our search and rescue helicopters provide at the moment.

Q176 Paul Maynard: Are you satisfied therefore with the availability of figures for Sea King, which I gather are only 61% available, which seems rather low for such important equipment?

Sir Alan Massey: On the first point I am very satisfied with our own coastguard helicopters, which meet the service standards in every respect. In terms of the performance of the other aircraft, they are search and rescue partners with us, but that is really a matter for the UK Strategic Search and Rescue Committee.

Q177 Paul Maynard: So you have no views on the matter?

Sir Alan Massey: I am not entitled to a view.

Q178 Chair: But you might have one?

Sir Alan Massey: My view would be that I have yet to see, in my term of office, any indication or evidence of any failure to rescue people out of the sea by helicopters.
Q179 Chair: So you are fully satisfied with the way the service operates?
Sir Alan Massey: I am satisfied with where we are at the moment, Madam Chairman, yes, but I clearly listen to what the UK SAR Strategic Committee will be telling me. From my perspective and the operation that I use and the tasking of helicopters that falls to me and my staff, we are satisfied with the service that we have.

Q180 Chair: You don’t have any concerns about it?
Sir Alan Massey: I have no concerns today, but if you ask me a question that said how will things look in 2016 it might differ. We have to look at different factors.

Q181 Kwasi Kwarteng: I just wanted to see your position on what the general feeling is in terms of the Committee and the public at large. It seems to me that you are going into a position of unusual savings in terms of the financial situation. We have heard that you have, I would say, a haphazard approach to risk assessment. There are issues about concentrating or diminishing the number of outposts. Do you understand, with all of this, the kinds of concerns that people might have? Do you appreciate that?
Sir Alan Massey: I think I do, sir. I appreciate it slightly more acutely as a result of the sorts of messages that we have been receiving as a result of launching the consultation into coastguards. But if that means am I concerned and do I feel that we have gone down the wrong route, the answer to that is no, at the moment.

Q182 Chair: Have you had any confirmation of your capital budget?
Sir Alan Massey: No we haven’t, Madam Chair.

Q183 Chair: Do you know when you are going to be getting it?
Sir Alan Massey: I don’t know. Mrs Ketteridge may.

Q184 Chair: What particular concerns do you have?
Sue Ketteridge: First, I have absolutely no concerns over the level of capital budget. The fact that in the memorandum we submitted to the Committee had “TBC” for future years simply meant that the discussions with the Department over their internal allocation process had not concluded.

Q185 Chair: But what are the particular things you would be concerned about being cut back?
Sue Ketteridge: If I did not have a capital budget to meet the requirements for the Agency then I would be concerned, but that is not the case at the moment so I am not concerned.

Q186 Chair: You have not had any indications of what could happen?
Sue Ketteridge: No. The discussions I have had with the Department to date do not give me any cause for concern about whether or not we would be properly resourced in our capital budget to deliver the obligations upon us. Clearly the outcome of the consultation document may mean that we need a different profile or a different spread of capital investment, depending on what the outcome is, but I am absolutely satisfied and content that, once we know the answer to that and can articulate exactly what our requirements are, I will be in a position to have those discussions with the Department and I would trust they don’t put me in a position where I am trying to deliver that for that. But at the moment that is not the case.

Q187 Gavin Shuker: We have touched on a lot of different issues and areas today, but the clear thing that has come through is there have been significant cuts in what you can deliver. To what extent would you say that the work that you are doing and the reforms that you are doing are driven by cost pressures rather than restructuring?
Sir Alan Massey: That is an extraordinarily difficult question to answer. I would look at it in a slightly different way, alluding back to this business about the coastguard and modernisation. It has been in gestation for a while but it has taken the impetus of a requirement to find savings that has probably pushed us across the start line in a way that has not happened in previous administrations. So in that sense, and without being in any sense cynical, it is an opportunity. It is an opportunity to modernise. Just on the point of savings, a really important additional observation is that we are not saving everything that we could save from doing this. In fact, part of the package that I have put forward is deliberately configured to allow for a recycling of cash into where it needs to be, which is the remuneration of our coastguards, who, in certain contexts, I think, have been underpaid for a long time for the job that they do. So it is not as if this is driven entirely by savings. This is driven by betterment.

Q188 Gavin Shuker: Isn’t the reality, though, that the Government have cut the amount of money coming to you by 22% and, as a result, regardless of whatever consultation goes on, you will be cutting back service?
Sir Alan Massey: We will but we are not unique in that sort of sense. This is right across Government.

Q189 Gavin Shuker: But, Sir Alan, you are unique in the sense that you are a safety agency in a sector where you are facing growing challenges, growing numbers of call-outs, for example?
Sir Alan Massey: Yes, but I think that is the case for other Departments as well.

Q190 Gavin Shuker: You are comfortable with that position. You think you got a good settlement at 22%?
Sir Alan Massey: I have got a settlement which I think I can live with, I think I can deliver, and at the end of it, because of the way that we have been able to approach this, it will result in a better, safer, service.

Q191 Chair: Is there a tension between your role of attracting more ships to the UK flag at the same time as maintaining high standards? Is there any contradiction there?
Sir Alan Massey: No, on the contrary. Again, Mr Naylor is better placed to answer this, but from a strategic perspective it is a good thing for the UK to have a large, healthy ship register, because we do it on the basis of high-quality shipping. The higher the quality of shipping that we have and others have, the safer the seas are. But Mr Naylor perhaps knows a little more detail.

Philip Naylor: We do not see a tension, and this Government’s policy is one of encouraging a strong and sustainable maritime sector. One of the parts we play in that is to provide a high-quality flag for ships that want to register themselves in the UK. To that extent, we have a flag which has attracted growth over the last 10 years but has not attracted growth, certainly in recent years, at the expense of accepting substandard or inferior-quality ships on to the flag. We now have a very clear focus on attracting high-quality young ships from quality owners on to our flag.

Q192 Chair: Do you have any views on light dues?

Sir Alan Massey: Actually, no, I do not, Madam Chair. That is way outside my competence. It is a Department issue.

Chair: Thank you very much for coming and answering our questions.
Tuesday 26 April 2011

Members present:

Mrs Louise Ellman (Chair)

Jim Dobbin
Mr Tom Harris
Julie Hilling
Kwasi Kwarteng

Mr John Leech
Paul Maynard
Iain Stewart
Julian Sturdy

Examination of Witnesses

Witnesses: Steve Quinn, President of Coastguard Section, Public and Commercial Services Union (PCS), David MacBeth, Assistant Secretary, Coastguard Section, Public and Commercial Services Union (PCS), Steve Todd, National Secretary, RMT, and Allan Graveson, Senior National Secretary, Nautilus International and Prospect, gave evidence.

Q193 Chair: Good afternoon, gentlemen, and welcome to the Transport Select Committee. Would you give your name and the organisation you represent, please? This is for our records. I will start at the end here.

Steve Quinn: Steve Quinn, PCS.
David MacBeth: Dave MacBeth, PCS.
Allan Graveson: Allan Graveson from Nautilus International, also representing Prospect.
Steve Todd: Steve Todd, RMT.

Q194 Chair: Thank you very much. Does the Coastguard need modernising?

Steve Quinn: I would say the short answer would be yes. We certainly need to move with the times and embrace new technology. The current proposal is offering wholesale cuts to the Coastguard Service with no real benefit that we can ascertain.

Q195 Chair: Who else has a view? Does the system need any change?

Allan Graveson: Yes. I believe there is always room for change in any organisation. An organisation that ceases to have change, shall we say, does not meet the challenges that are required. But, however, change should not mean wholesale and indeed random—or what appear to be random—cuts.

Steve Todd: I think pretty much the same as my colleagues. Without repeating what Allan has just said, along those lines, while we welcome change for the better, it doesn’t necessarily mean that there have to be cuts.

Q196 Chair: Can you identify any weaknesses in the way things work now, or do you have any suggestions of what change for the better might mean?

Steve Quinn: Change for the better would be if there was better resilience within the Service and if better technology could be used. At the moment we are very much reliant on radios and BT telephone lines. With the best will in the world, if the BT telephone system goes down, then we lose all our communications. There are areas that could be investigated where better technology, if it was available, could certainly be utilised.

Q197 Chair: Do you think that the Maritime and Coastguard Agency proposals will bring improved technology?

Steve Quinn: Certainly not that we have seen. We have seen no details of any new technology at all. The proposal that is on the table at the moment is utilising the existing technology but cutting frontline coastguard officers by 48%. Cuts of that magnitude can only end up leading to putting people’s lives at risk.

Q198 Chair: Does anybody else have a view on what kind of changes could be beneficial?

Allan Graveson: Yes, I do. If you are going to make change, you have got to invest and inevitably there is an upfront cost as a consequence. You could introduce some of the systems which are extensively used in the military in order to manage your situations in a different way and also make utilisation of technology that is available to them. But, of course, that requires capital investment. Currently, I believe the coastguard stations are, essentially, paired. That geographical pairing itself is a weakness. Certainly, if you could integrate, as we do with the internet, all of the stations together in one command and control system, I believe that would give significant benefits, but it does require investment in new technology.

Q199 Chair: Is that kind of investment in the proposals that the Maritime and Coastguard Agency have submitted?

Allan Graveson: I would regretfully say no, I don’t think it is there. They do allude to the idea of new systems of communication, but it is, I would suggest, insufficient. We have to look at this not just in a single context. We have to look at this in a much more holistic way.

We have lost the Nimrod aircraft with Searchwater radar and the search and rescue capability is reduced. We have an ageing helicopter force. Potentially, we are looking to lose the MIRG and then the coastguard stations as well. This is wholesale change that is taking place and there doesn’t seem to have been any thought given to what our end position is. We want to provide truly to this nation and its people a proper Coastguard of which we can be proud and that has a reasonable prospect of carrying out the job for which...
it is designed, and that is to rescue people at sea and provide the necessary support, indeed inland, in the event of certain natural disasters occurring.

**Q200 Chair:** Mr Todd, are there any changes you would like to see? The Maritime and Coastguard Agency say that many coastguards are underemployed and that the load of the work is very unevenly spread. Would you agree with that assessment?

**Steve Todd:** I can’t say, hand on heart, I could agree with that assessment. But, at the same time, if there were any improvements, I would like to see that the Coastguard would be funded properly and not based on a volunteer basis, to see more full-time people employed by the Coastguard Agency and not so many in the volunteer sector. The shipping industry brings so much money into our economy that it should be wholly funded. That is my view. If you are aware of the amount of funding that they receive at this moment in time and the proportion, on the balance of payments, of what the shipping industry brings back into the economy, it is far too disproportionate.

**Q201 Chair:** Mr Quinn, do you agree with the MCA statement that many coastguard officers are underemployed and that the workload is very unevenly spread?

**Steve Quinn:** With regard to the statistics that the MCA have put out in that document, there is no balance or weighting given to any of those statistics whatsoever. They state on the south coast during the summer months that the stations are very busy. This is a fact. What they don’t say is that, for instance, the stations in the northern part of the UK you can have an incident running for there is no weighting at all. As I say, in the northern incidents, when you delve down into those statistics would indicate a north-south divide on the number of incidents that might run for days at a time. So there is no weighting to them at all. Whereas the bald facts are otherwise. They state that many coastguards are underemployed and that local knowledge may or may not have been lost as a result of those coastguard stations closing?

**Q202 Mr Leech:** I want to move on to something different. Obviously, over the years, a number of coastguard stations have already closed. Can you tell me what impact the closure of those stations had on the work done in the other stations and, most specifically, what local knowledge may or may not have been lost as a result of those coastguard stations closing?

**Steve Quinn:** There has been no hard evidence gained to define what happened since the last round of coastguard closures, unfortunately, not that I am aware of anyway. Certainly with regard to the local knowledge, at the moment local knowledge is a vital tool that the Coastguard use every day in every incident they come across. You used the words “call handling centres” a moment ago. If you have somebody in difficulty in the water or somebody hanging by their fingertips off a cliff top, minutes count. I will give you a perfect example if local knowledge is diluted into two centres during night-time only and all the other stations are closed. At the moment, if a phone call went into a station in, say, Liverpool, Clyde or Belfast, telling us that somebody was in trouble on Blackpool Beach, the chances are those people in those operations rooms have a fair idea they are talking about Blackpool in the north-west of England because that is where they are based. However, if that call went into a southern MOC, they might think it is not the Blackpool in the north-west of England but a Blackpool down on the south coast, because there is another Blackpool down there. I am sure the professionalism of the coastguards would resolve those issues, but it will take time. It will take longer than knowing that information instantly. You have to go through a system of trying to ratify which part of the world you are talking about. My colleague here from the Western Isles can give you examples of four, five or six place names all with the same name.

**Q205 Chair:** Mr MacBeth, can you give us a couple of examples?
David MacBeth: Yes, sure. We have four Tarberts, plus a Tarbet. We have four Crathes; we have two Scalpayes. We also have places that sound the same. We have two Mallaigs, Melvaig, Maravaig and Moraig.

Q206 Mr Leech: We have a situation here where we are going to close or it is proposed to close further coastguard stations, but I want to know whether there is any evidence that, when the other ones have closed previously, there are examples of where this has caused a real problem, resulting in someone not having the local knowledge from a particular area that no longer has that coastguard station?

Allan Graveson: I can’t give a specific example because that was evolution and not revolution. At the time that was considered a relatively modest change. It was spaced over time and there was an ability for people to adapt. So that was evolution. What we are looking at here is revolution. We are looking at a situation that was considered a relatively modest change.

Q208 Iain Stewart: Mr Graveson has actually touched on the question I was going to ask and perhaps the other panel members could comment. That is, if you get your wish list of new technology, will you require the current number of stations and also the number that will be open 24 hours a day?

Steve Quinn: Until we know what that technology is and what it could achieve, I really couldn’t give an answer on that one at the moment.

Q209 Iain Stewart: But do you think there is a potential for rationalisation, or will we, in your best guess, still need the current number?

Steve Quinn: The PCS is still in the process of putting together a response to this document. I wouldn’t like to pre-empt what that response would be, but certainly at the moment if the MCA or anybody else could come up and say, “This is the technology we propose to use. This is what it can do. This is how you can operate it”, then we could certainly have a look at it. We have been calling for the MCA now to have a live exercise for over two years to put forward their ideas into a live exercise scenario so that we can test it and they can either prove it will work or it won’t work.

But, at the moment, despite our requests time and time again, we have not had this live exercise yet. So I can only assume that they haven’t got the technology that you are envisaging.

Q210 Iain Stewart: If I can follow that up, do you have evidence from other countries that have introduced new technology in their coastguard stations and been able to rationalise, or have they kept the same number of stations?

Steve Quinn: In fairness, the UK Coastguard is unlike just about any other coastguard in the world. In the UK, the Coastguard not only task assets but they co-ordinate that incident from start to finish. By and large, other coastguards around the world will task an asset and basically take a step back then and leave the professional asset themselves to organise that rescue. The two are not exactly compatible. We have no figures or facts to back that up one way or the other.

Q211 Julian Sturdy: Just following on from Mr Stewart’s question, there has been a lot of talk about the need for new investment in technology. Could you just highlight to me what sort of new technology you are talking about? Obviously we have been talking about satellite systems and things like that, but where would you like to see the direct investment going? A number of you have touched on this already, but I would just like a bit more detail on this, if I could, from across the board.

Steve Quinn: As I said before, at the moment we are very much at the mercy of the BT telephone system in its simplest form. If a workman with his digger digs
up a telephone line that happens to go to our aerial site or an exchange, we lose that aerial site. That is a weakness inherent in the BT system. If we could use satellite or cableless communications, that would then give us more resilience in the fact that we are not then at the mercy of somebody digging up a piece of wire. If these technologies are available—and I know some are—I don’t know at this moment in time whether they would give us the resilience we need, but certainly that is an area that I think should be investigated. If that technology is there, then it should be put into the system.

**Q212 Julian Sturdy:** Is that the feeling from everyone?

**Allan Graveson:** Yes, that is the feeling—that it should not only be the coastguard stations. I start out at the further limits here of aircraft with Searchwater radar. We know the Nimrod has been scrapped. I believe the chief executive of the MCA was not aware of that when these proposals were made. We do have some existing aircraft that could be used equally well. We could buy in smaller aircraft in order to provide that capability of Searchwater radar. Remember, we are responsible for half of the North Atlantic as a country and we have to borrow assets from Ireland and France. That is really quite impossible.

**Steve Quinn:** If I can just make one more comment on that one, the AIS has been mentioned. The AIS system we have in the UK at the moment for vessels is VHF radio-based, so you are looking at 30 miles best range. There is an option to have satellite-based AIS, but, as I understand it, the MCA are not looking into buying into that technology at the moment. If we got satellite AIS, we could potentially have global notification of vessels anywhere in the world that are intending coming to UK waters.

**Q213 Julian Sturdy:** If I may, I have a supplementary on that exact point. Mr Stewart asked about what other countries were doing. Are any other countries buying into that already? Is that operational in other parts of the European waters?

**Steve Quinn:** The Norwegians, as I understand it, and certainly the Americans are using this technology or they are bringing it on stream as we speak.

**Q214 Julian Sturdy:** So it is being developed at the moment.

**Steve Quinn:** Yes. I don’t know how far down the road it is. I do know it is more than a concept, if I can put it that way. The satellites are already in place, I understand.

**Q215 Chair:** Am I right in saying that, if there was a different kind of technology being proposed, you might have a different view on these proposals, because the whole thrust of the Maritime and Coastguard Agency’s proposals is that technology can deliver results in a much better way than it does now and that then would justify the change in the arrangements? I just want to be clear that you are saying that, as you understand the proposals, that new technology isn’t there.

**Allan Graveson:** No, Chair. If I may say, Chair, it is people that use technology. You can use technology to help a system, yes, to some extent substitute, but there is a limitation on that. You still need people and, arguably, you need more highly skilled people as a consequence of the introduction of this technology. You must remember the range of cases with which the Coastguard have to deal. It is not with the Deepwater incident in the mid-Atlantic. It is on our beaches, our coastal areas and, indeed, inland even into our rivers that they have to operate. Therefore, there is a limitation on the technology. It will help and assist, but it is no substitute for sufficiently qualified and able personnel.

**Steve Todd:** What I was also concerned about, as Allan quite ably said, is that you need people to use the technology and you need to train those people to a higher level if it is going to be new and improved technology. Without seeing what has actually been proposed, how can they even contemplate reducing the number of people already, without looking at what technology is going to be in place? In addition to what they are doing with the Coastguard, don’t forget that the intention is also to withdraw the emergency towing vessels and the Maritime Incident Response Unit for firefighting. All that has to be taken into consideration in what is being proposed here. It is just far too much.

**Q216 Paul Maynard:** I have listened carefully to what you have been saying and I read your evidence carefully. It is a very powerful act of oratory from Mr Graveson in particular. I am very clear as to what you are against. I am struggling to a certain extent to establish what you are for in terms of the Coastguard. In particular, I am still not clear to what extent you believe that the introduction of new technology—technology you have not been able to describe in any great detail but that is out there somewhere, you seem to suggest—would impact the number of coastguard co-ordination centres required. Can I ask you, Mr Graveson, with regard to Wales in particular, how you arrived at the number of two as the ideal number of coastguard co-ordination centres?

**Allan Graveson:** Of course I said three for Scotland, two for Wales, one for Northern Ireland and five for England. I felt that two was right for Wales because you need some resilience. Of course, we are looking at North Wales and South Wales. We also have to link up with our colleagues in Ireland of course. There is a dual responsibility here. I thought that would be the absolute minimum for Wales. More would be desirable, I fully agree, but I think two, because if one goes down you’ve got another one. I did mention the Welsh language there. I think that is very important and it is certainly very important to the people of Wales. So, if one goes down, you have another one available. I appreciate the majority of incidents will be reported in English; in some cases it might be very fractured English from many of the seafarers that are on the ships around our shores today.
Q217 Paul Maynard: Can you just confirm that, in making your apportionment, you did not refer to the existing caseload of current coastguard stations?
Allan Graveson: Yes, I think you can look at caseload because—

Q218 Paul Maynard: Did you?
Allan Graveson: I only looked generally because of the different seasons of the year. We can be affected by different meteorological conditions, and, clearly, when you look at the Coastguard, the demand does change seasonally. That is a reality.

Q219 Paul Maynard: May I ask a further question to the panel more generally about the issue of local knowledge? Clearly you have stressed its importance already. Do you have confidence that the members you represent working in coastguard co-ordination centres have a sufficiently high level of local knowledge? I use “local knowledge” in the definition adhered to by the MCA, i.e. in terms of the tests that people have to sit.
Steve Quinn: Certainly, as you say, each coastguard officer has to re-qualify in local knowledge for the station in which they are based, every two years as a minimum. Local knowledge is a never-ending thing. You will always gain more and more local knowledge the longer you stay in any given area. Certainly, since the consultation was announced, we have travelled round every single coastguard station in the UK, and I would say maybe three or four people have said they would be prepared to move to one of these two Maritime Operations Centres if it came about. The MCA is saying that local knowledge will be retained within the MCA by people moving from the stations where they are now into these two stations. But, for various reasons, not the least of which is the expense of moving to these stations, the chances are that the MCA personnel coastguard officer will be the second earner in that family rather than the main earner. People just cannot afford to move. So, as I said, in every station we have visited, there will be three or four people who have said, “Yes, I will move to one of those new stations.” Therefore, that local knowledge will not migrate to these MOCs.

Q220 Paul Maynard: Are you concerned at all by the striking variation in the quality of the local knowledge tests set by each maritime rescue co-ordination centre? The pass marks vary from some that have no pass marks at all to some that require 80% and others that require 50% in specific sections. Do you have any concern at all that your members are not adhering to the very highest standards in each maritime coastguard centre, because, having looked at what has been deposited in the library, I have some very grave concerns about the quality of these tests, and yet you are basing so much of your argument upon the importance of retaining local knowledge?
Steve Quinn: I can’t comment on how other stations would do their local knowledge tests. I have no first-hand knowledge of that myself. However, as I say, they are tested as a minimum every two years. With the best will in the world, it doesn’t matter what technology we introduce, and it could be the best technology possibly in the world for communications, but there are certain things that technology cannot provide. If I can just give you one very brief example, just a couple of weeks ago in the part of the world where I work, we took a call. A very distressed gentleman was watching another gentleman drown. He was using the name of the beach. He was saying it is New Aberdour beach. You can search any database, any chart, any piece of technology you like; you will not find anywhere called New Aberdour beach. New Aberdour is a village some three miles inland, but all the locals know that that beach is New Aberdour beach. It was only local knowledge that managed to solve that problem. It doesn’t matter what technology you have. The technology would not resolve that problem. There is nowhere called New Aberdour beach, but the locals refer it to as that and the officers in that coastguard station knew exactly where they were talking about.

Q221 Mr Harris: Just for the benefit of people watching this, Mr Quinn, did the gentleman survive?
Steve Quinn: Unfortunately, no.

Q222 Mr Harris: All of you have come today to respond to what the service is suggesting in terms of cuts. I think all of you have responded by saying that, instead of cutting, the Government should actually be spending more money on the Coastguard Service. Is that realistic? Would you expect that to succeed in your negotiations with the Government? At a time when every other public service is facing major cuts, you are walking into the Minister’s office and saying we should spend more on coastguards. Is that right?
Allan Graveson: If I can answer that, with regard to the rational argument that you can cut 20% of everything, yes, you might well do that in economies like Canada and Sweden, with high natural resources and low population. Here, yes, you could cut 20% of everything.

Q223 Chair: Mr Graveson, Mr Harris is asking you about increasing spending and how realistic that is.
Allan Graveson: However, in order to get savings later on, you need to invest up front in technology first, in order to generate the savings later. That, I believe, is what you need to do first. It requires some investment. The Coastguard, arguably, here is operated on a shoestring in this country. You have to face the reality of this. We therefore should look to investment to bring savings further on in the time frame.

Q224 Mr Harris: Could you explain how those savings would be materialised further down the line?
Allan Graveson: Yes. I mentioned quite clearly earlier that you could have 11 stations: three in Scotland, one in Northern Ireland, two in Wales and five in England. Yes, by bringing the communications systems together, the introduction of new technology, enhanced training, and the improvement of databases. That would require the investment up front. It could be achieved, but it cannot be achieved overnight. You need to do this with a proper risk assessment, arguably
even a formal safety assessment, even to that degree. Adopt a scientific approach to the cuts.
Here we are seeing 100% cuts in some capability. We are not seeing a 20% cut. We are seeing a 100% cut in some capability, which I would suggest is highly dangerous.

**Q225 Mr Harris:** Mr Quinn, PCS, in written evidence suggested that you were concerned about the social effects on your local economies if certain coastguard stations close. Would that be right? Is that one of PCS’s concerns?

**Steve Quinn:** That is one of the concerns, yes. I think my colleague here could better answer that one, with due respect, because he works in one of these small coastal areas where, if that station were to close, I would imagine it would have quite a devastating effect on the local economy.

**David MacBeth:** We are very much part of the community where we are, and most of our operators are second incomes because of the poor wages. It is not just the coastguard which would be affected. It is the local shops that would lose money. It is the contractors we have that maintain our vehicles, buildings and so on. They would all lose. Our unemployment rate is one of the highest in the country.

**Q226 Mr Harris:** But is it the Government’s job to be worried about that? Surely, the Maritime and Coastguard Agency’s responsibility is to maintain safety in the sea. Surely this is a kind of “by the way”; it is an incidental effect of having these coastguard stations. Is the Government responsible for that?

**David MacBeth:** I feel it should be taken into consideration.

**Q227 Mr Harris:** Isn’t that an argument for saying you should double the number of coastguard stations and then you will improve local economies everywhere?

**David MacBeth:** No, I am not saying that at all.

**Q228 Jim Dobbin:** Obviously this is a very high profile health and safety matter, not just for the general public but for your members. I am not sure whether we have established this yet, but were you concerned that your members got real in-depth consultation?

**Chair:** What kind of consultation was there?

**Steve Quinn:** The short answer is there was no consultation whatsoever. The staff were not consulted on any of these proposals. They were not asked to put forward any alternative proposals until after this proposal was actually published. The PCS was promised by the MCA that we would have a sight of this document well in advance of it being published. In reality, we got to see it two hours before it was published. So there was no consultation with staff before this document was published and there was no consultation with the union either.

**Q229 Jim Dobbin:** Are they basing their proposals on statistics?

**Steve Quinn:** I think by and large they are, yes. Since this document has been published and the consultation process, then, yes, everybody has been asked to put forward their proposal. But prior to that document being published there was no consultation whatsoever.

**Q230 Jim Dobbin:** That really worries me. Just following on that, I understand that there are a number of substations that are not going to be open 24 hours. A number of them—I think there are five in total—will be open during the hours of daylight. Does that not worry you?

**Steve Quinn:** Very much so. Again, you can look at statistics and you can say some stations are busier during daylight hours than night-time hours and busier during summer rather than winter. But you can look at other stations and there is no seasonal or diurnal variation whatsoever. Some stations can be as busy at 3 o’clock in the morning as they can be on a bank holiday Monday. So, yes, the fact that you are assuming you are only going to have major incidents during daylight hours, I think, is a very fraught assumption to make.

**Q231 Chair:** What would the impact of the proposed closures be on volunteers?

**Steve Quinn:** It is worth saying that the UK gets search and rescue very much on the cheap. We have 7,000 volunteer coast rescue officers; they are volunteers. The RNLI, mountain rescue and cave rescue are all volunteers. If these proposals go forward, then one could argue that there is going to be more reliance on these volunteers because the local coastguard station won’t be there. So these volunteers will have to be more available than they are now. At the moment we have no guarantee that, when we set the pagers off, anybody will respond or enough people will respond. As a consequence, if we want, for argument’s sake, a cliff rescue team, we might have to page two or three teams to get the numbers up. If that local coastguard station is no longer there, then the eyes and ears, the local knowledge, is going to be resting more and more on these volunteers.

**Q232 Chair:** Do you think the willingness of volunteers to be involved would be affected by the closures if they went ahead?

**Steve Quinn:** It is difficult to say. I am not in that position myself, but, if the station that you have been working with for a long time is no longer there, then the potential is there that these volunteers could feel as if they are being left out on a limb and neglected. I don’t know; that is just my own feeling on it.

**Q233 Julie Hilling:** I have listened to what you have been saying. You think, really, there has been underinvestment in the service in the first place. I just wanted to pick up on that because some of those arguments you have had are around the issues of language and local knowledge, et cetera. With the current set-up of the coastguard stations, is there that in-depth local knowledge of all of our coastline? What is the resilience of the communications structure that we have now? In terms of language, yes, okay, people are speaking Welsh, Gaelic or English, but what about...
those other languages? Part of the plank of your argument is that you need that coverage. I am just wondering then, in reality, whether we are covering those issues now.

Allan Graveson: If I could answer that, we have talked a great deal about local knowledge, but, clearly, with the number of stations we are down to now, there is a limited capability to that extent of local knowledge. I would prefer to use the words “regional capacity”, and you need to maintain the Coastguard in the regions. Countries in Europe recognise this and I think we need to have that regional capability. That regional capability can be construed as local knowledge or extended local knowledge, to a point.

Q234 Julie Hilling: What do you mean by “regional capacity”?

Allan Graveson: I alluded to this earlier. With the devolution which has taken place in these islands, which we have to accept, feelings are running extremely high, but also you have to look at the geographical nature of these islands too. We are much more exposed on the western northern shores of these islands, and the further north and west we go we are certainly more exposed to adverse weather. The topography is very different. You must also remember that we have the most severe waters in the western world. That is another factor to bear in mind, with a hydrographic programme that is starved of resources.

With the new technology that is now coming on to ships, will they be able to navigate to the precision they can around the shores of other countries? The answer is no, they cannot, to the same degree of certainty as a consequence.

I believe that we need to maintain the capability, recognising the different geographical nature of these islands. The variance is wonderful but it does present its problems. Also, with the location of these islands, we are susceptible to changing weather. Just look at how it has changed in the last two days.

But on this issue, too, of the night-time, the sea has no respect for day and night—that is the reality—and little respect for life as well, as we only too well know. Therefore, I do believe that the stations need to be 24/7, and we need to have that regional capability which you can call extended local knowledge. That, I believe, is necessary.

Q235 Chair: But the MCA have produced figures saying there are more accidents during the daytime than there are at night. What would your answer to that be in relation to the daylight only savings?

Allan Graveson: I can give you an answer to that, Chair. The problem is the statistical analysis, I would argue, is flawed because we haven’t got a sufficient span of time. Yes, we can look at the leisure incidents and, indeed, some elements of the fishing industry which can have some degree of repetition. But we have to have the capability to deal with the very big incident when it occurs: whether that be a passenger vessel, as we saw with the collision of the Norwegian Dream with the Ever Decent, or whether it be a ferry incident as we had with the Princess Victoria over half a century ago in the Irish Sea.

These very serious incidents occur at intervals of 18 to 25 years. If you only take a small snapshot of five years, your statistics will be flawed. It is small sample analysis. It will deal with the minor issues but not the capability. We must bear in mind a major incident could cause £1 billion, £2 billion or £3 billion of economic damage to a coastline, and I would say the western northern coasts are more susceptible.

Q236 Chair: What about the proposals to change the plans for emergency towing vessels and remove the state from supplying them? Is that going to be a dangerous thing to do or do you think that change can be made?

Steve Todd: If you look at where those tug were first put into place, when you follow the Braer disaster and other disasters which happened similar to that, and you look at what has happened since then, we have an ever-increasing coastline where you have more and more oil and gas rigs and platforms on the coastline. I wouldn’t say we now have overcapacity, but there are more and more wind farms. The coastal line around us is becoming more and more difficult to navigate, I would say. Therefore, you need those vessels on standby when you have small pieces of coastline like the Minches and places in the north of Scotland where vessels could run aground very easily. They are an essential part of that rescue.

Q237 Chair: But can this be done by the commercial sector rather than by the state, Mr Graveson?

Allan Graveson: No. Arguably, there is a market in the Channel and the southern North Sea and some elements of the North Sea, where you have the potential capacity for towing. But, when we move to the west and north of these islands, it is not a question of the market coming in to pick up here where the state doesn’t provide; there just is no market. The reality is there is no market. This was recognised in the Donaldson report, and I think section 85 recommended this, that the state would have to intervene and provide such provision. It does not mean to say that it will be at the state expense. A properly drafted contract could surely bring money back into the state.

Q238 Chair: There are proposals for change, too, for the Maritime Incident Response Group, whether by disbanding it or by changing it. Do you have views on that? Would anyone like to comment on that?

Steve Quinn: Again, the system is in place now and it is like an insurance policy. Just because you have never had reason to call on it, you don’t get rid of it. The facility is there. My personal view is it should be retained. It is just a question of who would finance it.

Allan Graveson: It is a relatively modest cost. At the time of inception we had 22 brigades coming down to 16. We now have a national strategic plan, with a regional provision using nine teams of 50 firefighters. They can actually be dispersed not only to ships at sea but into harbours and could be used for other civil contingencies. For the price of it, it is an absolute bargain.
Witnesses: Stewart Henderson, Offshore Development Manager, Svitzer, David Balston, Director of Safety and Environment, Chamber of Shipping, David Offin, Managing Director, JP Knight Caledonian & Anglian, and Steve Jellis, President, British Tugowners Association, gave evidence.

Q239 Julie Hilling: I have a question about the view of other countries. I guess that you are involved with other associations internationally and I am just wondering what other partner organisations are saying about the proposals for our cut. Are they raising concerns for their mariners on these issues?

Steve Todd: I think the shipping industry itself would have to answer that question. If you asked the ship owners themselves what their concerns were, as far as we go for the ratings that we represent, we are concerned for their safety and for their future.

Allan Graveson: If I may, Chair, we are an Anglo-Dutch organisation and in the Netherlands they think what the United Kingdom is seeking to do is absolutely incredible. Admittedly, they have a relatively small coastline and a relatively small search and rescue area, but they find it absolutely incredible what the United Kingdom is doing.

Q240 Chair: What is that in relation to?

Allan Graveson: The cuts in the Coastguard at all of the levels. Their impression is that there has not been any thought given to what the UK has a responsibility for. We have a responsibility for half of the Atlantic as well as around our shores. Holland has a very modest area.

Q241 Julie Hilling: Have they already raised concerns about the level of coverage that we have and the level of support that is in place? You have given an impression that we should be investing much more. Have you received concerns from other places and other organisations at all? I appreciate you have heard it from within your membership, but have you also picked up things from outside about that level?

Steve Quinn: I do believe that, yes. Mr Gautrey, our full-time negotiations officer, who is not here today, has been dealing with people in France and Brussels and a lot of European countries. They are all expressing grave concern, as has just been alluded to, that the UK is proposing these quite drastic cuts right across the piece, not only in the Coastguard but doing away with the emergency towing vessels and the Maritime Incident Response Group.

Chair: Thank you very much for coming and answering our questions.

Examination of Witnesses

Q242 Chair: Good afternoon, gentlemen. Welcome to the Transport Select Committee. Could you give your name and the organisation that you represent, please, for our records? I will start at the end here.

Steve Jellis: Steve Jellis, British Tugowners.

David Offin: David Offin, JP Knight.

David Balston: David Balston, Chamber of Shipping.

Stewart Henderson: Stewart Henderson, Svitzer UK.

Q243 Chair: Thank you very much. Could you explain how the Government decided to sign the contract to fund the four emergency towing vessels it has today? Would somebody like to explain to me how that came about and why it would seem to be so important?

David Offin: It starts with the Donaldson report or the incident of the Braer in 1993. The Donaldson report, as was said earlier, in recommendation 85, suggested the use of emergency vessels. That went on to the Chris Belton report, which defined the areas they thought were most suitable for where emergency towing vessels should be positioned. As a result of that, there were separate areas put in place. Some of them were primary areas and some of them were secondary areas. It started, as you probably know, with the two vessels and the winter service, it then went on to three and then finally four vessels. We were lucky enough to be awarded that contract for the four vessels in 2001.

Q244 Chair: How often are those vessels actually called out, Mr Offin? Could you tell me that?

David Offin: Those vessels are called out for taskings. Probably, we have about 180 to 190 taskings that we go to on an annual basis. Some of them lead to further intervention, further towage, but we do get called out on about 180 occasions per annum.

Q245 Chair: How much business is generated for your company through the whole operations?

David Offin: The company receives the award from the MCA for the contract itself. In addition to that, it may receive salvage; it may not. But, at the same time, we then do not stay as part of the MCA. We come out of contract. There is a win win situation, and some of that money obviously goes back to the MCA as well.

Q246 Chair: But how much is generated and how much goes back to the MCA?

David Offin: 15% goes back to the MCA.

Q247 Chair: Out of how much?

David Offin: I can’t tell you that figure off the top of my head. It is in the order of £70,000 to £100,000, somewhere in that range. It is not big sums of money.

Q248 Chair: There seems to be some disagreement about how much the vehicles are actually being used or have been used in recent times. Would anyone else like to give me their view on that? I know the Chamber says that you do value the vehicles. Would you like to tell us why you think it is important to maintain them?

David Balston: I think the situation has not changed since Lord Donaldson originally wrote his report. It is still very clear that we need to have some form of emergency towing service to be available should a
large vessel or any vessel actually get into difficulties. There have been numerous occasions in recent years—a large number—which could have gone very badly wrong and perhaps didn’t go wrong because there were emergency towing vessels quickly on hand to be able to provide that level of service.

Q249 Chair: Mr Henderson, you seem to have slightly differing views on this. Would you like to tell us why you think the current system should be changed, which is what your evidence is saying?

Stewart Henderson: The need for the provision of a service, on the assumption that the ETVs are going to be discontinued, fully recognises the rationale behind having a service which still exists. The commercial market can take up some of that slack with existing operators. There is a case of saving money, which was the rationale behind this in the beginning. The Government felt it wasn’t right that the taxpayer should be funding the ETVs.

That does not mean there shouldn’t be a service. We fully support the fact that there should be the search and rescue capability, but I think the commercial market and other operators can possibly do that in other ways with existing fleet or modifications to its fleet should there be no ETVs.

Q250 Chair: Are you confident the commercial market could do that within the timetable the Government have put forward?

Stewart Henderson: Do you mean by the end of September 2011?

Chair: Yes.

Stewart Henderson: There would need to be some further discussions on that and there would need to be some changes, but a lot of the slack could be taken up in that time, yes. But there would need to be some further talks on how we went about it, to put detail on it.

Q251 Mr Leech: What circumstances would there be in which you would have a situation where the commercial market wouldn’t deal with a particular problem?

Stewart Henderson: Perhaps I can answer that. In the present circumstances “commercial” means just that. There has to be some recompense, and a tug owner or a vessel owner has to see some point in providing the service. If it is purely on a commercial basis, which was the rationale behind this in the beginning. The Government felt it wasn’t right that the taxpayer should be funding the ETVs.

That does not mean there shouldn’t be a service. We fully support the fact that there should be the search and rescue capability, but I think the commercial market and other operators can possibly do that in other ways with existing fleet or modifications to its fleet should there be no ETVs.

Q252 Mr Leech: What I am trying to establish is what the circumstances are, lack of insurance or whatever it might be, which would mean that a commercial operator would say, “I’m not touching that with a barge pole.”

Stewart Henderson: Each incident is done on its merits and at the moment it is done through negotiations with a vessel owner. We are talking about vessels in distress or, with the risk of pollution at the moment, it is a commercial negotiation between the vessel’s owners or insurers and an individual commercial operator. Only through that would you determine whether there were sufficient funds or whether you would want to deal with that.

There are existing commercial salvage contracts which cover those aspects. They are generally used in negotiations, and there are different forms of that to cover eventualities. But a commercial operator will make his own judgment on that.

Q253 Mr Leech: What I am trying to establish is whether there are going to be circumstances where action will not be taken because a commercial operator won’t provide the support. If so, what are the circumstances that create that situation where a commercial operator is not prepared to intervene?

David Offin: There are a lot of circumstances where it could not take place. One is if somebody doesn’t have any insurance in place; secondly, where they haven’t got into the location where the incident is happening; thirdly, they may already be employed doing other things, so it is a commercial aspect where they have to do one thing as against another.

There are a number of cases you can take. There was Yeoman Bontrup last year at Glensanda, where it took a long time for people to get there and it was on the west coast. Commercially, there wouldn’t have been anybody there for a long time had it not been for the ETV in place that was stationed in Stornoway.
Steve Jellis: The British Tugowners operate all around the UK coast. We cover probably 80% of all tugs in the UK in harbour towage. But these are primarily harbour towage tugs and they certainly are not of the size of the ETVs. An ETV is a 150-tonne bollard pull. Our tugs range from 20 tonnes to over 100 tonnes, but these are spread commercially to carry out full-time commercial contracts.

I think the weakness in this case would be if an incident occurred with a very large ship in very bad weather. In those circumstances, which is what Donaldson was looking at when he specified these very large ETV tugs, in that situation, you could have a real problem. In the majority of incidents around the UK coast, the members of the British Tugowners would be able to offer support, as they have done for many years. I can see situations developing, due to size, technology and weather conditions—the very things that Donaldson was concerned about when he made his recommendation.

Q258 Paul Maynard: Can I ask you all, how would you differentiate the role of an ETV from other marine aids like, for example, lighthouses or buoys in terms of their function and potential funding models?

David Offin: I am contemplating how to answer that carefully.

Q259 Paul Maynard: It is based partly on your evidence, because there was mention of experience from Australia, where fundamental change had been undergone that had borrowed from all elements of the marine navigation issues to ensure a better service coming out the other end. I wanted to try and establish why you felt that ETVs were needed to be funded differently from, for example, lighthouses. That is what I am trying to get at.

David Offin: I don’t really mind where the funding comes from, to be quite frank about it. But if you go to the Australian model, for instance, most vessels are going to Australia, whereas a lot of vessels around the UK are not actually visiting the UK. So how would you define a similar kind of levy? You have your lighthouses that I am sure take all their money from Trinity House.

If we had a similar thing for the funding of ETVs, I would gladly sponsor that as well. I am quite happy to be there. But at the moment we haven’t got such funding. From what I hear, it is not that people don’t understand the need for ETVs. It is, “How can we pay for ETVs?”, and there is a difference. What has happened is the cut of the funding as from September. But I don’t think that that stops the reason for having an ETV in the first place. It is still important that we have it there and it is available for all those things. It was mentioned earlier, “How often do you get used?” It is not how often. It is the ones that are important that get used. That is what it is there for.

Q260 Paul Maynard: Clearly there are two debates. Do you require ETVs in the first place, to which you are all issuing a virtually unanimous yes, from what I hear. But the second one is that, if you do wish to retain ETVs, we are looking at either the Government funding them or the market in some way, shape or form funding them. The discussions we have had so far have focused on, if you withdraw an ETV, what would arise to fill the gap. Can you explore, though, other ways in which the market can fund existing ETVs—the existing service? That is perhaps what I am trying to ask you.

David Offin: There are some elements in salvage as well; that is a form of funding. I don’t believe that what we receive from the MCA covers all of our costs. It doesn’t. We found our model based on some of the income, or lack of income, that we get from salvage, as the case may be, because of how good we do as rescue.

We have the hydrographic services that are carried out as well that were mentioned earlier. They are another form of funding for it. There may be other things within the ports themselves. Don’t forget the ETV is about prevention of pollution. It is assisting, but prevention of pollution is its primary role. If we are going to have pollution incidents, who pays for the clean-up of them? How do we get our money back for that?

Q261 Julian Sturdy: Just to follow on Mr Maynard’s point, I agree entirely that there are two debates here. First, do we require ETVs, and, secondly, how are we going to fund them? But on the first part, “Do we require them?”, I just want to pick up something Mr Jellis talked about earlier on when he talked about the power of the ETVs compared to the tugs.

What we are saying, just for me to be correct here, is that there are certain vessels that would only be able to be manoeuvred in certain conditions by the current ETVs, i.e. the current size and horsepower that they carry. There would be no other commercial tugs that would be able to do that in certain conditions.

Steve Jellis: In certain conditions there would be limitations.

Q262 Julian Sturdy: When you say “limitations”, could you elaborate a bit more on that?

Steve Jellis: It obviously depends on the weather conditions, the situation of the ship and so on, and how many tugs could be deployed and how quickly. But, certainly, a very large ETV arriving promptly is going to be able to handle a very large ship much better than, say, a 50-tonne bollard pull tug.

Q263 Julian Sturdy: Is there a point when, actually, only the ETVs could manage certain vessels, because shipping vessels are increasing in size, aren’t they?

Steve Jellis: There are very large container ships and very large tankers, and, in particular, there are very large LNG ships now coming into the UK. In my view, depending on where that incident happened and what the local tugs were, that could create a situation that could get out of control, yes.

Q264 Julian Sturdy: Are there certain areas of the country that are better equipped than others? I am talking without the ETVs.

Steve Jellis: There are gaps in where commercial ports are located with commercial tugs and areas where there are not.
David Balston: Can I possibly just give an example of this? For instance, in 1996, when the Sea Empress went aground off Milford Haven, the rescue was attempted by local harbour tugs from Milford Haven and not by ETVs. The result was 73,000 tonnes of oil spilled, with a clean-up bill of about £120 million, which in today’s money equates to about £200 million. I am not guaranteeing that an ETV, obviously, could have done the job, but it is far more likely an ETV could have done the job.

Q265 Julian Sturdy: Would everyone on the panel agree that ETVs are pretty much essential in the general operations?
David Offin: I would say that you also have to take account of the amount of time that harbour tugs are used in that type of situation. The people that are employed in ETVs train to do this type of work, and harbour tugs do it maybe occasionally. ETVs have a very strong rapport with MCA stations and with the sales rep. They train and they carry equipment on board which you would not normally see on a harbour tug. Harbour tugs usually have four people on board or less. ETVs have 10 to 12 people on board. If you have an incident where you have to take action with a ship that has taken all its crew off and board that as well, then you would not be able to do it with harbour tugs. You have got to use ETVs if they are available.

Q266 Chair: Mr Balston, would you agree that ETVs are essential?
David Balston: Absolutely. I certainly believe that ETVs are essential, yes. But the essential question, to which again at least two members have alluded, is obviously the funding and how that funding is arranged. We are not disagreeing necessarily with the industry having to pay, for a number of years now there have been discussions about how that might be effected and how the industry might achieve that. That has led nowhere. We have now been given, basically, 12 months in which to address this issue—something which has not been addressed over the last several years. It is essential that Government retains its lead to ensure that a system of funding is brought into place before it walks away.

Q267 Chair: Mr Henderson, do you want to put any different view?
Stewart Henderson: I would echo everything that my colleagues on the panel have said in terms of appropriate provision. We have been focusing on harbour tugs, which I don’t think is necessarily right. I wouldn’t suggest for one minute that you would simply disband a service and replace it with ill-equipped, ill-trained harbour tugs. The service exists and it is important, yes, with the right vessels, properly equipped, properly trained, in whatever form that is. Whether it is current ETVs or other vessels, there would need to be some upgrade in modification of the existing fleet. Some of that capacity does exist but it needs to be properly managed. There needs to be some central Government control and intervention on this and monitoring of the same. Where does the funding come from? You can try and make a saving, but nobody on a commercial basis will do it without some form of recompense. The MCA is now negotiating and consulting on the correct protocol with various bodies to try and develop what alternative protocols there are to ensure that potential commercial providers can give that level of service with some form of recompense. It is that that needs to be negotiated. But I think we should not focus on harbour tugs as being the answer to replace ETVs. I agree with that, with my colleagues. They have to be properly equipped.

Q268 Mr Harris: Mr Henderson, do you think that Lord Donaldson got it wrong in his recommendation on ETVs?
Stewart Henderson: I would say not. At the time everybody said there was a need for a service provision. I don’t believe that he did get it wrong, no. There was a need for a service provision—an emergency response.

Q269 Mr Harris: I can’t remember exactly the phrasing in the report on the Braer, but isn’t it right that he was putting the onus for the provision of that service with the Government rather than the commercial sector?
Stewart Henderson: At the time, because there was no guarantee from the commercial sector that it could be provided because of the issue of recompense, there needed to be some intervention.

Q270 Mr Harris: In your opinion, the commercial sector in that respect has developed in the interim so that it can now provide that role that it couldn’t back in the late 1980s.
Stewart Henderson: In actual fact, in some ways the fleet has changed in regard to the average size of vessels and bollard pull. Probably the technology on vessels has improved and there are better available vessels. It could potentially have provided that service back in 1994 with the Donaldson report, but the incentive commercially wasn’t there. It could be made. With the correct protocols in place, that could be put in place, but vessel technology has improved.

Q271 Julie Hilling: Do other countries have ETVs and how do they fund them?
Stewart Henderson: It varies. Other countries do have ETVs. Some of them are centrally funded. I can’t answer on where and how they collect those funds. Some of them are taxpayer funded. Someone alluded to the Australian model, which I can give as an example, where they only have one ETV for the Australian coastline and the rest is performed by commercial tugs. But there is an element of them being properly equipped. There is one ETV in a particular area of coastline where there aren’t many commercial ports. The rest of them are done through existing commercial providers but with some central retaining, which is collected through the light dues system, as far as I know. But, as David said before, all ships are going to Australia and not passing it. It can be collected centrally, but most Governments do it through central funding, with varying degrees of commercial arrangements. If an ETV attends, there are varying degrees of different arrangements as to
who gets any potential salvage reward or commercial reward for the attendance. Some Governments will take more of that than others.

**David Offin:** Germany, France, Holland, Norway and Spain have them.

**Q272 Julie Hilling:** How are they funded?

**David Offin:** Principally from Government. As far as I am aware, they are all funded from Government.

**Q273 Julie Hilling:** It does seem to me that in the Channel, presumably, there is enough business so that somebody may be prepared to fund a ship that sits there and just does emergency work or whatever else there is. Is somebody commercially going to sit there with an ETV up in the north of Scotland and wait until they have to tow a ship or tow something else that will then pay their money?

**David Offin:** With France, there is a collective one. The ETV at Dover is funded 50% by the French as well, through the MCA. That is their business. We just charge the MCA.

**Steve Jellis:** In answer to your question, the answer probably is no; you are absolutely right. People will post a tug at Lands End for the winter months because they know there is a reasonable possibility of it being utilised. But, in Scotland, where that might not be the case, the answer to that is probably no, in certain parts on the west coast.

**Q274 Julie Hilling:** I can’t quite get my head round this. Are you saying there will be ship owners that say, “Yes, I will buy one of those. I’ll support it and I’ll just take money in”? Or are you saying there is any chance of the industry collectively paying taxes into this? Or are you just saying, no, it has got to be the Government? Can you help me, please?

**Steve Jellis:** Where there is a possible incident of salvage situations, then tug owners, be they British or foreign, will place a tug in a particular area. It is a gamble, if you like, whether they will be used or not. No one is funding them. But, if they get enough calls throughout a period, then they will deem that successful. So, in truth, it is where the incident is likely to be. Where the incidents are less likely, it is not to say there won’t be a very serious incident like the Braer, for instance. Incidents don’t just happen because people have taken precautions. Who knows where the next incident will be. I think that is the weakness in the situation.

**David Offin:** There are fewer salvors about than there were. It is a declining market. There are less salvage vessels on station specifically looking for salvage cases. The Greeks still have some. There are two operators that I can think of, and they operate them from the Azores and from Gibraltar. So they are some way from the UK coast.

**Q275 Julie Hilling:** So they would be really quickly there to save anybody.

**David Offin:** In the Western Approaches in wintertime, when people are without other commercial activities, they will post vessels in that area on the off chance that they may pick up some salvage. They may also do so at Dover, but I think that is less likely. In the north of Scotland and on the west coast of Scotland, it is highly unlikely, because not only is it a long way from anywhere but there is very little traffic that is going to come into their bag from the point of view of positioning. There is always the danger of having salvage or having incidents there, but there is not much other activity. You won’t pick up a tow or very few tows from the Western Isles. You won’t pick up many tows from the Northern Isles. You are likely to pick something up from the Western Approaches and you will very strongly pick up something from the Dover area. If people are waiting for something else to do commercially, that is where they would put them. They wouldn’t put them north. Or that is what I would do.

**Q276 Chair:** How many of you were involved in the consultation, if there was any, on this proposed change in relation to emergency towing vehicles? Were any of you involved in any consultations with the MCA?

**David Offin:** We did have discussions with the MCA on continuation of the ETV programme.

**Q277 Chair:** But not on the possible change.

**David Offin:** We were aware that we may have looked to possible changes, but we had no idea of the scale of what was going to happen.

**Q278 Chair:** Was anybody else involved in any discussion on the possible changes?

**David Balston:** Only post the announcement.

**Q279 Chair:** Was anyone involved before?

**Stewart Henderson:** Post-announcement we are now involved.

**Q280 Chair:** Is that the same for you, Mr Jellis?

**Steve Jellis:** Yes.

**Q281 Chair:** What would the impact of a change in the system for emergency towing vehicles be on the plans for coastguard centre closures and changes there? What would be the impact there?

**David Offin:** The coastguard stations and the ETVs work very closely together in their different locations. I suspect that there would be an impact, as has been talked about a lot earlier on, in local knowledge. There is obviously an awareness and a training that takes place between the coastguard stations and the ETVs themselves. So I imagine there would be an impact in that if they become more remote.

**Q282 Chair:** The Chamber of Shipping’s evidence expresses quite a lot of concern about the proposed coastguard centre closures. Is that concern increased at the prospect of a change in the emergency towing vehicle systems, Mr Balston? Is there anything you would like to say on that?

**David Balston:** Not necessarily. Our concerns with respect to the coastguard changes are that, whatever changes are taken, they don’t impact negatively on the level of service which is currently provided. I think, in general, actually, it would be fair to say that the majority of our members recognise that the
Coastguard Service is in need of modernisation. Many of the changes being suggested in terms of better communications seem actually to be quite sensible. But, as I said, it is absolutely essential that, whatever changes are made, and the same applies to ETVs as well, it does not lead to a diminution of services.

Q283 Chair: Your written evidence draws attention to concerns from your members about the proposals in relation to the eastern Irish Sea. You have quite a bit of detail in there about your members’ concerns. That’s correct, isn’t it?

David Balston: It is, yes. I think it would be fair to say that the views of our members come in three camps. We have about 140 members, which represent something like about 930 million tonnes of British shipping, so it is the majority of British shipping. There are those who strongly support the changes and there are those, who, frankly, are probably the majority, who are fairly indifferent. I think those that have expressed concern, particularly in the Irish Sea, as you have mentioned, are very regional companies who work regionally and obviously have very close working relationships with the coastguard services in those areas and obviously are supportive of the work they are doing. They are plying in particular a ferry route between two particular ports—one in Ireland and one on the UK mainland. They clearly do have local concerns.

Q284 Chair: There are also plans for changing or possibly disbanding the Maritime Incident Response Group. Do any of you have concerns or views on the issue of firefighting at sea? Would you be concerned at the disbandment of that group?

David Offin: Yes, I am concerned about that, because, again, a lot of the incidents that seem to be taking place these days are incidents of fires. They are trained to do that specific job and it is a very specialised job. We have had two incidents in the last 12 months in the Yeoman Bontrup and the Athena, where both were fires. These people are trained to deal with this, and it is important that that is maintained—or in my opinion it is.

Q285 Chair: Does anyone else have any views on the possible changes or disbandment of the Maritime Incident Response Group?

Stewart Henderson: As a vessel operator we benefited in the past from their services. We have worked with them and they are an important service provider. So we would support their continued existence.

Chair: Thank you very much, gentlemen, for coming and answering our questions. Thank you.

Examination of Witnesses

Witnesses: Steve Demetriou, CFOA MIRG Lead Officer, Chief Fire Officers’ Association, Mervyn Kettle, former Project Manager for the National Firefighting At Sea project, and Gary Walsh, Deputy Chief Fire Officer, East Sussex Fire and Rescue Service, gave evidence.

Q286 Chair: Good afternoon, gentlemen. Could you identify yourselves, please, with your name and the organisation that you are representing, for our records? I will start at the end here.

Steve Demetriou: I am Steve Demetriou. I am the Director of Operations for Kent Fire and Rescue Service, and I am the national lead for the Chief Fire Officers’ Association on the Maritime Incident Response Group.

Mervyn Kettle: I am Mervyn Kettle. I am a retired fire officer and I was the project manager for the National Firefighting At Sea project.

Gary Walsh: I am Gary Walsh. I am the Deputy Chief Fire Officer for East Sussex Fire and Rescue Service.

Q287 Chair: Thank you very much. Could you tell us the circumstances in which the Maritime Incident Response Group was set up and whether you feel that the same reasons for it being brought into existence exist today?

Mervyn Kettle: Could I pick up on that one, Madam Chairman? Thank you very much. Just to give you some brief background on it, the coastal fire and rescue services around the UK have, for a number of years, responded to incidents on ships on fire at sea. It is quite an historical issue. It goes back as far as 1947. It has always been done on a voluntary basis because it is not part of the core role of fire brigades to respond to ships on fire at sea. Back in the early 1990s, we had over 20 fire brigades around the UK coast all acting independently, with no standard procedures, which did give some cause for concern at the time. As time evolved, more and more fire brigades were finding they had to concentrate on their core roles and the numbers diminished. So therefore the Coastguard Service and mariners were not getting that level of support around the UK.

In 2003, the Chief Coastguard instigated what they call the Sea of Change project, for which I was the project manager. Over a two or three-year period we actually went from research to implementation because the number of fire brigades was still dropping out of the equation. Therefore, the level of cover and the level of resilience around the UK was severely diminished. Hence, in 2006, the national group was set up, where we had at that stage 15 fire and rescue services all carrying out similar initiatives, which was more cost-effective, with standard operating procedures, national risk assessments, and it probably still is one of the foremost organisations supported by fire and rescue services in dealing with fires on ships at sea. I hope that helps with a bit of background.

Q288 Chair: The Department for Transport has said, and I quote from a press release that they issued, that “there is little evidence that the MIRG has changed...”
the outcome of ship fires”. The Government have also said that MIRG has not been involved “in any significant incidents” since its formation in 2006. Does anybody agree with that statement? If not, could you tell us why it is wrong?

**Steve Demetriou:** Following on from Mervyn’s introduction to MIRG, we now currently have 14 fire and rescue services that operate as part of the MIRG group. Lothian and Borders, a Scottish Fire and Rescue Service withdrew just recently. So we now have 14 and we are starting to see a decrease in the number of fire services that can commit to this level of capability.

One of the considerations within the original project was a formal basis for a review of MIRG. Initially it was thought that this would be undertaken after three years, but the review has taken some time to be put in place by the MCA. We were in discussions with the MCA and, indeed, we participated in a review of the current risk arrangements for a ship fire or other incident around the UK coastline. In fact, the MCA in October did release the outcomes of that report which, hopefully, some of the Committee will have seen.

What that quite clearly says is that, although there have been six incidents in that time period that the MIRG group has attended, actually some of those were significant incidents. There is clear evidence to show that MIRG did improve the arrangements or the set-up of the incident at that time, provided timely advice, equipment, and specially trained firefighters to assist the ship’s master in that time of need.

What the report also indicates is that, having analysed the Marine Accident Investigation Branch statistics and other statistics across the EU and internationally, there is a requirement to have a capability to deal with that type of incident. There is a credible risk. The assessment is that there is a likelihood of an incident of that nature occurring twice every year. We have seen—and hopefully you have looked through the CFOA submission to the Committee—a number of significant incidents that have occurred in UK and international waters which would have the potential for a deployment of MIRG to that incident and specially trained firefighters to assist the ship’s master in that time of need.

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Q289 Chair: It seems that MIRG receives about £1.2 million funding from both the Maritime and Coastguard Agency and from the Fire Service. Is that amount of money justified or is there any way that efficiencies could be introduced?

**Steve Demetriou:** Undoubtedly, there are efficiencies and we have been very proactive in discussing those with the MCA. I think, even to a point when MIRG was first introduced, it was felt that an effective model could involve maybe eight to 10 fire and rescue services in that model, which was clearly why the review time scales were set in place. We have proposed some changes to the way that MIRG operates and we have highlighted the fact that some significant savings and efficiencies could be returned by the reduction in overall trained firefighters in MIRG.

Q290 Chair: How much do you think you could save?

**Steve Demetriou:** We have identified that there could be a 49% reduction in the number of team members across the 14 fire and rescue services, which would return 36% efficiencies in the overall budget. That would reduce the MCA contribution from £600,000 to approximately £380,000 per annum.

Q291 Chair: Are you in discussion with the Agency at the moment on this?

**Steve Demetriou:** I think it is fair to say that we were in discussion with the MCA around November about a reformed MIRG and changes to the way it operated, and obviously events overtook us. From January onwards, it became quite clear that the MCA stated that there would be no funding for MIRG going forward. From then on, a more formal consultation process has now taken place between the MCA and the fire and rescue authorities, with whom they have a formal memorandum of understanding on the deployment of MIRG.

Q292 Chair: Mr Walsh, are you involved in any of those discussions?

**Gary Walsh:** There has been no direct involvement and consultation with the MCA. Obviously, as our professional body, the Chief Fire Officers’ Association, Steve Demetriou represent us in discussions and we have a fire liaison manager working within the MCA.

But, in terms of direct consultation, the first we became aware formally of the report that Mr Demetriou refers to was on 8 March, when a letter was sent to the Chief Officer of East Sussex Fire and Rescue Service identifying that the funding was not to continue and therefore asking him pertinent questions about whether we were prepared to continue with our maritime response as part of a MIRG response. The Fire Authority has considered its position and is considerably concerned at the continuation of the maritime team response from East Sussex Fire and Rescue Service, and it has identified the need to identify fundings within our operational budget to maintain that response for the rest of this financial year.

Q293 Iain Stewart: Looking at models that other countries might operate, is there scope for raising additional revenue from vessels and operators in a similar way to light dues? Is that a viable alternative source of funding?

**Mervyn Kettle:** Can I maybe just step back to where we were pre-2002? A lot of the coastal fire and rescue services at the time, if they were asked to respond to a ship on fire, would contact the owners—and it could be done relatively quickly—to see if that fire authority could recover reasonable costs. In a lot of cases, fire
authors actually covered their costs—in some cases but not all—for responding to those incidents.

An incident on a vessel called the Kukawa, back in 1999, changed all that and there is case law around that. As for the European issue, I know Steve is having some discussions with European colleagues at the moment.

**Gary Walsh:** I understand that there were attempts in the 1990s to talk through Interreg with European countries, and obviously we would want to work with other organisations to identify improvements. But they do look to the UK Fire and Rescue Service and the provision of the MIRG as best practice in terms of the way it is developed through the Sea of Change project and the safe systems of work that brings to the firefighters and in terms of its response.

I would just like to counter what you said before about the effectiveness of the MIRG response. In terms of the evidence that is provided through an incident report, with regard to the MV Calypso, which was the first MIRG response from East Sussex Fire and Rescue Service in 2006, it identified that there were a number of failings in terms of the systems around the firefighting crews on board and that the prevention of further deterioration of the damage to the ship was in effect as a result of the response from East Sussex Fire and Rescue Service. That is a similar response that would be made from any of the 15 MIRG fire and rescue services because we are completely interoperable and we can support each other in that response.

**Steve Demetriou:** Might I add a couple of points to that? There is a current draft proposal for an EU project which involves four Member States—ourselves, Belgium, Netherlands and France—to develop work around the MIRG capability. Initial meetings have clearly shown that there is some MIRG capability within some of those states, but they look to the UK for the experience that we have developed, all the procedures, etcetera, to be potentially made available to them.

Obviously, unfortunately, we are in a position where potentially there could be a demise of that current arrangement in the UK because of funding issues. We are working very closely with them to try and develop those arrangements and to see whether or not there could ultimately be an EU MIRG capability. That is one thing. But we can certainly really work very closely together and collaborate on some of the thinking, the procedural issues, how we have undertaken risk assessment, the training, the equipment and some of the concepts of MIRG.

In fact, there is a further meeting in Holland tomorrow to develop that a bit further, with the potential for EU funding. My understanding is, currently, that that funding would only last until 2014. In terms of how MIRG could be funded in the future, we certainly see this as a national resilience issue and not just an issue which should rest with local authority fire and rescue services. We would support trying to get MIRG put on to a national footing, with national funding, because it does impact on the resilience of the UK as a whole.

In terms of cost recovery, within the current systems, the MCA do have the capability and the procedures to reclaim costs from casualty vessels. I am not sure that they have been pursued in the way that they could have been done in the past, but certainly the facilities are there and available to reclaim the costs from particular incidents.

**Q294 Iain Stewart:** There is a cost recovery from an incident, but I am also interested in finding out if there is anywhere in the world that operates almost like an insurance payment. Any vessel entering a UK port would pay a small levy to cover the eventuality of an incident. On a separate point, you mentioned national resilience. Is there a role for MIRG in monitoring and preventing terrorist incidents?

**Steve Demetriou:** On the first point, I am not aware of that particular levy being put forward as an option, although potentially that is something to explore a bit further. In terms of counter-terrorism, the Fire and Rescue Service, as you are aware, through the New Dimensions programme, has an overall role on an inter-agency basis to assist in dealing with terrorist incidents or the like. That capability doesn’t currently exist within MIRG, but it is something on which we have been in discussions with other parties and other security services to try and get that put on a more formal footing. Obviously, the risks are assessed on a regular basis, and even more so, in terms of maritime risks in the lead-up to London 2012, it is obviously an issue on which we have got a very close eye.

The Fire and Rescue Service, and MIRG in particular, could have a valid role in dealing with the aftermath of a terrorist incident and also we have detection, identification and monitoring equipment that could form part of a role in the preventative side around counterterrorism. But we are actively involved in that, and, certainly, if the MIRG model was not available in the future, I think that would impact on any arrangements that we could put in place.

[Interruption.]

**Chair:** We will adjourn for 10 minutes and ask members to get back as soon as possible. Would you wait, gentlemen? We will be back.

**Sit**

**Chair:** We have a quorum now. I think the allotted 10 minutes has passed.

**Q295 Paul Maynard:** I would like to try to clarify some of the terms that I think may be clouding the issue. I noted Mr Demetriou was a little concerned at one of the Department’s press releases referring to there being no significant incidents. In your own evidence you make reference in paragraph 18 to the Civil Contingencies Act 2004, where the Government clearly make the point that a significant transport accident is one in which the accident involves 10 fatalities. Then, subsequently, in paragraph 32 of your evidence, you make reference to the fact that MIRG has attended six significant incidents at sea since its inception. Clearly, you have a different definition of “significant incident” from the Government. For the sake of clarity, could you explain what your understanding of “significant” is?

**Steve Demetriou:** Certainly, within the statutory guidance for the Civil Contingencies Act, there is a specific definition of a significant incident which you
have correctly identified. That extract is taken directly from the independent report which was commissioned by the MCA to look at the review of requirements in relation to incidents involving fire on the UK coastline and it is a direct extract from the Emergency Preparedness guidance for responders who have a statutory duty under the Civil Contingencies Act.

In terms of a fire and rescue service perspective on a significant incident, we would also take recognition of how we would get adequate resources to an incident and I think also the significance of that incident in terms of that individual response from an organisation. So, on the one hand, we are talking about the definition in terms of preplanning and what is laid down in statutory guidance, but we would deem that those six deployments of MIRG have been significant enough for the ship’s master to request additional assistance outside of that which is available on the vessel. So, in the submission, certainly CFOA were not trying to create a difference in terms of how significance is classified, but we do feel that those incidents were significant because they did require additional resources outside of those available on board the vessel.

**Q296 Paul Maynard:** In the evidence we have heard so far and in our questioning we have been focusing quite a lot on the changing needs of shipping, i.e. increased frequency, more coastguard call-outs, and the increasing complexity of many incidents. I am just interested, from the point of view of cruise ships, do they have a changing profile in terms of risk, from your point of view? How is the risk profile of maritime activity changing?

**Steve Demetriou:** Our view and our perspective is that it is significantly increasing. You are quite right that in lots of the submissions and certainly the DfT will openly state that there is increased traffic, increased number of passengers. With regard to cruise liners in particular—and anyone can research this if they look across the internet—there are a significant number of fires that are occurring on cruise ships. The potential for a serious incident to occur with a number of passengers’ lives at risk is there for all to see. The statistics that we put within the CFOA submission are very clear. A number of those are cruise vessels, and, whether or not the fire occurs within UK or international waters, the risk and potential is there for a serious incident.

I think we also have to focus on the role of MIRG at an incident, which is to stabilise the vessel and ensure that the vessel can then carry on the journey to port, where the incident can be dealt with to conclusion. It is not about putting out the fire at sea. It is to prevent a mass evacuation of that particular vessel at sea, which quite clearly is a very dangerous and risky situation and is something that we would not obviously want to see.

MIRG has that ability to put specially trained firefighters on board the vessel, stabilise the situation and ensure that the vessel can continue to port where the situation can be brought under control.

**Q297 Paul Maynard:** Finally, do you feel that the crews on cruise ships are becoming more or less able to deal with incidents on their vessels in UK waters?

**Steve Demetriou:** We have certainly seen in numerous of the MAIB reports references to the level of training and the level of competence amongst crews on board the vessels. That is certainly in no way being detrimental to the crews that are on board the vessels. It is simply because their training is very limited in terms of firefighting. They have an initial two-day course. Some of those crews will go on to a four-day course of advanced firefighting, but it is a very basic introduction to those skills.

We have the ability, through MIRG, to provide trained firefighters. That is their profession and that is what they do day in day out. We enhance that training with specific training to deal with fires on board a ship. It is a very specialised incident and it is something that requires lots of training and ongoing maintenance of that competence, to enable those crews to deal with that particular incident. I don’t know whether my colleagues would have any other comment about specific incidents.

**Gary Walsh:** May I comment on the report from the MAIB in respect to the MV Calypso, which I mentioned earlier, which identified some concerns about the operations that had taken place prior to the Maritime Incident Response Group team getting on to the ship to assist.

Also, the report into the Oscar Wilde incident that occurred off Cornwall in 2010 identified some concerns about the operations in terms of the fire extinguishing media on that ship. Given that a cruise ship such as the MV Calypso has 708 individuals on board, there are some concerns there about the potential when you talk about significant incidents. The significant incident is the potential of 708 people having to leave that ship as a result of a fire and putting them into the sea, which is what we are trying to prevent in terms of the Maritime Incident Response Group.

**Mervyn Kettle:** Can I just add one final point there? We have seen an incident within the last week in the Gulf of Mexico with a 40-year-old cruise ship which does not necessarily meet the current IMO structural standards, where they actually evacuated 780 people for what was a relatively small fire. In that part of the world they don’t have the sort of facility that we have in the UK. There is no Maritime Incident Response Group in America. I did that bit of work a few years ago. What we have here is very unique. The fact is that we can send our teams out to provide confidence as well at the scene, but, if we haven’t got those teams, who is going to do it?

**Chair:** Dr Kwarteng, did you want to ask a question?

**Kwasi Kwarteng:** I was going to ask a question about funding but I appreciate that I have just arrived. So would anyone else like to ask it?

**Chair:** It is all right. You can ask it.

**Q298 Kwasi Kwarteng:** Before the Division bell you were giving some detail on your funding streams, but I did not get any specific undertaking or comments about where you think you can get the funding from if the MCA doesn’t come up with the money. I have
a supplementary to that with respect to value for money, but if you answer my first question I would be very much obliged.

**Steve Demetriou:** Just to recap, the funding arrangements at present are a contribution from the 14 fire and rescue services involved in MIRG for approximately £600,000 per year. Some of that is difficult to quantify because some of the input from the Fire and Rescue Service is not maybe directly attributable to MIRG activities. However, that is probably an underestimation. There is probably more that is contributed by those 14 fire and rescue services. There is a £600,000 a year input from the MCA towards MIRG. Through efficiencies, we have managed to reduce that burden on the MCA to £500,000, and we have put forward proposals to look at a restructuring of MIRG, which would require the MCA to contribute £380,000 per year.

In terms of funding streams—and this is, I think, a very important point—if the proposals went through that are currently under consideration and the MCA could not provide funding towards MIRG, our indications and the indications from the other fire and rescue services currently going through the consultation are that they would not be able to provide that response and therefore they would withdraw from the MIRG group. That is probably the majority of those 14 fire and rescue services. That would leave us without a national MIRG capability effectively, because with two or three fire and rescue services you don’t have a national capability to deal with that type of incident.

**Gary Walsh:** If I could add to that, yes, there are indirect costs which are associated with the provision of our Maritime Incident Response team that aren’t actually identified even within the £1.3 million. It is very difficult to extract out exactly what that is.

In terms of going forward, if there was no funding coming forward from the MCA in terms of the MIRG response, then there is no statutory duty for a fire authority to undertake that work. Therefore, we would then suffer in terms of the funding of that response going forward. We would have to look within our operational budget to fund that, and the burden obviously will fall upon the local taxpayer to provide a national response to an incident, because we would provide that response with the MIRG arrangements on the basis of the 15 fire and rescue services providing support for the larger significant incidents. So there would be, potentially, a burden directly on the council tax payer.

**Q299 Kwasi Kwarteng:** In summary, what you are saying is that, without the MCA funding, there would be no national provision. Effectively, that is what you are saying, in simple terms.

**Gary Walsh:** That is the risk.

**Q300 Kwasi Kwarteng:** I have a supplementary question to that. Given the money you already have, which I think is to the tune of, let’s say, £1 million, or £1.2 million if it is £600,000 from both sources, you are saying that you cut back to £500,000 and you are looking to cut back to £380,000. I am assuming you are getting in near enough £1 million a year. Is that right?

**Steve Demetriou:** That is if you pool those particular budgets. For some of those costs that are attributable to the Fire and Rescue Service, they are inputs from the Fire and Rescue Service through their own staffing arrangements, etcetera. That is their contribution to MIRG. It is not put into a specific pot and dealt with in that particular way.

**Q301 Kwasi Kwarteng:** But, willy-nilly, the amount is about £1 million, is it not?

**Steve Demetriou:** Yes.

**Q302 Kwasi Kwarteng:** I just wanted to know how this money was spent in terms of a breakdown of costs.

**Steve Demetriou:** There is a breakdown of costs overall for the funds of the MCA contribution, but, effectively, the majority of the Fire and Rescue Service funding, which amounts to about £40,000 per Fire and Rescue Service that is involved in MIRG, is through payments to staff to attend training courses and the like. But the MCA budget breaks down to a payment of approximately £75,000 for a co-ordinator, a fire liaison manager, whose role is to co-ordinate all of the arrangements for MIRG nationally, preplanning, training arrangements, and also to deal with incidents as they occur. A point was mentioned earlier that there have only been six deployments of MIRG. Sitting beneath that is a whole range of incidents where the fire liaison manager provides initial advice to ships’ masters or crews about incidents that have occurred but don’t necessarily then transpire to a full deployment of MIRG. There is a training budget of approximately £287,000 and equipment of £100,000.

**Q303 Kwasi Kwarteng:** That is about £450,000, is it? You have £75,000. This is a back-of-the-envelope calculation.

**Steve Demetriou:** The budget that is currently set for the next 12 months would amount to £477,000.

**Q304 Kwasi Kwarteng:** From the MCA.

**Steve Demetriou:** From the MCA. The model that we put forward for a restructure would require not an overall funding of £1 million but approximately £380,000 from the MCA, a combined total of about £700,000 from the MCA and Fire and Rescue Service. In terms of efficiencies, we feel that we are suggesting a much more efficient restructured model of MIRG, which would still provide the national capability that is needed but it would do it in a more streamlined way and certainly a more cost-effective way.

**Q305 Kwasi Kwarteng:** Just eyeballing these figures, you started off with a figure of roughly £1.2 million. You are saying that you could get down to £700,000.

**Steve Demetriou:** Approximately.

**Q306 Kwasi Kwarteng:** Yet at the same time you are saying that the MCA tranche is crucial. You have already potentially eliminated £500,000 from your
Steve Demetriou: These local costs, so that is a great success. Then, at the same time, you are saying that, without the MCA tranche, you can’t survive.

Steve Demetriou: Absolutely. But the point I made about the Fire and Rescue Service contribution—and Mr Walsh might want to make a comment here from a local perspective—is that their contribution towards MIRG is really around their own staff, and the way that they contribute towards the financial provisions for MIRG is through wages and payments for those staff attending training courses, and so on.

Q307 Kwasi Kwarteng: Just to pursue this, what you are saying is that you can’t see a situation in which your costs essentially are borne exclusively by you are saying is that you can’t see a situation in which your costs essentially are borne exclusively by your costs being nationalised?

Steve Demetriou: No. I think the local fire and rescue services would actually object to that situation as well, especially given the fact that this is about national resilience. MIRG is deployed across the whole of the UK coastline. For those 14 fire and rescue services that form part of the MIRG, this is not about local risk. It is about providing facilities for a national capability.

Q308 Kwasi Kwarteng: Do you see where I am coming from? You have already got down from £600,000 to £380,000 with the MCA contribution. So you have cut that pretty much by more than a third already. Those are the figures that you are giving me.

Steve Demetriou: Yes.

Q309 Kwasi Kwarteng: At the same time you are saying that that is an absolutely essential tranche.

Steve Demetriou: It is. What we also have to recognise is that, by reducing the number of fire and rescue services that would form part of MIRG, if we extrapolated the thinking that maybe this could all be funded from the Fire and Rescue Service, that would mean an increased cost to those eight fire and rescue services that are left within the model. I think that would be unacceptable to them and unpalatable.

Q310 Chair: What do you think the MCA’s attitude is to these discussions you are having? What has their response been?

Steve Demetriou: The response has been fairly clear since January that there is no funding available for MIRG. Actually, their discussion and the consultation letters seemed to try to elicit some views about what the potential could be to look at maybe the equipment being transferred across the Fire and Rescue Service or a provision where local fire and rescue authorities just simply make that provision without any central funding being put into those arrangements.

Gary Walsh: If I may add to that from a local perspective, obviously it will be a decision for each fire authority to identify whether they would continue to or provide some funding towards the MIRG response. There will be, I believe, a tipping point where a number of fire and rescue services will not continue with a MIRG response, which means that the support arrangements will not be sufficient for an individual fire and rescue authority to agree to allow its staff to go to fight a fire at sea. So there will be a tipping point at which, even if the funding is there, if there are not sufficient fire and rescue authorities committed to that response, the support arrangements around attending an incident, for instance, on a cruise ship, which potentially may go on for two or three days, will not be sufficient and we will not be able to provide a national response to an incident.

Q311 Chair: The essence of this is that it is national resilience and a national response using expertise from a number of places.

Gary Walsh: Yes, that has been grown over a number of years.

Q312 Julian Sturdy: Mr Kettle, I just wanted to go back to a point you raised when you were talking about an incident in the Gulf of Mexico which you raised as an example. When you were talking about what we have here, you said, “What we have here is very unique.” If that is the case, I just want to get my head around the provision that other countries provide within this sort of service. Is that really non-existent, or what is out there?

Mervyn Kettle: It is almost the case, certainly in my experience, and I have tried to keep up to date with most of these things. In Europe, we have reasonable coverage, but there are still only three or four countries. Sweden are very vociferous with their offshore firefighting, predominantly because they had a major ferry fire where 158 people died. That drove them forward. We have other European countries. Certainly in Australia, going further afield, they are now looking at introducing a MIRG type facility and that is because of some work we did with them a few years ago. Our colleagues across the pond in America have done very little. I think predominantly that is because of the size of the country. That is the limited amount of resources that I am certainly aware of these days, but I think the European issue is a whole new ballgame. We were talking about the use of our facilities and resources. The EU is the way forward with that, surely, particularly for working together. But, to date, it is quite limited.

Steve Demetriou: The independent report that I mentioned earlier covered in some detail what other capability, certainly in the EU states, is available. If you look through that, as Mr Kettle quite rightly said, Sweden have a very comprehensive set-up, as do Germany, which also provide teams with medical assistance as well. Others have developed models but on the back of work that we have done with them from the UK. Certainly in Rotterdam, they now have a team which is available from that port, which was developed using all of the UK procedures, all of the MIRG arrangements that are in place, and also a team from Northern Ireland. There are other teams around there, but, in terms of the development of that, they look to the UK in the MIRG arrangements that are in place to provide the rationale and the specifics about how it should operate. They see it as best practice.

Q313 Julie Hilling: Can I just be a little bit clearer? I think you said earlier that one authority has already withdrawn. Was it Strathclyde you said?
**Steve Demetriou**: Lothian and Borders.

Q314 Julie Hilling: Of those fire authorities that are involved, why those? Is there any potential of top slicing—and I hope Manchester is not listening? Why is it just those few, and if there is one—

Mervyn Kettle: If I could just go back to the original assessment we did at the beginning of 2003 when the project first started, as I mentioned earlier on, we did go from research to implementation at quite a gallop because it was really quite necessary at the time. We did an assessment. I wouldn’t say it was the best assessment in the world, but we did an assessment in the UK to identify what current resources we had in place that were still responding to an incident at sea, and it fitted the UK map quite well. They were already there, still operating. It also fitted in very nicely with where the search and rescue bases were because the helicopters are key to MIRG operations, and, also, where some of the key players were with regard to surface vessels.

So it fitted in quite nicely with what we already had in place. It was perhaps a little overzealous in places, but at the time it was seen as a positive move forward, bearing in mind that we identified at the outset and conclusion of the project that the MIRG would be reviewed on a three-year period anyway. That opportunity would then be taken to reassess that.

Gary Walsh: If I may just add to that, if you look at the number of deployments that have taken place during the MIRG response even in those three years, the average time in terms of deployment is around one hour from tasking a particular fire and rescue service to get out to the stricken vessel in terms of the casualty. That is a very quick response because of those arrangements that are in place and they are well practised and exercised; and there are certain arrangements around exercising that are in place as a result of the Sea of Change project in which Mr Kettle was involved that have borne fruit for the longevity of that particular response. So we have a very effective way of responding to incidents when they do occur and that is because of the arrangements of the now 14 but which were 15 MIRG fire and rescue services involved.

Q315 Julie Hilling: I think you have given an indication for this but I want to push you on this as well. I am not in favour of us driving to the bottom in terms of the worst response. I think we should be looking at the best response for the people that are at risk. If the money is withdrawn, then what do you think is going to happen with the service?

Gary Walsh: It is my understanding from discussions that have taken place—and Mr Demetriou may want to add to this—that a number of fire and rescue authorities have already stated that they would remove themselves from the current arrangements for the future if there is no funding, because of the difficulties around funding in their own fire authorities. It is not a statutory duty and therefore members of the public may ask why we are doing this.

Secondly, it may be that the devolved administrations may look to see whether they consider their own response within the devolved administration, which would then put at risk the whole of the aspect of the interoperability that takes place and the resilience around the current arrangements. There is, as I said before, a tipping point and the alternative arrangements that are being proposed are looking at maybe nine to 10 fire and rescue authorities being involved in the approach, which we believe we could maintain going forward.

Q316 Chair: Could a private provider step in? Could the Government commission one?

Gary Walsh: I would like to respond to that. In terms of the evidence of the review, the MCA’s only view is saying that the fire and rescue services that provide professional service at the moment is the most efficient and effective way of maintaining a response. It looks at other opportunities around Royal Navy and other options, on which Mr Demetriou may wish to comment. But, in terms of a private provider, the report of the review indicates that that would be a significant cost because of the number of incidents, and you balance that in terms of set-up costs, arrangements for training, provision and helicopter deployment.

Steve Demetriou: I know I keep referring to the independent report but, actually, there is a lot of information there and I would commend it to the Committee. The key point here is that the report states that they don’t believe a commercial provider would be able to provide that level of emergency response to an incident. Effectively, because the fire and rescue services have already made that investment in their firefighters and their core levels of training, for a commercial company to try and make that provision from scratch, it would be unaffordable and there would be no way that they would be able to match the current provision that is provided through MIRG.

Chair: Thank you.

Q317 Julie Hilling: With regard to the skills that people are using to fight, and I appreciate they are specialist skills, and so on, are they also transferable to other specialist incidents that occur on land?

Gary Walsh: I am happy to respond and report for the East Sussex Fire and Rescue Service because there may be independent issues around other fire and rescue services. But certainly we use those transferable skills in terms of our response to incidents in port. We have also used their skills through the ability for them to train and use a helicopter on cliff rescues. We have also used them at a response to the Hastings pier fire in terms of trying to address it from sea rather than from land. So their transferable skills of their abilities that they have had through their training have been used in other incidents within East Sussex Fire and Rescue Service.

Chair: Thank you very much, gentlemen. We have kept you a long time. We have found your evidence very interesting. Thank you very much.
Wednesday 18 May 2011

Members present:

Mrs Louise Ellman (Chair)

Mr John Leech

Paul Maynard

Iain Stewart

Julian Sturdy

Examination of Witnesses


Q318 Chair: Good morning gentlemen and welcome to this meeting of the Transport Select Committee. As you see, we have decided to come to you today instead of our normal practice of inviting our witnesses to come to see us in London. This is because we recognise the extent of interest and concern the proposals for the Coastguard and emergency services have elicited in this area. We thought it would be helpful to our inquiry to come down here ourselves to talk to people directly and to make it easier for you to come here to give evidence to us, and for us to question you. I welcome you to our meeting and we are very pleased to be here down on your patch. I would like to start by asking you to just give your name and the organisation you represent. This is to help identify the voices in our records. Could I start at the end, please?

Steve Brown: Thank you, Chair. Steve Brown, Cornwall Fire and Rescue; I am the lead officer for the Maritime Incident Response Group within Cornwall.

Andy Brigden: My name is Andy Brigden and I am the Maritime Manager for Cornwall Council.

Mark Sansom: I am Mark Sansom. I am the Harbormaster and Chief Executive for Falmouth Harbour Commissioners.

Rob Grose: I am Rob Grose; I am the Chairman-elect of the Harbour Forum for the ports of Truro and Penryn. We are a group of users of the harbour.

Q319 Chair: Do you agree that the Coastguard service needs to be modernised and have you any ideas about what direction that modernisation ought to take? Who would like to start on that?

Andy Brigden: I think like any organisation, modernisation is a progression, and there is nothing wrong with always looking at best practice to try to modernise to reduce cost and improve service. The view of the Council with regard to its Coastguard consultation is that they very much feel that the Falmouth Coastguard should be maintained as 24-hour cover and not reduced to 12-hour cover.

Mark Sansom: Falmouth Harbour Commissioners have similar views. We do not have strong views about whether a reorganisation should take place, but we do very much appreciate the very valuable contribution that Falmouth Coastguard contribute on a 24-hour basis to the management and protection of craft and individuals in this area.

Steve Brown: It is the same sort of view for Cornwall’s Maritime Incident Response Group. We value the work, effort and service that we receive from the Coastguard here in support of our command and control of incidences that we attend. Previously, in the two that we have done they have been invaluable to us.

Chair: Mr Grose, did you want to comment on this one?

Rob Grose: It is a similar view again. The users that I represent value the services that the Coastguard provides, but we have no direct comment to make on whether the service should be modernised or not at this stage.

Q320 Chair: Mr Brigden, in the evidence that we have received from Cornwall Council you talk about the combined effect of the planned changes for the Coastguard centres, changes to the specialist fire service, Fire Response Unit, and for the emergency towing vessel. Could you perhaps tell us a bit more about why perhaps you feel that combination of possible changes is a particular concern?

Andy Brigden: Yes. Cornwall Council is concerned because of the very uniqueness of where Falmouth is located in the Southwest Approaches, added to the fact that we have on our doorstep 24-hour MRCC, the Coastguard; we have an ETV stationed here; we have a MIRG unit here. But more importantly Falmouth has a long history of dealing with casualties—vessels that have problems. It is right out in the Southwest Approaches; it is very much the first casualty port a lot of vessels will get to, and experience has shown over the past that what goes on in Falmouth is very good for the rest of the UK.

When you have all these search and rescue and emergency towing vessels on your doorstep with a ship repair yard it is the ideal place to do all this. Really, the view of Cornwall Council is that if the ETV were to go, if the Coastguard station were to be downgraded to 12-hour cover and we were to lose the MIRG, then the effect on our resilience for dealing with any casualty would be catastrophic. It is a bit of a parochial argument, but it also does not help the rest of the UK because, as I said earlier, the geographical position of Falmouth is such that it is the first place a lot of ships will get to being damaged across the Atlantic.

Q321 Chair: Mr Brown, you have expressed concerns about the possible loss of the Maritime Incident Response Group. Can you tell us any more about that?
Steve Brown: Yes, thank you. If we were to lose that Maritime Incident Response Group, we would not be able to respond to such incidents like the Athena, which as Andy said, was very much a multi-agency incident where we worked closely with harbour masters, the docks and the Coastguard. We were able, as a team, to provide advice and guidance on what to do with that vessel to allow the ship into safe water in a safe haven. Without that, we would not be in a position as a service that we could respond and provide that sort of advice and guidance. As Andy says, although we are talking parochially at the moment about Cornwall, the Maritime Incident Response Group is a national asset. We rely heavily on neighbouring services that provide that, and obviously when we are mobilised they will stand up as well. So it is very much a piece of a much larger national jigsaw.

Q322 Chair: Do you think that it will be possible to reduce the costs of the service without disbanding it?

Steve Brown: Yes, speaking nationally, we have already met as a national service. The lead officers have met with the Fire Liaison Manager, who was the coordinating mind for that. We have offered up differing models that clearly demonstrate there are efficiencies and savings that can be made, but will still enable us to provide an effective response.

Q323 Mr Leech: The Department for Transport issued a press release that said there is little evidence that the MIRG has changed the outcome of ship fires. Do you think that is a fair statement?

Steve Brown: No, I do not. In my professional opinion, and I refer back to the Athena incident again, which was the most recent. Without our attendance at that, as part of the wider Maritime Incident Response Group, I really believe and my professional opinion is that lives would have been lost on that vessel.

Q324 Mr Leech: How much money does the Cornwall service actually pay towards the MIRG in terms of training and the work that you have to do for it?

Steve Brown: The training equipment is all provided nationally as a national asset, and is funded currently by the MCA. The contribution that is made by the Cornwall Fire and Rescue service is in regards to time and staff for training and suchlike. So currently there is minimal contribution to MIRG from the Fire and Rescue service.

Q325 Mr Leech: But at a time when all departments are suffering from spending cuts, if you had to make further spending cuts, is this an area that you would consider for reducing spending or would you say this is an area that you see as being vital to continue?

Steve Brown: I see it as an area that is vital to continue based on statistics that were identified within the independent review that was conducted by the MCA. In terms of cuts, yes, like any service at the moment, the Fire and Rescue Service are experiencing cuts as well, but in order to make those cuts we would not be able to respond as an authority to incidents at sea without funding externally from a national level.

Q326 Mr Leech: Finally, do you see this service as being equally important as fire services at airports?

Steve Brown: It is certainly on the same lines. You are dealing with people’s lives, whether it be a passenger vessel or a commercial vessel, whether it be ship’s crew or passengers—yes, you are dealing with people’s lives.

Q327 Julian Sturdy: Can I just focus briefly on the leisure craft side of it? So my question really goes to Mr Grose, if I can. To what extent does the leisure craft industry have the new digital selective calling technology that is being proposed? Are they all fitted with them or is it that the new ones are fitted but the older crafts are not?

Rob Grose: We have had a lot of discussion in our group about this. I cannot give you any statistics on it, but the feeling is that generally if there is digital selective calling fitted then it is limited, basic and rudimentary in that you can call to all ships, but the positional locational information linkage to GPS is often limited if there at all. I would say, in our experience the leisure craft do not have anything more than a rudimentary digital selective calling capability and no locational facilities.

Q328 Julian Sturdy: Just going on from that, I would imagine that around here the leisure craft activity goes through quite big spikes. So during the summer time when you have a lot of people down here, and in Newquay and places like that, the use shoots up. Obviously, and I am guessing again, it is a huge part of the local economy as well, I would imagine. What impact would it have on the leisure side and potentially on the local economy if Falmouth were just operating on daytime operations and not operating at night? Would that cause a real problem for the leisure side?

Rob Grose: It is difficult to quantify. We felt the actual report did not engage or mention the leisure industry at all. There was a lot mention of commercial shipping and the value of that to the UK economy. I do not know if any studies have been done on the value of the leisure marine trade to the Cornish economy, but we can only see it will have a detrimental impact on the economy of the county due to the fact that leisure users would basically be probably restricting their usage to daylight hours and when the facility was open. It is difficult to quantify.

Julian Sturdy: Yes, but you are obviously concerned about it.

Rob Grose: We are concerned, yes.

Q329 Julian Sturdy: Mr Brigden, from the Council, do you have any figures or anything on that?

Andy Brigden: No, we do not necessarily have figures. I would agree that there are a lot of the vessels around our coast, and we have a north and a south coast; the north tends to be more treacherous, and there are fewer boats on the north coast than there are on the south coast. We probably have tens of thousands of moorings just within Cornwall as well, and obviously a lot more than that within the southwest.
The other thing I would agree with is that the quality of the boats is not necessarily up to scratch. A lot of people in Cornwall own boats because that is what they have always done in Cornwall, but those boats are not necessarily of a high standard. They might be somebody’s little 20-foot wooden boat and it has absolutely no equipment at all on it. In trying to drop the Coastguard down to daylight cover only, one of the interesting things that emerged from the coastguard consultation was that Falmouth Coastguard has the most calls in the evening. So one of the concerns locally would be about any loss of local knowledge and descriptions of places around the Cornish coast.

Q330 Chair: Mr Grose, has there been a very big reaction from leisure craft users? Are they all aware of these proposals?

Rob Grose: I do not think the leisure craft users are aware of the proposals in detail. That is the issue; they see the headlines. But definitely the users I represent have been very vocal on making the submission. I am sitting here amongst professional people as a layperson representing a number of leisure users. I think that represents the level of feeling that our members have on this issue—that the facility that the Falmouth Coastguard 24/7 cover provides is extremely valued. There is concern that the loss would have a detrimental impact on existing leisure users.

Mark Sansom: I think if you are looking at the objective, which is to try to stop vessels going ashore in all circumstances, then that is a quite different objective to the commercial salvage objective. Therefore, you are looking at a dedicated resource that is going to be positioned to best effect at all times in order to try to prevent a shipping casualty being driven ashore in adverse conditions. The commercial salvage organisations are very much of a mind that they will use their resources to best effect to salvage the vessel, but that may be after the grounding; they would not necessarily see that they have a duty or any particular incentive to try to have salvage vessels in all the places there are ETVs in order to try to prevent a vessel coming on the coastline. So the ETV does perform a unique role, and it is designed to deliver that value to society in general rather than to the shipping industry. That is one of the slightly misleading aspects that has been put out as part of the consultation: this is not an industry service. It is very much a service to the general public.

Q331 Iain Stewart: I would like to touch on the emergency towing vessels aspect and particularly to Captain Sansom. Do you believe that commercial tugs could wholly take over the role that ETVs provide, or will we always need the insurance policy that they give?

Mark Sansom: I think it is well documented that, whereas at one stage there was a speculative market for commercial salvage and you would actually see purpose-built and designed salvage tugs with experienced crews stationed around Falmouth, particularly in the winter months, that no longer happens. Our understanding from the industry is that is not likely to come back, whatever the decision is about the ETVs. So you then have to look at what salvage cover would be available within the Southwest Approaches, and the documentation refers to the capability of harbour tugs and whether they would be suitable replacements for ETV cover, as the only assets that could potentially get to a casualty in time. The big concern about that is that the harbour tugs, particularly in Falmouth, are very small. They would not necessarily have a crew that was trained to go to sea. They might not be able to deploy for a variety of reasons, and certainly in adverse weather conditions would be very unlikely to be effective. So you have a situation potentially where there is no cover and a casualty that has a relatively long lead time for a response to be made, but no suitable asset to actually go and deliver an effective response, resulting in a ship going ashore.

Q332 Iain Stewart: We visited the ETV here earlier this morning and one of the comments that was made was that, as well as the salvage work, there is a considerable degree of preventative work, if I can put it that way, that takes place. Do you believe that that capacity can only be provided by ETVs?

Mark Sansom: I think if you are looking at the objective, which is to try to stop vessels going ashore, then that is a quite different objective to the commercial salvage objective. Therefore, you are looking at a dedicated resource that is going to be positioned to best effect at all times in order to try to prevent a shipping casualty being driven ashore in adverse conditions. The commercial salvage organisations are very much of a mind that they will use their resources to best effect to salvage the vessel, but that may be after the grounding; they would not necessarily see that they have a duty or any particular incentive to try to have salvage vessels in all the places there are ETVs in order to try to prevent a vessel coming on the coastline. So the ETV does perform a unique role, and it is designed to deliver that value to society in general rather than to the shipping industry. That is one of the slightly misleading aspects that has been put out as part of the consultation: this is not an industry service. It is very much a service to the general public.

Q333 Iain Stewart: Chair, if I can just have one follow-up question: it has been suggested that an additional income stream might be to levy something akin to light dues on shipping traffic. You have just mentioned the benefits are much wider. Do you think this would be a viable scheme?

Mark Sansom: I know this is being looked at, and I have attended a number of the consultation meetings. I attended one of the consultation meetings in London to discuss this. The big problem is you are talking about a worldwide industry, and levying against the worldwide shipping industry is going to be very difficult. If you start levying it in the same basis as light dues, you have no basis for actually proving whether the ships transiting our waters are going to end up in the UK or not. I think there would be enormous resistance to that. I think there would be enormous resistance to that. Trinity House have already commented that they do not see that as being permissible under the existing legislation, so in the short term that does not seem to be a viable option at all. With any industry solution that might be alternatively looked at in terms of insurance cover or protection and indemnity cover, I think you are going to find very real issues with actually trying to get a fund from the ship owners. They would see that their responsibilities are to the insurance of their ship and paying out in the event of loss, but not protection of the taxpayer in general.

Q334 Paul Maynard: I am particularly interested in the practical impact here in Cornwall of a decision to reduce Falmouth to being a daylight-only station. I wondered if I could ask Mr Grose, perhaps, to explain...
what leisure craft activity occurs in the waters around Falmouth after 17.00 or 18.00 in the evening. **Rob Grose:** On a typical evening there would be a lot of craft transiting around the estuary and in the bay, ranging from experienced sailors to weekend pleasure cruisers, to holidaymakers who have hired a craft from a local hire venue. The experience is vast, really. It is important to have that watch facility or that listening facility in case anyone gets into trouble. I mentioned the holidaymakers hiring these small motor cruisers from about Easter through to September. It is common to pick up the local newspaper and hear reports of these leisure craft going ashore or aground because they are unaware of the tides. That is something that our coast has a problem with in that a lot of these casual water users do not understand what happens: the tide comes in and the tide goes out. They get stuck on the mud and they have to be rescued.

So there is constant traffic, but the traffic is not limited to the summer months. I am a water user that uses the waters of the Falmouth Estuary 12 months of the year. Often we can be the only ones on the water, but there are often numerous leisure craft. Then you have the mariners who are visiting ports around the coast and they are not going to restrict themselves to 17.00 or 18.00; they are going to set their passage and arrive as and when their passage takes them.

**Q335 Paul Maynard:** What would the practical consequences be for such users of having to relay through Southampton for any emergency calls?

**Rob Grose:** One of the issues would be the capability of the VHF radios, if they have them, to make contact. That is something that the document was not too clear on, but the normal handsets or VHF radios on small boats have a range of about 9km to 10km. It would be whether that could be picked up and relayed through to one of these new regional centres. Then, especially if they are visiting yachtsmen, they could say, “I am in Falmouth Bay.” Falmouth Bay is a very large area in which to pin down an incident. Those are the practical issues: the strength of the radio signal, whether they could make contact, and, if they did make contact, their exact location.

**Q336 Paul Maynard:** Can I also ask Mr Brigden? I know you speak on behalf of Cornwall Council and you are a Maritime Manager, so this might not stray into your patch, but do you have any sense of how these changes will affect Cornwall’s tourist industry? In particular I am thinking of those who are perhaps holidaymakers on the coast, on the beach after daylight hours, possibly after having had a pleasant afternoon drinking. There are a large amount of alcohol-fuelled incidents. What sort of impact do you think this could have on them?

**Andy Brigden:** Cornwall Council’s view is very much that all these things need to be taken together—the Coastguard consultation, the reduction of the hours, the MIRG and the ETV—but what it also has asked to be pointed out is that Cornwall has the largest coastline of any county in the country. It is very dependent on tourists, so 5 million people are welcomed here in Cornwall and they come here for very much a maritime experience. They come and visit the beaches; they come in boats; they just have some element of the maritime use around here. I think that the whole economy of Cornwall is very much dependent on that, and not only with the tourism industry—we have fishing; we have shellfisheries and all that. If, for any reason, due to a lack of cover with the Coastguard, we have an incident, it will very markedly affect the economy of Cornwall, be it through the loss of shellfish and the fishing industry or the loss of tourism and all that. That is not to mention the environmental damage it will do. Cornwall again has a significant number of international, European and national areas of high environmental quality and value. It is just felt that we need to have all these elements to protect the coast certainly of Cornwall, but also for the rest of the Southwest.

**Q337 Paul Maynard:** Can I ask Mr Brigden one final follow-up question? Do any of these changes that the MCA are proposing have any consequent spending requirements from Cornwall Council? For example, increased spending on beach watchers, perhaps?

**Andy Brigden:** It is not known at the moment, but I think there is some concern with some harbour authorities and some harbourmasters, be they local authority owned or be they private or trust ports, that some of these cuts might push the element of responsibility further onto that harbour authority to undertake some of the work that the Coastguard used to do.

**Q338 Mr Leech:** We have received a lot of evidence both formally and informally about a real lack of consultation in the whole process. I know all four of your organisations have responded to the formal consultation, but were any of you consulted over plans to get rid of the MIRG, plans to get rid of the ETVs or plans to reduce the hours to daylight hours in certain Coastguard stations before the formal consultation process started?

**Steve Brown:** Certainly from our perspective no consultation dialogue was undertaken by the MCA with the Fire and Rescue services that are part of the Maritime Incident Response Group prior to that consultation decision to remove central funding.

**Q339 Chair:** Mr Brown, could you just clarify for us the current position? Has central funding actually been removed?

**Steve Brown:** Not at this present moment in time, no. There was a revision of that statement where the funding now exists until the end of September, so currently the national resilience of the Maritime Incident Response Group is funded until the end of September, after which time currently the situation is the funding will stop.

**Q340 Chair:** Thank you. Back to the consultation question.

**Andy Brigden:** The first I knew I think was through a professional link through the UK Harbourmasters Association advising me that there was a Coastguard consultation document on the Coastguard website. I
did not know anything about the MIRG or the ETV cuts and have never been formally consulted on them. **Mark Sansom:** My understanding is there is no consultation exercise on the ETV decision. It was presented to the port industry as a decision that was taken by the Minister, and even at subsequent meetings it was made clear that there was no intention to review the decision. It was clearly a matter of moving on from that decision. Likewise, with the MIRG there was no consultation that I am aware of with industry on that point. The Coastguard consultation exercise was reasonably promulgated. We did find out about that through the industry sources and were able to respond to that in the usual way.

**Q341 Mr Leech:** Was that before the formal consultation opened or was that in response to the formal consultation? **Mark Sansom:** No, we were advised when the consultation opened, and at that point we were given the full proposal to comment on. That is distinct from the others, where no consultation exercise I am aware of has taken place to date.

**Q342 Mr Leech:** But as experts in your own individual fields, would you not think perhaps that the MCA should have done a consultation before coming up with some proposals to consult on? **Mark Sansom:** You would like to think so. We do have discussion groups and industry representation does meet with the MCA, so there would have been an opportunity to put this through on an informal basis for discussion prior to the actual consultation process being launched. But I have to say that is relatively unusual even in other areas as well.

**Q343 Mr Leech:** We heard this morning at the Coastguard station that it was not yet clear exactly how a non-24-hour Coastguard station would operate in the future. I asked a question in relation to the potential for having to pass on the work from non-24-hour Coastguard stations to a 24-hour Coastguard station in the event of an ongoing issue. As far as you are concerned, would there be any problems with the potential for having to deal with a different set of people partway through the operation of an incident? **Steve Brown:** Certainly for us dealing with an incident, and that is making the assumption that obviously the response group continues, to halfway through an incident have to hand over command and control to another Coastguard station would cause us problems. Every time you hand over with an incident, you always get this stalling effect, which would potentially cause us problems.

**Q344 Chair:** Does anybody else want to comment on the handover issue? **Andy Brigden:** Sorry, Chair, it is not about the handover issue; it is really about the consultation about this. I think what seems to be missing is the understanding of the interdependence of the MIRG, the ETV and the Coastguard consultation together all as one. It is okay just having a consultation on one, but unless other people are aware of the interdependencies then I think it does not show the true picture. I can really point it out here because we have it all on our doorstep, and I think everyone in the country needs to be aware of those interdependencies. Really, if you take away all three in one fell swoop it just creates a perfect storm, and there will be a big incident somewhere.

**Q345 Iain Stewart:** Leaving to one side the desirability or otherwise of concentrating the Coastguard service into a small number of MOCs, do you think the MCA have the criteria right by which they would judge the location of those? In other words, Cornwall Council has advocated Falmouth as one of the centres; do you think the MCA’s appraisal process for that is correct? **Andy Brigden:** In the submission from Cornwall Council it put the case that in the Coastguard consultation document it said that they should be should be geographically spread. I cannot understand how Dover, Southampton and Aberdeen is geographically spread. The submission from Cornwall Council was that Falmouth should be considered in the geographical spread because of its geographical location — where it is right out in the Southwest Approaches, the first port that you come to in the UK. So whilst I may understand that it may not become an MOC, it is felt that it is far too important to downgrade it to a 12-hour station.

**Q346 Paul Maynard:** I would just like to return to the issue of emergency towing vessels and Captain Sansom. Earlier today we heard about the possibility of there being alternative funding mechanisms that were being devised as we spoke. Are you able to update us on what is occurring with these? **Mark Sansom:** I think Kevin Richardson, who is appearing later, will be able to give you an update. I understand there was a meeting in Glasgow very recently and a group has been formed. All I can say is that from the original conversations within the user group that was pulled together, there did not seem to me any promising lines that were going to result in an alternative funding solution, certainly within the timescale of the decision to get rid of the current ETVs.

**Q347 Paul Maynard:** What sort of timescale would be required in your view to come up with a credible alternative? **Mark Sansom:** My own view is that it is going to be immensely difficult. If you look back to the Lord Donaldson Report, the whole idea was the ETV would be Government funded as a stopgap, but in all that intervening period, no progress has been made, essentially because this is not, in my view, an industry problem. This is actually the taxpayers of the UK wanting reassurance that there is a method to stop vessels going ashore on their beaches and causing environmental havoc, rather than the response of industry to actually salvage the property of individual ship owners. Even though there is now very belatedly a group being put together to address the possibilities, the fundamental principles will defeat that.
Q348 Julian Sturdy: Just following on from that, if I can, on the ETV: Mr Samson, in your evidence you state that “the decision to remove ETV cover completely does not appear to have been based on analysis of the risk involved”. Would you not say that actually the risk involved is very hard to quantify on this, because you could not quantify what would happen if it was not there, could you? Is that going to be the real crux of it? Obviously, you might get called out to an incident with an ETV and you might get involved at that point, but if it was not there and you were in bad weather, then that incident could obviously be escalated. Is it not the issue that really it is very difficult to quantify this whole situation?

Mark Sansom: Certainly it is difficult. If you look back on the MCA documentation, in risk assessments they have put in work on casualty statistics—the actual occurrence of casualties and also the amount of times responses have been launched to try to mitigate those particular threats. The MCA’s own approach has been to undertake a number of risk assessments, all of which confirm the need for ETVs. My understanding is there is no further risk assessment that has been done that reached a different conclusion, so this decision has been made against the process of assessing the risks that the MCA undertook.

Q349 Julian Sturdy: I know you say that in your evidence as well, but would you say that there should be another risk assessment done before any action taken?

Mark Sansom: I am saying that it is of great concern that this decision has been taken without consultation and without apparently a further risk assessment being undertaken, because it does not show evidence of the decision being made to manage a particular risk. It seems that the decision has been taken as a cost-cutting measure, and the consequences of that measure have not been fully explored.

Q350 Chair: Mr Brown, has a risk assessment been undertaken in relation to the Fire Service?

Steve Brown: Yes. All the activities that we undertake as part of the response group are all based around risk assessment. All of our safe operating procedures are risk assessed first, and those safe operating procedures devise the training programme, which all of the firefighters nationally that are part of this team undertake. So the whole concept of the Maritime Incident Response Group is risk-based and risk-driven.

Q351 Chair: But has a risk assessment been undertaken in relation to the change proposed?

Steve Brown: That work has been undertaken with regards to the national model and the alternatives that we have put forward nationally, where we have looked at maintaining the same level of services but obviously on a reduced model.

Q352 Chair: But in relation to the MCA proposals, has there been a risk assessment?

Steve Brown: On that one, on a national level, I am not absolutely sure and I would have to confer with the national officer on that one.

Q353 Chair: If the Maritime Incident Response Group were to be split up, would Cornwall Fire and Rescue Service be able to continue its work?

Steve Brown: No, certainly we would not. It is not a statutory duty for us to respond to shipping at sea on fire, and certainly with the withdrawal of that central funding we would not be able to sustain the responses that we do. Nor would the risk assessments stack up, because similarly other fire and rescue services are going to be in the same situation where they are going to have difficult in funding that. Without them as our support and that mutual assistance they provide us, as I say, the risk assessments do not stand up.

If I could come back to that previous question that you asked me, within the review document that was undertaken there has been an independent risk assessment that was conducted, and it clearly states in that document that there is a significant risk and the best option available is the Maritime Incident Response Group.

Q354 Chair: So in that case why do you think that the proposals to disband it have gone ahead?

Steve Brown: I am afraid, Chair, that is not a question I am able to answer. I do not know the answer to that. It is probably one that is best asked to the MCA.

Q355 Chair: And Mr Grose, from what you said earlier, I would assume you are not aware of any risk assessment in relation to the sector you are involved in.

Rob Grose: I am not aware of any risk assessment at all. In fact, when you look at the documentation our view is that the leisure and small craft users around the coast have probably not been taken account of in coming up with the proposals.

Chair: Thank you very much, gentlemen for coming and answering our questions so fully. Thank you.
Examination of Witnesses

Witnesses: Jon Gifford, Honorary President, National Coastwatch Institution, Gus Lewis, Head of Legal & Government Affairs, Royal Yachting Association, and Captain Kevin Richardson, President, UK Harbour Masters’ Association, gave evidence.

Q356 Chair: Good afternoon, gentlemen, and welcome to this meeting of the Transport Select Committee in Falmouth. I would like to start by asking each of you to give your name and the organisation you represent, please. This is for our records. Could I start at the end?

Gus Lewis: Gus Lewis, Head of Legal and Government Affairs at the Royal Yachting Association.

Kevin Richardson: Kevin Richardson; I am currently president of the UK Harbourmasters Association.

Jon Gifford: Jon Gifford, National Coastwatch Institution, as president.

Q357 Chair: Thank you very much. Mr Lewis, could you tell us what reaction you have had from your members to the proposals for change?

Gus Lewis: Chair, as I think you would expect with any reasonably contentious issue such as this, our members have expressed the full spectrum of views, ranging from what I think could be rightly described as outright hostility to the proposals right through to full support. The thrust of most of our members’ views really boils down to ensuring that the level of service and the benefits that they receive from the search and rescue service provided by the Coastguard are maintained at the current level or possibly improved. That is really their concern. They really want to know that, if they are in distress, they push the switch on the VHF radio and the right asset comes to rescue them in the right place as quickly as possible. The range of views we have had from members really boils down to that core concern: if they want to be rescued, they want to be rescued as quickly as possible.

Q358 Chair: But what are their views on the proposals? Looking at the written evidence you have given, there is quite a lot of concern in there, particularly about communication systems. Can you tell us more about that?

Gus Lewis: Of course, I think that is absolutely right. The recreational boating community, as a gentleman alluded to earlier, is very much in transition between the longstanding analogue communication systems and digital systems. I think it will be some years before one could even say that even the majority of boaters had ready and available access to digital communications. The vast majority of yachtsmen and women and those who are dinghy sailors or users of small and open motorboats are absolutely dependent on voice communications through a normal handheld or small fixed set VHF radio. They are not in a position to carry AIS systems, digital charts or anything like that; that is just simply not practical on their craft. Even on those craft where it is practical, it is a significant investment and it is the sort of thing that takes many years to permeate through the sector. That is a real concern for them. What would be a potential disaster, I think, for the recreational boating sector is, if digital communications became the only way of communicating, people would move more in the direction of mobile phones as their primary source of communication with the shore when they are at sea. Of course, that is point to point rather than broadcast, and is a significant limitation on providing search and rescue support and assistance in a situation of distress.

Q359 Chair: You say in your written evidence that a great deal of concern has been expressed at public meetings on the issue of losing local knowledge under the proposals, and that it is very important that there is public confidence in the proposals. How concerned are you about that?

Gus Lewis: Local knowledge is held at a range of levels within the search and rescue services, from the dispatchers in the MRCCs down to the dispatched in terms of the lifeboat crews, the volunteer coastguard, the National Coastwatch Institution, the RNLI and others who are helping in that sort of environment. The challenge for the Coastguard is to ensure that whatever service is provided, the appropriate level of local knowledge is retained. As I mentioned before, our concern is that if somebody is in distress the right asset is deployed in the right direction, to the right place as quickly as possible.

Q360 Chair: But are you saying that would be deployed in that way in these proposals? The way you are talking about it you are not identifying this as a really big issue, but in your written evidence it is identified.

Gus Lewis: Public confidence in the service absolutely is a big issue. The challenge in our view is to make sure that, whatever the outcome of this consultation and modernisation process, the appropriate level of local knowledge is retained in the system at the appropriate level, whether that is in the dispatcher or the dispatched. It is absolutely right that there needs to be that retention of knowledge so that the public is confident that the right assets will come to rescue them. Where that is retained in the system is very much for the managers, organisers and deliverers of search and rescue to consider. We are not professionally qualified to express a view on how to deliver a search and rescue service. We, as users, want to know what is delivered matches what is currently available or is possibly even improved.

Q361 Chair: Does it make a difference to leisure craft users that a Coastguard Coordination Centre is nearby? Mr Lewis, what can you tell me on that?

Gus Lewis: I think there is some confusion in some sectors in the recreational users sector, which has not been helped by some of the television coverage, that communication from a VHF radio is direct to the MRCC; if the MRCC is not open, there is nobody to speak to. In practice, of course, you communicate from your VHF to the nearest aerial, and then that aerial routes the call through to the appropriate MRCC. So, the non-existence or the closure of a particular centre does not, of itself, mean that there is
nobody at the end VHF to call if you are in distress. That said, of course, it is vital that the current level of service of search and rescue provision is maintained as being available to recreational boaters. The Coastguard service needs to ensure that whatever provision is made it is sufficiently resourced to make sure that even over night time there is sufficient cover so, if somebody is in distress, search and rescue assets are deployed as quickly as possible to the right place to come and get the person in distress.

Q362 Paul Maynard: Could I just ask Mr Gifford to explain what the National Coastwatch Institution actually is and how it interlinks to the rest of the search and rescue network in the UK?
Jon Gifford: Yes. We are a volunteer body—a charity—that grew up here in Cornwall after two fishermen drowned in front of a decommissioned Coastguard station on the Lizard. Very generous people in Cornwall funded the establishment of a group of watch stations manned by volunteers, who would keep watch in daylight hours. That was in 1994. It has developed a long way since then, and we now have just over 2,000 trained volunteers operating in 45 stations, and we cover about 190,000 hours of organised watching during the year. Basically, people think we are a bunch of old boys sitting on a cliff top with a pair of binoculars waiting for the pubs to open or something quite derogatory. Highly skilled people trained over a year, regular reassessment—
Chair: We have not heard anything like that, Mr Gifford. I must put it on the record. We have had no such allegations.
Jon Gifford: Well, it is quite often said we are a cross between Dad’s Army and Baywatch. We would not mind Baywatch, but Dad’s Army is not very skilful. Basically, we have a very fine body of volunteers, and they all submit themselves to considerable training and assessment before they are let loose in a watch station at all.

Q363 Paul Maynard: How do you interact with an MRCC on a day-to-day basis?
Jon Gifford: Very closely. We log on in the morning; we talk to them on any subject of particular interest; it might be spot weather or whatever. We log off in the evening, and during the day we will be talking to people as incidents occur, reporting by various means. We are particularly concerned that we keep close to the MCA and the Coastguard stations that we work with. You get to know people as you go on over the years, and familiarity breeds cooperation and recognition, which is always important. We work, as I say, on a shift basis, in daylight hours. The main thing we are concerned about now is some of the separations between the MRCCs. If we take Falmouth, under the plan there will be nothing between Southampton, Lee-on-the-Solent and Falmouth, which is 160 miles as the crow flies and about 180 miles of coastline. Then you have to take north Cornwall in as well. It worries us that 22 NCI stations would be reporting to Falmouth on that basis. Otherwise they would be reporting to Brixham or Portland. We can imagine at a busy time in July/August five or six incidents occurring in that distance of coast. It is quite possible—perfectly possible. If there are only four watch officers on duty at Falmouth, they are going to have an overload.

Q364 Paul Maynard: It is quite clear that one of the key issues for both those who work in the Coastguard service and for users of the service is local knowledge, something that you are very clear in your written evidence that you seek to offer. Are you confident that, whereas the Coastguard officers have to sit local knowledge tests at their MRCCs, your level of local knowledge is of an equally high calibre, and what internal procedures do you have to assure that “local knowledge”, with capital letters, is something that your members are able to offer?
Jon Gifford: The training is primarily on the management of a watch station and, depending on its locality, it is absolutely vital that the area within its purview and beyond is known and understood by its members. Otherwise they could quite well report erroneously to the MCA and get everybody in a hell of a muddle.

Q365 Paul Maynard: But do you have a written examination of any sorts?
Jon Gifford: Yes. Every watchkeeper is assessed before he is pronounced as a watchkeeper. He is a trainee until he is assessed and passes quite a stiff examination, which is done on paper and verbally, and then if he is allowed to be a watchkeeper then that is fine—he will have a local knowledge—but he will be reassessed on a regular basis. It sounds a bit onerous for volunteers, but they volunteer knowing that is going to happen because we are very conscious of the fact that, if we do not know the local area, we could produce some duff information.

Q366 Paul Maynard: Are you confident that, if the MCA’s proposals were to go ahead, you will be able to play a fuller role in future in providing these services?
Jon Gifford: Yes. I am personally in regular contact with the Chief Executive and the Chief Coastguard. We are talking all the time about how we could integrate our arrangements more closely.

Q367 Paul Maynard: Would you suggest that the Chief Executive of the MCA would like to see you take on more of these roles, perhaps?
Jon Gifford: We certainly feel we could help and we have told them. With VHF, all our trained watchkeepers are qualified, by the way. We would not allow a watch to operate without at least one, hopefully two, qualified VHF operators so they are perfectly able to talk. We feel we could help, certainly with smaller items like radio checks, spot weather and items of that sort that are constantly being asked of MRCCs in the busy season. For instance, Solent is overwhelmed with traffic, people doing radio checks, and if you have 1,000 yachts out on the water and people want to talk to the MRCC, there is going to be a lot of confusion.

Q368 Iain Stewart: I would like to ask Captain Richardson a couple of questions arising from the recent evidence that you have submitted. The Harbour
Masters’ Association states that they would acknowledge that the Coastguard service is in need of modernisation. Could you expand on what you think needs to be done?

Kevin Richardson: Certainly in the internal consultation that we have had with our membership, the vast majority of members concede that the current Coastguard arrangements can be improved, and arguably that situation has existed for some time. We believe that the training, the deployment of resources, the actual resilience of the current model can be improved. The proposals that the MCA have advanced do go some way to setting that out, so in that sense our members are reasonably welcoming of the proposal to modernise. However, having said that, as you know from my written evidence, there are some concerns.

Q369 Iain Stewart: Do you believe that the modernisation gains that can be achieved require the current number of stations or is there a case for some rationalisation?

Kevin Richardson: I think the case can be made for rationalisation. There are certainly some views expressed by some of our members that that rationalisation goes too far and too quickly. Also that the geographical spread of those resources has actually gone too far in terms of the regionalisation of MOCs and the resilience of that particular model. For example, my home port is Dover and Dover is not designated as a MOC, Marine Operations Centre.

Chair: It is helpful if you can say the words. It is easier for people to understand.

Kevin Richardson: I am very sorry, Chair. The MCA proposals set out two Marine Operations Centres, one based in Aberdeen and the other one somewhere on the south coast between Portsmouth and Southampton. I do not think the location has been exactly agreed yet. Dover is an MRCC, but the MCA acknowledge Dover’s importance, particularly in terms of the channel navigation information service, CNIS, it provides. So the MCA, by recognising that, do see the importance of Dover as a regional centre and yet it is not designated as a MOC status under these proposals, and I fail to understand why. It is a MOC by any other name, it seems to me.

Q370 Iain Stewart: Have you an idea of the optimal number of stations around the country? I think we have 18 currently, and the proposal is to have two MOCs. Is there an ideal number somewhere between those two?

Kevin Richardson: I do not profess to know the exact number here or express a view there. Certainly, the vast majority of our members believe the model as it is proposed can work—it can work. We have some questions and concerns about resilience and, as you have already asked, questions about local knowledge, there are some concerns from some of our members, probably, it is fair to say, more of our northern-based members, particularly around Scotland, about that local knowledge issue. But we would propose that a more resilient model would be an Aberdeen, Dover and Falmouth proposal for the Marine Operations Centres. That seems to us a more resilient model than just the two Marine Operations Centres under the current proposals.

Q371 Chair: Captain Richardson, when you say the proposals could work, that is not terribly consistent with what you have said to us in the written evidence you have given us, where you talk pretty clearly about concern of loss of local knowledge, you express a particular concern about a lack of formal risk assessment on the plans to change the emergency towing vessels, and you talk about concern on the reduction of safety on the plans for the Maritime Incident Response Group. That does not really add up to say it can work; has somebody been asking you to put your evidence in a slightly different way?

Kevin Richardson: Madam Chairman, no. Please let me try to clarify. When I was answering the question that was put to me, I believed that was in the context of the modernisation of the Coastguard, and certainly the majority of our members would agree that that model can work. I am not addressing there the issue of ETVs or MIRG. We have some very grave concerns about those proposals and, indeed, the lack of any formal consultation on those two issues alone. I would certainly echo what has been said before this morning about not seeing these proposals in isolation—so not seeing the modernisation proposals of the Coastguard, the abolition of ETVs and the demise of MIRG in isolation. They are linked; they are very definitely linked and they should be seen as a whole.

Q372 Mr Leech: We have heard a fair bit of evidence from different people who have some serious concerns about the potential of transfer from a daylight operation to a 24-hour operation while an operation is actually in progress, and the potential problems that that might bring. First of all, would the three of you agree that is a potential problem, and is it something that could be easily dealt with?

Kevin Richardson: Could I respond to that question initially? It is a concern. Any person that has been involved in an emergency response to an emergency incident will tell you that a real point of weakness is when there is a transfer of either command and control or a transfer from the marine aspect of that incident to the land side aspect of that incident. That is the point at which things can go very wrong. There is a potential weakness there in the transfer from a daylight manned station dealing with an incident to a regional centre dealing with that incident. It follows, and all of the emergency models will tell you that, and so there is an inherent weakness potentially in this particular model for that scenario, in my view.

Jon Gifford: I find it difficult to imagine that the Coastguard would walk away from its post in the middle of an emergency just because it happens to be 15.00 in the afternoon and their shift is over. I believe that they will have an emergency response team in each MRCC or MOC so that if there is a serious problem they will be there to manage it. I cannot believe that it would be handed over. We would never do that. If we were involved, even up till the middle of the night, in a serious incident we would stay there until we were shut down.
Mr Leech: Do you have anything to say on that, Mr Lewis?

Gus Lewis: We are not really in a position to comment on how to deliver or manage an incident response. From our point of view, we would want to make sure that, if there is a handover or if that proves to be the case, that has no impact on the services delivered. It is something for the Coastguard service to make sure it does not happen.

Q373 Mr Leech: So in that case, if there is the potential for a problem at a handover, whether or not those handovers ever actually happen in reality, would you agree—and I am specifically thinking of Mr Richardson here—that whichever Coastguard stations are to be retained ought to be 24 hours?

Kevin Richardson: There is certainly a case to be made for that. I do not disagree at all with what Mr Gifford has said, but the case has not been cogently made by the Coastguard yet in any of the response to this public consultation about exactly how they would deal with that particular issue. It would have been reassuring to us if that had been explicitly stated. The fact is it has not.

Q374 Mr Leech: We heard informally this morning that it certainly was not clear exactly what roles and responsibilities the daytime Coastguard stations would actually have. If their roles and responsibilities stayed similar to what they are at the moment, but not on a 24-hour basis, are you suggesting then that they should be 24 hours?

Kevin Richardson: Some of my members would suggest that. Again, I am speaking on behalf of my association here; if you want a personal view I am quite happy to give that, but on behalf of my association there is a significant minority of my members that would suggest that. If an MRCC is to have full capability, it should be manned on a 24-hour basis.

Q375 Chair: And your views? You said you would give us yours.

Kevin Richardson: I personally belong in the opposite camp, so I am with the majority of my association’s members in thinking that is not a key requirement.

Q376 Julian Sturdy: A question to Captain Richardson, if I can, and with your experience within the association, looking at the ETVs—obviously, we have been and looked at one this morning—and talking to people there, do you believe that the commercial tugs could do a job that the ETVs do? This morning we were told that in certain weather conditions that just would not happen. What is your view on that?

Kevin Richardson: My view is, frankly, pretty negative. Based on my own professional view and those of my members, and we have consulted very significantly on this issue—and I am delighted that you took the time to go and see the ETV this morning—that is a purpose-built, purpose-crewed, purpose-equipped piece of kit designed for a specific job. There is no way that harbour towage could substitute for that particular specialist tool. In my own case in my own port, if the Dover Straits ETV were to be withdrawn and it was considered that my tugs should be deployed to carry out that role, I would have very serious reservations. In certain circumstances, I just would not send them. It would actually be quite dangerous of me to do so. So I do not believe that harbour towage in particular is a substitute for the proper tools for the emergency towing vessel role as it is currently set out.

Q377 Julian Sturdy: So you do not believe that the private sector then at all, or any element, could cover the coastline that the ETVs cover at the moment?

Kevin Richardson: There may be isolated areas or some areas where private towage might carry out a role, and in terms of harbour towage the MCA make great play about the CAST Agreement, so getting harbours to sign up to the CAST Agreement as somehow being a panacea for the demise of ETVs. I do not believe that that is the case. The CAST Agreement is out of date, and although at the latest meeting we had with the MCA they said they are going to review that, not before time in my view, it is certainly not the total answer to this particular problem.

Q378 Chair: What do you think the answer is?

Kevin Richardson: The answer is to retain all four of the ETVs as they are currently deployed. There is a clear need for them that has been set out in previous risk assessments. Lord Donaldson made the recommendation; they have done a good job since their deployment, and withdrawing them summarily, without any consultation whatsoever, is in my view utterly deplorable.

Q379 Paul Maynard: Can I just ask, for the record, what consultation each of you have had with the MCA, both before 16 December announcement and after the 16 December announcement?

Kevin Richardson: I am happy to respond to that question. Before the announcement: none whatsoever. After the announcement: belated. On the ETV issue—not on the MIRG issue but on the ETV issue—the MCA have entered into discussions with industry on what might be done to address the abolition of ETVs in particular. There have been three regional meetings, one in the north in Edinburgh in March, one in London in late March and, most recently, last week up in Greenock on that particular issue. I am happy to give you an update on where we got to, if you would allow that.

Paul Maynard: Can we come back to that in one minute? I just want to hear from Mr Lewis and Mr Gifford about consultation. I do want to come back on that.

Gus Lewis: I can only comment on the modernisation proposals. We do not have any comment on ETVs and MIRG. We were notified of the intended consultation before consultation date, but not consulted informally or formally.

Q380 Chair: But you were not involved in drawing up the plans to be consulted on?

Gus Lewis: No.
Q381 Chair: Mr Gifford?
Jon Gifford: I was advised about three years ago by the then Chief Executive that something would have to be done to rationalise the layout of the Coastguard. He then left, and since then in discussions it has always been in the background that something with modern communications would allow a rationalisation or an alteration of layout of some sort.

Q382 Paul Maynard: Were you specifically consulted before the 16 December announcement?
Jon Gifford: Not in the terms that we know now.

Q384 Paul Maynard: Right, and were you consulted after 16 December?
Jon Gifford: In conversation, yes.

Q385 Paul Maynard: And what would the nature of that timeline be? 12 months? 18 months?
Kevin Richardson: The meeting was really to bring together the components and the output from the first two meetings in the third meeting and try to make some progress. The two main outputs from that meeting in Greenock were the formation of two working groups. One of the working groups was to be chaired by industry and is called the ETV Working Group—very imaginative. That group is primarily focused on looking for alternative funding arrangements for the maintenance of the current ETV provision. The second working group that was formed as an output from that meeting was a review group to look at the terms of CAST and review that agreement to make it more fit for purpose.

The UKHMA will take part in the review of the cast agreement. We are not part of and are not planning to take part in the ETV review group because that is about a funding issue and that is not our area of expertise. My own personal view is that that ETV group has a mountainous task to try to find a solution and get that solution implemented by 30 September. In fact, I would say it is impossible. My view would be, and I stated this view to the MCA at the meeting, that if they are going to be really serious about giving this group a chance to work with industry to try to find a funding solution, then give it time, and whilst it is carrying out that very important work, do not summarily withdraw the current ETV coverage arrangements on 30 September.

Q386 Paul Maynard: So you are effectively asking for an open-ended commitment from the Government in the hope that the private sector can come up with an alternative? Is that correct?
Kevin Richardson: I would not think that would be reasonable. I think there has to be a definite time level set, but it has to be reasonable. I do not believe the timescale between now and 30 September to be reasonable.

Q387 Chair: I want to ask a little about the relationship between the volunteers and the Coastguard coordination centres, and the impact of any changes or the changes put forward. Mr Lewis, could you give us any views on that? How closely connected with the coordination centres are the volunteers, and if there were a drastic reduction in centres, as envisaged in the consultation, what impact would that have on volunteers?
Gus Lewis: I am not really in a position to comment. Other colleagues are best placed to comment on the current working arrangements between volunteers and the individual centres. On behalf of the users, we welcome the proposed increased support for the voluntary components of the overall search and rescue picture. The volunteers are a vital part of search and rescue provision, whether it is volunteer Coastguard, National Coastwatch or the RNLI. It is all very much part of the approach. If the voluntary side had greater support there may be greater opportunities for other voluntary organisations, yacht clubs or other communities to volunteer to be part of that overall matrix. That is something we are obviously keen to support.

Q388 Chair: Can you tell us anything about this link between the volunteers and the Maritime Coordination Centres?
Gus Lewis: I am not in a position to answer that.
Chair: You are not in a position to do that. Mr Gifford, can you help us?
Jon Gifford: Yes. We need to keep close; we need to know each other’s ambitions and what we are planning to do. We exercise regularly with the lifeboats. When they go out on exercise we are now becoming involved, so we communicate with them. For instance, if I may just digress for a second, they would go out to sea, drop some buoys, then go further out to sea and our volunteers would come back to the poor devil in the water so they could effect a rescue. That sort of thing happens regularly. My own station did that last week for an hour and a half. The visits to the stations are quite frequent. Our volunteers go in groups, by arrangement, to MRCCs and see what they do, and when they have time they come to see us. They take part in our assessments; they witness our assessments very often, but the problem is they are short of staff so they cannot do it, but they are first on the list of invitees to come and see what we do. We have a radio training programme that meets with their approval and that of the RYA so we can undertake our own VHF training. From that aspect we can save time and cost. So the relationship is pretty close; it has to be.

Q389 Chair: So how would that be affected then if the changes proposed actually went ahead and there were so many closures?
Jon Gifford: I think to start with we would find it a bit strange, because we are so used to talking to Portland, Brixham, Humber or whichever. We would find it a bit strange. There is a worry about this, but with
proper communications absolutely at the highest level we would be perfectly comfortable. We have to produce accurate information, and it has to be received direct at the other end. We would like to know, if possible, who is receiving it, so we do visit each other and talk to each other.

**Q390 Chair:** You say you have a worry about the communications. What is that worry?

**Jon Gifford:** We want to know quite clearly in an incident we have a clear line to an MRC and that we are not queuing up in line to talk. It does not often happen. We do it by telephone and in extremis on the VHF system. We try not to use VHF system because of over-trafficking, but basically we want to have absolutely clear communication, and the facilities are okay at the moment but, of the Coastguard’s own admission, getting aged.

**Q391 Chair:** If your communications were with people covering much bigger areas, dramatically bigger areas, would that again be of concern to you?

**Jon Gifford:** This must be a concern if you are used to dealing with people fairly close to you. I understand that if Falmouth got overloaded they could pass the traffic to Humber, but I feel rather sorry for the poor old watch officer in Humber who is trying to cope with a problem against the tide in Sennen Cove or somewhere in Cornwall. He has his work cut out.

**Chair:** Thank you very much, gentlemen, for coming and answering our questions.
Thursday 19 May 2011

Members present
Mrs Louise Ellman (Chair)
Julie Hilling
Mr John Leech
Paul Maynard
Iain Stewart
Julian Sturdy

Examination of Witnesses

Witnesses: Bob Skinley, Treasurer, PCS Shetland Islands, Mrs Alex Dodge, Chair, PCS Shetland Islands, Murdo Macaulay, PCS Stornoway Branch, and Carol Collins, PCS Stornoway Branch, gave evidence.

Q392 Chair: Good morning ladies and gentlemen, and welcome to this meeting of the Transport Select Committee. We normally hold our meetings in the House of Commons, but today we have decided to come here to take evidence from you, and that is because we are aware of so much concern in Scotland about the proposals to the changes to the coastguard service. Our inquiry covers proposals for the whole of the UK, but we felt it was particularly important to come here today so that we could meet people here and talk to you directly about your concerns on the Government’s plans for change. I would like to start by asking each of you please to give your name and the organisation that you represent, and that is for our records.

Bob Skinley: Thank you madam Chair, members of the Committee. My name is Bob Skinley. I am a serving coastguard watch officer at Shetland MRCC but I am also the branch treasurer of the Shetland branch of the Public and Commercial Services Union, and it is in that capacity that I appear before you today.

Alex Dodge: Good morning. My name is Alexandra Dodge. I am also a serving watch officer at Shetland Coastguard and I am the chairperson of the Shetland branch of the PCS Union.

Murdo Macaulay: Good Morning Madam Chairman, members of the Committee. My name is Murdo Macaulay; I am a serving coastguard watch manager and today I am appearing as a branch official for the Stornoway Coastguard branch of the Public and Commercial Services Union.

Carol Collins: Good morning madam Chair. My name is Carol Collins. I am a watch manager at Stornoway Coastguard and I am also the PCS branch chair for the Stornoway branch.

Q393 Chair: Thank you. Could you tell us whether you think there is a case for modernising the coastguard and give us an indication of your major concerns about the proposals being put forward? Who would like to start?

Bob Skinley: Yes, madam Chair. Coastguards are not against modernisation per se. We do agree that there certainly is a case for certain improvements to be made to the way we do things. In any job you are always looking to improve and do things better. However, we do not agree that requires the virtual decimation of the coastguard as it stands. Things could be done to improve the way in which we do things and the tools that we use to do the job without necessarily closing half the coastguard stations and getting rid of half the staff. The MCA has tried to imply through the consultation document that the coastguard is some sort of 40-year-old, out-of-date monolith that requires radical surgery, and that simply is not the case. The coastguard is a constantly evolving and modernising organisation. For example, over the last 10 to 15 years we have seen the introduction of a raft of new technologies and tools for us to use in order to do our job properly, such as a computerised instant management system called VISION, which is undergoing a further upgrade as we speak, and the introduction of ICCS, the Integrated Coastguard Communications System, which is a touch-screen system that combines all our telephones and radios, except the MF, medium frequency, into one terminal. However, that is also undergoing a current upgrade whereby the MF facility will be integrated into that as well. We have things like AIS, the Automatic Identification System, where we can see virtually in real time what vessels that carry this system are doing. That has been in operations rooms for a number of years now. So, to suggest that the coastguard is some sort of out-of-date monolith that needs to be dragged kicking and screaming into the 21st century is simply not the case, I am afraid.

Q394 Chair: Does anybody else want to either disagree with that or to add to it?

Alex Dodge: We believe that this is not actually a modernisation; it is cost-cutting, because everything that they propose for us to use is in use as we stand just now. All they are proposing is just updated equipment; there are no new systems; there is nothing new in what they are proposing. It is a cost-cutting by stealth.

Q395 Chair: Are you sure about that? The proposals that have been put forward state that there would be new technology that would make the proposals viable. Are you challenging that?

Alex Dodge: We were told at the meeting in Shetland at the town hall, the public meeting, that they would only be using existing technology. There is nothing new in this.

Q396 Chair: Would anybody else like to comment on that?

Murdo Macaulay: I think the point is that a lot of the technology that has been referred to here is already in the process of being rolled out and fitted into existing
coastguard stations. The Radio Equipment Replacement Project, the RER Project, is under way. There are stations with this new gear in it now, and that, in essence, will allow stations to link in a five-way grouping, if you like, giving us ultimate resilience. To now imply that we should take this bought-and-paid-for technology out of current stations, throw it in the bin, and move to another system or move to a system with less stations using exactly the same equipment we have just bought and paid for, does not seem to be a sensible use of money that has been spent on the project.

Q397 Chair: Mrs Collins, how do you see this? Do you believe that the system has been modernised or that it is in need of further modernisation?

Carol Collins: The system that we have at the moment, that they are upgrading, as Murdo says, has the capability to provide us with a networked system. If we have that, it provides the resilience and certainly it is a good system. But it is a system that was installed in 2000, I think. That is making use of an already old system, when maybe we should be looking at upgrading, maybe comparing with other organisations to make sure that we are compatible and that we are dynamic towards the future, rather than maybe revamping a system that is already there.

Q398 Chair: Do you think that the proposals put forward are revamping what is there, rather than doing things that are new and different?

Carol Collins: Definitely, yes.

Q399 Julian Sturdy: I just want to follow on about the debate over the technology and whether it is improvements or whether it is new technology. To be fair, we have heard that from other areas that we have been to as part of the inquiry already, so the same story is coming through. I just wanted to touch on really the area that you cover here, so obviously Stornoway and the Shetland Islands, because earlier this morning it was pointed out to us that there are a number of black spots across the areas that are being covered. Is there any way that the advancements, if we can call them that, coming down the line—whether it is new technology or just tweaking the current system—are going to cover those black spots at all?

Murdo Macaulay: At the moment, one of the things that has come out of the document and in various meetings is that the actual infrastructure, the remote VHF aerial sites that link every coordination centre to their end user on radio, is not going to be changed. There is no money there to build new ones, so the very raw mast that receives that distress call from the person out in the water is not going to change. So, under this proposal as it stands at the moment, we will still have the black spots that we have now post-plan A, for want of a better word. That is my understanding; that is what has been put to us fairly regularly from all the questions we have asked.

Q400 Julian Sturdy: Any more views on that?

Bob Skinley: If I may, I will just add something to that. Specifically, from a Shetland point of view, we do have a lot of problems with our communications, and that is purely because we do not have a fixed link to the mainland. All our communications at present come via microwave relay links and they are inherently unstable. They are subject to atmospheric conditions, subject to weather, and not just bad weather; it can happen in good weather as well. Just recently, as you know, there has been a lot of high pressure centred over the United Kingdom. This too, can have an adverse effect on the communications, whereby they drop out, because they are subject to a phenomenon called tropospheric scatter, which breaks up the signal and scatters it. So, we can lose communications at any time of year.

Now, it has been proposed that BT will link into a fibre-optic cable that runs through Shetland and is owned by Faroese Telecom. Now, BT have said they will link into that. However, I had a discussion with the Scottish regional director of BT and he was at pains to point out that, whilst this may well provide some short-term improvement in terms of things like available telephone lines, broadband speeds, etc., he could not, nor could BT, guarantee that the problems we experience at the moment will not be repeated, even though there is improved infrastructure in place.

Q401 Julian Sturdy: Given what you are saying, how important is the local knowledge that you have within the current stations to these areas where you do not have the communication covered?

Bob Skinley: It is absolutely vital, because obviously in the operations room, amongst the team that work in there, there will be somebody who knows the specific coastguard or coastguard team that we need to call out in order to provide such coverage. To give you an example of what we do in terms of when we lose communications, as it stands at the moment the most critical factor in being able to cover the Shetland district if we lose communications with the mainland is the fact that the MRCC actually exists and that we have a radio mast at the back of the station that is hardwired into the station. It is not routed to the mainland and is not subject to these communications outages.

So, from the station in Lerwick we can communicate still with our teams; we can put teams on hilltop sites to provide emergency VHF coverage and talk to them on the radio. I can have a team as far north as Saxa Vord on Unst. I can have a team as far south as Fitful Head, at the southern end of Shetland, near Sumburgh airport, and be able to talk to them via radio. Now, that is important because obviously, if you have a coastguard team on a hilltop site providing emergency cover, you need to be able to speak to them for them to relay to you perhaps a distress message that they have heard. You also need to talk to them because quite often this happens in foul weather conditions, and you need to be sure about their Health and Safety and to be able to organise shift changeovers, because bear in mind these people are volunteers; they may need to work in the morning. Now, that could not be done from a MOC in Aberdeen or Southampton.

The other thing you have to remember is that quite often the way these microwave relay links work is not only is our traffic routed through them but so is the Public Service Telephone Network, the PSTN, and
Indeed, the mobile phone network. So if that link is down, it is entirely possible that not only will we lose the radio coverage but also telephone and mobile telephone links as well. In any case, mobile telephone coverage in Shetland is patchy to say the least. In some places, like Lerwick, it is quite good, and you get a really good signal. In other places it is poor and in other places still, it simply does not exist. So, if we go down the route of what the MCA plans and we have a circumstance where this happens in Shetland, a MOC would be unable to communicate. They might be able to task the teams to go to the hilltop sites, but then they would not be able to communicate with them. What happens then? The MCA has been unable to answer that question.

Q402 Chair: Mr Macaulay, what are the implications of local knowledge of Stornoway, and could that local knowledge be used in a different way if the proposals went ahead?

Murdo Macaulay: Yes. Earlier this morning I used an example. One of the pieces of technology that the MCA have pointed to in the plan that will work round their lack of knowledgeable operators of a particular district is what is called the EISEC, the Enhanced Information System for Emergency Calls. This is technology out there at the moment that sends the positional information of a particular emergency call with an error circle round it. Now, this works relatively well where you have good mobile phone communications, where masts are well spaced together, where they are close and where, in essence, you do get small circles. It also relies on that particular mobile phone being able to access its own network. Yesterday I was on watch; I was coordinating a particular incident where we had a broken 999 call that we had on the line for possibly about 10 seconds. The caller stated, “I am in a small boat; I am being pushed onto the shore and I am in Inverpolly Fish Farm,” and then the line went dead. With no disrespect to any other colleagues around the country, there is little chance, I think, of an operator in Southampton knowing where Inverpolly Bay is on the North West coast of Sutherland. We knew as soon as that was said where Inverpolly is. We directed the helicopter to it. Again, in the document it refers to helicopter crews’ local knowledge. Our helicopter crews are excellent; I am not denigrating their local knowledge in any way, shape or form. They did not know where Inverpolly Bay was; they asked me for a direction to fly. I directed the helicopter mid-air, it flew into Inverpolly and because I know, because I live in this place, that salmon farms tend to be in bays rather than in the open sea, we directed the helicopter to a series of bays and this boat was, essentially, saved on a bay on a lee shore, in what was actually a fairly horrible day yesterday. That is how local knowledge can intervene when technology, which is not currently at the kind of stage we need for this plan, does not quite deliver the answer. There were four people yesterday directly, I believe, saved or intervened, certainly, as a result of local knowledge.

Q403 Paul Maynard: It is now 10 years since the closure of the Oban, Tyne and Pentland coastguard stations. I wondered if you could tell me what impact you have seen of those closures, either on specific incidents or more widely on how you interact with your volunteer coastguard, who presumably will have taken over substantial chunks of area that were not formerly part of your coastguard stations. How does the relationship with your volunteer coastguards differ in those two different branches?

Alex Dodge: For Shetland coastguard I obviously joined after Pentland coastguard joined, but I feel our interaction with the community in Orkney is different to that in Shetland. I feel that we do not get as many phone calls from Orkney, and they have lost their trust within the coastguard. They feel they cannot phone us up and chat to us. We do have a close working relationship with our coastguard rescue officers within Orkney. They have had their numbers recently reduced and yet again that does build a relationship of mistrust, which you cannot afford to have within an organisation such as ours. We have been accused of many things by the Orcadians. Three years ago we were actually going through a fatal accident inquiry ourselves, where a gentleman was lost from a boat, and we have been accused that our lack of knowledge of Orkney was at fault. Actually, I cannot say much more on that because it is still going through the process, but that is what builds with us: a feeling of mistrust because their coastguard station has been lost; their coastguards have gone and they have been fobbed off onto somebody else.

Murdo Macaulay: I would echo the same really. I joined the service in 1999 and Oban Coastguard shut in September 2000. It would be wrong to say the initial handover period was particularly comfortable. I think the communities down there felt that they were being hard done by. My personal view is that we are now at a point where we have a reasonable working relationship with our responders down there, whether that be lifeboat or volunteer coastguard rescue teams and we just have to train and manage that. I would say we have a good working relationship down there now, but that has taken a decade to build. We are still not as close to the communities there as we are to the communities we serve here and on the West Coast of Scotland. It is a different situation definitely with the district that was there post closure.

Carol Collins: I would like to add to that because Oban district was actually split in two, and Clyde coastguard took part of that district and we took the northern part of that district, so there are more relationships there that we do not know about that could come into play. Really, probably, the best people to tell you what the relationships are like would be the RNLI and the teams in the local community.

Q404 Paul Maynard: Do you believe that the transfer to MOC in Aberdeen or, indeed, elsewhere, would cause similar problems?

Carol Collins: Yes, it will cause problems I think, but when you are looking at reducing so many coastguard stations to a few, and staff are dealing with a much larger area, relationships and local knowledge are going to be diluted. They are not going to be anywhere near the same as staff that are based in a local community, get to know the people, ship
movements, the fishing, the activities in their area. We envisage a MOC as—not an ideal world—a call centre with cells in it. Now, with the best will in the world, I do not think that environment is conducive to setting up relationships to building local knowledge and keeping it going. It is a dynamic thing.

**Q405 Chair:** What has been the impact of that? Mr Macaulay said it took 10 years to build the relationships. What has the actual impact of that been? Have lives been lost? Have there been incidents that might not have happened otherwise?

**Murdo Macaulay:** It is very hard for us to have that information. In certain areas we do not have the same community links in there. Again, as Carol said, possibly the likes of the lifeboat crews and their coastguard teams would answer this, but there are undoubtedly incidents down there that probably happen, probably occur and do not get reported to us because we are not Oban coastguard. The other thing is we have a fundamental issue of trust with the people that use our seas. They know where we are; they know who we are. They know that we know where they are and the situation they are in, and I think the further you remove that, the less efficient our service is going to be. You will reach a point where, I suspect, again, this is probably true with the closure of Oban—I do not have anything to prove in concrete—people will not not be telling you about certain incidents. You will not be getting knowledge of things that are going on. That particular knowledge at any one time can be a critical piece in unravelling and solving an incident that threatens life or the environment. In summary, it is hard to say statistically what the closure of Oban did, but I think we are certainly less close to the communities we serve, and that is bad for the service. There is no doubt about that.

**Q406 Mr Leech:** We have heard a lot of evidence, both formally and informally, from people working in the coastguard service that there has been a serious lack of consultation about the proposals before they were published. Were any of your members in Stornoway or Shetland contacted and spoken to about the modernisation process before the publication?

**Bob Skinley:** No. No significant numbers of operational coastguards were at any time contacted, or indeed involved, or indeed our colleagues in the coast rescue service, in putting together this consultation document. The only person on the management team who has any operational coastguard experience at all is the chief coastguard, Mr Johnson, and his experience of the coastguard operations room has been some years ago. So no, there has been virtually no operational coastguard input into this document.

**Q407 Mr Leech:** Is that the same for Stornoway?

**Murdo Macaulay:** Absolutely, and I think it is the same for almost every station around the country. It is probably a rather sad fact that we are here today and the consultation has been done in public. It has been done the wrong way round. We should have had this process as a service before we moved to a plan, not issue a plan and then move to this process in public as a service.

**Q408 Mr Leech:** In answer to a previous question, Mr Skinley and Mr Macaulay, you both talked about technological issues in Shetland and local knowledge issues in Stornoway in relation to the difficulty that you would have if your stations were to be closed. Had the people who came up with these modernisation proposals been aware of the things that you have been telling us this morning, do you think that the proposals that have been put forward could possibly have been put forward under those circumstances?

**Murdo Macaulay:** No. Given the evidence that is sitting with us now, with all the arguments of resilience, local knowledge and lack of consultation, I do not think that this plan stands up to any of these arguments and delivers a safe and workable model for the UK search and rescue system. That is where we stand, I think.

**Bob Skinley:** I would agree with that. If they had done it the proper way round, involved us from the beginning—let’s not mess around here. We are professional, operational coastguards. In essence, we are the experts, and yet they chose not to ask us. Now, how can you possibly come up with a plan related to safety of life if you do not ask the people who deal with that on a day-to-day basis? How can you possibly come up with a safe, workable plan? The problem with this plan is its emphasis is all wrong. Their focus is on centralising things and these MOCs becoming all-important, and what goes on around the coast becomes, basically, peripheral. What we are saying is: they have got this the wrong way round. What is important is what happens out on the coast and what the MRCCs, geographically dispersed around the coast, see and do. The ability to have a backup, whereby the centre can take control in extremis, is a good idea, but it is secondary to what we do out on the coast. They have essentially got this the wrong way round and they did not ask us. That is why this plan is ill thought out.

**Q409 Chair:** Please, to the public, I do understand your strong feelings on this but if you can, can we just have a dialogue between ourselves and the witnesses. We have been told there has been a risk assessment and that that does not show any undue risk coming from the proposals. Do you have any comments on that, Mrs Dodge?

**Alex Dodge:** It was a risk assessment that was created after the proposal was published. There was obviously no forethought put into what they were creating—no forethought as to the safety of people’s lives that this is all about. If there is one life lost due to this, it is one life too many.

**Q410 Mr Leech:** My final question is in relation to the exercise. What appears to have been done is a paper exercise, based on certain coastguard stations being allegedly busier than others, based on the number of incidents. Would you say that the number of incidents that are recorded can really justify saying one station is busier than another, or do we need to measure how much time and effort and workload is put into an incident before deciding on whether or not a particular coastguard station is busy or not busy?
Bob Skinley: I think the answer to your two questions are no and yes. The statistics that have been presented by the MCA do not give a true picture. All they do is give a bare number. To give an example of that, if you have an incident, say, off the South Coast of England, which involves, perhaps, a child floating off on a lilo, that incident may be resolved in a short space of time and involve very few resources and relatively minimal effort. However, by the same token, to give an example from the Shetland district, we had an anchor-handling tug called Bourbon Dolphin that overturned. Now, that particular incident took four days to resolve. However, what you get in the statistics: one incident for the South Coast, one incident for Shetland. So there is no weighting given to the statistics as to the nature or severity or duration of the incident, so it paints a false picture. Just because, say, a South Coast station has lots of incidents in terms of numbers does not necessarily make them busier than a station like Shetland that has had one incident of the gravity of the Bourbon Dolphin.

Furthermore, I would argue that it, in any case, has been a misleading use of statistics, because what they have done is taken raw numbers and said, “Our numbers show that between certain months of the year, and at certain times of the day, there is a peak in activity.” Those numbers are artificially skewed by the number of single incidents that would occur off the South Coast of England, say, on a busy bank holiday, or during the summer season, when there are a lot of people at the seaside. However, to then take that, extrapolate that around the coast and say, “This is the basis under which we can say we can safely close coastguard stations, or indeed reduce coastguard stations to daytime-only operation,” is, frankly, risible. There is a strong difference between what happens on the South Coast, and around the waters of the Northern Isles and Western Isles. Yes, numerically perhaps, we get fewer incidents, but they are more severe, often very extended, and involve a lot of effort. So, yes, I would agree that perhaps the best way to do this is to delve deeper into the incidents and come up with some idea of the gravity, nature and extent, rather than just going on pure numbers.

Carol Collins: I absolutely agree with what Bob says, and if you think about the South Coast as well, there are both RNLI and independent lifeboats. There is a thickness of resources along the South Coast of England. Not only that, if you go down there in summer there are boats everywhere, so rescues can be effected quite quickly, either by launching a SAR unit or just by somebody else going to assist. Up here, as you saw today in the operations room, our resources are much more widely spaced and it takes planning and careful thought as to what resources you are going to put in to get the right response to this district. For example, we have not got lifeboats the length and breadth of the West Coast of the Isle of Lewis, so it is often our helicopter that has to respond to incidents out there. There are a lot more tactics involved and planning that needs to be taken into account.

Q411 Iain Stewart: Amongst the written evidence that we have received is, of course, all the MCA’s responsibilities could be devolved down to the Scottish Government. Now leaving aside any broader political or constitutional issues that might be prevalent at the time, practically, would such a move be viable, or are there operational or logistical reasons that would suggest we should maintain a UK-wide system of management?

Chair: We do not want to get into the—

Murdo Macaulay: We are not getting into politics yet.

Chair: Not today, anyway.

Q412 Iain Stewart: Is that view shared by the other witnesses?

Alex Dodge: Yes, we could look towards the likes of the Norwegian coastguard, where they combine their search and rescue with their fisheries protection, with their lightering. All those sorts of things could be combined. So, Scotland could do the same thing; we could have an all-embracing marine directorate that is in charge of our maritime environment.

Bob Skinley: I would agree on the face of it. Logistically and operationally, there is absolutely no reason why that could not be the case.

Q413 Chair: There are proposals to have five sub-centres, possibly including yours, but that is not clear, to be open in daylight hours only. What are your views on that proposal, from an operation point of view?

Bob Skinley: There are a number of problems with that. Firstly, as I have already indicated in terms of the statistics that the MCA provided, this whole rationale for daytime-running stations is based on the premise that we have a clearly identifiable peak of activity. Now, as I already explained to you, certainly around the coast of Scotland that simply is not the case. For the majority of Scottish stations the actually incident profile flattens, with perhaps a small bump in the summer, but not as noticeable as perhaps on the South Coast of England. Furthermore, the MCA in the document made great play of the fact that we should be—and we are—a national emergency service. Do we think it is a good idea for a national emergency service to be thinking of going down the road of operating on anything other than a 24-hour basis? I do not think so. It does not make sense. Furthermore, particularly in our neck of the woods, around Shetland and I am sure it is the case for Stornoway as well, some of our severest incidents will happen precisely during the hours when the MCA thinks it is safe to close coastguard stations: at night, during the winter months, in the severest of weather conditions. The whole premise of having anything other than a 24-hour service is a non-starter in my view.
Q414 Julie Hilling: I want to ask questions really about local knowledge and volunteers. A lot has been said around this whole inquiry around the need for local knowledge, but you are all having to learn about big tracts of coastline. Coastguards that we have met have transferred from other stations into different areas and so have to do that learning. Can that knowledge not be transferred into a larger centre?

Carol Collins: I would like to answer that. I was at MRCC Belfast for 10 years before I moved up here. I moved up here in 2002 and I did my homework before I came here because I thought, “This is a very big district and I am not a Gaelic speaker.” When I came up here I had to get used to the language, and know what to type into the computer system because there is the English version then there is the Gaelic version. Do I try to type the Gaelic version in; do I try to use the English? All these wee quirks. It is a vast district and compared with Belfast, I can honestly say I will probably never know this district inside out, and I think Murdo will hopefully agree with me there. There is so much to it.

Now, as I said before, if you combine that into a MOC or one station that has then got local of not just the West Coast of Scotland but the whole of Scotland, and then look at maybe a centre in Southampton trying to cope with that, I say you will lose local knowledge. Local knowledge will not be local knowledge, and I really, speaking from experience, know that you are not going to be able to harvest this knowledge, and put it into a database, keep it up to date and have it as a useful tool. Being a part of the community, being a team where you can draw on each other’s local knowledge is the key to it. That makes the fast response. We do not sit and type around in Google trying to find out where something is, unless we are really stuck. We get on with it; we put our heads together and we discuss it, and I just do not see how that is going to work on a larger scale.

Murdo Macaulay: No, definitely.

Q415 Julie Hilling: I heard what you said with that, and your role is identifying where the incident is, but can the volunteers who are actually out there working on the ground and facilitating the rescue be coordinated from a centre, wherever that centre is?

Murdo Macaulay: One thing that has been said is that the Maritime Operation Centres will operate with desks—particular desks that will have a certain area to them. But that steps into the realm of the fact that we are responsible for the coordination of an incident; we are not simply call takers who take a call, put it on the map. We are responsible from the infancy of that incident until, essentially, it is closed and, for want of a better word, cradle to grave—it is closed and dealt with. So, we have elements of coordination all the way through that call in our local knowledge, contacts, the people we have, the trust we have built up with various responders, and not just responders, but the wider public who often help resolve incidents. That has taken many years to formulate. Carol says it is about being part of the community. It absolutely is. There is knowing who is where, what has actually happened out there, and simply knowing the kind of terrain and the weather that you are putting these people into. I know we have moved on a bit from the day-centre debate, but all these arguments are possibly even more critical by night, with more complex and harder things. So, I think local knowledge is critical and it is critical for the entire duration of that incident, and it is not something that you can replicate by a desk with someone who has no concept of, for example, the west coast of Scotland or the islands.

Q416 Julie Hilling: Would that then put more responsibility on the volunteers, in terms of recruiting volunteers? You have got a voluntary force out there that are doing the work. What effect do you think that would have on them: their recruitment, their retention, etc?

Murdo Macaulay: We have good links with the volunteers—the coastguard rescue officers that actually go out and do the job for us. We have excellent links with these people, and all I can say is that they have been entirely supportive of our station’s campaign; they have been entirely supportive of the wider campaign. I had better be clear, for the record, that this is only the teams I have spoken to within Stornoway; I have no national overview of this picture. They have been entirely supportive, and the fundamental issue of trust and knowing each other is critical, and it is only in times of stress that you will test that and rely on that. Day-to-day, nice, smooth, easy sailing: you can possibly do without that. When times are hard and when you are asking people to do unpleasant things, that is when you need to have that knowledge of the individuals, the team capabilities, the kind of place you are sending them into, and that link is fairly dynamic and changes by the second. I do not think, and I do not think anyone in the service thinks, that you can replicate that from a station on the other side or at the other end of the country, and that is no denigration to any of my colleagues.

Q417 Chair: You said before, I think, that it was more complicated at night or more difficult at night. Have you got any evidence to back that statement up?

Murdo Macaulay: Night incidents present you with various dangers that are not there by day; they make getting across the terrain, navigating the terrain, simply getting out and getting teams in and back, more difficult and more complex. They tend to, therefore, stretch out the incidents, if you like. So, incidents that would be resolved, say, within a ballpark figure of an hour by day will take significantly longer by night.

Q418 Paul Maynard: Could you, Mrs Dodge, perhaps, very briefly explain how you think leisure usage in the north of Scotland has changed in recent years and what the impacts have been for your service?

Alex Dodge: In the 10 years that I have been within the coastguard service I can say that we have got fewer fishing vessels working in the area, but we have more and more visiting yachtsman coming right the way up from the South Coast of England; coming from Norway and Faroe. We also have a lot more
people interested in more extreme sports: doing sailboarding, windsurfing, kayaking. Kayaking has increased vastly over the past few years. We quite often have unusual incidents; we have had a pair of Faroese gentlemen who used a personal watercraft to come over from Faroe. We also get people trying to row back from Norway. But we also have people going out fishing on small boats. There are numerous ways that people like to enjoy the maritime environment around us and it is getting more and more every year.

Q419 Paul Maynard: Do any of you think that there is any weight in the allegation, perhaps, that in the MCA’s current proposals it is paying more attention to its legal, statutory obligations towards the commercial shipping industry and insufficient attention to its obligations towards leisure craft users and general coastal services?

Alex Dodge: Yes, absolutely. What you have got to remember is the professional mariner is trained to deal with situations and they tend to be able to cope and they know what to do. But this proposal does not speak about the majority of our customers, for want of a better word, which is usually the leisure time, maritime user.

Q420 Paul Maynard: Would any of the panel disagree with that?

Murdo Macaulay: No, I would agree and I think page 13 of the consultation document issued makes reference to refreshment of modern communications technology, and they mention specifically automatic identification system and long-range identification and tracking. There are other references in there to positioning aides like GPS and Emergency Position Indicating Radio Beacons, that have, in their own words, taken the “search” out of search and rescue. But these are systems that only have to be carried—so regulatory—on large commercial vessels. This is a tiny percentage of our statistics. In the statistics for Stornoway last year, 4% of our casualties were commercial maritime—4%. I have no doubt that that is probably echoed at many other stations. In fact, if anything, it is probably smaller, because given the nature of our district we have more commercial traffic passing through it.

Q421 Mr Leech: How important are the ETVs in giving support to the coastguard service in Shetland and Stornoway?

Carol Collins: Our coastguard tug in Stornoway is used quite regularly. It has a duty to escort laden tankers over 50,000 gross tonnes through the Little Minch. We get quite a lot of vessels of that size transiting between the likes of Pembroke and Sullom Voe. We also use the tug for vessels that carry hazardous chemicals and that sort of thing. Should one of these ships get into difficulty, it is the only vessel there capable of holding it off our shoreline. There are no other commercial tugs. The nearest commercial tugs are in Glasgow, possibly Aberdeen, which is a long distance away. If we are looking at holding a vessel off our coastline to prevent an environmental disaster, that is the only vessel we have.

Bob Skiny: I agree with what Carol says. We are in a similar situation in Shetland. The ETV has been provided there to cover what we call the Fair Isle channel, which, as you will appreciate, is an important shipping lane between the oil fields of Norway and the United States and Canada. Last year 935 vessels carrying dangerous cargoes transited those waters. We need a vessel in place with sufficient bollard pull to be able to hold a vessel should the need arise. There have been occasions in the past when we have had to resort to the commercial sector, because our ETV has been involved in another incident, to see whether we can obtain the services of a tug. Frankly, it has been impossible. We go through the regular agencies, tugboat brokers such as Sam Stewart and Marint. The nearest tug we can get is about 14 hours’ sailing away in Aberdeen. Even if you seek a tug in Aberdeen there is no guarantee you will get it, because quite often most of the traffic in Aberdeen is already on contract to somebody else. They are not going to break that contract because it is worth too much money to them. I talked to you earlier about our communication problems. One of the tools in our toolbox for dealing with communication problems is, strangely enough, the ETV. We can station the ETV in the Fair Isle channel to give additional radio coverage, even to the extent that we can use it as a link to hop down to Orkney if we need to. That tool will be taken from our toolbox with the removal of the ETV.

Q422 Mr Leech: Are there any examples of a disaster involving the environment or human life that has been averted because of the work of the ETVs?

Carol Collins: At the end of last year I had an incident involving a commercial vessel called the Red Duchess, which almost ran aground on the island of Rum. The ETV was tasked and it took a bit of steaming time to get to the scene, so the Mallaig lifeboat managed to hold the ship, which was a small coaster laden with coal bound for Stornoway. For most of that day the lifeboat held that ship off the coastline of Rum. The tug got there literally in the nick of time. Just as it arrived I think the towline between the lifeboat and ship broke. Even when the ETV took that vessel in tow the line parted a couple of times. They got her in tow, and I think she came within half a mile of the coastline of Rum.

Q423 Mr Leech: If the ETV had not been able to be on the scene, what would have been the likely outcome?

Carol Collins: I do not think the lifeboat could have carried on holding that vessel. It was a lee shore. If I remember, the wind was very strong at times, about force 6 or 7, and the lifeboat would not have held it much longer. There is nothing else in that area. We took broadcast action; we looked at AIS to see if there was anything else there. There was not. Our ETV had to take that tow.

Q424 Iain Stewart: I should just like to pick up some of the earlier comments about the implications of the closure of Oban. One of the alternative models suggested to us would be effectively to close Clyde
and make Stornoway responsible for most of the west coast of Scotland but also retain Belfast and some cross-border, if that is the right word, to do the west coast of Scotland and Northern Ireland. In particular, given Miss Collins' experience, how viable is that? **Carol Collins:** Given Belfast's infrastructure, it could certainly expand. We could certainly expand further south, so that is an option.

**Murdo Macaulay:** One of the arguments that may come up against this instantly, or certainly one that people present to us when this alternative model is put forward, is how you can say on the one hand that you will have this critical loss of local knowledge and yet propose the closure of a handful of coastguard stations. My counter to that is that what we would be looking at by closing a handful of stations, with the caveat of "if we must", and moving to a managed downsizing would not be taking over entirely different areas of the country with which we had no links or understanding of the language or the communities—the maritime picture—but simply evolving. Our district would be expanding and we would be taking over an area of which we already have some knowledge.

To take a raw example, if Clyde did shut and Stornoway expanded to the south and took in Clyde's district, we would simply be stretching down the west coast of Scotland. It is not an area unknown to us. You would need a fairly generous timescale for that to be managed safely. As a ballpark we would probably be looking at the lifetime term of the implementation as planned—four years—to get that managed safely before you could close the key in any station's door.

**Carol Collins:** Equipment being developed at the moment would facilitate that, because with our ability to link into other stations on our flanks properly that could be a gradual process and a proper building up of real local knowledge without trying to bite off too much. It is gradual and can be done; it would work.

**Q425 Chair:** You are saying that some change is possible?

**Carol Collins:** Yes, but well managed.

**Q426 Chair:** But not on the scale and speed proposed?

**Carol Collins:** Yes.

**Murdo Macaulay:** The day station argument is certainly one, within the 12-station model, that, if we are honest, is a fairly common model that has been put forward by a lot of different stations. I do not think that any station at this point is advocating day stations because of the difficulties that arise with handing over incidents. At some point in the 24-hour period you have to hand over a live incident to another station on the other side of the country. Handing over a live incident of any size within your current station where you are face to face with your oncoming watch is a difficult process. You can iron out any issues; you can sit with them and let them bed in and get their feet under the table and understand what is going on. It is difficult enough to do that.

To use the current proposal as a model, if Stornoway, or Shetland for that matter, was a day station handing over to Aberdeen at the close of the day, the potential for missing key information on any particular incident would be too great to give the day station argument any merit. Recently this year we have had major ongoing investigations in the courts in a fatal accident inquiry. One of the key problems was that there was a disjointed handover. As a result the MCA brought out an operational advice note, which essentially said that, if at all possible, incidents should not be handed over because it was too dangerous.

**Q427 Chair:** When did that happen? Have we got this on the record?

**Murdo Macaulay:** The date of issue of that particular operational advice note was 28 April 2010. That was the date of issue of the work guidance to us.

**Q428 Chair:** That arose after an incident?

**Murdo Macaulay:** There would have been others, but this was the direct result of an incident involving the fishing vessel Aquila, the ensuing fatal accident inquiry and the various recommendations made by that.

**Chair:** We will have a look at that.

**Q429 Julian Sturdy:** I want to go back to the questions put by Mr Maynard. He talked about activities changing within the waters, with fewer fishing boats and more pleasure boats and leisure activities. I know the activity is changing, but are the waters getting busier?

**Carol Collins:** Certainly from the point of view of pleasure craft. I hope Murdo agrees with me. Recently, kayaking in our district seems to be a very big activity. We are logging details of them more than ever. There are large groups that do not go out just for a day or two; they island hop. They make perhaps a week’s trip out of it, trying to get weather windows. We talked earlier today about St Kilda. If they get the right weather window they head out on expeditions to St Kilda and back. That is one activity that is really taking off.

**Mrs Dodge:** I also refer to the commercial sector within Shetland. In our area we have a salmon industry worth £180 million. That is absolutely massive. There is a lot of small boat activity involved in that. Obviously, environmental impact is vital to those people because they bank on our clean, pristine environment and the view everybody has about our place. We also have a vast increase of cruise ships coming into our waters. This year alone 53 cruise ships are booked to come into Lerwick, and 69 came into Kirkwall in Orkney last year. There is a growing ecotourism boom going on just now, where people go out to see the wildlife; they go round the nature reserves in Shetland. That is increasing all the time. People want to come and see wildlife, and we have to look after them as well.

**Q430 Julie Hilling:** On a totally different tack, there was a proposal to disband the Maritime Incident Response Group. I just wonder what effect that would have in this region.

**Carol Collins:** The Maritime Incident Response Group is our fire-fighting teams equipped for maritime
response. They are also there to help in incidents where people are trapped or incidents involving chemicals. They are the experts who are ready to go with the equipment. They can be put on to a helicopter and flown out to a ship at its request. I recently was involved in an incident where they were about to be flown to one of our islands in Skye following the report of a fire, because that was the best way to move the team. The equipment is ready; the fire fighters are trained; they just go. A lot of work was done to set that up. The procedures with regard to tasking them could be simplified, but a lot of work has gone into preparing this service, training them and getting them equipped so they are ready to be transported by helicopter. That is a good thing to have.

Q431 Julie Hilling: You are saying that is more than incidents at sea; it is being used for land incidents in more remote places?
Carol Collins: Yes. Just a few weeks ago a fire was reported on an island just off Skye. The fire brigade itself wanted to task the MIRG team and asked for our helicopter to take them, and that was what happened. Luckily, it was resolved before they got there, but the team with its equipment was on the aircraft ready to take off.

Q432 Chair: Is the view of the Shetlands similar?
Bob Skinley: Yes. The Highlands and Islands Fire Brigade also has a MIRG team based in Kirkwall. I agree with Carol. We need to see an improvement in the way we call out these teams out in the first place, because it is very long winded. I think they can also be utilised more effectively. A lot of thought and money has gone into equipping and training these teams. Like Stornoway, we get incidents involving fires on remote islands that the fire brigade cannot get to. At the moment they have to talk to us and see if we can get the local inter-islands ferry or whatever to come out and take them across. However, there are some islands where ferries do not operate, so the ability to have a team to hand to fight fires that can be deployed by helicopter on a more regular basis than at the moment certainly would be an asset to us and I am sure to the fire brigade as well. We would like to see them retained, the procedure for calling them out speeded up and greater use being made of them, particularly in island chains.
Chair: Thank you very much for coming to answer our questions.

Examination of Witnesses

Witnesses: Cllr Michael Foxley, Leader of the Administration, Highland Council, Robert Paterson, Director of Health and Safety, Oil and Gas UK, Tom Piper, Co-ordinator, KIMO UK, Cllr Angus Campbell, Leader, Comhairle nan Eilean Siar (Western Isles Council), and Cllr Dr Jonathan Wills, Shetland Islands Council, gave evidence.

Q433 Chair: Good afternoon, gentlemen. I apologise for keeping you waiting, but I think you have been listening to the previous session and I am sure you will forgive us in the circumstances. Perhaps you would give your names and the organisations you represent for our records.
Robert Paterson: My name is Robert Paterson. I am Health and Safety Director with Oil and Gas UK. Our member companies are organisations that explore or produce oil and gas in the North Sea.
Tom Piper: I am Tom Piper. I work for KIMO UK. I represent local authorities on marine pollution matters.
Angus Campbell: I am Angus Campbell, Leader of Comhairle Nan Eilean Siar. Just so you are sure of the language, that is the Western Isles Council. I am also Chairman of the coastguard group for the Outer Hebrides. Perhaps I may thank you on behalf of the highlands and islands for bringing this matter to this part of the world. We are very appreciative of that.
Cllr Foxley: I am Michael Foxley, Leader of the Highland Council. Like Angus, on behalf of the council we are very pleased that you have come up to hear first hand the information. It is also relevant to this inquiry that since the late 1980s I co-chaired the tanker traffic in the Minches working group. We were seriously concerned about the passage of hazardous cargoes and vessels through the Minches, so we are looking at things like pilotage, ETVs prior to the Braer and Donaldson, compulsory shipping lanes, etc. That was the work of the working group.
Cllr Wills: I am Jonathan Wills. I am an independent councillor on Shetland Islands Council for the port of Lerwick. I am also a member of the MCA’s Shetland marine safety sub-committee in my capacity as a commercial tourist boat operator. I spent 20 years as a local journalist covering hundreds of coastguard incidents.

Q434 Chair: Councillor Campbell, in the written evidence you have given us you describe the combination of proposals that have been put in front of us as “dangerously reckless”. Why is that your view?
Cllr Campbell: That was not a term used lightly; it was used because we did an awful lot of work and research into the effect of the proposals as they would impact on this area. It is undoubted that, if you look at the withdrawal of the coastguard alone, that will increase the risk to these islands, added to the other proposals that are happening at the same time: the unilateral withdrawal of the ETV, the withdrawal of the fire rescue group without any consultation, and the fact that the Nimrods, which are part of safety here, have already gone. The question that we asked the MCA and the civil servants who came up here the first time was: what risk assessment had been made of the cumulative effect of all these things. There was a deafening silence in the room. They looked at each
other and eventually we got the answer that risk underpinned a lot of the work they did anyway. But we believe as a group that there was no work to look at the risk assessment of the cumulative effect of all these things, far less a risk assessment being done properly and in a logical way on the effect of the Coastguard Service moving to the new model that they showed. Therefore, it was not used lightly. Along with our colleagues in Shetland, we also commissioned a respected commercial company to do a marine risk assessment of the proposals. It is not us as politicians saying this; we are saying it on the basis of professional evidence and logic.

Q435 Chair: What was the result of the risk assessment that you commissioned?

Cllr Campbell: It showed quite clearly that the risk was increasing greatly, that the aspects that had been talked about in terms of the usage and type of incidents had not been looked at, and that the cumulative effect of that was to put our communities in great danger.

Q436 Iain Stewart: It was increasing greatly, that the aspects that had not been properly considered: the maritime experience to answer your question. It was

Q46 Iain Stewart: It showed quite clearly that the risk was increasing greatly, that the aspects that had been talked about in terms of the usage and type of incidents had not been looked at, and that the cumulative effect of that was to put our communities in great danger.
Nimrods, which have already been mentioned; the closure of the Moray air bases; and the SAR helicopter procurement exercise. All these things have never been factored in. We are very concerned that this consultative document does not take into account a number of key issues that ought to have been built into this process.

**Tom Piper:** I think that if an ETV was removed and was not able to intervene, from the point of view of pollution many businesses from tourism to fisheries—all that sort of thing—would be destroyed in a moment and there would be a big environmental disaster. An ETV is designed to intervene. The economies in this part of the world rely on that sort of industry. We do not have big IT businesses and what have you. The serious money in this part of the world comes from tourism, fisheries and that sort of thing.

**Q439 Julian Sturdy:** Do you say it is vital not only from an environmental but economic point of view as a matter of security? I put that question to everyone.

**Chair:** Cllr Foxley, what is your view?

**Cllr Foxley:** I wonder whether you would allow me to respond to that question by providing literally some colour to the ETV argument. I have some colour photographs. Perhaps you would allow me to pass them to the Committee so I can talk to them.

**Q440 Chair:** You can pass them but they are not in our record.

**Cllr Foxley:** You can leave them behind.

**Q441 Chair:** We will keep them, but could you talk about them as well?

**Cllr Foxley:** Absolutely. Perhaps Jonathan would pass them to the clerk. We are concerned about the potential for serious incidents involving tanker traffic within the Minches in particular. We were doing a lot of campaigning work prior to Donaldson finally achieving that. I do not want to go through the whole of the file but use three incidents that have occurred in the last eight months to prove why ETVs are critical and it is essential that they stay. They are all fairly close to where I live and work from on the west coast. The first involved a boat called the Yeoman Bontrup at Glensanda, just down the loch from me. It is spectacularly on fire in the berthage at that deep-water port. It is the biggest super-quarry in Britain, which used to be run by Foster Yeoman. The fire was put out by the Anglian Sovereign, which had unique firefighting capacity to do that. Had the fire not been put out it would have sunk at the berth. If that had happened, according to the previous managing director of the company, which exports 7 million tonnes of granite a year, it would have put that super-quarry out of operation for three months, with major economic implications for the country. That follows on from what Jonathan said about the national interest. Nobody else could have put out that fire within two days’ steaming time, had they been available in the North Sea.

The second incident to which I want to add a bit of colour, and this was referred to earlier by the lady from the coastguard, involved the Red Duchess. I was a councillor for Rum for a long time. It is knee-deep in nature conservation designations and special areas of conservation. It has at least nine SSSIs. As she described very adequately, the Red Duchess was prevented from ending up on Rum by the Mallaig lifeboat and then towed off by the Anglian Prince. It would have had serious environmental consequences for Rum had she hit the shore.

The third incident, which is on the second dog-eared page of the photo file, which I am sure you will have read about in the national press, involved the sadly named HMS Astute, which went aground off Kyle. The relevance of that incident, which was quite spectacular, is that since then we have discovered that the Ministry of Defence was not involved in a risk assessment of the removal of the ETVs in terms of the exercises that they regularly carry out on the west coast. Indeed, an exercise is currently under way to the west of Shetland. There are major bases, as you know—a torpedo range in Kyle and also Faslane. Those are three incidents just in the last eight months that show the vital importance of that ETV.

My colleagues and I have now been at two meetings arranged by the Marine Coastguard Agency, one in Edinburgh two months ago and one in Greenock just last week. Everybody in the room representing UK shipping, local authorities and salvage tugs, have agreed two things: first, that the ETVs are essential. The second thing they have agreed unanimously, with the exception of the MCA senior management reps present—they keep talking about the perception of risk despite these photographs—is that there is no commercial alternative. The nearest alternative is at least a day to a day and a half’s sailing time away, if they are available and they are not close to the Norwegian coast and they are not already involved in a commercial contract.

**Q442 Chair:** Who was it that agreed that at the meeting you referred to? Who decided that it could not be done in any other way?

**Cllr Foxley:** I can provide a list to the clerk. We had workshops involving representatives. The one last week in Greenock involved representatives from throughout the UK: shipping and tug interests; salvage interests; insurance interests, as well as local authority interest, in this case both from England and Scotland. Nobody in the workshops in the room thought there were commercial alternatives available.

**Cllr Wills:** Perhaps I may refer you to the Maritime and Coastguard Agency’s own document of November 2008, which I have here, entitled “Emergency Towing vessels: Assessment of Requirements”. It says specifically, “There is no commercially available emergency rescue service.” It makes all the points for keeping an ETV. The only thing that has changed since then is that it looks as though the cost of renewing the contract is a lot more than they thought, but none of the parameters in the argument has changed. I am sure you have a copy of this, but if not you are welcome to mine.

**Cllr Foxley:** To add to that briefly, the argument that the MCA proposed for an alternative was use of the harbour tugs, but these are small tugs working usually
in very good conditions in harbours with a 40-tonne bollard pull. The ETVs have up to 170-tonne bollard pull, so the vessels involved at Glensanda and off Rum had the requirements to survive extreme weather conditions, force 7 in the case of the incident off Rum, and also serious bollard pull. That alternative is not available. To my surprise, looking at the entire west coast of the UK this is the only one; it is not in Merseyside, Bristol or the Clyde.

Cllr Wills: In that context, my council is the port authority for Sullom Voe oil terminal. We also own the tug company. Our tugs are brand new and state of the art, but they do not have ocean towage capability. It is not just bollard pull, which as Michael says is part of it, but how much and what kind of wire you can store in the big drum on the back. Our tugs are not set up for ocean towing briddles of maybe a mile or half a mile long; they are set up to tow tankers in port, and they are very good for that job. They are not multi-purpose tugs, unlike an ETV.

Q443 Julian Sturdy: One last follow-up question on that. Thank you, that is very informative. You talk about bollard pull and the power of the tug and the lack of power in other areas that will be needed. I do not know whether you can answer this question. Are commercial tankers and cargo vessels getting larger? Is that happening with the new vessels coming on stream?

Cllr Wills: I can answer that. The trend is for tankers to become slightly smaller. We no longer have many of the super-max tankers; they are mostly what are called panamax vessels of about 100,000 tonnes. The product tankers, as distinct from crude tankers, are tending to get bigger. The vessels that are really getting bigger are cruise ships and container ships, for example the Napoli, which again was saved by an ETV off the south coast of England.

Cllr Campbell: To follow through on that, in the last week there was an incident involving the cruise ship Opera, which had 900-odd people aboard and was saved only because of the availability of a tug. At the time the Astute went aground, as a local authority we did a desktop exercise to see where the nearest tug would have been. That was in Aberdeen, which was nearly a day’s steaming away. If that had been a cruise ship sitting with 1,000 people aboard, do we not have a responsibility for some safety mechanism to deal with that situation? As everyone said, the number of cruise ships is increasing greatly. The numbers quoted were for those coming into port, but there is an awful lot of cruise ships travelling up and down the Minch to other destinations. That responsibility lies there, I think, and we have to look at that.

Tom Piper: The justification we received from the DfT for removing the ETVs focused solely on the amount of oil they may have prevented from being spilled. In the principles set out by Lord Donaldson’s report, it is not there just for oil; it is there for all sorts of non-toxic pollution, which, although it may not destroy whole ecosystems, would cost millions to tidy up. There are also fire-fighting capabilities and cruise liners. So, the only justification that has not been properly risk assessed, and certainly not consulted on, is just a couple of pages about how much oil spillage may have been prevented. It is a much wider issue than just oil.

Q444 Paul Maynard: We have already heard today about how the nature of the economy has changed in recent years. It is now 17 years since the Braer accident. Can you say how the economy has changed even in those 17 years, and if a similar accident occurred now, would the impact on the economy be the same as the Braer or potentially more damaging?

I am trying to get some quantitative idea.

Tom Piper: I do not think you can relate it directly to the economy. If you look at the history of incidents involving oil spills in particular, some cost tens of millions to tidy up; some cost in excess of—

Q445 Paul Maynard: I am thinking in terms of the economy though. Perhaps I may ask the council leaders. Are you now more dependent upon agriculture or tourism?

Cllr Campbell: The aquaculture sector has continued to grow in size. It is a very important part of the rural economy of these islands. Marine and environmental tourism has grown greatly over the last few years. With that we have had more evident designations. For instance, in Kilda we have a double world heritage site. We have talked about the cruise ships, which add to the economy; that is apparent in itself. Even this week you have seen announcements about marine technology and where renewables are going. An increasing amount of work that will take place both in the Minch and off the west coasts of the Hebrides and the Shetlands will inevitably bring much more traffic to that area. It is inevitable because we have the best resource; it is inevitable because if the country wants to meet its renewable targets, it has to start accessing that. All these economic factors will bring increased activity and so increased risk, all of which makes the case for having the proper coastguard and tug coverage.

Q446 Paul Maynard: And the preventative justification for ETVs will therefore increase?

Cllr Campbell: Absolutely in my mind.

Cllr Foxley: Without repeating what Angus has said, on tourism the British Waterways Board is very actively marketing the Caledonian canal. There is now a very substantial number of yachts coming across from Scandinavia in particular. People also go sea kayaking. I would like to expand on the point you made about renewables. The seas are becoming much more congested and there is less sea room for manoeuvre. So far 47 gigawatts of marine renewables have been approved in the three rounds in Scottish territorial waters. Those are approvals of offshore wind. It will change with time but, based on 5 megawatts, that is almost 10,000 offshore wind turbines off the coast. Tidal schemes have already been granted in the more sheltered parts of the Pentland Firth, if I may put it that way, and also near Glenelg. I should have said earlier that the leader of Orkney Islands Council is unable to be here, but this is joint action. The Highlands and Islands meet regularly every three or four weeks; there is a coordinated view on all of this. In terms of marine renewables, one of
...the potential funding streams to maintain ETVs is from the Crown Estate. That is not just because they gain £5 million a year from aquaculture and fish farming in the Highlands and Islands; that is because they will accrue substantial revenues from offshore renewables. To protect their income streams and safeguard their own interests, they should contribute to maintaining these ETVs.

*Cllr Wills:* I wrote a book about the Braer, so I will not deive you with my opinion on it. Just brie

*Cllr Foxley:* I think it was in February that the shipping Minister himself thought there was a commercial alternative. JP Knight will not be staying in station after the end of September when the current contract ends. They are already marketing that ETV. One of the things about which we have very serious concerns is that we wish to see the current contract extended until we can find the finding streams to maintain that ETV on station. So, the company currently running it, JP Knight, is marketing it and will be removing it towards the end of September. The other companies with similar equipment see no financial benefits in remaining in these waters. The analogy is to leave your house uninsured. As I said earlier, we ran this campaign for years because we were concerned. We got part of the result with the ETV; we got other things like shipping lanes etc, etc. Most of us feel that sooner or later there will be a major catastrophic incident. Whether it be salmon farming, coastal tourism, bird life and wildlife on the west coast, for all these factors we will pay a very heavy price for the removal of the ETVs.

Q447 Mr Leech: I should like to return brie to ETVs. I do not think anyone has suggested to us that there is a commercially viable alternative in Scotland. Is the reason why there is no commercially viable alternative the existence of the ETVs, or is it simply because it is just not commercially viable?

*Cllr Foxley:* I think it was in February that the shipping Minister himself thought there was a commercial alternative. JP Knight will not be staying in station after the end of September when the current contract ends. They are already marketing that ETV. One of the things about which we have very serious concerns is that we wish to see the current contract extended until we can find the finding streams to maintain that ETV on station. So, the company currently running it, JP Knight, is marketing it and will be removing it towards the end of September. The other companies with similar equipment see no financial benefits in remaining in these waters. The analogy is to leave your house uninsured. As I said earlier, we ran this campaign for years because we were concerned. We got part of the result with the ETV; we got other things like shipping lanes etc, etc. Most of us feel that sooner or later there will be a major catastrophic incident. Whether it be salmon farming, coastal tourism, bird life and wildlife on the west coast, for all these factors we will pay a very heavy price for the removal of the ETVs.

Q448 Mr Leech: My next question is specifically to the councillors. Do you see this ending up as a financial burden on local authorities? *Cllr Wills,* I think you said that Shetland Council had responsibility for the port and harbours. *Cllr Wills:* We are the port authority for Sullom Voe. We also own the towage company. Take the example of the Braer. Our council had very large costs in clean up. We were the first responder—there was nobody else there—with the help of the local coastguards.

Q449 Chair: What did it cost you? *Cllr Wills:* I do not know the figures, but I know we did not get back all the money. It was millions; it was a very significant part of our budget. We never got it all back. I could get that figure for you from our director of finance.

Q450 Mr Leech: If the ETV was no longer there, would the local authority take the view that it had to have something available that would be big enough to deal with deeper water tows?

*Cllr Wills:* Obviously, we will send our tugs if we have to. They are nothing like as good as an ETV because they are not designed for the job. We would have to do something to try to protect our waters.

Q451 Mr Leech: What I am trying to establish is whether or not as a council you would take the view that you need a more substantial tug to be able to deal with deeper waters and heavier ships that have to be towed?

*Cllr Wills:* We certainly would require that, but we do not have any money of paying for it; we have no income stream. That is why this essential means of public protection—safety of life and protection of the environment and the economy—is a Government responsibility. Coastguard Dodge made a very interesting reference to the Norwegian experience. They have multi-purpose ETVs, which are involved in fishery protection, customs, anti-drug smuggling and environmental protection and monitoring. All these functions could be performed without disrupting the work of an ETV and would provide income streams, but instead of looking at the whole thing, the MCA has looked at this mad proposal—that is all I can call it—to remove an ETV that took us years to get with lots of arguing. It was not recommended by Donaldson for the Fair Isle Channel. It took another disaster and the loss of a life in the Green Lily incident on 19 November 1997 on the island where I live [Bressay] to get us our ETV. It is very much valued; it is very useful and is an essential insurance policy, as Michael said. We cannot believe this madness. You would not leave the Dover Strait without that protection. What on earth is going on? *Why us?*

*Cllr Foxley:* I think our response would be that we had not planned to buy and run a tug. But what have done is to put a lot of energy in terms of going to meetings and discussing with officials where the funding should come from other than a direct grant

An important point that I should have made about the ETVs but forget is this: The Minister’s assumption that the ETVs are solely for salvage purposes is mistaken. The primary purposes are to save life (e.g. by preventing strandings and assisting with firefighting) and to safeguard the environment. Salvage is a subordinate consideration. The MCA’s own report in 2008 (referred to above) makes this very plain.
from the UK Government. The UK Government has a very big responsibility in this matter, as does the MCA. They need to continue to manage the contract. The salvage from rescued vessels could be increased from 15% to 50%. Tankers and hazardous cargo, which are escorted through the Minches, could be charged for example. There is a flip argument—we are to have a meeting about this next Friday—as to whether funding comes from the general lighthouse fund, which is there for aids to navigation. Currently, that is in surplus to the tune of £50 million, on top of the £60 million reserve that it requires. We feel that is a very useful source of funding. I have covered the issue about the Crown Estate and offshore renewables. There is work by both the UK Government and the Scottish Government that could be done by these ETVs, whether it is things like border issues, MOD, hydrographic surveys or work for Marine Scotland. The four local authorities are leading a UK-wide group—they have made me interim chair—but I want to make sure that the MCA is locked into this, because we are not going to take on all these responsibilities. We are pursuing where these additional funding streams could come from so we can give a package to you and the Minister and say that we need to keep the ETVs. Give us a bit more time to put these funding streams sustainably in place so they make sense.

Q452 Chair: How much time would you need? Do you think that you could realistically come up with alternative funding?

Clr Foxley: I am certain that we can come up with additional funding streams; there are four or five routes, and that is in our evidence. I think we need an extension of six to nine months to carry out those discussions. We need to stop JP Knight marketing the current tugs and removing them from station, so we need that leeway right through to the winter to put this package in place.

Q453 Chair: Mr Paterson, are you of the same view about the tugs? If the state withdrew, do you think the private sector would step in?

Robert Paterson: As I said, my member companies do not operate tankers, so we do not have to think about whether we need these emergency towing services. We do not operate tankers, so we do not have to think about the tugs? If the state withdrew, do you think the private sector would step in?

Q454 Mr Leech: Could the tugs be relocated and reduced in number without unduly increasing the risk to the environment and human life?

Clr Foxley: The quick answer to that is no. Some people initially thought that but when we looked at the steaming times involved and the risks in terms of where they are currently stationed and the increased traffic, it was just spreading it too thin.

Clr Wills: I entirely agree. That idea was in the report in 2008. That is one of the things that has changed. Traffic appeared to be decreasing. Traffic is now increasing. There is also a lot of relatively sub-standard tanker tonnage coming from the big ports in the Russian White Sea and the Baltic to some extent and going past Orkney, Shetland and the western Isles.

Clr Foxley: Sometimes we do not know where the ships are or their quality. That is the big risk area. They are not coming to good ports like the Firth of Forth or Sullom Voe; they are going to God knows where.

Q455 Chair: Is this a growing trend?

Clr Wills: It is a growing trend. There is a very large increase in Russian export of oil in tankers that may or may not be subject to the same high standards that you have in Forth ports, Flotta in Orkney and Sullom Voe in Shetland.

Q456 Julie Hilling: I want to go back to the discussion on the station closure and its effect on local economies, particularly staff in the gas and oil industry. What is your opinion of station closures or their consolidation into two big ones? What effect do you think that may have on your industry? For the others, what effect does that have on local economies?

Robert Paterson: In our reading of the consultative document we did not recognise the current weaknesses that were claimed. What we have is an organisation that works with us and has many strengths, particularly where it is local to our operations like Aberdeen, Great Yarmouth and so on. We have built up a whole range of collaboration, not least because there is a legal requirement on us in the regulations that came after Piper Alpha to consult with the coastguard. We value enormously those local relations because they enable us to work closely with the coastguard in that area, develop exercises and try to make sure that, if an emergency did happen offshore, everybody would be familiar with the process of ensuring that does not escalate and is controlled as quickly as possible. So, our local knowledge need is really about the installations local to a particular coastguard station rather than knowledge of, say, the coast.

5 For the sake of clarity, I should have explained that the Automated Identification System (AIS) now fitted on almost all large ships relies on line-of-sight VHF links, so there will be tankers passing west of Shetland, Orkney and the Hebrides that are out of AIS range but are still potentially major environmental hazards if they break down (or break up) and drift shorewards.
Q457 Julie Hilling: Do you think there would be a problem if that was concentrated in a big centre that has a little desk that says “we’re oil and gas” or whatever it may be?

Robert Paterson: As you are aware, the centre of the oil and gas industry is Aberdeen. So, having a major centre in Aberdeen seems initially very attractive, because that would give strength, depth and so on, but we also value the local centres, particularly Shetland, Great Yarmouth, Humberside, Liverpool and so on, because of their proximity to the industry. There are two energy officers in Aberdeen who have particular in-depth knowledge of the oil industry that enables MCA to be much more effective in organising itself because of their deeper knowledge of the industry. They act as a resource for all the other centres around the UK. So, having a big centre in Aberdeen is obviously very appealing to us in the oil industry because it is co-located with our major companies.

Cllr Wills: On a much smaller scale, I am in the tour boat business. Like other tour boat operators in Shetland, I have to carry insurance. My insurers are very happy that every time I leave port I radio the coastguard station. I speak to Alex, Bob and their colleagues twice a day when I am not here. I tell them where I am going, when I am coming back and how many passengers I have. That is a routine passage report for every trip. It is a condition of my insurance that I do it. Because I have done that for nearly 20 years and have not had an incident, I get a lower insurance premium, which helps my business. It helps to keep down fares because insurance is a big cost. It is also a great comfort to me to know that I have an automatic [DSC] system. If I lift a flap and press the squawk button, it will tell them where I am. Okay, a marine operations centre in Aberdeen, Singapore or Port Stanley in the Falkland Islands could pick up that signal, but what happens in Lerwick is that they would know what sort of place it was; they would know if I was under the big seabird cliff not to send a helicopter, because 20,000 gannets and a Sikorsky S-92 do not mix; it is a fatal combination. They would have to send a lifeboat. They would also need to know, as they do, where I would make for if the boat was holed and I needed to beach her. There are not many beaches around where I go; it would be on a rock shelf. They must have all that local knowledge.

It is not just local knowledge; it is personal acquaintance. There are dozens of people like me around Shetland and various industries going out in relatively small boats, many carrying passengers, who, together with their insurers, have the confidence that the people at that coastguard station know what they are talking about. I am licensed to drown only 12 people, but I have not yet and it is partly because of the good cover I get from the coastguards. That is a really important thing for my passengers as well.

Q458 Julie Hilling: Does anyone else have a comment about the wider economic argument for the coastguard stations? Maybe it is about insurance, or are there other elements that add to your concern?

Cllr Campbell: The whole economic argument ties into the fact that we feel the service is best delivered by having a local station, given the risk that the changes are putting on our economy. If you put it in context, the economy of the Outer Hebrides is fighting very hard to reverse the decline. A lot of what we are doing is based on having good seafood, tourism and environmental tourism and getting new activities. If you have one accident, that blackens all of that and years of work will go down the drain. Given the fragile state of the economy in the Outer Hebrides, if that happens there might not be any coming back from it, so it is very important from an economic point of view that we make sure we cover that risk and stop it happening.

Cllr Foxley: To follow up Jonathan’s point, I worked as a GP on the west coast for over 30 years. As to the emergency services, you need to know each other’s strengths and weaknesses. There is local knowledge, understanding and teamwork between the command centre within the coastguard station, the local coastguard units and the topography there. The other element—which is part of the modernisation—is that all of the councils in the highlands and islands are determined to retain local services. We do not want to see fire or police centralised so it becomes a Scottish Government issue. What we are working on here is how those services can work much more closely together. We had a series of meetings to see how police, fire and rescue services, and the ambulance service in particular, which is centralised, can work more closely together and with the coastguard units. What we are talking about currently in Highland Council is looking at an initial emergency responder who has generic abilities, because in many of our smaller remote rural island communities we are running out of man- and womanpower to keep these teams going within individual units. We are looking at that and will be making presentations to the new Scottish Government about this matter. That is a way to retain people in the rural communities and, as Angus said, to maintain all the economic factors that go with it.

Robert Paterson: I said that we liked the Aberdeen centre, but the key point for us is that offshore emergencies do not happen very often, but when they do they can be quite protracted. One of the things we would fear is the process of handing things over from a centre like Shetland to Aberdeen and back again, because that is when you lose information and things start to go wrong. That interface is something that would cause us particular concerns.

Cllr Wills: In that context, there was a question about this raised at the public meeting that the MCA held in Lerwick. A member of the audience said to an MCA official that if you looked at the chart—I have given the Committee a copy—Shetland was nearer the centre of the oil fields and the fishing grounds and cruise liner grounds, so why not move your MOC, marine operations centre, to Lerwick. The answer...
from a very senior MCA official was that communications were not reliable enough.

Q459 Chair: On that note, we would like to thank you very much for coming to answer our questions.
Tuesday 24 May 2011

Members present:

Mrs Louise Ellman (Chair)
Steve Baker
Jim Dobbin
Mr Tom Harris
Julie Hilling
Mr John Leech
Paul Maynard
Iain Stewart
Julian Sturdy

Examination of Witnesses

Witnesses: Michael Vlasto, Operations Director, RNLI, Brian George, Chairman, Liverpool Branch, PCS Union, and Graham Warlow, Chairman, Milford Haven Branch, PCS Union, gave evidence.

Q460 Chair: Good morning, gentlemen, and welcome to the Transport Select Committee. I would like to start by asking each of you, please, if you could give your name and the organisation that you are representing. It helps us for our records. Can I start at the end here?


Brian George: Brian George, Chairman of PCS Liverpool Branch.

Graham Warlow: I am Graham Warlow, PCS Chairman of Milford Haven branch.

Q461 Chair: Thank you very much. Let me start by asking you whether you think that the Coastguard needs to be modernised.

Brian George: Any organisation needs modernisation; otherwise we would all still be sitting here with quill and pen in front of us. We all need to modernise. But that modernisation must be safe, in our business in particular. Our general view of the modernisation proposals is that they are unsafe. They appear to fragment the service and introduce dog legs in various places. If I could try and simplify it, UK SAR arrangements are very direct at the moment. If a person gets into trouble, a team at the MRCC takes the information from that person, asks them what the problem is, where they are and how many people there are. Then that same team uses that information and formulates a plan. The same team tasks the relevant units. The same team continues to receive information from those units and from other sources and the same team talks to the casualty throughout. It is very direct. Some of the units go to the scene, effect the rescue and bring them back. These proposals seem to fragment everything and introduce dog legs in various places. For example, even in the MOC itself there are tiers of different stages of co-ordinator.

Graham Warlow: I would agree with Brian. I think the Coastguard needs modernising. I do not think that we expected a complete slashing of the work force by half to achieve that modernisation. What I think generally we would see is that we would be able to take on additional work through modernisation, as well as updating technology, giving us state-of-the-art technology in the operations room. Certainly there is room to take on additional work, additional co-ordination of maybe inland search and rescue, mountain rescue, or even flood response. There is scope for us to modernise and alter our work practices, I think.

Q462 Chair: Do you think that there is a case for modernisation even if you do not agree with the proposals that are being put forward?

Brian George: Yes, we do need to modernise. As I say, all organisations need to modernise.

Q463 Chair: What direction would you like to see that go in?

Brian George: Closing coastguard stations is not modernising. We need to make sure that modernisation focuses on the casualty and public safety. It is our job to look after the public—the sea user—for whatever reason. They may be using the sea to earn a living or it may be a leisure use. It makes no difference. But whatever modernisation is, it should focus on that and not so much on technology and what technology is available. Technology will assist us but it is not the be-all and end-all. We can all argue about technology until we are blue in the face, but, in essence, when somebody needs rescuing it is people that help people when they are in trouble, not technology. Technology just assists.

Graham Warlow: I am Graham Warlow, PCS Chairman of Milford Haven branch.

Q464 Chair: Were you consulted when these proposals were being drawn up?

Brian George: No. There is a rumour that a watch manager or a watch officer was involved in the consultation process originally, but, as I say, I cannot find any more information out about that. It was just a rumour.

Q465 Chair: Mr Warlow, what is your viewpoint?

Graham Warlow: I would agree with Brian. I think the Coastguard needs modernising. I do not think that we expected a complete slashing of the work force by half to achieve that modernisation. What I think generally we would see is that we would be able to take on additional work through modernisation, as well as updating technology, giving us state-of-the-art technology in the operations room. Certainly there is room to take on additional work, additional co-ordination of maybe inland search and rescue, mountain rescue, or even flood response. There is scope for us to modernise and alter our work practices, I think.

Q466 Chair: Were you consulted as well?

Graham Warlow: No, I was not, and I do not believe that anybody else in the Milford Haven branch was.

Q467 Chair: Mr Vlasto, the Royal National Lifeboat Institution is somewhat of a mystery to us in relation to this inquiry. You are obviously deeply involved at the sharp end of rescue. In the sometimes informal discussions members of the Committee have had with volunteers we have picked up a great deal of concern about the planned changes. Yet the RNLI has not submitted any written evidence. You did not submit it originally. We asked you for some and you still did not submit any. We find the silence or reticence a bit of a mystery. Can you enlighten us?
Michael Vlasto: Chairman, certainly. We did respond to the consultation document, the MCA—

Q468 Chair: This is the Select Committee inquiry to which we asked you to respond.

Michael Vlasto: As far as I am aware, certainly at headquarters we have not been asked to present written evidence. We said we would come and give oral evidence, but I am not aware of a request for written evidence.9

Q469 Chair: I think you were asked, but why did you not submit written evidence, whether you were or you were not asked? This is a Select Committee inquiry into a vitally important and very contentious issue. Your organisation clearly has a lot of experience of it and it is surprising to us that you did not submit anything.

Michael Vlasto: 10 years ago I attended a previous Select Committee and, again, that was oral evidence that we submitted. We were not asked to submit written evidence. On this occasion the evidence that we have provided—the consultation response to the MCA document—is all we have provided to date.

Q470 Chair: Do you think that modernisation is required and do you like the proposals as they have come forward?

Michael Vlasto: Continuous improvement is essential in any organisation and particularly so for those involved in saving lives. We certainly agree, and the feedback we are getting is that there is general agreement that modernisation is appropriate for the Coastguard. It is about the scale of that modernisation, the balance and resilience that results from this, local knowledge, and obviously the capability of those with whom we, the RNLI, interface in terms of getting lifeboats and lifeguards into the water to save lives. We certainly agree, and the feedback we are getting is that there is general agreement that modernisation is appropriate for the Coastguard. It is about the scale of that modernisation, the balance and resilience that results from this, local knowledge, and obviously the capability of those with whom we, the RNLI, interface in terms of getting lifeboats and lifeguards into the water to save lives.

Q471 Chair: Were you consulted about these proposals?

Michael Vlasto: We have a very close relationship at all levels with the Coastguard. We were not consulted formally. There was some discussion. We knew some proposals were being put together but very much in the broadest sense.

Q472 Chair: Were you consulted about the specific proposals being put forward?

Michael Vlasto: No, we were not, Chairman.

Q473 Mr Leech: Mr George, at the beginning you said that when an incident takes place there is an ongoing dialogue between the coastguard station and the people that are doing the rescue. We visited three different coastguard stations last week and there were a small number of people within the operation at any one time. During an incident would you expect all the people who were working within that environment to be involved in a single incident if it was perhaps an incident that went across a number of hours?

Brian George: Yes. All the staff would be involved.

Q474 Mr Leech: What do you think would be the impact of an incident like that being dealt with by one of the MOCs where there may be a very large number of people working in the same environment? Would that have any impact on the way that incident was handled because a lot more people might end up being involved in the process?

Brian George: Yes. It would have an impact—a negative impact in fact. In the proposals in an MOC, there would be two levels of operator: operator 1 and operator 2. That immediately introduces another decision-making process somewhere along the line, that is, if operator 1 takes a call, on whether it should be passed up to a higher being, if you like, or whether it should be maintained at that particular level. So there is that, which can create a dog leg, as I said earlier. If you introduce into the mix input from sector managers who may become involved in the actual co-ordination process or more involved in the co-ordination process, that creates another dog leg as well. There are several places where information can become corrupted and even lost.

Q475 Mr Leech: So you would say then that an incident being dealt with by a small team of coastguards is a more effective way of handling a particular incident.

Brian George: Yes.

Q476 Mr Leech: One of the other things that came across very strongly in the evidence that we heard last week during our visits was concern about the potential for a changeover from a local coastguard station that was open in daylight hours being transferred over to an MOC after hours. Do you see there being a problem with the potential for that changeover period where it may go from being dealt with by a local station to the MOC?

Brian George: Yes, I can see that for the same reason. It is another dog leg. It is a place where information can become corrupted and even lost. We understand that the satellite stations or daylight stations would be open not necessarily 9 to 5, but the times that they would be open would vary according to figures that are being collated, which always seem to focus on the start of incidents. You must remember that incidents very often go over a long period. But when you have some satellite stations open some of the time and other satellite stations open for some of the other time, then there is going to be potential for confusion and trouble because of that.

Q477 Chair: Mr Warlow, did you want to add to that?

Graham Warlow: Yes, certainly. The handover is quite a crucial stage in an incident. Generally it will be quite a comprehensive handover for certain incidents. It can take quite a while. The coastguard would invariably stay on well after his watch had finished to make sure that all the information that had been received had been passed on to his oncoming watch. If you were handing over an incident from a day station to an MOC, if any information was forgotten, these people have probably gone off home, so I do think that is probably a problem.
Q478 Chair: Mr Vlasto, what would the impact of this be on volunteers?
Michael Vlasto: We have had assurances from the chief executive of the MCA and his team that, with regard to the impact of any changes that take place on the initiation and co-ordination of search and rescue, which are the bits that impact on the RNLI, there will not be any adverse impact on those.

Q479 Chair: But, Mr Vlasto, we are not here just to hear assurances that have been given. The purpose of these meetings is to examine the veracity of such assurances. In your view and in the view of the volunteers, what would the impact of these changes be on the volunteers and their ability to play such a vital role?

Michael Vlasto: Providing the volunteers get given clear information as to where an incident is taking place, if that information is available, the lifeboats will launch and the lifeguards will do their job.

Q480 Chair: But it is “providing”, is it not, because we have spoken to volunteers? What was said to us very clearly was that they were concerned that these changes, closures of stations and changeovers, could result in more onus being put on them in terms of local knowledge and local information. This could cause a difficulty for them. That was said to us by quite a number of volunteers to whom we have spoken.

Michael Vlasto: The resting place of true local knowledge has always been with our volunteers and it is something they are particularly proud of because we have lifeboat stations every 20 to 25 miles around the coast and they have very detailed local knowledge of their areas.

Q481 Chair: That is not a substitute for what is in the co-ordination centre, is it, at the point of dispatch and deciding what is required?
Michael Vlasto: No, it is not. How the system works at the moment is that calls come in and there is sufficient local knowledge in the MRCCs to task an appropriate lifeboat, a helicopter, or whatever.

Chair: The issue is the significance of change or the impact of change, but perhaps other members might want to pursue that further.

Q482 Iain Stewart: I would like to turn to the opening comments of Mr George and Mr Warlow. You both said that there can and should be some modernisation. You clearly think that the MCA’s proposals go too far in the reduction of the number of stations. But we have had alternative proposals during our inquiry from other coastguard stations that there could be some rationalisation. Would you agree with that?

Brian George: Yes, there can be some rationalisation. But, as we have both said and as you said, the proposals on the table go too far too quickly. There is no substitution for having sufficient 24-hour emergency cover around our coasts. How we modernise that is a matter for discussion with experienced people on the team to decide the best way forward to make the best use of what technology is available with that in mind. As I said at the beginning, the whole exercise must be focused on the casualty and the safety of the public. We feel that these proposals on the table do not do that.

Q483 Iain Stewart: In the alternative proposals we have had there are some differences in detail, but most of them centre round the possibility that about 12 stations could operate around the country with suitable interconnection. Does that figure sound about right to you?

Brian George: Yes. 12 to 14 stations is a possibility, but, as I say, it needs a team of experienced people to look at it carefully again to decide the number of stations that would be required and their locations.

Q484 Iain Stewart: If I can add to that question in terms of resilience of the current arrangements, do you think that the current system for resilience of interoperability is sufficient or does that need modernising as well?

Brian George: It is actually being modernised as we speak. There is a radio replacement exercise going on at the moment, which means that our resilience is improved. Again, we cannot see how going down to two MOCs and having daylight stations increases the resilience above that.

Q485 Iain Stewart: Mr Warlow, do you concur with that?

Graham Warlow: I would, again, agree with Brian. The consultation set out a rationale to improve resilience. In our current arrangement we have nine pairs of stations and it sets out that a problem could affect both stations in a given pair. Yet, the modernisation proposals suggest that we go down to one pair, which improves resilience. I do not necessarily agree that the future concept or proposals would improve resilience. As Brian said, there is an upgrade project at the moment which allows rescue centres to link into their two flanked stations either side, which has obviously improved resilience again. But, clearly, there is an argument to network all stations within the UK, to give follow-up interoperability.

Q486 Julian Sturdy: Can I just ask Mr Vlasto from the RNLI’s point of view? I want to go into it a bit further about the local knowledge. Last week, when we were up in the station at Clyde and Stornoway, we were told about the issues with quite considerable areas that suffer black spots and lack of radio contact within that. How important is the local knowledge within the RNLI to look at and cover those black spots? Do you think the local knowledge that you have in those individual stations would overcome any lack of local knowledge that would be put in place by the MOCs?

Michael Vlasto: Are you talking about communications black spots?

Julian Sturdy: Yes, communications black spots, sorry.

Michael Vlasto: Yes. There are some, not many, black spots. Often where the lifeboat cannot speak directly to the MRCC, the sector manager or a coastguard in
a Land Rover will go out and act as a link on the top of a cliff because it is to do with the radio shadow, and often if a lifeboat is tight in under a cliff it does not make the link. But, in general terms, that is not a major issue for us. As far as local knowledge is concerned, as I mentioned earlier, local knowledge is absolutely paramount for a lifeboat crew. Lifeboats get taken into places no sane mariner would go because other people have either got things wrong or got themselves stuck and the lifeboat has to go in and give its best endeavours. So local knowledge is very important. The link between the lifeboat station’s local knowledge, back through the CRS teams, the local coastguards, who have significant local knowledge, and how that gets back into an MRCC is important. But it degrades as you get back towards the centre, obviously.

Q487 Julian Sturdy: In areas like that, on the west coast of Scotland, where there are some quite challenging coastlines and there are the black spots, if you put the control centre under an MOC at Aberdeen, do you think the lack of local knowledge would cause real problems then for your crews? Michael Vlasto: I do not think it would cause real problems. We have been through this before in the 1980s and 2000 and 2001, when Oban and Pentland were closed down, and the local knowledge issue came up. There should be a transfer wherever the centre is. I accept that one centre might not be enough, but, wherever the focus is, it will be important that some arrangement is made to transfer the existing local knowledge that exists in Stornoway or Shetland, to wherever it is going to end up. But in the past it has worked and has been transferred. There is a limit to how much you can transfer.

Q488 Julian Sturdy: My final question is this. Do you think that knowledge can be transferred or do you think over a period of time you lose that knowledge, i.e. it degrades because you cannot recruit the people into, say, for example, Aberdeen with the knowledge from Stornoway or the Shetlands? Michael Vlasto: Local knowledge experience is developed over a period of time. As I have said, in previous changes to the coastguard structure, there has been a period of time while this transfer takes place and then it gets built up again. Also, modern technology, some of the equipment and some of the information systems available to people now, which certainly were not available in the 1970s when I joined the RNLI, will make it easier to have more local knowledge in the centre. But there is some work to be done on that, undoubtedly.

Q489 Chair: Mr Vlasto, what kind of consultation did you conduct with your members on this issue? Michael Vlasto: I wrote to all the lifeboat stations and explained as far as the consultation process was concerned that there would be a formal response from the RNLI, as you would expect. However, and it has been mentioned elsewhere, there has been absolutely no attempt whatsoever to gag lifeboat stations. The whole principle of trying to gag volunteers just does not work.

Q490 Chair: But what kind of consultation took place, because the things that you are saying to us now appear rather complacent compared with what we were told when we actually spoke to volunteers ourselves? They told us that they were discouraged from making any representations themselves because they were told this was going to be done centrally. They spoke to us in great detail about the teamwork they have with the coastguard centres and their great concerns about that being broken up. But none of that seems to be reflected in what you are saying. So I was wondering what kind of consultation you had with the people who are actually doing the work on a day-to-day basis. Michael Vlasto: Chairman, as I have mentioned, we wrote to all the lifeboat stations, we explained the access to the consultation document so they all had access to it, and we said, if they had any particular points they wanted to make, they should let us have them and we would either include them in our submission or we would discuss them with the coastguard if they were particularly local issues and give them feedback. That has happened.

Q491 Chair: You have spoken about the problems that were dealt with by previous closures, but do you not think the proposals this time are on an entirely different scale? This is proposing to close down more than half of the existing centres—significantly more than half when you look at the change to daylight hours for some of them and complete closure for others. Do you not think there is a step change here? Michael Vlasto: I do think there is a step change, but the RNLI does not feel that it is our business to tell a Government agency how they should rearrange their business. Chairman, as I have mentioned, we wondered what kind of consultation you had with the coastguard centres and their great concerns. They told us in great detail about the teamwork they have with the coastguard centres and their great concerns about that being broken up. But none of that seems to be reflected in what you are saying. So I was wondering what kind of consultation you had with the people who are actually doing the work on a day-to-day basis. Michael Vlasto: Chairman, as I have mentioned, we written to all the lifeboat stations, we explained the access to the consultation document so they all had access to it, and we said, if they had any particular points they wanted to make, they should let us have them and we would either include them in our submission or we would discuss them with the coastguard if they were particularly local issues and give them feedback. That has happened.

Q492 Paul Maynard: Could I keep trying to prise Mr Vlasto open a little further? How many of your lifeboat stations responded to your consultation? Michael Vlasto: Five.


Q494 Paul Maynard: What interpretation did you draw from that response rate?
Michael Vlasto: Probably that they were comfortable that the response that was being submitted centrally would be appropriate.

Q495 Paul Maynard: How would you characterise the five responses you did receive?

Michael Vlasto: Very varied. One involved language from some Welsh lifeboat stations. Others from Northern Ireland raised issues about the close links they have with Belfast. They were locally connected rather than generic responses.

Q496 Paul Maynard: How would you respond to the suggestion that a consultation by a major national organisation such as yourself which has had a response rate of only 2.5%, if I calculate correctly, is perhaps not a terribly well run consultation and therefore you have not elucidated the views of your members adequately to make a serious contribution to the MCA consultation?

Michael Vlasto: That is a point of view. The information was made available in a very open way. There has been a lot of discussion out on the coast. I spent a lot of time going around lifeboat stations talking to our people. We explained that we did not spent a lot of time going around lifeboat stations to each and every one of your lifeboat personnel to each and every one of your lifeboat volunteers then?

Michael Vlasto: No, because I do not see the way volunteer coastguard rescue service is going to have a full-time coastguard overall manager in an area.

Q500 Paul Maynard: But if we were to adopt the MCA’s proposals and we were to have one single MOC, you are saying that the responsibility for ensuring the local visits took place with enhanced local knowledge would lie with the volunteer coastguard rescue service. Is that correct?

Michael Vlasto: My understanding is that the local volunteer coastguard rescue service is going to have a full-time coastguard overall manager in an area.

Q501 Paul Maynard: Do you not think that that would place greater burdens on the existing volunteers then?

Michael Vlasto: No, because I do not see the way volunteer lifeboat crews and volunteer coastguards interface with each other on a regular basis changing. I do not actually see it as an increased burden, providing there are links back to the MRCC.

Q502 Paul Maynard: Can I ask one final question, please? Could you just comment on your relationship with the National Coastwatch Institution and whether you regard them as an adequate repository of local knowledge?

Michael Vlasto: I have limited knowledge of the NCI. We obviously work mainly with Her Majesty’s Coastguard. There are outposts of the NCI around the coast and we have a very cordial relationship with them. We do not have communication links with them, but we certainly value their contribution and their input which goes through the MCA and the Coastguard rather than through us.

Q503 Jim Dobbin: You, Chairman, and Mr Maynard have referred to the previous closures of 2000 and 2001. As a new member of this Committee I want just to be clear in my own mind about how that affected the organisations. Specifically, I would quite like to direct this question to Mr George and Mr Warlow to give me your views about what possibly may happen with these new closures, based on your experience of the previous ones.

Chair: Mr George, what do you think the impact of these proposals would be?

Brian George: The impact of the previous closure was quite significant, particularly with regard to local knowledge. A lot of local knowledge was lost. It was very different from these proposals. At that time there were a limited number of coastguard stations that had closed. Some of the staff did transfer to other
Michael Vlasto: did you not submit a response to the consultation on the written proposals. Did you or the Coastguards Agency how to organise the Department. You do not see it as your job to tell the Maritime and Coastguard—to initiate and co-ordinate the assets we have. The RNLI provides the maritime part of meeting the State's responsibility under international law. We rely on the MCA—the RNLI provides the lifeboats, lifeguards and we do quite a lot in the way of prevention as well. We have the RNLI's executive of the MCA, as far as the impact on the RNLI was concerned, we certainly felt and said in that document that there was more work to be done. But we certainly did not feel that it was going to be impossible to work with what was proposed.

Graham Warlow: Under the new proposals we will lose an element of local knowledge from the rescue co-ordination centres. I can speak for Milford certain. 25% of the staff based at Milford are also either coast rescue service volunteers or volunteers from local lifeboat stations. They bring quite a rich mix into the operations room. Moving to a centralised system in either Aberdeen or Southampton, that will not have that element of volunteer local knowledge it has also brought into the ops room. I cannot see that that would migrate at all.

Q504 Mr Harris: Mr Vlasto, you said twice now that you do not see it as your job to tell the Maritime and Coastguards Agency how to organise the Department. Has anyone asked you to offer your instructions on how to organise it? I presume you are talking about the consultation on the written proposals. Did you or did you not submit a response?

Michael Vlasto: Yes.

Q505 Mr Harris: I just want to clarify your unusual choice of language when you said you do not see it as your responsibility to tell the MCA how to do its job, but nevertheless you did submit your response to the consultation. Is that right?

Michael Vlasto: We did. Our expertise is in running a lifeboat service: a lifesaving service in terms of lifeboats, lifeguards and we do quite a lot in the way of prevention as well. We rely on the MCA—the Coastguard—to initiate and co-ordinate the assets we have. The RNLI provides the maritime part of meeting the State’s responsibility under international conventions.

Q506 Mr Harris: In your response to the Government consultation then, did you simply say, “We have no views on this reorganisation. We will just do our job”? Is that essentially what you said?

Michael Vlasto: No, we did not. There were some areas where, obviously, it was appropriate. But as far as the detail was concerned of how many MRCCs there should be, whether it should be two MOCs, and resilience, we did comment that, if Dover was remaining open for 24 hours to do the CNIS work, perhaps making that a third MOC was worthy of consideration. But we did not make any more detailed geographical comment, apart from a mention of Belfast. Because we provide the lifeboat cover in the Republic of Ireland as well and there is a very close liaison between the Irish coastguard MRCC in Dublin and Belfast MRCC, we obviously had an interest in maintaining a coastguard presence in Northern Ireland. 10

Q507 Mr Harris: I have not seen your response but would it be correct to say that your response from the RNLI to the consultation was, on the whole, positive and supportive of these proposals, or would it be completely agnostic?

Michael Vlasto: They were agnostic to a point. From the reassurances that we had had from the chief executive of the MCA, as far as the impact on the RNLI was concerned, we certainly felt and said in that document that there was more work to be done. But we certainly did not feel that it was going to be impossible to work with what was proposed.

Q508 Mr Harris: Is that view representative of your volunteers as well? If your volunteers are sitting at home watching this on television, they will have listened to what you said this morning and say, “Yes, I fully subscribe to that.”

Michael Vlasto: Some will probably agree with me and some will not. It will depend on the geography and how close some of the stations are to existing MRCCs. Obviously some stations have a much closer relationship.

Q509 Mr Harris: What I am getting at is this. Is the submission from the RNLI representative of the management of RNLI and yourself or is it representative of the whole organisation?

Michael Vlasto: It was put together by management, having consulted or given the opportunity to our lifeboat stations to put their feedback in.

Q510 Mr Harris: That is where the 2.5% response comes. When it came to this inquiry—and I think there was a bit of confusion at the start of your evidence about how this relates to the Maritime and Coastguard Agency consultation, which is of course entirely separate—you chose not to submit evidence to this Committee, but were your volunteers on the ground given an opportunity to respond to our request for evidence to this inquiry?

Michael Vlasto: I was not aware that our lifeboat stations or our volunteers had been asked to give evidence to this inquiry.

Q511 Mr Harris: No, but presumably you were. Did you give an instruction for your volunteers to be made aware of this inquiry or to volunteer information to the inquiry if the centre did not want to submit any?

Michael Vlasto: They are aware and had the opportunity, yes.

Q512 Mr Harris: You wrote to them.

Michael Vlasto: Yes.

10 See ev 175
Mr Harris: I am not sure, Chair, if we have had any evidence from the volunteers.

Q513 Chair: We have spoken to volunteers when we were in Scotland. We made a point of talking to volunteers and we did receive a very clear response, which is rather different from the one we have got. Mr Vlasto, I just want to clarify something. You referred a number of times to reassurances you were given by the Maritime and Coastguard Agency. At what stage in the proceedings were those reassurances given to you? Was it before the proposals were announced or during the consultation? When was it and who gave those assurances to you?

Michael Vlasto: It was probably a couple of months ago, and it was a discussion initially between my chief executive and the chief executive of the Maritime and Coastguard Agency.

Q514 Chair: What kind of meeting was that? Was that after the publication of the proposals?

Michael Vlasto: Yes, it would have been.

Q515 Chair: Was it a private discussion? Was it minuted anywhere? Was the nature of the reassurances written anywhere?

Michael Vlasto: No, it was a discussion. It was a one-to-one meeting.

Q516 Chair: Based on a discussion of about two months ago, which is not recorded, you felt it was not for you to comment about the proposals.

Michael Vlasto: No. We have a very close relationship with the Coastguard, at many different levels. Certainly our chief executive was of the view, which I totally support, that the line we have taken is rather different from the one we have got. Mr Vlasto, I just want to clarify something. You referred a number of times to reassurances you were given by the Maritime and Coastguard Agency.

Q517 Chair: I am asking you about the nature of the reassurances you were given. From what you are saying to me, you have a close relationship with the MCA. Your chief executive had an apparently private discussion that was not recorded anywhere which gave certain reassurances, the detail of which we do not know about. On the basis of that you felt you should not criticise the proposals.

Michael Vlasto: That is correct.

Q518 Mr Harris: Chair, can I just ask a final supplementary of Mr Vlasto? You were given these reassurances. Presumably you expressed reservations because you are not given reassurances unless they are in response to reservations. What were the reservations you expressed; and was it to the Minister or was it to the chief executive of the agency?

Michael Vlasto: Our reservations are contained in our response to the consultation. There are quite a few points made in there that more work needs to be done on the detail of the number of MRCCs, issues around the potential for some of them only operating for daylight hours, the fact that we welcomed the increase in manpower for the CRS, and that vital link between stations and the auxiliary coastguard. It was those sorts of issues.

Q519 Mr Harris: Welcoming an increase in manpower is not really a reservation, though, is it?

Michael Vlasto: Well, it was, sorry—

Q520 Mr Harris: But you were given reassurance on that anyway.

Michael Vlasto: It was part of our overall response.

Graham Warlow: Excuse me, I do not think I answered Mr Dobbin’s question properly, really. You asked about the impact of the previous closures. I know that there was an incident off the west coast of Scotland. I do not have the full details and I think it involved a fishing vessel called Aquila. You would have to maybe hunt that one down. As far as a lot of local knowledge going into the new system is concerned, I think the PCS have conducted a survey and only about 12% of coastguards have expressed an interest or a willingness probably to move to these new centres. Undoubtedly, there will be a loss of local knowledge. I am sorry to have to go back to that one.

Q521 Mr Leech: I would like to go back briefly to the issue of the coastguard volunteers. We have had a certain amount of evidence to suggest that, when there have been previous coastguard closures, some of the volunteers have fallen away. Do you agree that there have been issues about volunteer coastguards giving up being volunteer coastguards after they have lost their coastguard station? Do you see that as being a potential problem in areas where coastguard stations are being proposed for closure now?

Brian George: Most definitely. We see it now. It is a constant battle for the sector managers to retain volunteers. Judging from the uproar when these proposals were first put on the table from the coastal rescue service, from the volunteers, I would say it will have quite a significant effect. A lot of people feel they are being let down and they do not want to have anything—

Q522 Mr Leech: What is it about the link between the coastguard station and those volunteer coastguards that keeps those volunteer coastguards on board that perhaps will not keep those volunteer coastguards on board if they are dealing with the MOC?

Brian George: One of the things is the constant interaction between the volunteers and the MRCC. We talk to them all the time. It is not only as far as local knowledge and effecting rescues is concerned. There are a lot of other issues. Education is one thing: schools programmes, liaison visits or visits to the coastguard station or coastal rescue stations by local communities, schools and that sort of thing. There is a lot of work that goes on in the background between us and the stations.

Q523 Mr Leech: If you lost even a small number of volunteers from a particular area, would that result in there being serious gaps in provision of support on the ground?

Brian George: It would initially, yes. It would result in exactly that.

Q524 Julie Hilling: One of the things that we heard when we were in Stornoway was to do with the
reporting in of boats to the coastguard stations or to the centres. “I am going from A to B today and I will be fishing around wherever.” But they also said that, particularly for the Orkney fishermen, there was a big reduction in reporting when coastguard stations closed. How important is it to have that reporting in, particularly of the small boats, because obviously the large boats have their electronic signals but the smaller boats will not? How important is that reporting in and how important is that in terms of effecting rescues if something goes wrong?

Brian George: Being from Liverpool, I cannot speak for that particular area, but, generally, it is very important that we maintain it. The reporting in of yachts, boats and small fishing vessels is a voluntary thing. They do not have to do it, but obviously we encourage it. We then have that information. If somebody goes missing, we have already got the information to hand. We haven’t got to go hunting round for it. So it is very important. If that is reduced because they feel that the coastguard station has gone or the local community or the leisure industry, yachtsmen, fishermen and so on feel that the co-ordination centre has become remote from that area, then they may feel that reporting in is not worth it and therefore we may see a reduction as before.

Graham Warlow: I agree with Brian. It is very important. Certainly if we were to receive a report of an overdue vessel, there is a significant amount of work involved in investigating where one may have gone to and where it left from. Those traffic reports or transit reports are very important to us and we do encourage any small vessel to pass them into us. If our station was to leave, maybe there would be a case where people would not bother. However, the aerial structure would still be in place so they can still call in. So I cannot really say.

Q525 Julie Hilling: You have not experienced a reduction where there have been closures. As I say, we have received evidence to say there had been a reduction.

Brian George: There is no evidence of that. As I say, coming from Liverpool, we were not affected, although, initially, we were because we were threatened with closure then, again. But we did not close and I have not been involved in that process, so I cannot really say.

Chair: Thank you very much, gentlemen, for coming and answering our questions.

Examination of Witnesses

Witnesses: Mike Penning MP, Parliamentary Under-Secretary of State, Department for Transport, Vice-Admiral Sir Alan Massey KCB CBE, Chief Executive, Maritime and Coastguard Agency, and Philip Naylor, Director of Maritime Services, Maritime and Coastguard Agency, gave evidence.

Q526 Chair: Good morning, gentlemen, and welcome to the Select Committee. Minister, on 24 March you told Parliament during the course of a debate on proposals to close half the coastguard centres that any member of staff has “the right” to give evidence to the Select Committee. You then continued to say that the staff should feel confident that, if they wish to do so, they can express their views robustly.

Mike Penning: Yes.

Q527 Chair: Yet, after that, you forbade coastguard officers from giving oral evidence to this Committee. Why did you change this information without any explanation or apology?

Mike Penning: I have explained, in great detail, Madam Chairman, to you.

Q528 Chair: Minister, you made a clear statement to Parliament on 24 March and you then gave a different decision.

Mike Penning: You asked me why I had not explained—

Q529 Chair: Why the change?

Mike Penning: You asked me why I had not explained and I explained to you in great detail, in several letters, and you replied in letters asking me again. Many of those letters, Madam Chairman, that you sent to me were in the domain of the press before I had them as well, before I could respond to them.

Q530 Chair: To the Select Committee, you said in Parliament.

Mike Penning: Madam, if you would let me finish—

Q531 Chair: Minister, I want you to reply to the specific point, not general comment. You made a specific statement to Parliament that any member of staff could give evidence to the Select Committee.

Mike Penning: And they can.

Q532 Chair: That is separate to the consultation.

Mike Penning: They can and they have.

Q533 Chair: You forbade them from giving formal oral evidence.

Mike Penning: They are civil servants, Madam Chairman, and I took senior advice from the Cabinet Office right the way through up to Gus O’Donnell at the top. The advice that I was given is that I had bent over backwards to give access to the Committee and that any member of the coastguard that was not on duty, not in uniform, could give evidence to the Committee when they went round the country or in written evidence. They are civil servants. A civil
servant’s job is to support the Government of the day. They would be in a position where they would be asked whether they were supporting the Government of the day or not if they gave oral evidence, and the advice from the Cabinet Office was that I could not allow that to happen. I have not gagged anybody—and I stress “not gagged anybody”—and any member of the coastguard that wanted, and you have had access to any coastguard station in the country that you wanted to go to, can give evidence to you. I could not, under the advice I was given, allow them to give oral evidence before this Committee.

Q534 Chair: So the statement you made on 24 March was incorrect, although given—
Mike Penning: I do not remember saying the word “oral” in the evidence to you.

Q535 Chair: The statement was “give evidence to the Select Committee”.
Mike Penning: And they have been allowed to give evidence.

Q536 Chair: But you told them they could not come and give oral evidence here today.
Mike Penning: Correct, on the advice I was given. That is a fact and I stand by that.

Q537 Chair: You have changed your view from—
Mike Penning: No, I have not changed my view, Madam Chairman. Don’t put words into my mouth. Please do not put words into my mouth.

Q538 Chair: Minister, I am going back to what is in Hansard and in what you said to a debate in Parliament, at which I was present, which is there on Hansard for everybody to see.
Mike Penning: You can shout me down, Madam Chairman, but I have a right to answer.

Q539 Chair: Minister, would you please not interrupt me when I am speaking?
Mike Penning: Then don’t interrupt me when I am trying to answer.

Q540 Chair: Minister, I ask you to treat this Committee with respect.
Mike Penning: I am.

Q541 Chair: I am chairing this Committee. I am putting an important point to you and it may well be that your answer is that you gave that statement in good faith and on further reflection decided that you had to qualify it. That is how I have tried to look at this in terms of thinking of the position you might be in. But you must not cut across what I am saying. I am pointing that out to you. You said “evidence to the Select Committee”. That did not turn out to be the case, although it is correct that we were able to speak to people. On that point, I would like to pick up a point which I have put to you in writing which I have not had a response to—
Mike Penning: Can I put on the record that you have not allowed me to answer the question?

Q542 Chair: Can I have an assurance that members of the Coastguard Service who did speak to us informally, as it was stated they were allowed to do, would not be victimised in any way in any reorganisation that might take place?
Mike Penning: I find the comment that they would be victimised disappointing.

Q543 Chair: I am asking you for an assurance they won’t be.
Mike Penning: Madam Chairman, if you cut across me every time, I can’t answer your question.

Q544 Chair: Minister, I would ask you—
Mike Penning: It is your choice.

Q545 Chair:—to respect the Select Committee you are now appearing in front of. I am asking you: can I please have an assurance that any member of staff who spoke to this Committee informally will not be victimised? I am asking you this today, because I have asked for that assurance in writing and I have not had a reply to that specific point. That is why I am asking you—
Mike Penning: That is probably because it was leaked to the press before it was sent to me. You have my assurance, Madam Chairman.

Q546 Chair: Thank you. Would you agree that the consultation that took place was very much wanting? Virtually everybody we have spoken to during the course of this inquiry—people who work operationally in the service—tells us they were not consulted when the proposals were being put together. Do you think the consultation could have been handled better?
Mike Penning: No, I do not. The consultation was for an extended period to start. There were meetings with the PCS union before we announced the consultation. I then extended the consultation to give more time for the very detailed types of submissions it was obvious were going to be coming in, particularly after I had visited Bangor, where they had a very detailed submission and they were asking for extra time for other stations. So we extended that. We have now extended the consultation, which has now closed, to allow it to open so that this Committee’s submission and its report can be taken in the consultation. So I do not think in any way it has been flawed. Actually, we have bent over backwards to be as open and to allow as many people to be part of the consultation as possible.

Q547 Chair: Do you think it would have been better if people working operationally in the service had been able to contribute to the proposals as they were being developed, before they were finalised?
Mike Penning: Madam Chairman, these proposals have been on the table long before I became a Minister and long before the coalition Government came into formation. Two years ago, when the now Chief Coastguard, Mr Rod Johnson, came in, they were provided to him like this on the table. Previous Ministers know that proposals very similar to this were on the table. When Sir Alan Massey came into
It might be fair to say that there are types and varying durations. It is accurate to say that, obviously, incidents are of varying durations in their length or the complexity of the work. Due weight is given to the length or the complexity of the incident when the coastguard is recording it without giving any undue weight as to the length or the complexity of the incident. The statistics used do not present a complete picture in so far as a single incident is recorded without giving any undue weight to the length or the complexity of the incident. We heard quite clear evidence when we visited coastguard stations and we open up the consultation for that purpose.

Q548 Chair: There was some speculation in the press last week about where these proposals might be located and whether they were going to be changed or withdrawn. Could you give the Committee a statement on how you see the position?

Mike Penning: To reiterate what I have just said, from the outset and at every station I visited—and I know Sir Alan has visited every station as well—we have said categorically this is not a done deal. What we ended up with at the end of this process will not be what we started with; otherwise what is the point of having a consultation? What we will come out with is a different consultation, a different consultation. What happens is that we have evidence that has been submitted and, of course, the report from this Committee. But what is that consultation actually be? If you are consulting, then do not ignore the consultees. Do the consultation in the correct way and then come to the conclusion as to what we think, as the Government, is the best way forward.

Q549 Chair: Have any decisions been made at this point?

Mike Penning: I am sorry?

Q551 Iain Stewart: Before we move on to the specifics of the proposals, I would just like to ask a couple of questions about the statistics that are used in the consultation document. We heard quite clear evidence when we visited coastguard stations and from the written evidence we have received that the statistics used do not present a complete picture in so far as a single incident is recorded without giving any undue weight as to the length or the complexity of the case. Would you care to comment on that?

Philip Naylor: Obviously, incidents are of varying types and varying durations. It is accurate to say that, for example, an incident that is being managed or handled in Scotland will tend to be of much longer duration. In many ways that is because of the geography. However, if we take a classic incident in Scotland, it generally begins in the sense that the alert is raised, the coastguards decide what they are going to do about it, they task the assets to the scene, and in some cases there can be quite a long wait until the assets get there. Once they are on the scene, there is obviously some further activity to do with co-ordinating the actual business of the search and the rescue. Then there is, again, another dormant period until the assets return with the survivors.

While it might be accurate to say that an incident, for example, in Scotland might remain open for a number of hours, in fact the absolute level of activity is concentrated into, typically, three quite short bursts. In terms of the overall workload, the duration of such an incident is not an accurate reflection of the amount of work that would go into it.

Q552 Iain Stewart: The concern expressed has been that the proposals for rationalisation are based on the number of incidents without there having been given due weight as to the total workload that those incidents cover.

Philip Naylor: In overall terms, as I recall, the average duration of an incident, whether it is a very long incident or a much shorter incident, is about 1 hour and 20 minutes. In terms of the average workload, many of them being very much shorter than that and some of them being longer, albeit with these, if you, like three comparatively short and contained bursts, the proposals do reflect the amount of work that needs to go into the business of searching for and rescuing people at sea.

Q554 Iain Stewart: One final question if I may, Chair. In terms of night-time incidents do you accept that those, by their very nature, are likely to be longer lasting in their duration and complexity?

Philip Naylor: I do not think there is anything to say or suggest that a night-time incident would be longer either in its duration or its complexity.

Q555 Iain Stewart: That conflicts with what we have heard in evidence round the country.
night-time activity will reflect many fewer incidents of that type, but, in terms of whether a corresponding incident at night or during the day is going to be significantly different, we would not accept that, type for type.

Q556 Julie Hilling: I want to go back to coastguards not being allowed to give evidence because, as a relatively new member of this House and of this Committee, I thought the Select Committee’s role was to investigate the effect of Government policy or proposals. I want to ask you the question whether this is, potentially, a dangerous path to go down. Are you, Minister, saying that any Select Committee should be able to talk to a job centre worker or a highway patrol or all of those people who are at the bottom of the civil service? Are you saying that no Select Committee should be able to take evidence from any of those people to ensure that the policy that the Government is proposing or has in place is effective and is not causing any difficulty?

Mike Penning: I understand the frustration. I sat on a Select Committee for many years myself. I understand the frustration, but that is the code if you are a civil servant, and many of the people you have just described are not civil servants. They are in a public service, which is a different thing and thus not subject to the Civil Service Code. If you are a civil servant, then it is your role to support a Government and a Minister that you work under. That is the protocol and it has been around a lot. This was heavily debated when an inquiry into Westland took place and that ruling was made then. That is the rule. I have not gagged. I have allowed evidence to be given. I have allowed the unions to be here and give evidence, I have certainly allowed people off duty to do it. But what they cannot do, in uniform or as a spokesman for the MCA or the Coastguard, is give evidence. That was the advice that I took and it was right to the very top.

Q557 Julie Hilling: What are you scared of, Minister?

Mike Penning: I am not scared of anything.

Q558 Julie Hilling: It seems to me that you must be scared that those coastguards may be giving evidence that you are not happy about, because you are talking about people who are low paid, who work often in remote locations, so they are not people who are part of the London civil service. They are people who are working on the ground, I just do not understand. I am not disappointed or frustrated. I am outraged that you are not allowing them to give evidence.

Mike Penning: If you continue the point, then I will be outraged as well. I am not frightened of anything. I have served in the emergency services myself. I would not expect a fireman to come before a Select Committee, and we would have not done so. The unions would have come and the officers that are in charge of the Fire Service would. No coastguard has been gagged at all. The rule is quite simple. As civil servants, they are not, at that level, allowed to come and give evidence. That is something that the Committee Chairman, I am sure, would like to take up with the House authorities and with the Cabinet Office, but that is the ruling.

How I can be accused of being scared, when we have given complete access to any coastguard station in the country and to speak to any member of staff, I find actually quite fascinating, because you have had more access as a Committee than any Committee that I have served on at any time.

Chair: I really don’t want to pursue this further here. I have said what I have to say here and there are other places for it. But the issue was the difference between the commitment you gave to Parliament and then what subsequently happened. Although it is correct that we have spoken to a very wide range of people, the conversation with a lot of those coastguards we have spoken to has been off the record, which is not the same as giving evidence to the Select Committee. But I think enough of this issue for today, and we will return to it elsewhere.

Q559 Mr Leech: Minister, you have just reminded the Committee that you used to be a serving firefighter. So you are aware of the importance of having firefighters on standby for emergencies. We have taken a lot of evidence from people in relation to the emergency towing vessels and the decision to remove those. Do you not think that we are taking a great risk by removing these emergency towing vessels that can avoid environmental or human disasters?

Mike Penning: In a perfect world, if we were not in the financial situation that this country is in, we would not have had to announce in the CSR that we were not going to renew the contract for emergency towing vessels in September. We are saving round about £3.8 million per tug and last year the four tugs went out to eight operational jobs. They were called out eight times. One of the tugs is slightly subsidised with a deal we have with the French. But, if we had not made that announcement, the discussions that my officials in now with local authorities and the private sector as to how that facility should be paid for and facilitated by those that are, if you wish, creating the risk would never have taken place.

Q560 Paul Maynard: Could I ask why there was no consultation in relation to the removal of the emergency towing vessels?

Mike Penning: Can I just correct myself? It is £2.8 million and not £3.8 million per tug. Because it was an announcement within the CSR and CSR announcements are not preannounced, thus there could not have been a consultation before CSR announced it.

Q561 Mr Leech: Can I ask Sir Alan whether the MCA was consulted over the decision to remove the emergency towing vehicles?

Sir Alan Massey: Yes.

Q562 Mr Leech: Do you have any concerns about the impact of those emergency towing vessels not being available?

Sir Alan Massey: My concern is focused on whether we can find a way to maintain the service. We have
never denied that there is a risk. We have never denied that a towage service is a helpful way of mitigating that risk. Mr Naylor, on my behalf, has been negotiating hard with local authorities, tug providers and brokers and other interested parties to see how we can provide for this towage capacity in the future. We do not know the outcome of that yet, but I know that the tug companies, for example, are very closely engaged because they see a need for it.

Q563 Mr Leech: Would the Minister and the MCA accept that there is a lot of evidence from people that we have certainly spoken to and I am sure that have spoken to you that there are certain parts of the UK, particularly the west coast and north coast of Scotland, where there is just simply not a commercial alternative to the emergency towing vessels?

Mike Penning: I would argue that, if we do not actually say we have a strong position, we are going to withdraw. I know there are discussions out there with any commercial sector or with any local authority. Those negotiations are taking place. The interesting thing—I visited both Stornoway and Shetland and discussed this with the local people there—is that, very often, the tugs that are available there are not available because they are away on other activities. The way that the contract works with those tugs is a really interesting thing. I am sure everybody probably saw on TV, and you probably heard, when the coastguard tug responded to HMS Astute when she was on the rocks, the word “Coastguard” written across the side of it. She was not a coastguard tug at that time. She had been privately contracted to the MoD. What we had done as taxpayers is to pay for her to be on standby at huge cost to the taxpayers and then immediately they have privately contracted it out. That is what happens nearly all the time. Very often, the tug will stand by literally next to perhaps a vessel that has had its engines disabled or is drifting, while a private contracted tug comes in alongside, and we have picked up all the cost with no benefits to it at all. The contract itself is very flawed and I think everybody accepts that.

Q564 Mr Leech: Would you accept, though, Minister, that, rather than just scrapping the emergency towing vessels, there is the potential for ensuring that the way that those emergency towing vessels are funded could be done in a different way so that there was not such an enormous cost to the taxpayer but the vessels were there for those occasions when they were absolutely required?

Mike Penning: There are discussions now taking place to do with that, particularly on the south coast. In Shetland and the Western Isles I understand the concerns there. But they also undertake activities up there which perhaps, as a taxpayer-funded tug, they should not be doing. For instance, they escort through the Minches free of charge, and I think that is one of the negotiations that will be taking place as to whether or not as a Government we continue to allow ships to go through the Minches, who should pay for the towing and protection if it is done, or whether or not we stop going through there, because that would take a huge problem and role away for the tugs. But, as I say, they do many other things and they are not available all the time. We need to make sure that the industry that has put this risk in place—it is not the taxpayer that puts this in place; it is actually the industry—picks up the tab for this rather than the taxpayer.

Q565 Mr Leech: The contract comes to an end in September. If there was a disaster next winter during bad seas, how long do you think it would be before newspapers were calling for you to resign and for Sir Alan to resign if there was an environmental disaster along the lines of certain disasters that we have had in the past?

Mike Penning: If we are led by newspaper headlines, then we are not doing our job in the first place. We have to look at the risk and what is right for the taxpayer to fund. It is, in my opinion, wrong that the taxpayer continues to pick up the tab, which was not what Donaldson was describing. He did not necessarily say that the taxpayer should pick up this huge burden which we pick up every year on this. Interestingly, the French on the south coast have responded and they have now moved their ETV to Calais to cover that section of the Channel as well.

Q566 Chair: We did hear overwhelming concern about the plans to change the system for the emergency towing vessels. If a solution is not found by September, would you consider extending the current contract?

Mike Penning: No. It is really important that the industries out there see that the Government are determined and that we have to come to a conclusion. If I extend it, then they will drift away from the negotiations. You are doing the negotiations, Mr Naylor. It is for you to disagree with me if you wish, but I think they will drift away if we moved our position, because we are picking up the bill at the moment and they do not want to pick up the bill. So we have to negotiate a way that they pick up the responsibility and the bills.

Q567 Julian Sturdy: Minister and Sir Alan, I believe you have visited a number of coastguard stations during the consultation period. Could you just set out how many and where you have been during this process?

Mike Penning: I will set out mine. You have visited all of them, haven’t you?

Sir Alan Massey: I have been to all 19 and some of them two of three times now. I have made a point during the consultation period of putting the management point of view across to them and to listen to what they have had to say. I have not seen every coastguard because of course they are on a watch-keeping system, but I have been at least two watches in every location that I have been to.

Q568 Julian Sturdy: But you have been to all 19 stations.

Sir Alan Massey: I have been to every single one, yes.

Mike Penning: From my point of view, the first one I visited was what everybody calls Liverpool, which
is Crosby; Bangor; Western Isles; Shetland; Falmouth; Brixham; and Milford Haven—quite a few.

Q569 Julian Sturdy: It has been quite an extensive process that you have undertaken.

Mike Penning: I made it a point that I visited all of the countries: so Northern Ireland, Scotland, Wales and England, and to the farthest reaches as well. It was the easy option to go for the nearest ones but I did not. You have visited Shetland yourself. It is not the easiest place at times to get to, especially coming from the Western Isles as I had to do.

Q570 Julian Sturdy: Just on that, how important was the issue of local knowledge expressed to you during those visits?

Mike Penning: It was expressed at every station and in probably nearly every submission as well. They had felt that their local knowledge to their particular local area was not transferrable, even though in some places with the sheer size of the area they covered that local knowledge will have had to have been diminished, and they understood that, but actually it has been put there.

But, of course, when we then get into the depth of the conversation, for instance, to do with the pairing or the twinning of the coastguard stations, that is where that local knowledge starts to fall apart because, for instance, Bangor, commonly called Belfast, is twinned with the Clyde and it is just impossible. That was put to me when I was in Northern Ireland. The Clyde could not know that and vice versa. That is also where some of the resilience, which is one of the greatest concerns with all of this, was falling down.

Sir Alan Massey: I had a slightly more nuanced response. Initially, people would say that local knowledge is irreplaceable and “The way we do it is the only way to do it.” But, after discussions and after leading them through our thinking on this, particularly in relation to using systems a little more systematically, I had more than a handful of coastguards saying, “Yes, you know, that is a good point, and, by the way, when we, for example, take over the responsibilities for our twinned or our paired station, we fall back on more systematic approaches because that which is stored in our memory is no longer adequate, even though we have the responsibility.” So there is an acceptance amongst those who give it some thought that there are different ways of doing it, although we have never diminished the importance of local knowledge to a certain degree.

That has always been the case. It is very interesting to read Lord Donaldson’s report on the closures that took place at the turn of the Millennium. Three stations were closed. He put some very strong arguments against local knowledge being held in people’s minds and that this needs to be better used across databases using modern geographic information systems because it is just too unreliable to leave it in people’s heads.

Q571 Chair: What does “more than a handful” mean? You said that, after you had spoken to them, more than a handful, you thought—

Sir Alan Massey: I would say that at half the stations, in discussions with maybe four or five people, you would see the body language and you would have discussions afterwards.

Q572 Chair: So it was the body language of about—

Sir Alan Massey: It was quite clear that they would say, “Look, we get the local knowledge thing, but this is what I am really interested in”, and then we would go on to a different subject. I do not have actual statistics, Madam Chair, but you know as I do that in conversation you can see the lights going on. That is what was happening.

Q573 Julian Sturdy: Given the extent of the visits that you have undertaken, do you feel in relation to the proposals that you are consulting on that there is an issue over the loss of local knowledge and do you think that has to be counted in some form?

Mike Penning: The really interesting thing, and I have not looked at every one, is that there were three sorts of submission to the consultation when we visited and subsequently in writing in some cases. One group of people questioned my parenthood and said I am a nasty, horrible man and I should be sacked tomorrow morning. There is a degree of that. Then there is, “Protect us” and that is all around the local “just our station”. Then there were some really, really detailed submissions that some of them were presenting. The visual and written submission that I got at Bangor was so detailed, even though they did not have the fiscal modelling that they would have needed to do it, and the Falmouth one, which you have probably had sight of as well, all came back down to, “We know we need to change. We know we need stations to close.”

They all come down to around nine to 10 stations staying open full time and there is then a discussion about how many MOCs there should be. Should it be one or two? I did topography when I was a fireman myself and did my local knowledge, but that knocks that bit away because, if they are saying to me, as operational coastguard stations, “We see the future of the coastguard MRCs at nine to 10 stations”, and the average is around 10 that they have submitted, that tells you they accept that, while they are not happy with the submission now, their outcomes are not that dissimilar to what we have said and the local knowledge goes with it, if you wish, if they go down to 10. So they seem to have accepted that.

Q574 Julian Sturdy: The impression I got, certainly from the Falmouth proposal, was that they believe by going down to 10 they can still keep a base of the local knowledge there and they fear that if they go further then it will be lost for good.

Mike Penning: I think you are right. The submissions basically say, if you look at our twins or our pairs, the Falmouth one basically takes the pairs out. Bangor is not that dissimilar. What they feel is they keep some of the local knowledge because they have kept their station and they will have the knowledge from the

11 To note—while the Minister has visited Brixham Coastguard station this was not actually during the consultation period.
paired station coming across. The only thing I would say about that on that particular point is that a lot of the verbal and oral evidence to do with how much knowledge there was of their twin did come down to technical abilities and equipment and technology rather than what is stored in the head, because that is where you have it from your own stations.

Q575 Paul Maynard: I share your assessment of the quality of the submissions we have seen and a general agreement that there is a need both to reform the system and perhaps to reduce the number of stations, and you rightly identify that between eight and 10 is perceived to be the optimum figure. What would appear to be key to me, though, is to assess what the impact of any closures will be, not just on the local knowledge of the coastguards who work in the coastguard co-ordination centre, but on the wider network of volunteers and the wider network also of lifeboats, for example, the Coastwatch and so on and so forth. That is why it is particularly important that we consider in some detail the supplementary evidence 10c that you supplied to us in April regarding the assessment of the closures of Pentland, Oban and Tyne stations 10 years ago, because they very clearly make the statement that there was no obvious damage done to the level of service provision.

I just want to try and analyse that a little closer because it does give me some cause for concern. The impact assessment would appear to be wholly quantitative rather than qualitative. Would you agree with that?

Mike Penning: It is based on a set of assumptions, Mr Maynard; you are absolutely right. We have to look at the evidence as to what happened when the previous set of closures took place. It is quite arbitrary as well if you look at the way the stations are spaced around the UK. There is no geographical logic to where they are. It was just who fought the hardest in around the UK. There is no geographical logic to

Q576 Paul Maynard: Paragraph 7.13 of the impact assessment is the only qualitative piece of evidence that is supplied. That is also the only piece of evidence which is critical of the impact of the closure of these stations. It relates to anecdotal evidence regarding the perceptions of the lifeboats at Sunderland and Cullercoats that they would be downgraded compared to another lifeboat when they were called out. When we visited Clyde, we heard from the station there that, when Oban was closed, despite that being 10 years ago, they have felt that there has been almost a permanent decline in the quality of the local knowledge, the local interaction, the situational awareness—which is a phrase I prefer to local knowledge—for the area that they inherited from Oban, compared to the area that they were always in charge of. What work have you done or are you intending to do to ensure that these qualitative concerns, which seem to struggle to make their way to the surface in your impact assessments, are done for any set of future changes that you may or may not propose?

Sir Alan Massey: I completely empathise with what you are saying and I can see the issues. I can understand your point. The problem with this, because we have considered it, is that at this stage it would be, at best, speculative. We were able to draw those qualitative assessments on the basis of 10 years’ knowledge of what has happened in the Oban, Tyne and Pentland areas since they have closed. It is unsurprising to me that there would be some suspicion and concern among other communities, be they lifeboat men, beach users or whatever else, at the perceived lack now of coastguard cover in places. You would expect that. I can only speculate in projecting ahead as to what that would mean in hard terms for what is effectively what I am trying to do, which is to provide a search and rescue service in quantitative and qualitative terms to the public. I can see your point. I would find it very difficult at this stage to commission any sort of work that would give me a meaningful answer. But, as part of the review process, beyond whatever decision is made, I will certainly have to take these things into account and see what we have to build back, if necessary, to cater for it.

Q577 Paul Maynard: I am trying to understand how much effort was put into the qualitative research for the impact assessment. For example, paragraph 7.15 states: “There were no incidents of volunteer coastguards seeking to resign their membership because of the station closure programme.” By reading that, if I am applying a degree of academic rigour to that statement, that would imply that you were doing an exit survey of all volunteer coastguards who left the service, to understand their reason for leaving the service. Is that correct?

Sir Alan Massey: Yes. That reflects our knowledge that nobody in those areas opted to leave the volunteer coastguard service quoting the reason that those stations have closed.

Q578 Paul Maynard: Everybody gets a survey and they have to tick a box.

Sir Alan Massey: No. To my knowledge, that sort of scientific research was not done. The knowledge of these coastguard teams, how they work and interact, and the folklore that goes with them is extremely well understood by our people on the ground. We would know very quickly if a team is starting to haemorrhage people because of a reason or not. In fact, there have been cases in the past where we have had particularly disaffected teams losing members for specific reasons. We instantly know that because our sector managers tell the coastal safety managers, who tell us. We have
a pretty good network of understanding. We do not have, or at least we did not then, I am sure, have formal tick box forms, but you get the message very clearly about why people are leaving.  

**Mike Penning:** I have left two emergency services, one by choice and one by not. When I left the army they did not ask me why I was leaving. I bought myself out and off I went.  

**Q579 Paul Maynard:** It is superficially a comforting statement to read in an impact assessment. I wanted to investigate how robust a statement it was. On paragraph 6, where you are talking about the consultations you received, the Minister has already categorised them as being very fully worked-up responses, possibly without costings. But, also, I have seen paragraph 6 with reference to separating out the large number of clear “protests”, as they are referred to. Can you confirm to me whether you are considering those perhaps more simplistic statements of opposition as somehow less important than the fully worked-up responses?  

**Mike Penning:** It is obviously for me to answer this, Madam Chairman. We will publish all of them. Every single one of them will be published online and every one of them is valued. However, some of them, when you read them, are one page of A4 and they are quite abusive, and so, naturally enough, they do not get quite the sort of time that other more detailed responses will.  

You are absolutely right to say—and this is one of the things that we have offered help with as we go forward on some of the submissions—that it has been very difficult particularly for groups of coastguards to put together the fiscal modelling because they just do not have that sort of information. Even the ones which are referring just to individual stations staying open have been quite detailed. But the size and commitment to rigour within some of the larger submissions—there are about 20 quite detailed submissions about the future of the coastguard nationally, which is what this consultation is about of course—has been, to me, one of the best things about this consultation. I accept there will be contradictions about this, but this is the way consultations should be done going forward. We have to accept we are going to be accused of doing U-turns and bits and bobs and whatever. But, if we believe in doing consultations, you have to accept that sometimes people are going to put ideas to you that you are going to change your mind on.  

**Q580 Paul Maynard:** Would you not agree, therefore, that it might have been preferable to have had those 20 excellent submissions before you launched the initial proposal rather than after you had launched the initial proposal?  

**Mike Penning:** I think you have to start with something. Those proposals, as I say, had been around within the Coastguard for an awful long time. I know it is difficult and this is not being party political, because I have accused a lot of consultations before of just being smokescreens, just going through the process and they are going to be ignored. We have said all the way through this that we would not do that with these. We started with something which certainly was not perfect, and we know that, and we will come out with something which I feel will take the Coastguard through the 21st century and on.  

**Q581 Chair:** Are you willing, Minister, to change your mind on basic parts of the proposals if you feel the information you have warrants it?  

**Mike Penning:** Nothing is set in stone, Madam Chairman.  

**Q582 Chair:** Nothing at all is.  

**Mike Penning:** Nothing. Can I just add? Nothing is, but staying where we are, with the present size where we are, that is not an option. But the consultation as we submitted it is not set in stone is what I meant. The present footprint as it is now has to change.  

**Q583 Mr Harris:** I want to welcome what the Minister said about this being a genuine consultation. I take him at his word and I think that is a very good template for other Departments to emulate in their own consultations. Sir Alan, not so much, because I get the distinct impression that you have decided what the right way forward is. I am going to quote some of your language back at you because you give the impression that it is just a bit tiresome dealing with people who are not as clever as you. You said, when you were talking about the local knowledge debate, that when you explained you position: “There is agreement among those who give it some thought.” Taking that description, “among those who give it some thought”, are they a minority in the Coastguard or are they a majority—the ones who give it some thought?  

Before you answer, there is another quote. You said that, when you explain your position, you “see the lights going on”. It must be a remarkable experience to see someone being really stupid and then suddenly, once you explain your position, the lights go on and they understand what you are talking about. Can you understand why some people in the Coastguard Agency are not entirely enthused about your vision of the future?  

**Sir Alan Massey:** I do not recognise myself in your description there.  

**Q584 Mr Harris:** You can read the excerpt from Hansard.  

**Sir Alan Massey:** That is fine. The point about those who give it some thought and seeing the lights go on relates to the conversations I have had in 19 different coastguard stations and, in fact, many more, whereby when one sits down and is prepared to take the flak with the work force and lead them through every bit of one’s thinking, putting it in the broader context, it is quite surprising. The body language and the eyes tell you that they are starting to see your point of view. I am not saying that necessarily our point of view is 100% right and we are omniscient. I am the last person in the world to do that. But we have thought through and we have evidence based what I think is a very workable scheme for bringing the Coastguard Service into the 21st century. My job is to bring my work force with me and I have to say I have had considerable success in human interaction with
people, explaining why it is we are doing particular things, listening to their points, taking away a good deal of learning and thereby benefiting the whole process. I really do not recognise your accusation.

Q585 Mr Harris: It is important what the Minister has said—that this is a genuine consultation. It is always dangerous to talk about hypotheticals, but it could well be that he will conclude as the Minister, as the person making these decisions, that your template that went out for consultation is so flawed that large parts of it cannot be implemented. In those circumstances are you expecting to have a conversation with the Minister and see the lights go on on his face?

Mike Penning: It would have to be a long conversation, wouldn’t it?

Sir Alan Massey: I think perhaps we ought to move off that particular point. I do not discern the question there.

Mike Penning: Mr Harris, let me use slightly different language. One of the first stations I went to was Crosby in Liverpool. There was a picket on the outside, we went through and I went back down to the picket, much to their surprise, and spoke to them and said, “I understand and I respect what you are doing.” It was quite a difficult meeting, there was a lot of anger and there were a lot of things thrown around. Then we calmed down and we started to talk. Just before the end, a very senior member of the staff there said to me, “Minister, for God’s sake, we have been talking about nine stations for years. Why won’t they listen to us?” If you want an analogy of the lights coming on, the lights came on with me then because I was talking about eight, basically. They immediately said to me, “We have been talking about nine and in the larger conversations we are between nine and 10.” It is breaking through the initial understandable concerns about individual stations and then saying, “Okay, but is this perfect now? Is this working now?” “No.” Then the conversation will start. As it happened I said, “Can you give me the nine?” We did not get the nine from them and I do not know whether in the submissions they have come through. It is breaking through the initial understandable concerns about individual stations and then saying, “Okay, but is this perfect now? Is this working now?” “No.” Then the conversation will start. As it happened I said, “Can you give me the nine?” We did not get the nine from them and I do not know whether in the submissions they have come through. But clearly there had been discussions for some very considerable time within the Coastguard, which I was told about at that meeting. That is why it was so useful for me going round and, I know, for Sir Alan as well.

Q586 Chair: Minister, perhaps you had better clarify what you are saying on the record here. You are not suggesting, or are you, that from your conversations at Crosby Liverpool station there was an acceptance of your specific proposals?

Mike Penning: No. The proposals are there and the consultation was out at that stage, but it was said in public, and there were plenty of people in the room. Sir Alan, I think, was there and Mr Naylor was there as well. A senior member of the Coastguard said to me, after we had had these quite heated discussions, etcetera, “We have been talking about the fact that there should be nine stations for years.”

Q587 Chair: Was that nine full-time stations?

Mike Penning: He did not quantify that. He just said nine stations.

Q588 Chair: It is important for the record it is clear what is said because we have received written evidence from Crosby and we have also had evidence from representatives—

Mike Penning: This person may be part of that or may not.

Chair: It appears to us that there is strong opposition there to the proposals for change. I just think we should be clear what is on the record and what happened.

Q589 Mr Harris: We will set that aside for the time being. But, Sir Alan, I want to come back to a subject that we talked about last time you appeared in front of the Committee, which is Gaelic, which I think, if you remember, you inadvertently described as a dialect the last time you were here and you withdrew that. I accept that. Obviously, Gaelic is a native language in the Western Isles. It is not a foreign language; it is a native language. Apparently, a new paragraph was inserted into your own consultation document suggesting that a factor is that English is a second language and that the Coastguard, in common with other emergency services, is addressing through training in terms of learning the Gaelic language. That is not really happening, though, is it, because there is not a single person in the Coastguard who is learning Gaelic as a second language if they are not already a native speaker?

Sir Alan Massey: No.

Q590 Mr Harris: Is that not one perfect example of local knowledge that is absolutely guaranteed to be lost under this reorganisation?

Sir Alan Massey: The training relates to training in questioning techniques. If you get a complete language barrier, then that is an issue, and that is clearly an issue. But the training we refer to is the way that we train people to respond to 999 calls and VHF transmissions such that they can try to localise the position and ascertain the nature of a particular incident of distress. To my knowledge, and I am pretty sure that is the case, we do not train people in Gaelic.

Q591 Mr Harris: But you accept then, if an emergency call comes through from a native Gaelic speaker, expecting perhaps to speak to another native Gaelic speaker, there is going to be an issue there if the person taking the call is not a native Gaelic speaker?

Sir Alan Massey: Yes, there could be an issue there if a native Gaelic speaker was unable to communicate with, basically, an English language rescue service.

Q592 Mr Harris: Or indeed if they spoke in the English language. I have spoken to Angus MacNeil, the member for Na h-Eileanan an Iar, and, frankly, some of the place names that he talks about are befuddling at best, and I am from Scotland. Even place names can sound very similar and the point I am making is that there could be some confusion. You accept that.
Q593 Mr Harris: You do not think there is any risk of local knowledge being lost there or you do not think local knowledge lost there is a problem.

Sir Alan Massey: Local knowledge being totally lost anywhere would be a massive problem. It is a question of how you capture, store, assess and share and distribute that local knowledge. That is what we are trying to grapple with, with this new concept.

Philip Naylor: I wonder if I could just add this in relation to a national emergency service. In fact, it is the only national emergency service in which we recruit our coastguards nationally and a coastguard from anywhere in the country could be posted to any coastguard station anywhere else in the country. The whole issue of languages other than English, which, after all, is the international language of the sea, is not a requirement for coastguards.

Q594 Mr Harris: No, indeed it is not. You are saying that there would be no issue with interpretation, understanding of local knowledge and local language. That would not be an issue because coastguards are already recruited nationally and are posted to Stornoway.

Philip Naylor: I probably would not go that far, to be frank, because coastguards themselves, when they are dealing, for example, with a ship trading internationally, might be dealing with people on the ship who speak very little or no English. Nevertheless, through their experience as a coastguard and their techniques in questioning people as to their location, the nature of their difficulty and the nature of the assistance that they require, good coastguards will always be able to put together a competent rescue to deal with it, regardless of the ability of the person to communicate—

Mr Harris: As long as they go to the right place.

Philip Naylor:—either in terms of their language or in terms of how good the communications are, because, after all, over wireless, the communications may not be perfect.

Q595 Mr Harris: One other subject, Madam Chair. On emergency towing vessels, Minister, you said quite expressly now that you cannot, as a Government, guarantee that these vessels will be available unless the commercial sector comes in and starts funding them. I hear what you are saying about Lord Donaldson’s conclusions. I did not know that he had not recommended that they be funded by the Government and I will have to revisit that particular report, but is it not the case that Lord Donaldson, whatever preferred mechanism for funding he wanted, certainly recommended that those vessels be available, whoever funds them? You are now talking about a scenario which, one way or another, could result in those vessels not being available. Is that correct? It goes entirely against what Donaldson recommended.

Mike Penning: What I know is very important here is that we have to look at risk based on cost and who picks the cost up, and whether it is right and proper for the British taxpayer to pick up that cost continually or whether or not those who create the risk should do so. Until we made this announcement, those that were creating the risk had not under any circumstances said that they would come to the table and start talking to us. They are now, and I was party to negotiations, not only in the Western Isles but also in Shetland, around local communities, and local authorities are seeing the differences now. Whether it is right and proper that we still escort through the Minches, what type of contract will go forward, who will pick up the bill on that and whether or not they will continue to do surveying and other such work is part of the negotiations which are still taking place. I know it must be frustrating for the Committee, but if I reveal my hand too much I will go straight back to where we started and I am not willing to do that.

Q596 Mr Harris: I am going to be cheeky, Minister, and I am going to suggest—and you do not have to answer this—that you are playing a game of poker. I do not think you personally would tolerate a situation where those emergency towing vessels did not exist, whoever was paying for them, but you need to say a particular thing at the moment to get the commercial people round the table.

Mike Penning: I will cease that contract in September.

Q597 Mr Harris: Yes, I knew you were going to say that. Just one very brief question. Did coastguards know that they were civil servants before we started this inquiry?

Philip Naylor: Yes, they do. As you can imagine, joining the Coastguard involves a fairly extensive and very detailed induction and training programme. Then, annually, as part of the civil service attitudes and behaviours questionnaire, the whole subject of the Civil Service Code and awareness of the individual employees of the Civil Service Code is measured. We very often go back to our employers and remind them about the existence and the duties that they have under the terms of the Civil Service Code.

Q598 Mr Harris: But Highways Agency patrol officers are not.

Mike Penning: Highways Agency patrol officers are not civil servants. 12

Mr Harris: It is odd, to say the least.

Mike Penning: I know it is, and I fully accept the anomaly. It frustrates the Committee, and that might be one—

Mr Harris: Maybe if we have an inquiry that involves the Highways Agency they will suddenly be redesignated as civil servants here.

Chair: That is an interesting conversation.

Q599 Iain Stewart: Thank you, Chair. Mr Harris has rather pre-empted my question on ETVs. I want to pick up on one specific point about the ETVs and it relates to the evidence we received from the Western
Isles Council. They made the point that we should not look at the four ETVs as the same because the two northern ones are in a very different category. For the two southern ones, there is quite possibly a market-based solution but that might not apply to the two northern ones. Would you consider in your negotiations that you do not have a blanket solution to it but you actually split it up in a geographic way? **Mike Penning:** I reiterate what I said to Mr Harris. I am not willing to change my hand. I will stick, using the analogy from earlier on, because we have to. We have to come out of this. This is a hugely expensive project. In hindsight, whoever signed that contract, where you take all the risk and then the tug operators take all the profit is a really worrying example of how Government contracts can go very wrong.

**Q600 Iain Stewart:** I am reassured that you are aware of that potential difference. **Mike Penning:** I certainly am.

**Q601 Iain Stewart:** It is a good example to lead on to a broader question I have. We have received proposals that the Scottish MCA should actually be devolved to Holyrood, and I asked, when we took evidence in Stornoway, if there were any practical or logistical reasons why that should not happen and the coastguards said there was not. I do not want to open this up into a broader constitutional debate, but, from your perspective and the MCA’s perspective, what are the practical and logistical advantages of retaining a unitary UK-wide system? **Mike Penning:** I have the honour of being a Minister of the Crown where most of my portfolio is a national United Kingdom portfolio. This is a national emergency service and the Government have not looked at, and have no intention of looking at, breaking that up under the devolution settlements. It is important, I think, that the brand, the Coastguard, is seen as a national organisation and should go forward as one. It is world-renowned as the Coastguard for the United Kingdom and should be so.

**Q602 Iain Stewart:** If I could maybe ask the question the other way round, what would you see are the dangers of fragmenting it? **Mike Penning:** It is up to my colleagues to speak as well if they wish, but I think, if you break up something which is world-renowned as a national organisation, there is an obvious risk of fragmentation and quality. For me, it is the same sort of question as to whether you say, “Would you break up the British Army?” The British Army is a national organisation and world-renowned, and so is the Coastguard. I think it is really important that it is. I do not in any way say I am surprised that the devolved Parliament in Scotland is pushing for it, especially since the elections in Scotland. But I think I speak—I do speak—on behalf of the Government and we have no plans whatsoever to break up the Coastguard.

**Sir Alan Massey:** Just at an operational level there are merits to be had in having a common training standard, common techniques, procedures, even down to quite mundane things like common uniform and economies of scale that go with that. But as a national organisation it has proved itself, it is of a size to allow for reasonable movement as between the various parts of the UK so that career progression can be enhanced on the basis of a broad experience, and so I can see a lot of operational reasons for maintaining it as it is.

**Q603 Julie Hilling:** Can I explore a little bit of the 21st century Coastguard that you talked about before? One question is on the responses at the coastguard stations that you visited or have received. Was their coastguard station always the one that would stay open? **Mike Penning:** Yes.

**Q604 Julie Hilling:** One thing that was good was that they did not all sit back and go, “We are all right,” and not worry about the others. **Mike Penning:** Some have, to be fair. But if you look at the larger national resilience submissions, turkeys don’t vote for Christmas and I fully understand that. They have kept their station as part of the nine or 10 they are proposing. Most of those have proposed one national control centre rather than the proposals in the consultations, which is two, but most of them have gone to one and then their station plus nine or their station plus eight.

**Q605 Julie Hilling:** Presumably they are then saying that their local knowledge is really important, but the local knowledge and experience less important. **Mike Penning:** I am sure you have seen this. Not all of them but most of them have looked along themselves and the pair. In other words, they are twinned and they are losing their twin. If you look at Falmouth, their proposal is that Brixham should close. The two exceptions to that, of course, are the Western Isles and Shetland, which are not twinned now, and so they do not have an opposite one to close within the submissions. So that is slightly different. It is interesting in other parts of the world. Australia, for example, only has one MRCC, Spain has one, Norway has two, and France has seven. As radical as our proposals are, they are not as radical as what other countries have already done, and Australia has a bit more coastline than we have. But they do it with one. None of the proposals take it anywhere near to those levels, actually not even to a seven, but we do start from eight upwards and then we stop at 10.

**Q606 Julie Hilling:** Minister, would you accept that, certainly, what the coastguards have said to us is that, “If some have to close, then we would propose this”? You gave the impression before that people were saying, “Yes, actually we should go down to this number.” The people that spoke to us were more saying, “It should not go down, but if it has got to go down then this is the very least that we can survive with.” Would you accept that that is— **Mike Penning:** I do not think that is across the board. You are right that if you speak to some people you do get that feeling. I have also had submissions and conversations where they fully accept that the status quo is not sustainable, and they have done for some considerable time. These emergency services have been in dispute for many, many years. If you look at
the starting pay of something like £13,500 for some of them, it is what I would call from the army “dead man’s shoes”. It is very difficult very often to get promoted and to get qualifications and go up through the ranks because of the way the shift systems work and the fact that there are so many stations. As I alluded to earlier on, you could be recruited in one part of the country and end up being posted to another, which is a huge upheaval. I fully accept that, with the closures that we are proposing, there will be that sort of upheaval as well. But it is not just, “If we have to do it, this is the best option for us.” There is a bit of that, but I have been very impressed with the submissions where people are saying, “We know we can’t carry on like this”. If you scratch the surface, that is there with most people.

Q607 Julie Hilling: When you say, “We know we can’t carry on like this”, is that about finance from the Government, though, as opposed to the job that they are doing on the ground?

Mike Penning: From day one I have been very worried, especially coming from a military background and the Fire Service, about the resilience within the service. When I was in the Western Isles, they talked to me about how they are cut off completely. They have volunteers going up to the wireless mast on the top of the hill. The resilience within the communications and the resilience within the service is not 21st century. It has not been for some considerable time and has to be addressed.

Q608 Julie Hilling: In your proposals then, and we have not picked up any of this, are you proposing that there will be more radio masts for these dead spots, etcetera? What are your proposals for improving technology?

Mike Penning: I have said since day one there has to be a national resilience and that is in the proposals. The radio masts will always remain because we rely on that quite a lot. But with regard to our comms systems, for instance, when I was in the Western Isles their land link line had been down for two weeks last time when I was there. They were saying they had a real problem. There is a technical issue to do with the resilience within the service which no other emergency service has in the same way that this has.

Q609 Julie Hilling: Are you solving that technical issue, because that was not the evidence that we were receiving from people? What they seem to be saying is, “We already have the technology in place, and to close stations now would remove any new technology that was being proposed.” There did not seem to be any indication of new technology that would improve communications across the piece.

Chair: Is there actually going to be new technology?

Mike Penning: This was a very strong recurring theme that we had when we spoke to people.

Sir Alan Massey: We have stressed all along that at the moment we are already setting in train a programme which is putting the best available technology in our generation of equipment into all of the stations on a progressive basis. What will change into the future is that we will be linking the stations together in a way that has never been attempted in the past. It is not terribly difficult to do this but it is reasonably expensive. The aim at the end of that is that any station can listen to any aerial and, therefore, if you lose the station, then others can jump in to take over in an emergency situation or, indeed, you can distribute work load in any way that you want to, driven by a Maritime Operations Centre at the heart saying, “Aberdeen, you go down; you go training today. Somebody else will take your aerials. You have a technical fault there at Liverpool, so somebody else, Dover, you can take that sector.” We cannot do that at the moment but this hard wiring will allow you to do just that.

At the moment, for example, if I lost Falmouth because of lightning strikes, which has happened twice, and if I lost Brixham as well, with which it is paired, it would be extraordinarily difficult for us to maintain any sensible cover over the south-west. We could. We could do it with volunteers at radio masts using mobile phones, but it would be a very second rate or third rate capability. We are looking for a first rate resilience that will allow us properly to operate a national service.

Q610 Chair: We have had representations, too, about leisure craft, and it was said to us that leisure craft would not have access to the kind of technology that would be required. Is that correct, and is there any change of policy required in relation to the service given to leisure craft?

Sir Alan Massey: No, absolutely not.

Q611 Chair: Mr Naylor, could you answer that because we heard that point made very strongly on many occasions?

Philip Naylor: Our ability to hear the people that currently call us will be unchanged. Anybody that can contact us on a leisure craft or by telephoning us nationally will be able to do the same in the future as they do now.

Q612 Julie Hilling: What about those who currently cannot contact you because of the problems with masts, etcetera? Will they then be able to contact you?

Philip Naylor: I think perhaps what you are referring to is areas where our aerial coverage might be patchy or weak.

Q613 Julie Hilling: And no mobile phone coverage either.

Philip Naylor: And no mobile phone coverage. Mobile phone coverage is rightly a matter for mobile phone providers. They are continually modifying their areas of coverage, and so, too, is our organisation continually monitoring the coverage that we have with our aerials to listen to radio calls that we receive. We have 156 aerials, I believe it is, at the moment, which give us a national coverage. Generally speaking, that provides us with a very high level of coverage around the entire coast of the UK. There are occasionally the odd spots where coverage is not the greatest, but by and large we work to resolve those in various ways.
Q614 Julie Hilling: I do not wish to be rude, but the question really is, as a result of these changes, will there be greater coverage for those areas that currently cannot communicate?

Philip Naylor: The plans foresee that the coverage will remain as it is now, but as things evolve, as demand arises, then we make changes to our aerial coverage. We make the changes now and we will continue to make those changes in the future.

Mike Penning: This is very important because we are the only emergency service at the moment that does not use Airwave. Interestingly enough, the coverage Airwave, which is loosely based on the O2 network—and I have to be slightly careful because Airwave has its headquarters in my constituency so I am not going to deride them in any way—has allowed the emergency services to talk and bring us together for the first time. It never happened in my time when I was there. But they come to us very often. Very often other emergency services come to us when Airwave is not working, particularly on the coast, so that we can talk through our radios. Even though it is not perfect, and we accept that, the coverage we have is probably the best, and we will probably look to be using Airwave to speak later on to the other emergency services because it is important that we do so. The spots where they cannot pick up they rely on us, interestingly enough.

Q615 Julie Hilling: Minister, one of the things about local knowledge that came in from the coastguards was that it was also about that difficulty with communication, that ability to use other ways, the fact that you may only get a fragment of a call that you can then place because of local knowledge. But can I just ask another question on the 24 hours? You have indicated that you will be listening to what people have said and will be changing the proposals going forward in some way, which is of course welcome. But are you still talking, therefore, about daytime-only centres or are you considering those remaining centres to be 24-hour?

Mike Penning: What I have said and would reiterate is that the status quo now is not an option, but the proposals going for option are not fixed in stone. I do not want to reveal my hand too much because a lot of this has yet to be decided. The submissions are there and are being assessed now by the panel. Of course, the Committee have not yet submitted their conclusions to me and it would be improper to the Committee to indicate what I am likely to do before I receive your submissions because, otherwise, there is no need to reopen the consultation. I will just be, frankly, ignoring the Committee’s conclusions. I think that would be wrong.

Q616 Mr Leech: My question follows on very neatly from that. I want to know what the logic or the reasoning behind proposing non-24-hour stations was that, generally speaking, incidents at night will be of longer duration than incidents during daylight. One of the challenges is that the amount of work load at night was so low that, cost-effectively, it was not worth the risk of having those manned 24 hours a day. So they moved to whole-time retained and what they call day manning; you are operational fully there during the day. You will see that around the country today. Only Manchester and London do not have those sorts of operations. That is not exactly the same as what we are looking for, but we are saying that during the night there is a completely different work load at some stations, not all, compared to others. That is one of the reasons why we looked at the daytime. That just gives a concept as to what I have experienced before I came into this role, and essentially that is where we are now.

Q617 Chair: Sir Alan, what about daylight hour stations, because there is a lot of concern expressed to us about this, including questions about the definition of daytime stations and what it actually means?

Sir Alan Massey: Yes. If one takes the hard logic of our thinking to its conclusion, one ends up with a single maritime operation centre, as other nations have, somewhere in the middle of the UK. We always thought that was the wrong answer. We thought you needed at least two, if not three, of those to give you inbuilt resilience. But we also looked very hard at the historical incidence of search and rescue activity, which, as I think we have seen from the diagrams, shows a very marked peak during daylight hours. 70% of all activity happens between 9 o’clock in the morning and 7 o’clock at night. Taking a pragmatic balance between seeking efficiency, trying to build resilience and also being credible, we thought the best answer was to populate the national system with daylight hour stations to cope with that daylight peak in demand. There is a certain logic to it; there is a persuasive argument there for the public. It gives you the opportunity for a strategic lay-down and it also allows your emergency service to interact in a sensible way with other emergency providers in the locality, be it a region or a city or whatever. That was the thinking behind it. I can understand people’s concerns about the lack of 24/7 cover, but the whole theme behind this is that, if you do it correctly, if you link yourselves up correctly and you train your people correctly, you can run this from national centres of the sort we have proposed.

Q618 Mr Leech: Would you accept, though, with regard to what the definition of an incident is, that there may be fewer incidents at night, but the actual amount of work for the coastguard station on a particular incident at night—and the evidence that we have had is it certainly seems to be the case—will require an awful lot more work by those particular coastguards? We took evidence last week that told us that there were some incidents that last a number of days but they are still classed as one incident. Those statistics may be quite misleading about the level of work load in the evenings because the incidents are more complicated.

Philip Naylor: Madam Chair, perhaps I can answer that question. It is an accurate point to make to say that, generally speaking, incidents at night will be of longer duration than incidents during daylight. One of
the reasons for that probably is that it is dark. But it is, also, because they tend not to be, as I mentioned previously to Mr Stewart, the type of incident that you would have, for example on a beach, a beach-type incident, which tends to be an alert where there are lots of people around, generally there is a very rapid response from a large number of people and the incident tends to be dealt with quite quickly. However, two points are worth bearing in mind. The first one is that, even though the incidents might be of longer duration, there are many fewer of them. When you look at the statistics for incidents at night, there really are very, very few of them. Secondly, many fewer of them, even though it is fair to say they tend to be of longer duration, tend to be typified by this type of event where we will find out what the problem is, we will decide what the response is going to be, assets will be tasked to the scene and then there tends to be a lull. Sometimes, if you take an incident off the coast of Scotland, that lull might be 12 hours; it might be six or seven hours. While the assets get to the scene, a helicopter can sometimes take over an hour, an hour and a half, to get to an incident off Scotland. Nothing is really happening in that time. Then everything arrives on scene, there is another peak of activity, as I have said, the job is dealt with on the scene and then the assets return. Again, there is another lull. It is inaccurate to say that, just because the incidents at night tend to take longer, they tend to require much more input. Even though there are many fewer incidents at night, we have still made provision by a very large margin within the proposals for the number of people that you would need to deal with the very worst possible example of the number of incidents you would need to deal with at night—a huge margin.

Q619 Mr Leech: Would you accept, though, that the statistics about what is classed as an incident are very, very misleading because some incidents at some coastguard stations are very, very minor and trivial in terms of the amount of input required by a coastguard, yet some of the more complicated incidents, many of which would take place in perhaps the more dangerous waters around the coastline, particularly in Scotland, are just still classed as one incident regardless of how much work is put in? It is very difficult to justify saying there is hardly any work going on at this coastguard station or there is very little work going on at night, because you are simply just classing one incident the same regardless of whether it is—

Mike Penning: It is the nature of an emergency service. If you looked at my station and asked how many shouts you went on last night, you went out on four shouts. All fire stations around the country are looked at based on the amount of shouts—the amount of jobs—they do, and the Coastguard operates similarly. But, and this is exactly the problem, we used to go to bin fires quite a lot, sadly. That still takes up the same person on the end of the phone taking the 999 call, the same person sending the assets out there and a crew attending. It is the same. If you have a big job on, interestingly enough, once it starts, it tends to flow.

We were talking quite extensively to the fire we had off of Falmouth on a factory ship. But, remember, those other smaller jobs, those trivial jobs, still come in. What was worrying me in particular to do with how our assets were working is that if you have the south coast, which has a lot of leisure activity in the summer and a lot of beach activity, as I say, you still have those calls coming in and it takes up a huge amount of time. But, interestingly enough, from my experience—and I think this is what Mr Naylor was alluding to—a big job is a big job, and you get on and do it. The rest of the stuff comes through as well. But they are called jobs. It is just the nature of the emergency services, what they do and what they call them.

Q620 Mr Leech: What is proposed for the international calls from around the world that currently come into Falmouth, because what might be daylight hours in England is not daylight hours in other parts of the world? What will happen to that? Will that go to one of the MOCs?

Mike Penning: That is one of the things we have looked at very carefully because, at the moment, I know Falmouth quite rightly are very proud of their international reputation. Falmouth were asked to do this role when it first came up and they do it fantastically well. But, as Sir Alan indicated earlier on, Falmouth have been hit twice by lightning strikes in the last few years. I have no one else that can pick up that role at the moment—no one. That is where the big issue is.

Q621 Julian Sturdy: Can I just come in on the larger issues that occur? Take, for example, Falmouth. You are right to say that the tourism activity there would generate a lot of different issues ongoing. But, under the proposals, if you get a large incident arising during the daylight hours, would the Falmouth coastguard station see that through if it runs into the evening hours?

Sir Alan Massey: Yes. There is absolutely no question that we would do exactly as we do at the moment. Where there is an incident ongoing that is engaging a particular station in an intense way, we would not let them change watch; we would not try and take the incident off them. We would let that go to a logical position at which you could safely hand it off. It is the same in any service.

Q622 Julian Sturdy: They would not see it through to conclusion then, necessarily.

Mike Penning: They don’t now.

Sir Alan Massey: Not necessarily.

Julian Sturdy: There would be a handover.

Mike Penning: What all emergency services do is they take it to a logical position where a proper handover takes place. It is like A&E.

Chair: So there would be a handover.

Mike Penning: Yes, of course.

Q623 Julian Sturdy: Just on that point, just to clarify, they would take it to its normal logical conclusion. If that took it to 2 o’clock or 3 o’clock in the morning—
Mike Penning: No. That is not how any emergency service operates, whether it be your A&E department or whatever. If we were on a job, then there would normally be an hour given to the new crew coming on duty to come out, a handover to take place and you would come back and then the control centres that operate do exactly the same.

Q624 Julian Sturdy: I understand that currently there would be a handover from the change in shift. I am using Falmouth as an example but it should be the case anywhere. There is a handover from a change of shift in Falmouth. What I am trying to get at here is, if, say, under the current proposals under daylight hours Falmouth would close at 7 o’clock, if that incident had run over that until 10 o’clock or 11 o’clock but it had not got to its natural conclusion where you would normally hand it over, would they stay with that or would they hand over at 7 o’clock?

Sir Alan Massey: This will be very much horses for courses, to be honest. We are talking about protracted incidents now because, if it is short, you see it to its end. If it is one that is likely to be protracted, taking Mr Naylor’s analogy there, in this incident the helicopter is tasked, we know the location of the casualty, the helicopter is en route, and there is a natural lull in activity. That could be a point at which you hand off safely to a Maritime Operations Centre or to another station, bearing in mind of course under our model the Maritime Operations Centre would already know exactly what is going on.

Mike Penning: It wouldn’t be in isolation. It would be monitored all the way through.

Sir Alan Massey: It would be totally aware and, of course, we will be sharing each other’s data systems on which all of these incidents are being logged and tracked. While I understand the issue, I do not see a problem with it because they are already trained to do it this way. It is absolutely common across all emergency services I have ever dealt with and I do not see it being a difficulty at all. It is totally organic.

Q625 Julian Sturdy: There will be flexibility within that as well.

Sir Alan Massey: Yes. We would have to negotiate clearly with our work force and with the unions exactly what the length of rope one has there to play with, but, in principle, I am absolutely certain that the natural professionalism of the coastguards would not allow them to simply say, “End of shift”, tools down and off.

Julian Sturdy: There has been some concern expressed, certainly when we have been out there talking and taking evidence, that the handover in the middle of an incident would cause some problems.

Q626 Chair: Who takes the decision about when the handover should take place?

Sir Alan Massey: Under our model that would be the Maritime Operations Centre.

Chair: They would decide.

Mike Penning: They would be monitoring this all the way through, Madam Chair.

Q627 Iain Stewart: I have just one very short question. There was some confusion when we took evidence about what you meant by daylight hours. Is it a fixed 12-hour cycle or, in the case of Shetland, daylight in the peak of the summer and in the peak of the winter?

Mike Penning: We have to be pragmatic. I was not there at that time of the year, but there is no night sometimes in the Western Isles and the Shetlands and vice versa. Of course, we would have to look at a cut-off point, whether it is 7 o’clock or whatever it would be. We are quite pragmatic about that. But the big issue with doing the daylight hours is not in the north. It is in the south, particularly with the leisure and tourism side of it. In other words, it is the cliffs and the beaches and all those sorts of issues. We have to take a pragmatic look at what daylight means and when the shift patterns would be. 7 o’clock has been put to me as a time, which seems fairly logical.

But, just to go back to your last point, all the emergency services have within their contractual obligations that if they are on a job—and it is the same for the handovers—they will stay until they get relieved. Nobody leaves a job in any of the emergency services, as I understand it. It just will not happen.

Q628 Chair: I have one further point on firefighting. One of the proposals—I think you have already done it—is to remove funding, as I understand it, from the Maritime Incident Response Group, the specialist firefighting service. We have had a lot of concern expressed about that. Are you proposing to revisit that? We were told that the current service could not operate if all funding was removed. It was also suggested that it could operate perhaps in a different way but not without funding.

Mike Penning: We are discussing this at the moment. I had a very good meeting the other day with Chief Fire Officer Roy Wilsher, who happens to be my fire officer in Hertfordshire, the furthest away from the sea anywhere in the country. Everybody understands, with the cost implications that we have and the nature of it being used, and it is not being used to its full capacity in any shape or form, that we are looking at that as we go forward.

We have to look very carefully at what our obligation is. Is it the job in the 21st century for firefighters to attempt to put out fires deep at sea? Frankly, they do not do that, Madam. Crews on ships are trained to fight fires. Invariably, they will leave a fire and use the onboard equipment that is automatic to contain it, and then they will wait until they come into port. We very rarely fight fires at sea these days. What we do, and we have continued to offer, is take qualified people out to the incident at sea and assess what is going on. But it is an enormously dangerous thing to do. We are looking very carefully at how that is done and what happens when we bring them into port. One of the first fires I ever went to was on a freighter in Tilbury docks and it is a very frightening experience to fight, let alone fighting it at sea. We are going to keep the expertise, but even the Fire Service have indicated to me that they know the present model needs to be looked at very carefully, which is what we are doing.
Q629 Chair: So you are discussing other ways of dealing with this.

Mike Penning: Yes, we are.

Chair: Thank you very much for coming and answering our questions.
Written evidence

Written evidence from Mervyn Kettle (MCA 02)

100s OF LIVES COULD BE LOST!!

Government Spending Review and “ending” the UK Maritime Incident Response Group (MIRG)

I am writing to you as Chair of the Transport Select Committee regarding the subject of the UK Maritime Incident Response Group (MIRG) and the announcement in the Spending Review of October 2010 by DfT relating to the “possible ending” of MIRG.

In writing I note with interest that the MCA website now displays the current consultation taking place in relation to “Coastguard Modernisation” (predominantly regarding the Maritime Rescue Coordination Centres—MRCCs). The consultation does not take account of announced proposed changes to MIRG and indeed also that of the Emergency Towing Vessels (also in the Spending Review).

Is the MCA complying with the Government’s Code of Practice on Consultation with regards removal of MIRG and ETVs?

The consultation document executive summary highlights the risks around our coasts which clearly reinforces the need to retain a viable and effective FRS MIRG!

In the spending review announcements the DfT advise that (see additional information) “they (MIRG) have not been involved in any significant incidents”. Further, the DfT state that “there is little evidence that MIRG has changed the outcome of ship fires...”. This statement is without foundation. For example, within four weeks of the MIRG going live in 2006 a MIRG team was deployed to a serious fire on the cruise ship MV Calypso in the English Channel with 480 persons onboard. Only recently we have seen in the South West approaches a major rescue at sea following a ship fire to which another MIRG team was deployed—the fishing support vessel “Athena”. These are just two major incidents of note—several others have occurred where MIRG has not been deployed, but these could have escalated into a major incident requiring the support of MIRG.

Having a deterrent to reduce escalation of an incident at sea and the probable outcomes of that escalation far outweigh the disadvantages of having no deterrent at all! As I am sure you well appreciate as does that of your own constituents.

There is no doubt that the Government has to reduce the budget deficit but it would be extremely unwise, having spent in excess of £3 million in researching and introducing the MIRG, to just “end it”!

I do accept that the MIRG can and should be restructured and the time is right. However, an effective MIRG resource must be kept available as must the position of its Fire Liaison Manager (a Senior Fire Officer currently employed within the MCA) who acts as the key link between the MCA and the MIRG Fire Services. This role is crucial in maintaining continuity and uniformity.

In 1987 the “Herald of Free Enterprise” capsized in the English Channel claiming the lives of 190 people. The government at the time “ordered” UK Fire Services resources to attend and assist.

In 1990 the “Scandinavian Star” fire off the coast of Sweden claimed 158 lives. Both of these incidents highlighted the importance of professional support from shore based Fire Services and both countries now have an “integrated” response in place.

I am sure that you would agree we cannot afford to put the clock back on an issue such as UK maritime resilience especially in these times of heightened national security. To reduce the nation’s capability in dealing with the possible aftermath of a terrorist incident at sea as originally identified in the Civil Contingencies Act 2004 would have disastrous consequences.

I would ask that your committee ensure that the Department for Transport does not “throw this particular baby out with the bath water” thus reducing our national response capability to where it was almost ten years ago. Lives will be lost and eventually shore based emergency responders will again one day face the extremely tough moral dilemma of responding to an incident at sea probably without adequate training and equipment. This must not be allowed to happen.

Additional Information

DfT Transport Spending Review Press Notice—20.10.2010

“ANNEX F—AVIATION, MARITIME AND SECURITY—The Maritime Incident Response Group (MIRG) will be reviewed. The MIRG was formed to respond to incidents at sea for which firefighting, chemical hazard and/or rescue teams may be required. The teams are drawn from 15 Fire and Rescue Services and since the MIRG teams began operating in 2006 they have not been involved in any significant incidents. All ships’ crews are trained in basic firefighting techniques and there is little evidence that MIRG has changed the
outcome of ship fires. A consultation will follow on the detailed proposals but it is estimated that ending all
the MIRG would save the Department £340,000 annually”.

BACKGROUND

Maritime Incident Response Group (MIRG)

In September 2002, due to the decline in coastal Fire & Rescue Services (FRS) resources available to support
HM Coastguard in “responding” to fires on ships at sea, the Maritime & Coastguard Agency agreed to fund a
research project to redress the issue. The primary aim was to produce a strategy report for the Department for
Transport in relation to the way UK FRS could, if they were willing to do so, support the MCA. Subsequently
the research project expanded into development and implementation of what is now known as the MIRG.

Fifteen Fire Authorities who were identified agreed to participate in the proposed strategy and in February
2006 a formal agreement between them and the MCA was signed thus underpinning many of the outcomes
from the project.

In April 2006 the then Secretary of State for Transport, the Rt. Hon. Alistair Darling formally launched the
implementation of the new MCA/Fire Service partnership known as the MIRG.

Fire Authorities have no legal obligation to respond to incidents at sea and the introduction of these resources
to assist HM Coastguard and the shipping industry still relies on “volunteers” from the respective Fire Services
and the “goodwill” of those Local Authorities.

The uniqueness of the project and ultimate strategy, the first of its kind in the world, was the result of major
cross-governmental co-operation and work involving a number of the principal organisations who support UK
civil resilience.

The project also received acknowledgement from the United Nations International Maritime Organisation
(IMO) and expressions of interest in its outcomes were received from several EU countries, the USA and
Australia.

Funding in excess of £3 million from the MCA together with additional funding from the Department for
Communities & Local Government and each of the 15 FRS involved, has enabled the MCA/DfT to enhance
its role in line with the Civil Contingencies Act 2004.

MIRG responders are supported with national risk assessments, national safe systems of work and national
standard operational procedures (including those working with the Emergency Towing Vessels which are also
currently under threat) to ensure a more safety conscious working environment that far exceeds the adhoc
arrangements in place prior to the start of the project in 2003.

As agents for the MCA, the MIRG teams now provide an additional resource to UK maritime resilience
which is a vital and much valued element of UK Search & Rescue and still very much a world leader.

January 2011

Written evidence from Mervyn Kettle and Peter Pearce (MCA 02a)

EXECUTIVE SUMMARY

This submission is made in relation to maintaining the MCA/Fire & Rescue Services’ (FRSs) Maritime
Incident Response Group (MIRG).

There is no doubt that the whole subject of firefighting at sea is very emotive and to try to deal with it in
this evidence submission is unrealistic. The reader has only to look at the MCA’s own recent report¹ to try
and grasp the enormity of this subject. Hence we have included a guide to some of the key additional
bibliography that is available. See final page of this submission.

Since the introduction of the Fire Services Act 1947 a number of UK coastal FRSs have provided, at their
own cost, a response to assist Her Majesty’s Coastguard (HMCG) with ships on fire at sea. This non statutory
requirement continues to this day and is carried out on a voluntary basis by MIRG firefighters.

The MCA introduced a project in 2003 to address the decline in support from FRSs and ultimately in April
2006, the new MCA/FRS partnership the UK Maritime Incident Response Group (MIRG) was launched.

The introduction of MIRG relied heavily on the financial support of the MCA. It however should be
recognised that all the FRSs concerned, the Department of Communities and Local Government (under the
New Dimensions work stream) and the Chief Fire Officers Association (CFOA) also provided additional
funding to subsequently ensure the successful outcome of the project and the introduction and maintenance of
MIRG thus enhancing UK maritime resilience.

¹ Review of Requirements of the MCA in Relation to Assisting with Incidents Involving Fire, Chemical Hazard and Industrial
Accidents at Sea (October 2010).
MIRG responders now have the support of national Risk Assessments, Safe Systems of Work and Standard Operational Procedures.

Improved agreed working procedures with other agencies (including SAR helicopter and Emergency Towing Vessels) now ensure a more safety conscious working environment far exceeding the ad hoc arrangements which were in place prior to the start of the Sea of Change Project in 2003.

There is no doubt that the UK needs to maintain some form of MIRG response. This is clearly highlighted in the MCA's own independent report produced by BMT Isis but how will this be achieved without the FRSs fit for purpose support?

Any major maritime incident, that may include a terrorist based scenario, can lead to a large loss of life or major ecological disaster. The political fall-out nationally and internationally could be unacceptable if plans and resources are not properly in place, thereby placing a moral dilemma on government and their emergency responders alike to deploy untrained and ill prepared resources.

Without continued financial support from the MCA, FRS declared resources will rapidly disappear and the skills base will decay. Both the FRSs and the MCA will become vulnerable to similar issues which first initiated the formation of the project back in 2003.

We seem quite often to forget that we are an island and maritime nation that relies daily on a massive maritime activity. There is a huge potential life risk given the level of commercial transportation of passengers and the fact that around 90% of our export/import trade is by sea.

**INTRODUCTION**

1. Mervyn Kettle and Peter Pearce are retired FRS officers. They both have a lengthy backgrounds in ship firefighting as Lead Officers for their respective FRS and had been active participants within the Chief Fire Officers’ Association (CFOA) Operations Committee Firefighting at Sea Working Group (now known as the Marine Operations Group or MOG).

In 2000, whilst playing an active role in MOG they produced the first inter-agency firefighting at sea standard operational procedural documents on behalf of CFOA and HMCG.

Between 2003 and 2007 Mervyn was the Project Manager and Peter the Technical Officer for the MCA/FRS “Sea of Change” firefighting at sea project.

A number of key outcomes that they were directly responsible for during the Project included:

- Framing and negotiating the signing of the first tripartite Memorandum of Understanding between HM Coastguard, the Ministry of Defence and coastal FRSs in relation to the formal provision of SAR helicopter assets and training protocols.
- Drafting the national working agreement between the Fire Service and the MCA.
- The research and development of the national FRS maritime Safe Systems of Work, Operational Standards, Training Packages and Specialist Equipment in order to provide a standardised approach which is now in use.
- The research and development of a strategic assessment for a MIRG National Response Criteria.

Both officers retired from the Fire Service and MCA on completion of the Project in April 2007. Since then they have made efforts to consolidate a co-ordinated approach to ship firefighting within the EU.

**BACKGROUND**

2. Since the introduction of the Fire Services Act 1947 a number of coastal FRSs in the British Isles have provided, at their own cost, a response to assist HMCG with ships on fire at sea. This non statutory requirement continues to this day and is carried out on a voluntary basis by MIRG firefighters.

3. In 1994, a Memorandum of Understanding (MOU) was agreed between HMCG and the Fire Service on the arrangements for firefighting, chemical hazards, and rescue on vessels at sea. It is estimated that at the time 23 of the 39 UK coastal FRSs had “declared facilities” to the Coastguard that could be called upon to attend these incidents. These FRSs were acting independently and there was no cohesive integrated structure in place.

4. In 1998, CFOA Operations Committee instigated a review of the way FRSs responded to firefighting at sea. The subsequent “Offshore Operations Working Report” highlighted a number of key issues. In particular FRSs “should co-operate to achieve mutual support and standard operating procedures that reduce resource demands and facilitate effective, efficient operations. This cooperation will provide the potential for individual fire brigades to operate small teams of well qualified firefighters that additionally reduces the demands on the finite training resources available nationally”.

5. By 2001 the number of FRSs providing support had reduced to less than 12 due predominantly to the role being non statutory business and FRSs having to focus on core “statutory” activities. The other major
problem was that the quality and degree of response varied and although some FRSs had been carrying out this work for many years there were considerable weaknesses.

6. In 2002 with FRS support still declining the Chief Coastguard agreed to support a research project (entitled the “Sea of Change”) to review the situation. The aim was to produce a strategy report for the Department for Transport (DfT) in relation to the way UK FRSs could, if they were willing to do so, provide a co-ordinated fit for purpose national support to the MCA.

Due to the continual decline in available FRS resources and subsequent risk to the UKSAR strategy the Project quickly moved from research only to research and implementation.

7. Ultimately in April 2006, the Secretary of State for Transport formally launched the new MCA/FRS partnership the UK Maritime Incident Response Group (MIRG).

8. The uniqueness of the Project and ultimate strategy was the result of major cross-governmental co-operation and work involving a number of the principal organisations who support the UK’s maritime civil resilience. As agents for the MCA, the MIRG teams do now provide that vital and additional resource to the MCA and UK maritime resilience.

The Issues at Stake

9. The role and primary responsibility of the MCA is the co-ordination of resources for civil maritime search and rescue in the UK; it does not possess all the resources and skills required for the types of incidents that occur. There is a need therefore to rely on other agencies including Local Authority Category 1 Responders (Fire, Ambulance, Coastguard and Police).

10. Pre-planning and providing a cost effective professional response for fires and the aftermath of chemical incidents within their waters should be part of every State’s civil resilience plan, eg the Bonn Agreement. The UK has reinforced these plans thanks to the introduction and maintenance of the MIRG.

11. In 1990 the fire aboard the North Sea ferry “Scandinavian Star” claimed 158 lives. The joint States’ report highlighted the need for “rapid support from shore based firefighters to minimise the risk to life...” and within two years Sweden had introduced their FRS “major incident response teams”. These teams are still maintained.

12. The IMO clearly lays out strict guidance for the construction and operation of ships. However even the most compliant of vessels can still suffer major failures. Two recent examples include the cruise ships “Star Princess” (Balcony fire—March 2006) and “Carnival Splendor” (Engine room fire—November 2010).

The provision of passive and active systems built into “modern” ships does not negate the requirement to have available additional professional support in times of major emergencies. Not all ships may meet current IMO standards and therefore the “threat” still exists.

13. The ultimate cost from a substantial loss of life or major ecological disaster resulting from a fire or chemical release at sea could be extreme. The political fall-out nationally and internationally could be unacceptable if plans and resources are not properly in place and a major moral dilemma may be burdened on government and their emergency responders alike.

14. In addition being prepared to deal with the after effects of a maritime terrorist incident around our coastline is critical for UK resilience.

Risk versus Benefit

15. The MCA consultation taking place in relation to “Coastguard Modernisation” does not take account of further announced proposed changes to MIRG and indeed also that of the Emergency Towing Vessels. Therefore is the MCA failing to comply with the Government’s Code of Practice on Consultation with regards removal of MIRG and ETVs?

The consultation document executive summary highlights the risks around our coasts. This must therefore reinforce the need to retain a viable and effective MIRG response which is centrally administered, equipped and fit for purpose.

16. In May 2006 a MIRG team was deployed to a serious fire on the cruise ship MV Calypso in the English Channel with 480 persons onboard. The outcome was successful.

A number of other incidents have occurred where MIRG teams have been deployed, however it is extremely difficult to analyse the effectiveness of some of these deployments as in many cases both recently and pre 2006 the accuracy of available incident debriefing information is questionable.

There have been further incidents around our coasts each year for which MIRG has not been deployed. Is this because there was no perceived need?

The incident failed to escalate to a scale that warranted an attendance by MIRG?
Or in some cases have the MCA been “reluctant” to deploy a MIRG team because of the concerns of financial redress to FRSs?

17. The voluntary role of Fire Service assistance to incidents at sea is humanitarian and ecological for the protection of those using the seas around our coastline. The faster any emergency incident can be addressed and supported by professional intervention, the greater the levels of success will be achieved.

The MIRG philosophy and strategy is exactly that—to provide an early well trained and equipped response that other agencies/services cannot provide. The composition and response levels of the MIRG were developed through a process of Risk Analysis to produce a credible methodology to ensure a robust capability 24 hours a day.

18. Without a strategy or pre-planned response, untrained FRS personnel could and will be deployed into a hostile environment of which they have little knowledge or understanding and lacking the necessary equipment and protection systems. Even if a very small number of FRSs continue to provide a service—there will be a steady dilution of safe procedures and standards which in turn will prevent these same FRSs from allowing deployment to “at sea” incidents.

ADDITIONAL OPTIONS FOR CONSIDERATION

19. There is within government an inconsistency in funding pre-planned intervention to specific types of incidents, both nationally and internationally. We will rightly deploy Urban Search & Rescue FRS Teams around the world and also invest in FRS major flood training exercises but are now very reluctant to continue similar provision in the protection of all those using the waters around our coastline.

20. The bonus of already having a uniquely centrally managed trained group of firefighters that are able to work on, over and around coastal waters is also a prime asset for coastal flooding emergencies. This is another consideration that the MCA and a number of other Government departments have failed to fully recognise.

21. It is healthy and essential that any resource policy should be reviewed regularly in order to see that it remains fit for purpose and is cost effective. There is always an optimum effective size for any resource and this is the key to providing value for money.

22. The MCA and/or CFOA should investigate the possibility of EU funding to develop/expand the MIRG strategy to support environmental protection in line with the EU Civil Protection Mechanism. The EU Interreg initiatives such as that carried out by the Baltic States in 2007–08 and the North Sea Region Programme 2007–13 are excellent examples of inter State co-operation.

From research carried out in 2008–09 there is a willingness to participate. The route however appears to be extremely bureaucratic but the pooling of our combined resources means greater and wider protection, thereby providing a modern and more cost effective approach. It also meets the European Union co-operation ideals of using collective strength.

CONCLUSIONS

23. Support given to the MCA by coastal FRSs has always been recognised as being crucial to the service of HMCG in times of extreme emergency in relation to vessels on fire at sea.

24. The lack of continued financial support via the DfT/MCA to maintain a MIRG response would have a major impact on the way the UK would meet its responsibilities for maritime resilience in line with the Civil Contingencies Act 2004.

25. The MCA’s Cost Recovery Department was previously identified as a mechanism to assist in offsetting some of the MCA funding issues and they could be more proactive in recovering costs from the ship owners/cargo owners for incidents attended by MIRG. (See also the Marine Safety Act 2003)

26. We cannot afford to put the clock back on an issue such as UK maritime resilience especially in these times of heightened national security. If we should return to the pre 2006 situation it would place Government and FRSs in an immediate moral dilemma to deploy resources that are totally unfit for the hazards and tasks involved.

27. To further reduce the nation’s capability in dealing with the possible aftermath of a terrorist incident at sea as originally identified in the Civil Contingencies Act 2004 would also have disastrous consequences.

The UK response to a major “fire” disaster at sea will quickly become terminal as a credible response, way beyond the decline we saw in the late 1990s with FRSs rapidly withdrawing their resources. If the MCA, who heralds “safer lives” ... “safer ships” ... “cleaner seas”, are no longer willing to fund a resource that supports that philosophy then an alternative funding stream should be identified and allocated.

28. The MCA should review the strength of the MIRG response by re-examining the number and location of MIRG teams in relation to relevant risks to make it more cost effective. Ideally 8–10 strategically located teams and retention of the Fire Liaison Manager to manage continuity can reduce costs significantly without compromising its safety and operational effect.
29. Consideration should be given to investigating an application for European funding through the Community Civil Protection Scheme and other areas of monies available for maritime protection and resilience.

30. CFOA, in order to maximise the benefit from this highly trained and equipped resource, should review and pursue the development of all policies and procedures in relation to the use of MIRG teams at inland water safety incidents, particularly coastal flooding.

31. Should DfT/MCA finance be withdrawn from MIRG and an alternative funding stream not be provided then it is highly likely FRSs will not independently finance the non statutory role of firefighting at sea. They must therefore, when a national emergency at sea occurs, not permit untrained and poorly equipped resources to be deployed into a totally unfamiliar and hazardous environment. An unacceptable dilemma to lay at the Fire Service door.

32. … and finally, one has to ask the following question. “Why did the DfT accept in 2003 that there was a need to address the issue of firefighting at sea around the coast of the UK, subsequently introduce the MIRG and now in 2011 consider its demise”? Clearly “… the currently provided MIRG is appropriate for consideration as an ongoing option …”, as quoted in the BMT Isis report produced for the MCA is already out of date and no longer the answer to the question!

Additional relevant supporting information can be found as follows:

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<tr>
<th>Author/Publisher</th>
<th>Title</th>
<th>Reference</th>
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<td>CFBAC</td>
<td>The Joint Committee of the Central Fire Brigade Advisory Council</td>
<td>FSC 17/67</td>
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<td>CFOA</td>
<td>Fire Service Circular to review firefighting at sea and to create relevant guidance for the Service</td>
<td>CACFOA 1998</td>
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<tr>
<td>CFBAC</td>
<td>Operations Committee, Offshore Firefighting Working Party Report</td>
<td>On behalf of CFOA &amp; MCA</td>
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<td>Peter Pearce</td>
<td>Fire Service Circular—Maritime Resilience and the Role of the UK Coastal FRSs</td>
<td>Held by MCA</td>
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<td>DCLG</td>
<td>Report of the “Sea of Change” Firefighting &amp; Rescue at Sea Project 2007</td>
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<td>Mervyn Kettle</td>
<td>Review of Requirements of the MCA in Relation to Assisting with Incidents Involving Fire, Chemical Hazard and Industrial Accidents at Sea (October 2010)</td>
<td>Held by MCA</td>
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INTERNET BIBLIOGRAPHY

MIRG Video: www.mirg.org.uk/video/video.shtml


March 2011
**Written evidence from Svitzer (MCA 04)**

**INTO MAJOR AGENCIES AND NON-DEPARTMENTAL PUBLIC BODIES ASSOCIATED WITH THE DEPARTMENT FOR TRANSPORT**

1. This submission is made by Svitzer and centres on two sets of Department of Transport (Department or DfT) agencies: the three general lighthouse authorities (GLAs) and the Maritime and Coastguard Agency (MCA). The focal point of the evidence is the inconsistent approach taken by the Department regarding the use of the commercial market in the respective agencies and the lack of value and cost control the DfT is able to impose on the GLAs.

2. Svitzer operates specialist and interrelated services within harbour, terminal, and ocean towage, salvage and emergency response as well as fast transportation of crew and supplies to offshore installations in order to enable safety and support at sea. With a diverse fleet of more than 550 vessels operating in more than 35 countries, Svitzer is today a leading provider of marine services, providing solutions for clients all over the world.

3. Svitzer sets the highest standards of training and knowledge in our industry, and encourage a culture of safety, innovation, and entrepreneurship amongst its employees with exceedingly high retention rates.

4. Svitzer operates 85% of the tugs serving British ports and together, with the rest of the British Tugowners’ Association members, we have unrivalled expertise in ensuring that freight from around the world arrives safely and swiftly at UK ports.

5. The three GLAs are Trinity House (TH—for England, Wales and other British territorial waters with the exception of Scotland, the Isle of Man and Northern Ireland), the Northern Lighthouse Board (for Scotland and the Isle of Man) and the Commissioners of Irish Lights (for Ireland).

6. As part of the Comprehensive Spending Review 2010, the Government decided that the MCA contract for the publicly funded emergency towing vessels (ETVs) will not be renewed when it expires in September 2011.

7. Between now and next September, the MCA is in discussions with the shipping, wider maritime industries, local authorities and the Scottish Government, to explore options for ensuring the effective operation of commercial arrangements can operate effectively in the future. In particular, how commercial tug and salvage arrangements will operate to assist ships that get into difficulty.

8. Prior to taking the decision to discontinue the provision of ETVs, the DfT undertook an assessment of the changes that have taken place over the past decade in the maritime environment, together with a consideration of the frequency with which ETVs have been tasked to assist vessels that have got into difficulty. The Government found that this is a matter for commercial shipowners and the insurers using the services of commercial towing vessels. Accordingly, the Government judged that the risk in not renewing the ETV contract from September 2011 was acceptable.

9. This logic is prudent and use of financial criteria sensible, although it is diametrically opposed to the reason used by the Department when making a similar decision in relation to the collective GLA fleet capacity (five tenders, plus THV Patricia).

10. The GLAs already undertake selective outsourcing of a range of activities where they consider it appropriate and cost effective to do so. In the general drive to reduce costs and target realistic and large items of one-off expenditure to generate ongoing savings to the General Lighthouse Fund (the central fund into which light dues are paid into a central fund and from where they are disbursed by the DfT to the three GLAs in England, Scotland and Ireland), the use of the commercial market would seem sensible.

11. Svitzer believes the GLA fleet capacity is a key area of capital and revenue expenditure where strong Departmental direction should be given and effort concentrated to realise a financial saving while gaining further operational flexibility.

12. In the summer and autumn 2010, a business case for the replacement of one of the GLA tenders, THV Patricia, was constructed by TH and, as part of that process, the market was tested.

13. The commercial market offers good and operationally adequate alternative that could provide greater emergency cover and depth of provision. However, questions about the impartiality of TH’s business case and the strength of the market analysis conducted in the summer and autumn 2010 remain.

14. TH’s business case concluded that the commercial market did not offer the best financial and operational option. Instead, TH recommended (and DfT accepted in December 2010) a scaled back refitting of the tender from the initial estimate of £3 million to £535k.

15. Although it is far from clear what the original £3 million figure included over and above the proposed new dynamic positioning system, modification of buoy working deck and chain handling system and reconfiguration of the dining rooms.
16. Although these points were made last year (July 2010) by Svitzer when the company issued a response to the Atkins assessment and the report’s recommendations on the matter of whether, and how, THV Patricia should be replaced, Svitzer believes that it is important for the Committee to be appraised of what the commercial market does and could offer the GLAs and the Department.

— Access to a significant number of existing vessels and crew capable of buoy maintenance and wreck response duties that will increase coverage and decrease emergency response times;
— The capability of utilising existing vessel coverage for the specific times and durations required so as to maximise vessel utilisation and limit operational costs solely to periods of agreed activity;
— The potential for the GLAs to fix commercial coverage on their terms, meeting their full service requirements;
— To enable comparisons to be drawn with the GLA costs as part of the process of continually reviewing the value for money of their functions; and
— Without detriment to mariner safety, the GLAs and Department will be able target real-term reductions in running costs. (see Appendix 1)

The commercial market: the UK lagging behind

17. Aside from the stark inconsistent internal approach taken by the DfT, it is clear that the UK is lagging far behind other countries in this area; in particular, Australia.

18. Over a decade ago, the Australia system—modeled on the UK system and many of the features of the Australian lighthouse service can be traced back to the GLAs—was completely overhauled.

19. Strikingly, and with many parallels to the current situation in the UK, the Australian lighthouse service reached a crisis point in the 1980s that culminated in a parliamentary inquiry into the whole system for the provision of marine aids to navigation. The central issue was the ever-increasing rate of light dues to fund an ever-increasing cost of constructing and maintaining marine navigations aids.

20. The result was a complete overhaul of the system which had the effect of, among other things, improving the service quality while substantial driving the costs down leading to a massive 50% reduction in light dues. As the private sector provider had a financial and operational incentive to ensure that investment was made in reliable and efficient technology to keep the costs to a minimum.

“The current [UK] cost base of some £75 million per annum should be more like £45 million per annum or less. Based on my experience with the Australian system, the entire UK and Irish system could be safely, efficiently and reliably serviced with the equivalent of one vessel and a single maintenance depot”. Lloyd’s List, Clive Davidson, former chief executive, AMSA. 23 August 2010

21. This potential hitherto has been ignored and the potential for a 50% reduction in GLA operating costs if the aids to navigation services were put to the market—as evidenced from the experience of Clive Davidson, former chief executive of the Australian Maritime Safety Authority (AMSA) who achieved such a saving when he was responsible for the Australian aids to navigation service. (see Annex 1 and 2)

Conclusion

22. Svitzer believes that the Department is unable to impose effective cost and value control consistently across all her maritime agencies.

23. The logic employed in not renewing the public funding of the ETV contract is prudent and the use of financial criteria sensible, although Svitzer remains concerned that it is diametrically opposed to the reason used by the Department when making a similar decision in relation to the GLA fleet capacity in December 2010.

24. In order for the GLAs’ fleet to retain and, importantly, gain further operational flexibility, Svitzer strongly believes that the commercial market would offer an affordable alternative emergency provision to supplement the remaining GLA fleet capacity rather than refurbishing, purchasing or leasing a straight replacement vessel. The failure to properly assess commercial market potential is down to the Government’s lack of oversight of the market testing process in the building of the business case for the replacement of the THV Patricia.

January 2011
Appendix 1

Svitzer UK – Existing Operational Coverage

Summary

1. This submission is made by Svitzer and focuses on the decision by the Government to cease the Maritime and Coastguard Agency (MCA or Agency) emergency towing vessel (ETV) contract. Svitzer supports this decision.

2. The UK tug market currently offers a network of highly skilled service provision which allows shipowners access to a significant number of vessels with a full coverage of the British Isles equipped with crew capable of wreck response and salvage operations.

3. Svitzer believes that commercial tug and salvage arrangements can operate effectively to assist ships in the period preceding the end of the contract in September 2011.
OVERVIEW

4. Svitzer operates specialist and interrelated services within harbour, terminal, and ocean towage, salvage and emergency response as well as fast transportation of crew and supplies to offshore installations in order to enable safety and support at sea. With a diverse fleet of more than 550 vessels operating in more than 35 countries, Svitzer is today a leading provider of marine services, providing solutions for clients all over the world.

5. Svitzer ensures that all their personnel have the highest standards of training and knowledge in our industry, and encourages a culture of safety amongst its employees. The company’s operations, services and personnel are based up-and-down the country, from Felixstowe to the Clyde. [see Appendix 1 of where the company’s 89 tugs are based]

6. Svitzer operates the majority of the tugs serving British ports and together, with the rest of the British Tug operators’ Association (BTA) members, we have unrivalled expertise in ensuring that freight from around the world arrives safely and swiftly at UK ports.

7. The Agency currently has four dedicated ETVs on standby all-year-round to respond to shipping incidents at an annual cost to the UK taxpayer of £10 million. The ETVs are based in the Northern Isles, the Minches, the south-west approaches and the Dover Straits. In addition to these dedicated resources, the MCA uses the Coastguard Agreement on Salvage and Towage (CAST) to call upon the services of the tugs in ports and harbours throughout the UK.

8. As a consequence of the Comprehensive Spending Review 2010, the Government decided that the MCA contract for the publicly funded ETVs will not be renewed when it expires in September 2011.

9. Between 2006 and 2010, the MCA used the four ETVs on a total of 182 occasions. Of this, 134 were incidents where ETVs were sent to standby vessels, but where they were not required to render towage services. This would typically be where a vessel had broken down in open sea and was drifting until repairs had been completed, or where a vessel’s owners had arranged for a tug belonging to another towage company to attend on scene to assist their vessel. The MCA also dispatched ETVs on 48 occasions to assist disabled vessels in circumstances where a tow was connected. In all cases the ensuing towage services were the subject of a commercial towage agreement or the performance of an act of salvage by the tug operator. In the Western Isles, ETV undertakes passive escort duties in the Minches, and one ETV undertakes hydrographic survey work during the summer season. [Source: written parliamentary answer from Michael Penning, Parliamentary Under Secretary of State for Transport, to Eilidh Whiteford, MP for Banff and Buchan, 14 March 2011]

10. The MCA’s risk analysis points towards a requirement for towage and salvage capabilities of some kind for the waters around the British Isles. Between now and next September, the MCA is in discussions with Svitzer, other shipping and wider maritime industries, local authorities and the Scottish Government, to explore options to ensure the efficient operation of commercial arrangements can function effectively in the future.

11. Svitzer supports the MCA, as the Agency seeks to establish an operational protocol whereby there will be commercial benefit for tug operators in stationing tugs in the sort of places that they are needed—on the basis that when they are called forward for a towage or salvage contract they will be recompensed and, therefore, it becomes commercially worthwhile to do so.

12. The question for Svitzer and other tug operators is whether tugs are in the right place at the right time—a core point at the heart of the protocol being established by the MCA.

13. Svitzer believes the operational capacity exists and a satisfactory financial model can be established to ensure any vessel around the British Isles can be dealt with effectively and swiftly.

14. Recent examples of Svitzer tug provision, where an ETV was not in the immediate vicinity, include attendance at the high profile incidents involving the HMS Astute and the Yeoman Bontrup off the west coast of Scotland where Svitzer tugs attended in conjunction with or prior to the ETV. Less recently the tanker, Stella Rigel, was drifting off Milford Haven and was taken in tow a short distance from shore and delivered to a safe port. In addition, over recent years there have been numerous Svitzer responses around the UK to less urgent towage cases—these incidents also involved the operations of Svitzer Salvage.

DFT’S INCONSISTENT APPROACH

15. The logic employed in not renewing the publicly funded ETV contract is diametrically opposed to the reason used by the Department when making a similar decision in relation to the general lighthouse authority (GLA) fleet capacity in December 2010.

16. In order for the G1A’s fleet to retain and, importantly, gain further operational flexibility, Svitzer strongly believes that the commercial charter market would offer an affordable alternative emergency provision to supplement the remaining GLA fleet capacity rather than refurbishing, purchasing or leasing a straight replacement vessel.
17. Svitzer believes the GLA fleet capacity is a key area of capital and revenue expenditure where strong Departmental direction should be given and effort concentrated to realise a financial saving while gaining further operational flexibility.

18. In the summer and autumn 2010, a business case for the replacement of one of the GLA tenders, *THV Patricia*, was constructed by Trinity House (TH) and, as part of that process, the market was tested.

19. The commercial charter market offers good and operationally adequate alternative that could provide greater emergency cover and depth of provision. However, questions about the impartiality of TH’s business case and the strength of the market analysis conducted in the summer and autumn 2010 remain. These concerns centre on the specifications used when the market was tested and the lack of oversight by the Department.

20. It is understood that the specified provision drove up the price unnecessarily and thus delivered a result that favoured straight replacement and/or refurbishment of the *THV Patricia* ie the price was given for the use of one vessel on permanent standby.

21. In the end, TH’s business case concluded that the commercial charter market did not offer the best financial and operational option. Instead, TH recommended (and DfT accepted in December 2010) a scaled back refitting of the tender from the initial estimate of £3 million to £535,000.

22. Although it is far from clear what the original £3 million figure included over and above the proposed new dynamic positioning system, modification of buoy working deck and chain handling system and reconfiguration of the dining rooms.

23. The failure to use the commercial charter market is down to the DfT’s lack of oversight of the market testing process in the building of the business case for the replacement of the *THV Patricia*.

**CONCLUSION**

24. The logic employed in not renewing the public funding of the ETV contract is prudent and the use of financial criteria sensible.

25. The reason employed in the ETV decision is diametrically opposed to the rationale used by the Department when making a similar decision in relation to the general lighthouse authority (GLA) fleet capacity in December 2010. This is a concern as the market offers a strong and effective alternative.

26. Current practice is that if a tug provides a towage or salvage service to a ship, then it will result in an agreement between the tug and the shipowner and the setting up of a contract which will then result in a payment for that service. This practice is commonplace and will carry on regardless of whether the publicly funded ETV contract is renewed or not.

27. Svitzer supports the BTA's position that tug operators will always have to respond to each incident on a case-by-case basis due to a combination of reasons—principally, tug availability and capability.

28. The tugs stationed up-and-down the country offer an operationally adequate alternative that could provide sufficient emergency cover and depth of provision for wreck response, towage, salvor, lighthouse and buoy maintenance work.

29. Svitzer believes the protocol that the MCA is seeking to establish will provide adequate safety provision for the UK—both in terms of seafarer, marine and landside environmental safety.

30. Once the operational protocol is established between the MCA, stakeholders and the commercial maritime sector, Svitzer believes the MCA should retain a supervisory role and the Government should periodically assess emergency safety provision for the British Isles to ensure it is adequate.

*April 2011*

**Written evidence from the Chamber of Shipping (MCA 06)**

The Chamber of Shipping works closely with the MCA at all levels and both endorses and shares its three key aims; preventing loss of life, continuously improving maritime safety and protecting the marine environment. It remains vitally important that the UK’s maritime administration maintains a strong, technically competent policy capability. We also very much welcome the proactive and inclusive approach that has so far been the hallmark of its new leadership. This is beginning to become evident from more positive feedback on surveys and inspections and from our own involvement with the Agency.

We do, however, believe that it is too early to scrutinise its outputs as the Agency is clearly undergoing major changes and restructuring both within and without the Head Office and, until there is greater clarity on how this will both develop and settle, it is difficult to comment constructively. That said, the Chamber appreciates the Transport Committee’s intent to scrutinise the work of the major agencies and non-departmental public bodies associated with the Department for Transport.
The one issue which we believe merits early scrutiny, however, is the MCA decision to stop funding Emergency Towing Vessels (ETVs) at the end of their current contract (September 2011). The MCA wrote in their statement that “...the provision of ETVs does not represent a correct use of taxpayer’s money and that ship salvage should be a commercial matter between a ship’s operator and the salvor”. Although there is some validity in this statement, applying a commercial system truly responsive to emergencies that might arise on any vessel, regardless of flag, in our waters will be fraught with difficulty.

While the Chamber understands the desire of Government to make savings where it can in the current economic climate, the existing provisions were put in place over 10 years ago following Lord Donaldson’s recommendations in the aftermath of the very significant pollution incidents from the loss of the Braer on the Shetland coast and the grounding of the Sea Empress in Milford Haven. These incidents demonstrated the need for permanently sited salvage vessels, and that need is no less today. The Chamber would wish to see an in-depth study on the potential impacts of removing the ETVs before any action is taken together, with the Government’s proposals for providing emergency services in an alternative way. It is particularly important to consider how the Secretary of State’s Representative for Maritime Salvage and Intervention (SOSREP) role would function in the absence of these vessels, and also to understand that the move would likely lead to the withdrawal of salvage resources in the absence of a formal contract such as is in force today.

The Chamber has raised these concerns informally with the MCA but we have yet to be advised of, or involved in, meetings to discuss future provision of emergency salvage tugs. We would welcome the opportunity to present oral evidence if that would be considered helpful.

January 2011

Further written evidence from the Chamber of Shipping (MCA 06a)

The Chamber of Shipping (“the Chamber”) welcomes the opportunity to provide written evidence to the Transport Committee in order to aid its inquiry into the MCA Consultation on Proposals for Modernising the Coastguard 2010, the decision not to renew the current government contract for Emergency Towing Vessels (ETV), and the review of arrangements for the Maritime Incident Response Group (MIRG).

With 139 members and associate members, the Chamber represents over 932 ships of about 25 million gross tonnes and is recognised as the voice of the UK shipping industry. Collectively among our members and associates we account for 90% of British shipping and represent various sectors such as ferries, cruise ships, container ships, tankers, dry bulk carriers, offshore support vessels, aggregate carriers and other specialist vessels.

The Coastguard plays a vital role in making our seas safer and saving lives by co-ordinating rescue operations in the most difficult sea conditions. However, nothing being put forward in the Consultation should be allowed to jeopardise the MCA’s ability to respond to emergencies, co-ordinate rescue operations or prevent loss of life. The concept of prevention of loss of life at sea is enshrined in the International Convention for the Safety of Life at Sea (SOLAS) and this must remain the top priority of the UK Government when considering any changes to the Coastguard. In addition, we cannot afford to be in a position where we are unable to deal with a future maritime incident with the potential to damage the coast in a manner similar to “Erika”, “Prestige”, “Sea Empress” or “Braer”. Incidents of this scale have a long lasting impact on our environment and on our trade capabilities.

The Chamber has submitted a full response to the MCA Consultation jointly with the British Tugowners Association (BTA). In our response we agree that modern technology should be embraced in order to provide better value for the taxpayer and that the decision to review the current Coastguard communications structure is correct. The current pairing system of regional Maritime Rescue Co-ordination Centres (MRCC) is indeed vulnerable to situations where a multitude of incidents occur simultaneously in one region, and therefore we support the plan to develop a nationally integrated communications network via the establishment of centralised Maritime Operations Centres (MOC).

However, we also highlight that there should be no material reduction in the level of response, the nature of response or the assets available for preventing loss of life and co-ordinating rescue. The proposed closure of several MRCCs has raised a number of concerns, as has the proposal to only staff those being retained as sub-centres during “peak” hours. We do not believe the concepts of “peak” and “off-peak” hours are fully applicable to shipping and have made this clear in our response.

As a result of these concerns, the Chamber has called on the MCA to provide assurances that the proposed closure of regional MRCCs will not lead to a loss of vital local knowledge. We have also asked for a review of the proposal to limit the Irish Sea area to one regional sub-centre (at either Liverpool or Belfast) with no 24-hour coverage. This reflects a number of concerns raised by Chamber members operating in the region.

We are disappointed to note that the MCA has decided not to renew the contract for four ETVs. The potential cost of being unable to respond to a major maritime disaster could easily outweigh any benefits gained through immediate cost savings measures. There must be an alternative mechanism put in place to ensure some form of a guaranteed response. Whilst funding for a future scheme may have to rely upon industry and local groups, until there is agreement for a long term solution the MCA must retain its coordinating role in finding a workable
and effective way ahead. Additionally, we have concerns over the review of arrangements for the MIRG and recommend that it be retained as a resource, potentially at specific locations only.

I attach a copy of the full Chamber and BTA response to the MCA Consultation as an appendix for your consideration. Should you have any questions or wish to request further input from the Chamber, please do not hesitate to contact me.

APPENDIX

JOINT RESPONSE BY THE CHAMBER OF SHIPPING AND THE BRITISH TUG OWNERS ASSOCIATION: MCA CONSULTATION ON PROPOSALS FOR MODERNISING THE COASTGUARD

Question 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?

The Chamber and the BTA welcome the MCA’s acknowledgement of the changes occurring in UK waters that are affecting the way the Coastguard needs to operate. Whilst we support the proposals to exploit new equipment and technology in order to adapt to these changes and improve the response capabilities of the Coastguard, they must not lead to a reduced level of service. The proposed reduction in MRCC numbers must not lead to an inability to respond to an emergency or multiple emergencies simultaneously with the same level of promptness currently demonstrated.

We also feel that the MCA should consider the following issues prior to seeking implementation of their suggested measures:

1. Withdrawal of Emergency Towage Vessel (ETV) coverage and the possible ending of the Maritime Incident Response Group (MIRG) should not lead to a vacuum in response provisions. There must be firm arrangements in place to deal with emergencies that threaten lives or the environment. The decision to remove these resources is likely to place an increased burden on the Coastguard when dealing with maritime incidents. We therefore believe that this potential reduction in the external resources available to the Coastguard should be taken into consideration when making the final decision on modernisation of the service.

2. No mention has been made in the consultation paper of the proposed changes to the provision of airborne Search and Rescue (SAR) services. Helicopter capability is the single vital means of providing prompt SAR responses to merchant shipping and any proposed changes in this provision must be fully taken into consideration.

3. On 22 March 2010 the Government announced the creation of a National Maritime Information Centre (NMIC), supported cross-government but principally by the Ministry of Defence and the MCA. The terms and role of the NMIC should be considered in these proposals. Whilst our understanding is that the NMIC’s role is primarily to act as an information exchange, its future role and potential should be assessed.

Question 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?

The Chamber and the BTA support the MCA’s proposals to develop a truly integrated national Coastguard system utilising up-to-date technology and equipment. The current inability of all MRCCs to communicate effectively with each other and share workload is a weakness in the system and the MCA’s proposals have clearly taken this into account.

However, reassurance is sought that the closure of many regional MRCCs will not lead to a loss of the local knowledge possessed by Coastguard officers at these centres.

Question 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?

We support the MCA’s proposal to link all regional sub-centres via the establishment of multiple MOCs. As identified in the consultation document, this is preferable to the establishment of a single MOC due to the risks posed by infrastructure damage, adverse weather or illness. However, we have concerns over the proposals to significantly reduce the total number of Coastguard stations handling emergency calls 24 hours a day. Whilst we are supportive of efforts to improve communications via the deployment of up-to-date technology, there is a danger that this would be coupled with a reduction in the 24 hour availability of both local knowledge and experience under the current proposals. The consultation document indicates that sub-centres will be developed at the locations of some existing MRCCs in order to maintain a regional presence, but under the proposals some key locations will be left without any kind of Coastguard communications centre. Therefore, we seek reassurance that the reduction in the physical number of Coastguard centres will not have any impact on the Coastguard’s ability to handle calls.
We support the proposed system’s ability to deal with high levels of demand. However, we do not agree with the distinction between peak and off-peak hours, as this has limited relevance to shipping. Adequate provisions should be maintained 24 hours a day rather than differentiating between peak and off-peak hours.

**Question 4—** Our proposals for Maritime Operations Centres and sub-centres locates 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?

Please see above.

Particular concerns have been raised over the potential closure of the Liverpool MRCC, with the eastern Irish Sea being a very busy area with a diverse range of activities. Within this area there are gas and oil rigs and wind farms, all with their associated supply and transport vessels and aircraft. The number of wind farms is set to increase in the next few years with the Irish Sea Round 3 Zone and Gwynt y Mor developments, as well as extensions to the Burbo Bank and Walney wind farms. These wind turbines present a potential hazard to shipping, with numerous routes, including both high speed and traditional passenger ferry, operating in the area.

These concerns surrounding the Liverpool MRCC are however not an indication of any particular preference between the Liverpool and Belfast sites under the MCA’s proposals, as both sites have strong merits. High levels of passenger ferry crossing currently exist between Northern Ireland and Scotland, as well as significant passenger routes elsewhere to the south in the Irish Sea. We therefore recommend that the current proposal to restrict the Irish Sea area to one regional sub-centre with no 24 hour coverage is reviewed.

**Question 5—** 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 see Question 7

**Question 6—** 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?

The knowledge possessed by local volunteer HM Coastguard Rescue Teams is equally as important as that of the regional MRCCs and should continued to be relied upon, as indicated in the consultation document. However, as noted under Question 4, the loss of regional MRCCs and their extensive local knowledge could be detrimental to the Coastguard’s ability to respond quickly and effectively to incidents.

**Question 7—** 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?

We welcome the introduction of 24/7 on-call Coastal Safety Officers on a regional basis as they would ensure continued provision of local knowledge.

**Further Comments**

Overall, we are supportive of the positive steps to modernise the Coastguard, particularly in terms of deploying the latest technologies to improve communications and emergency response effectiveness. We do however have some concerns over the potential loss of regional 24-hour MRCCs.

The proposal to link regional sub-centres to centralised MOCs has broad support in terms of its potential to create a nationally integrated Coastguard system and we believe the proposed system represents an adoption of modern practices. However, we request assurances that the proposed system would be able to deal with an unexpectedly large number of incidents outside of peak hours. The decisions to possibly remove both ETV provision and the MIRG may also reduce confidence in the Coastguard’s ability to deal with major incidents. Removal of ETVs without another mechanism to replace them is untenable, and we wish to contribute to finding a way forward on this issue.

The MIRG should continue to exist (perhaps at specific locations only) as its removal would represent a huge loss of expertise and an invaluable response mechanism for the cruise and ferry sector. We also feel that the removal of MIRG would reduce confidence in the Coastguard’s ability to deal with major incidents.

*April 2011*
Written evidence from the Public Commercial Services Union (PCS) (MCA 07)

The Public and Commercial Services union represents over 300,000 members in the civil service, related bodies and in privet companies working on public contracts.

1. PCS represents over 500 staff within the Maritime & Coastguard Agency (MCA). We have members at all 19 Maritime Rescue Coordination Centres (MRCCs) and at the MCA HQ in Southampton.

2. PCS believes that the proposals for the MCA are worse than those we would see for any other emergency service.

3. PCS are concerned that there is no appreciation of the difference in the role of those who work in MRCCs offices who take a lead on emergency operations as oppose to those who answer other emergency services who hand that responsibility to those carrying out those operations to the crews on the ground.

4. Local knowledge is key to MCA work and this would be lost with centralisations.

5. There is a concern there has been insufficient consideration paid to the effects these cuts will have on local economies particularly in places with already high unemployment.

Future of the Agency

6. PCS has grave concerns over the future of the agency following the publication of the government’s “protecting our seas and shores in the 21st century”. The document currently out for consultation until March 2011 proposes the creation of two Maritime Operation Centres, the closure of nine MRCCs with a further five only being open during the day. The proposal to move to a more centralised coastguard operation will result in the loss of over 200 coastguard officers and with it, the PCS fears the local knowledge of the coast. Coastguard officers currently possess local knowledge of the coast which cannot be replicated by a station many hundreds of miles away. A similar problem was found with the FireControle project—an attempt to centralise fire services—scrapped in December 2010 after eight years of consultation.

7. Furthermore, the loss of coastguard stations, in mainly small communities, will impact upon the local economy and jobs market. The Coastguard service is an invaluable asset within the local communities ensuring that local coastlines are safe as well as providing jobs and boosting local coastal communities.

8. PCS believes that whilst the proposals hold some merit, the service plans to use existing technology to provide a national service. We do not believe that the current technology will be able to adequately address a single, national service.

9. PCS is concerned that despite requests, there has been no commitment to avoiding compulsory redundancies. No detail has been given as to how these plans will be implemented and the impact on our member’s terms and conditions.

10. Should the MCA continue with its proposals it faces a very difficult time in closing stations whilst maintaining a national 24/7 maritime search and rescue capability.

11. PCS is also concerned that the unique considerations regarding Northern Ireland have not been considered properly.

12. PCS believes that the consultation document does not contain sufficient information for either staff or key stakeholders to be able to gauge whether the proposals will endanger public safety. We are calling on the Transport Select Committee to seek a halt to the consultation process until the select committee is able to critically examine the currently untested proposals and be satisfied that the proposals will not in anyway endanger public safety.

Pay

13. PCS members in the MCA have been taking industrial action short of a strike for four years over wholly inadequate pay levels. A coastguard officer can earn as little as £13,500 and many have to supplement their wages by taking additional jobs. The Coastguard Service is an emergency service but the pay levels within the MCA do not reflect the pay of other emergency services. This has been the subject of many reviews over the years and accepted by senior management, but nothing concrete to date has come of it.

Technology

14. PCS believes that the MCA has suffered from a lack of technological investment. A lot of operational equipment is past its sell by date and no longer fit for purpose. An operational coastguard now spends most of his working day sitting at a number of computer terminals which constantly crash and slow down at a crucial moments. The withdrawal of the DF (directional finding) facility is also seen as a detrimental move and could possible cost lives. The removal of the DF facility was driven purely by monetary constraints.

15. PCS has concerns that the removal of the Emergency Towing Vessels will result in greater sea pollution, damage to the national infrastructure and loss of lives. The importance of the tugs was demonstrated when HMS Astute, the Royal Navy’s newest submarine ran aground off the west coast of Scotland.
16. Uncertainty over the Search and Rescue Harmonisation Project (SARH) is resulting in the RAF continuing to use outdated SeaKing helicopters which are well past their sell by date and constantly going off service resulting in large areas of the UK Search and Rescue Region with no SAR helicopter coverage.

17. The current systems will not be fit for a more national coastguard structure and the consultation document does not say what technology will be used to move to a new structure.

**COAST RESCUE**

18. Coast Rescue Officers provide an invaluable service to the public on the cliffs and coastline. However, these volunteers are unpaid and can often be unavailable due to other work commitments. PCS believes that we should not solely rely on unpaid volunteers.

19. PCS believes that this country gets search and rescue on the cheap, relying as it does mainly on volunteers, not only CROs but also RNLI, mountain rescue etc.

*January 2011*

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**Written evidence from the National Union of Rail, Maritime and Transport Workers (RMT) (MCA 08)**

**THE WORK OF THE MARITIME AND COASTGUARD AGENCY**

The National Union of Rail, Maritime and Transport Workers (RMT) welcome the opportunity to contribute to the Transport Committee examination of the work of the Maritime Coastguard Agency, (MCA). The union represents the majority of UK seafaring ratings currently employed within the industry.

We have long standing concerns on the level of funding that the MCA receives. The latest round of cutbacks to MCA Head Office staff and front line emergency staff is therefore alarming. The MCA have agreed with the Department for Transport to cut funding by £80 million by March 2015. This is a 22% cut in current levels of funding in four years.

On a more general point RMT believe that there is a very strong case for grouping maritime safety with other transport sectors so that there is independent safety regulation under the remit of the Health and Safety Executive.

**MCA Resources**

RMT has expressed concern that constraints on the MCA budget have restricted the ability of the MCA to effectively police merchant shipping in UK waters. The duty of the MCA is to develop, promote and enforce high standards of maritime safety in the UK. In particular they safeguard the safety of ships and their crews by undertaking inspections of ships visiting UK ports.

In recent years there has been increasing concern over sub-standard vessels trading in UK waters and the proper enforcement of hours of work regulations. The MCA needs a well resourced Inspectorate and we remain concerned as to the level of MCA resources available to undertake this vital work.

It is not just the number of inspections that are important but also how rigorous the actual inspections can be in the time permitted to undertake them. RMT members believe that there is insufficient attention given to seafarers living and working conditions, even though the MCA are responsible for enforcing ILO Conventions on this subject.

This is not through negligence by MCA Inspectors but merely a reflection of the resources that the agency has available. A comprehensive report on the MCA was conducted by the National Audit Office in March 2001. The committee should note that one of the recommendations of the report was for the MCA to pay more attention to the human factors that underpin safety on board vessels.

**The Impact of Public Spending Cuts on the MCA**

RMT believes that the public spending cuts currently being undertaken are likely to have a detrimental effect on the quality of service available to seafarers. A fully resourced MCA would be instrumental in maritime safety for ships at sea and the seafarers on board. However a 22% cut to overall MCA funding will we believe compound the difficulties for the Agency who have now signalled their intention to close half of the existing Coastguard stations and withdraw emergency towing vessels.

The severe cuts proposed by the MCA would surely be in the media spotlight were it not for the other more high profile parts of the public sector that are suffering spending cuts. The reduction in number of Maritime Rescue Co-ordination Centres from 18 to just eight is a massive cut which will remove local knowledge from the organisation.

It should also be noted that only three of these MRCCs will open 24 hours a day, a stark contrast to the 18 which are currently open 24 hours a day. The MCA must provide an explanation as to how new technology can replace the loss of local expertise in Coastguard Stations set for closure.
In addition the MCA provision of Emergency Towing Vessels (ETV) will be completely withdrawn at the end of the contract in September 2011. This will surely have an impact on UK seafaring, and also for the projected image of the UK Shipping Industry enforcing higher standards of safety than other shipping registers. The committee should note that the grounding of HMS Astute near the Isle of Skye in October 2010, a nuclear submarine now owned by the Ministry of Defence, required an ETV to tow it. The vehicles play an essential role in maritime safety.

We would refer the committee to the previous report produced by the Transport Committee in 2004. In this report the committee found that the Agency had failed to account for the understaffing of the Coastguard Centres and also to have not conducted a full assessment of the impact of the closures of three Coastguard Centres. It called for an independent review to include an assessment of how long it would take to respond to incidents and staffing levels.

The MCA have recently advised RMT that a risk assessment has been completed in consultation with the Coastguard trade unions. However at the time of writing the Public and Commercial Services Union (PCS) had not received any risk assessment and we hope this will be forthcoming soon so that a proper analysis can be undertaken.

In addition, but separate from MCA cuts, the Nimrod maritime patrol aircraft is also being withdrawn. All of these cuts and closures could impact on UK seafarers.

Coordination with other parts of Government

In recent years the MCA have undertaken a thorough overhaul of its procedures for administering the UK Register of Merchant Ships and we believe that internally many MCA procedures will have been revised so that the Agency is able to respond to the new demands of the UK Shipping Industry.

RMT believe that it is essential to ensure employment and training information is shared with the Department for Transport (DfT) in order for DfT policy objectives to be effectively pursued. In the past the MCA has been too narrowly focussed given that it is an Executive Agency of the DfT. The Agency needs to demonstrate that it can share information with other arms of Government who cover work overlapping with that of the Agency.

For example MCA hold important information on training programs for merchant seafarers, the seafarers who actually attend these courses, the identification of serving seafarers and related documentation on UK registered ships. The MCA must always be aware of the wider DfT Government objectives for shipping and information needs to be effectively shared between the two organisations so that policy objectives can be pursued effectively.

ILO Maritime Convention

Work on the implementation of the ILO Maritime Convention has brought employment matters to the forefront of MCA work; however, the Shipping Industry has been advised that this work is again slipping behind schedule and that the revised target date of 2012 may now be missed.

The ILO Convention provides enhanced powers of enforcement to the regulatory authorities to check living and working conditions. RMT are concerned that the cutbacks in MCA funding will limit the amount of inspections, or the quality of the checks that can be made on an individual ship visit.

Penalties and enforcement action against sub-standard shipping must be strongly promoted in order that there are effective mechanisms to encourage compliance with all international safety instruments.

National Minimum Wage

RMT have been seeking clarification on how the National Minimum Wage gets enforced, even for the very limited rights that foreign national seafarers have on UK registered ships ie when the ship is in UK internal waters.

The MCA do not enforce the National Minimum Wage but do pass on information to the HMRC enforcement body, the National Minimum Wage Compliance Unit. So far identified cases of non-compliance with the National Minimum Wage have not been pursued by the Compliance Unit despite the fact that detailed evidence has been submitted.

It would be interesting to hear how potential breaches of UK domestic legislation could be identified by the MCA Inspectorate and in particular how effective joint work with HMRC could be developed.

Hour of work—enforcement

The MCA are responsible for hours of work regulatory enforcement and we continue to have concerns on this matter. This is despite the fact that MCA have advised us that ship inspections will not be affected by the substantial cutbacks that are being made at the organisation.

Seafarers are already permitted to work up to 91 hours per week and so it is a concern that certain shipowners attitudes to upholding the rules are less than rigorous. Indeed we know that in certain instances seafarers have
been encouraged to falsify time sheets. It is also an established fact that a high proportion of accidents at sea are related to fatigue.

A major difficulty is that the hours of work regime already permits very long hours of work and crewing levels are usually reduced by shipowners to the very minimum that MCA specify are required for a safe voyage. RMT therefore believe that an improvement in the level of enforcement action is actually necessary.

Safety Regulation

Finally we would also like to advise the committee that it remains our overall view that transport safety regulation be unified in order that best practice can be identified and a consistency of approach adopted. There should be an independent safety body not under the control of the Department for Transport. There will then be no possible conflicts of interest over its sponsorship of transport industries.

The above objective could most easily be achieved by the transfer of maritime safety to the HSE, although in order that technical expertise is not diluted upon transfer the maritime section would need to retain its own section within the HSE.

CONCLUSION

RMT have been assured that after the proposed cutbacks the same level of service will still be available to seafarers. We sincerely hope this is the case but not surprisingly we find it hard to believe.

There could well be a very sound reason to modernise the Coastguard service but it is surely not appropriate to do this alongside such a drastic cut in stations and personnel. The loss of local knowledge could clearly have adverse consequences for seafarers and passengers in the event of an emergency. It is intended by the MCA that 226 Coastguard staff are to be lost from a total of 600.

We would refer the committee to the previous 2004 Transport Committee call for an independent assessment of risks of coastguard closures and no doubt the committee will carefully consider this matter once again.

RMT is also concerned at the very significant reductions in staffing that will have to take place at the MCA Headquarters in Southampton, many of whom will have specialist maritime knowledge.

We hope that the committee finds our evidence useful when considering this matter.

January 2011

Further written evidence from the National Union of Rail, Maritime & Transport Workers (RMT) (MCA 08a)

INTRODUCTION

The National Union of Rail, Maritime and Transport Workers (RMT) welcome the opportunity to contribute to the Transport Select Committee inquiry on proposals for modernising the Coastguard, removing emergency towing vessels and the maritime incident response group.

The union represents the majority of UK seafaring ratings currently employed within the UK shipping industry.

As you will be aware the Union has already submitted substantial evidence to the Committee in relation to its Inquiry on the MCA. This evidence provides additional comment on the Coastguard, the removal of emergency towing vessels and the maritime incident response group. It also links up and restates some key points made in the first submission.

MARITIME COASTGUARD AGENCY

RMT agrees with the MCA insofar as our seas are becoming more congested, that ships are getting larger, that the coastline is getting busier and that weather conditions are becoming more extreme.

RMT also notes that the number of incidents to which the Coastguard has had to respond have increased dramatically, by almost 25%, over the past five years and agrees with the MCA that this pattern is likely to continue.

RMT understands that interoperability must be a priority for any vital national emergency service, and it is an objective which must be pursued. However, RMT believes that developing interoperability does not require a reduction in the services provided, or the times at which they are provided, or the numbers of staff required to deliver the service. Additionally, RMT believes that the development of interoperability and a nationally networked service should be introduced without loss of local knowledge and without any reduction in the number of Maritime Rescue Coordination Centres, or their opening hours.

In summary, RMT believes that the introduction of interoperability should be seen as an opportunity to increase the quality of the service provided, or as a minimum retaining existing levels of service, and not as a
means of reducing it. We believe that aiming for a minimum level of service is not appropriate in a safety critical service.

We have long standing concerns on the level of funding that the MCA receives. The latest round of cutbacks to MCA Head Office staff and front line emergency staff is therefore alarming. The MCA have agreed with the Department for Transport to cut funding by £80 million by March 2015. This is a massive 22% cut in current levels of funding in four years.

Furthermore, whatever internal discussions may have happened within MCA, it is clear that the outcome of the restructuring has been determined by the scale of the reduction in public sector funding available.

**Consultation with the Workforce**

RMT was shocked to learn that no consultation had taken place with MCA staff prior to proposals being put to Ministers, and that the proposals were not shown to the recognised trade union until the eve of the announcement. RMT therefore supports the call from the PCS for the current proposals to be scrapped and a genuine consultation exercise on the future of the Coastguard to take place with staff.

**Resources**

In the past RMT has expressed concern that constraints on the MCA budget have restricted the ability of the MCA to effectively police merchant shipping in UK waters. The duty of the MCA is to develop, promote and enforce high standards of maritime safety in the UK. In particular they safeguard the safety of ships and their crews by undertaking inspections of ships visiting UK ports.

In recent years there has been increasing concern over sub-standard vessels trading in UK waters. The union retains the view that there are not sufficient inspectors to undertake this important work. It is not just the number of inspections that are important but also how rigorous the actual inspections can be in the time permitted to undertake them.

RMT members believe that there is insufficient attention given to seafarers living and working conditions, even though the MCA are responsible for enforcing ILO Conventions on this subject. This is not through negligence by MCA Inspectors but merely a reflection of the resources that the agency has available.

Additionally, MCA have recently flagged up resources as an issue in meeting European requirements for inspections on high risk ships. MCA chief executive, Vice-Admiral Massey, recently told the All-Party Parliamentary Maritime and Ports Group “We are missing a number of priority one inspections at the moment because we do not yet have a workable arrangement for our surveyors to inspect ships outside of normal working hours”.

This development gives us real cause for concern that the MCA is underfunded for what it has to do. The growth in the UK merchant fleet has seen a massive increase in the demands placed upon the MCA and no commensurate increase in resources.

**The Impact of Public Spending Cuts on the MCA**

RMT believes that the public spending cuts currently being undertaken will have a detrimental effect on the quality of service available to seafarers. A fully resourced MCA would play a vital role in maritime safety. However, MCA intend to scrap the Nimrod Maritime Patrol Aircraft, terminate the ETVs and drastically reduce the number of Maritime Rescue Co-ordination Centres.

The reduction in the number of emergency towing vessels could have an impact on UK seafaring and incentives for companies to operate in UK waters. For example, the grounding of HMS Astute, a nuclear submarine, required an ETV to tow it. The vehicles play an essential role in maritime safety.

The reduction in number of Maritime Rescue Co-ordination Centres from 18 to just eight is a massive cut and one that will undoubtedly reduce service levels, and also reduce local, specialised knowledge from the MCA. It should be noted that only three of these MRCCs will open 24 hours a day, a stark contrast to the 18 which are currently open 24 hours a day.

**Crewing Levels**

One of the principle concerns of the MCA for RMT members has been the lack of consultation over changes to crewing levels that have been authorised by the MCA. Shipowners have frequently been able to get sign off for revised crewing levels by the MCA without any consultation with RMT. RMT wish to have the opportunity to comment on proposals to change crewing levels before they are agreed, in contrast to the employer led arrangements which are currently in place.

**ILO Maritime Convention**

Work on the ILO Maritime Convention has brought employment matters to the forefront of MCA work, however, RMT is now concerned that this is slipping behind schedule.
The ILO Convention provides enhanced powers of enforcement to the regulatory authorities to check living and working conditions. RMT are concerned that the cutbacks in MCA funding will limit the amount of inspections, or the quality of the checks that can be made on an individual ship visit.

Penalties and enforcement action against sub-standard shipping must be strongly promoted in order that there are effective mechanisms to encourage compliance with all international safety instruments.

**Hours of work—Enforcement**

In our earlier submission we highlighted our concern regarding the enforcement of the hours of work regulations.

Seafarers are already permitted to work up to 91 hours per week and so it is a concern that certain shipowners attitudes to upholding the rules are less than rigorous. Indeed we know that in certain instances seafarers have been told to falsify time sheets.

**Emergency Towing Vessels**

As stated earlier, the withdrawal of emergency towing vessels will have an impact on safety in UK waters.

We referred earlier to the grounding of HMS Astute, a nuclear submarine which required an ETV to tow it. Another example is the rescue in November 2010 of The Red Duchess which was helplessly drifting within half a mile of the shoreline after she lost all power to the engines off Rum in a Force 7 gale. There was a clear danger to the crew, the cargo and other vessels. The vehicles clearly play an essential role in maritime safety.

It has also been brought to the attention of the RMT that no risk assessment has been conducted into the scrapping of the ETVs to date. In our view this is completely unacceptable.

RMT believes that it is highly unlikely that the industry, or their insurers, will provide a suitable alternative to the ETVs and as such, that the UK Government has a responsibility to both crew and passengers in providing ETVs.

**Maritime Incident Response Group**

MCA chief executive, Vice-Admiral Massey, has previously told the transport committee that the MCA had been instructed by the DfT to review the arrangements for the Maritime Incident Response Group to see how it could be provided in the future at no cost to government.

However, one recent internal report prepared for the MCA by consultants BMT-ISIS, states that the elimination of the provision of a MIRG service is not considered to be an option, pointing out that the MCA has invested in the formation of MIRG, and UK fire services have invested in supporting and providing it.

The report says that the MIRG is appropriate for consideration as an ongoing option, with adjustments, but also said the option of transferring the provision to alternative providers, such as private contractors or naval fire fighters, was not found to be appropriate.

It states that a fire that results in fatalities of crew or passengers could be expected with a probability of 1 in 100 fires per year, far exceeding a 1 in 1,000 acceptable risk threshold.

RMT believes that the MIRG is an essential, life saving service and one which cannot be adequately provided by the private sector. RMT believes that the UK Government has an equal responsibility in providing fire services for those in its territorial waters as it does on the mainland.

**Conclusion**

RMT is opposed to the cuts being imposed at the MCA, the Coastguard stations, the ETVs and the MIRG. We are firmly of the belief that these cuts will be severely damaging to the industry and subsequently to those employed in the industry.

As our territorial waters get busier, RMT believes that maritime safety should have investment not substantial cut backs, and not be reliant on volunteers, or for that matter industry players whose primary motive is profit.

Additionally, RMT welcomes the fact that the privatisation of SAR services has been placed on hold. RMT believes that such services must be directly publically accountable and not put out to tender. The view of RMT is that the failed tendering process, which failed due to “irregularities”, has provided both the DfT and the MoD with the opportunity to reverse privatisation.

We hope that the committee finds our evidence useful when considering this matter.

April 2011
Written evidence from Nautilus International and Prospect (MCA 09)

INTRODUCTION

Nautilus International is the trade union and professional organisation representing almost 23,000 shipmasters, officers, cadets, ratings and other maritime professional staff working at sea and ashore—including MCA employees. Prospect is a trade union representing nearly 120,000 members who are predominantly professionals and specialists working in both the public and private sector. We are a recognised trade union within the MCA and collectively bargain on behalf of Marine Surveyors and other professionals in the Agency.

The Unions welcome the Transport Committee’s decision to conduct an inquiry into the work of the MCA and the issues within its remit.

Britain is an island nation, highly dependent on shipping for its economic and strategic wellbeing. As the Department for Transport agency responsible for regulating the UK merchant fleet, controlling seafarer standards of training and certification, and monitoring and enforcing national and international maritime safety regulation, the MCA has a highly significant and important role.

Nautilus and Prospect are strongly supportive of the MCA’s core functions and responsibilities and we believe it has a record to be proud of. However, we believe there is evidence to demonstrate the validity of our concerns about the increasing pressures faced by the Agency in upholding high standards on UK ships and on foreign vessels visiting our waters. We are particularly concerned that the impact of government spending cuts will have a seriously detrimental effect on the MCA’s ability to discharge vital safety duties and will exacerbate existing problems that have been identified in previous investigations.

State spending on shipping lags behind other transport sectors, despite its increasingly significant contribution to the national economy. We are concerned that the relatively low level of government spending on the maritime sector translates through to severe economic pressures on the MCA, which in turn have resulted in proposals for changes in the way it delivers its services.

The Unions argue that the significant expansion of the UK merchant fleet, coupled with the growth in the issue of Certificates of Equivalent Competency (CECs) and the additional survey and inspection demands generated by the surge in seaborne trade over the past decade, should have led to a matching increase in the survey and inspection resources at the MCA.

In fact, surveyor numbers have fallen—and the Unions fear this reduces the ability of the MCA to enforce key safety regulations, including seafarers’ hours of work and rest, and onboard working conditions.

Shipping remains an essential industry for the UK. More than 90% of the nation’s imports and exports come and go by sea, and ministers have acknowledged that trade is critical to economic recovery. Furthermore, given the huge potential costs, environmental damage and loss of life that can arise as a result of maritime accidents, it makes economic sense for adequate investment in the MCA to ensure the safe and efficient operations of all shipping running in and out of UK ports.

MCA RESOURCES

Under the current Department for Transport spending reductions, the MCA budget will be reduced by 22% by March 2015. However, even before the outcome of the government’s public spending review was determined, there was clear evidence of the MCA suffering practical problems in being able to meet all its responsibilities and strategic objectives. The Unions had raised concerns that reductions in MCA staffing and a restructuring of operations announced in 2008 amounted, in effect, to cutbacks which were driven by financial pressures.

The Unions have been especially concerned that the Agency’s staffing and resources have not been developed to meet the additional survey and certification requirements arising from an influx of tonnage to the UK flag since the tonnage tax scheme was introduced in 2000, as well as the demands of important new international safety and security regulations, such as the new Paris MOU port state control inspection regime, the International Ship & Port Facilities Security Code, an extension of the ISM Code to cargo vessels trading internationally, the domestic passenger safety management code, and the forthcoming Maritime Labour Convention.

In particular, the Unions are concerned that the number of surveyors involved in survey and inspection work has fallen at a time of continued increases in demands on MCA professionals. The scale of the challenge is underlined by figures showing that the number of UK merchant ships increased from 1,050 to 1,502 since the launch of the tonnage tax and the end of 2010, with 80 new ship registrations last year alone. In parallel with the growth of the fleet, the number of certificates of equivalent competency being issued by the MCA rose 46% between 2003–04 and 2007–08. In fact, ship survey and inspection work rose by some 33% between 1999–2000 and 2007–08 and the MCA has also had to adjust to a new pattern of inspections as a result of significant changes in the key trading areas of UK ships—with more than half of the fleet not calling to UK ports in 2007, compared with one-third in 2000.

Workload was also increased by the number of seafarer certificates having to be issued for seafarers serving on the ships coming to the UK register. Between 2003–04 and 2007–08 alone, the total rose from around 6,400
to 7,700—almost entirely attributable to growth in the issue of UK CECs. Nautilus has been particularly concerned about the need for better control over the CEC process and to analyse in depth the impact of the increasing numbers of CECs being granted by the MCA. The Agency has a responsibility to ensure that holders meet certain basic standards, however Nautilus is concerned that even these low level checks are failing to ensure the application of fundamental safety principles. In addition, Nautilus believes that if the issue of CECs is restricted to the numbers actually required by shipping companies, the administrative burden on the MCA will be significantly reduced.

UK QUALITY

Nautilus and Prospect are proud of the UK ship register’s long record as a flag of quality and believes that the favourable loss and detention records are a testament to the skills and professionalism of seafarers, and of the MCA’s commitment to maintaining standards in the face of intense pressure on resources. We welcome the fact that the Agency has prevented a significant number of foreign ships from joining the register because of concerns about their quality and has tightened its criteria in response to evidence of problems arising from the influx of tonnage immediately after the introduction of the tonnage tax scheme.

However, whilst the PSC and loss rates are generally exceptional, we do note with concern the Paris MOU port state control statistics showing that the percentage of UK-registered ships found with deficiencies rose from 37.3% in 2005 to 48.7% in 2009.

While UK-flagged vessels have a markedly superior safety record than the world fleet average, and the UK register also boasts one of the world’s best port-state control inspection/detention ratios, it has slipped since 2000 from second place to fourth place in the Paris MOU “whitelist” and there can be no room for complacency. Nautilus and Prospect believe that there are a number of recent trends (supported by significant case histories), which give cause for concern.

Of note are statistics showing a rise in the rolling average of crew deaths on UK registered merchant vessels (from 2.7 in 2000–02 to 4.0 in 2004–06 to 7.1 in 2006–09). Similarly, while the accident rate per 1,000 UK merchant vessels reduced significantly from 225 to 76 between 1997 and 2007, it is of concern that it subsequently rose to 86 in 2008 and 89 in 2009.

The unions have been disturbed by signs that the MCA has faced growing political and commercial pressure to attract tonnage to the UK flag, and that its role in promoting the UK Ship Register can inherently conflict with its role as safety watchdog.

To illustrate this, we would highlight such cases as the Hyundai Dominion (where an MAIB report revealed problems such as breaches of the working time rules, communication difficulties amongst the multinational crew, and deck officers unable to use the engine controls on the bridge), the Morning Miracle (where the Union contended that fire-fighting arrangements breached the intentions of the IMO International Safety of Life (SOLAS) Convention 1974 as amended), and the Maersk Doha (where an MAIB report highlighted safety issues including communication difficulties among the multinational crew and shortcomings in maintenance, emergency drills and procedures).

We believe our concerns were endorsed by the 2009 National Audit Office inquiry into the MCA’s response to the growth of the UK merchant fleet, which warned that “there are signs that the quality advantage of the UK flag, which came from its high standing in international rankings, is starting to erode”. The NAO also found that even though owners had pledged to switch significant amounts of tonnage to the UK flag if the tonnage tax was approved, the MCA had failed to make specific plans for handling the workload associated with potential growth before the scheme was launched in 2000. The Agency had made no assessment of likely fleet growth on its workloads and resource requirements—and it failed to carry out any detailed work to forecast potential fleet growth until 2006.

PROFESSIONAL STAFF

Nautilus and Prospect are concerned that, rather than increasing professional survey staff numbers to respond to these increased demands, the MCA has instead sought to delegate more survey work to classification societies. The amount of statutory survey work being delegated to classification societies rose from around 80% in 1999 to around 85% by 2009. The Unions are concerned that this dilutes the Agency’s ability to directly monitor and enforce safety standards as well as removing such responsibilities from a “state” framework which is both independent and free from commercial or competitive pressures.

The NOA report noted concerns among surveyors and some owners and operators that “if the Agency delegated more of its survey work it would run the risk of losing the core capacity essential to maintaining a strong flag state role”.

MCA surveyors also told NOA investigators that shortages are “constraining their ability to undertake comprehensive surveys and inspections, and to achieve targets”. The number of marine surveyors in post in 2007–8 was 158, compared with a complement of 178, while the marine offices had a staff complement of 141, but only 122 staff in post. What is of immense concern now are reports suggesting that the MCA will be seeking to reduce surveyor numbers by around 25%.
The Unions have had concerns for many years now about the evidence of recruitment and retention problems for MCA professional staff, with the age profile meaning that substantial numbers of existing surveyors are approaching retirement at a time when a reduction in the pool of suitably qualified personnel, and difficulties in competing on pay and conditions (around one-third of the surveyors who resigned in the past four years gave pay as a reason), are making it harder to find their replacements. Indeed, in 2007 the then Chief Executive, in a submission to the Treasury stated that the Agency would increasingly face a recruitment and retention crisis unless there was a significant increase to the pay of surveyors.

However, despite this recognition of an impending staffing crisis many surveyors have seen their real terms pay fall over the past four years. The staffing situation in the MCA is not helped by the industrial dispute, which has been ongoing for surveyors and other similar grades since 2007.

The Unions believe there is a serious need for measures to address low morale and to recruit and retain sufficient numbers of skilled and experienced professionals. MCA surveyors and coastguards provide vital safety and emergency support and it is unacceptable that their conditions of service are such that they feel it necessary to embark upon industrial action. There is evidence that continuing low morale and ongoing industrial action over pay and conditions has affected key areas of the MCA’s safety work, such as compromising the Agency’s ability to undertake inspections of high-risk overseas flagged vessels at weekends.

Nautilus and Prospect also consider that these problems are not confined solely to professional surveyors, but also to other specialist personnel within the MCA. As noted earlier, demands on the MCA have increased dramatically—but staffing and resources have not increased commensurately: indeed, they have been reduced. Last year saw 131 people leave the MCA, and a net loss of 61 staff. Posts affected by leavers included ship safety technical support, environmental and vessel traffic management policy leads, hydrography manager, seafarers’ manager, safe manning manager, hydrography and SAR specialists, and watch officers and watch managers.

**International Obligations**

The Unions are deeply disturbed that the financial pressures experienced by the MCA are having a highly negative impact on the UK’s ability to comply with critically important international maritime conventions and regulations.

We do not believe there has been sufficient investment in professional staff to underpin the effective application and enforcement of measures such the ISPS Code, ISM (on deepsea and domestic ships), and the response to the growing regulatory focus on “human factor” and “decent work” issues. The commitment to adopt and implement the ILO’s Maritime Labour Convention 2006 will significantly increase the need for surveyors to have competence in dealing with a very wide range of “human element” and social measures—ranging from terms and conditions of employment to hours of work and rest—and it is essential that there are sufficient surveyors, suitably trained and experienced, to police these standards.

We believe that staffing and resources issues have hampered the UK’s ability to progress the necessary legislative changes to enable MLC ratification by the EU target date of end-2010.

In addition, we are concerned that the UK has been unable to implement EU Directive 2009/16/EC on port state control, again because of a failure to put the legislation in place to fully implement the directive. Despite the importance of this directive, the UK lacks the required new PSC regulations and has also failed to update vessel traffic management regulations or put an appropriate computer system in place to implement the system. The PSC inspectors have also not been equipped with the necessary portable IT equipment to enable them to work within the new PSC database, Thetis.

The Agency has also failed to secure a negotiated agreement on out of hours conditions, which means that there are no surveyors available on weekends to do mandatory PSC inspections. The lack of suitable IT equipment means that mandatory information about actual ships’ arrival and departure has to be put in manually by individual marine offices and that inspection reports cannot be directly inputted into the Thetis data base, as required by the EU Directive.

The failure to implement the directive by 1 January 2011 means that the UK will not be able to comply with the provisions for banning repeatedly offending vessels from EU ports and all of these failings raise the risk of European infraction proceedings which could financially far outweigh any spending on personnel or equipment.

**Cuts Programme**

Nautilus and Prospect are profoundly concerned at the potentially disastrous impact of proposed government spending cutbacks which mean a reported 21% reduction in the Department for Transport’s budget over the next four years and which will affect essential safety and support functions administered by the MCA.

The Unions believe the UK is gambling with the safety of lives and the environment with its plan to end the contract for the four emergency towing vessels (ETVs), which provide crucial salvage back-up in the event of shipping accidents and which were introduced in response to the Braer and Sea Empress tanker disasters. We are also alarmed by the government’s associated announcement that the future of the Maritime Incident Response Group is in question as part of the cost-saving programme.
Ending the ETV service will save a total of £32.5 million over the spending review period and scrapping MIRG will save a further £340,000 a year.

The government argues that state provision of ETVs does not represent a correct use of taxpayers’ money and that ship salvage should be a commercial matter between a ship’s operator and the salvor.

The government claims that MIRG had not been involved in any significant incidents since its launch. “All ships’ crews are trained in basic firefighting techniques and there is little evidence that MIRG has changed the outcome of ship fires”, the DfT argued. The Unions consider the thinking behind these proposals to be utterly incomprehensible.

ETVs

The ETVs were put in place for extremely good reasons, following reports into two terrible tanker disasters, and their success has proved to be a model for other countries.

The number of recent incidents and near-misses in the Channel alone serves to demonstrate the value of these vessels, and it is clear that the government is running a significant risk in removing the protection they provide. A series of incidents since the announcement was made further underlined the importance of having the ETVs in place.

ETVs were first introduced in 1994—initially on a trial basis—as a result of recommendations made by Lord Donaldson in his “Safer ships, cleaner seas” report following the Braer and Sea Empress tanker disasters.

Lord Donaldson’s inquiry highlighted emergency assistance as a key factor and warned that salvage tugs were becoming “an endangered species”, with insufficient provision around the UK coast to prevent a potential disaster from becoming an actual disaster. His findings were starkly illustrated by the Marine Accident Investigation Branch report into the Sea Empress disaster, which found that the tug power available to take the grounded tanker to safety was inadequate.

It was calculated that some 900 tonnes of total bollard pull would have been needed to undertake the holding operations for the 147,243dwt tanker. Five tugs has been unable to restrain the tanker in deteriorating weather conditions, and it grounded three times before being refloated and towed into port by 12 tugs.

However, the problems were not simply an issue of power, but also of the suitability of equipment and of the available tug types. One of the largest tugs sent to assist the Sea Empress was an ocean-going salvage tug whose deep draught was not suited to holding the tanker in the relatively confined waters.

The MAIB report concluded: “If a powerful and manoeuvrable tug such as an AHTS had been based there and summoned to assist in the very early stages of the operation it would have improved the chances of safely holding the casualty in the ‘pool’”.

A subsequent study showed that the Sea Empress incident cost as much as £109 million, with an associated economic impact of between £50 million and £98 million.

It was also estimated that another major incident on a similar scale could be anticipated in UK waters every 12 years.

Initially, ETVs were stationed at Dover and Stornoway for the winter months only, but following a further review the numbers were increased to four and the cover was provided on a 24/7 year-round basis.

Nautilus points out that the decision to extend ETV coverage was taken in 2001 following a detailed cost-benefit analysis which concluded that it would be cost-effective to provide a fourth ETV based in the Shetland Islands and for all the vessels to operate throughout the year.

In coming to its decision, the Maritime & Coastguard Agency noted that “trends indicate the UK coast is exposed to potential pollution threats due to larger vessels carrying more bunker fuel oil and an increase in large cruise vessels both visiting UK ports and transiting UK waters, as well as laden tankers such as Very Large Crude Carriers. The deployment of Emergency Towing Vessels to stop drifting vessels grounding on a lee shore or as passive escorts to laden tankers, has proved very successful as a proactive means of pollution prevention”.

Even after this extension, concerns continued about the adequacy of specialist towing vessel cover—notably in the Irish Sea and there had been talks between the UK and Irish governments over a potential agreement to provide an ETV based in Milford Haven, which was a minimum of nine hours of steaming time away from the nearest vessel.

Nautilus and Prospect believe that all the reasons why the ETVs were put in place remain valid, and we cannot see what has changed to render the previous cost-benefit analyses redundant. We simply cannot accept the government’s argument that the role of the ETVs can be picked up by the private sector. It did not work before, and the issues of salvage capacity highlighted by Lord Donaldson are still relevant today. Cancelling the ETV contract on the grounds that the vessels have not been used very much in recent years is like cancelling your home insurance because you haven’t been burgled—it just doesn’t make sense.
MIRG

MIRG was also created for good reasons, following long-running concerns over the decline in the number of fire brigades capable of delivering emergency support at sea. At one stage before MIRG was launched, only nine of the 39 fire and rescue services around the whole of the UK had the capacity to provide services to shipping. In response to this decline and the loss of support for the Coastguard in responding to emergencies at sea, the Maritime & Coastguard Agency commissioned a research project in September 2002.

This study identified a need within a more formalised integrated strategy to consider other shore-based emergency responders, such as paramedics, and it resulted in the government’s agreement to establish MIRG with 15 specialist fire and rescue services around the UK.

Each MIRG team consists of around 50 specially-trained fire-fighters and paramedics who operate in nine-strong teams that can be flown by helicopter to incidents up to 250 miles out to sea with a target response time of 45 to 60 minutes.

The MIRG now involves more than 700 fire-fighters around the UK who work to similar national standards for responding to incidents of fire at sea. The service also aims to assist seafarers in dealing with chemical incidents onboard their ships, and handling such emergencies as freeing trapped personnel.

The government claims that since the MIRG teams began operating in 2006 they have not been involved in any significant incidents. “All ships’ crews are trained in basic fire-fighting techniques and there is little evidence that MIRG has changed the outcome of ship fires,” the shipping minister stated.

However, this is disputed by former Chief Fire Officer Mervyn Kettle, who was project manager for the MCA’s National Firefighting at Sea study and was directly responsible for the development of many of the national Fire & Rescue Service (FRS) maritime standards now in use. He said the recent incident onboard the ship Athena highlights the importance of retaining offshore fire-fighting capability and said it would be extremely unwise, after spending almost £3.4 million in researching and introducing the MIRG, to end it. In these times of heightened national security, to reduce the nation’s capability in dealing with the possible aftermath of a terrorist incident at sea, as originally identified in the Civil Contingencies Act 2004, could have disastrous consequences.

The reasons why MIRG was created in 2006 remain valid today. Ships have been getting bigger, carrying more passengers than ever before, as well as hazardous and often complex cargoes. At a time when crewing levels have been reduced significantly, it is essential that seafarers are given the back-up and support of properly trained specialist teams to handle the huge challenges that can arise in emergency situations.

Whilst ministers claim there is little evidence that MIRG has changed the outcome of ship fires, teams have been involved in some high-profile cases including a fire and loss of power on the cruise ship Calypso, a severe engineroom fire onboard the passenger ferry Oscar Wilde, and a fire in the cargo hold of the Dutch ship Sea Charente.

When MIRG was launched, transport minister Alistair Darling said there had been incidents at sea which could have had catastrophic consequences had they not been brought under control quickly. The Unions believe nothing has changed to alter this assessment and that any savings that will be made by abolishing MIRG are not worth the risk of a major disaster involving loss of life or environmental pollution as a result of shortfalls in safety cover.

The proposed savings represent a drop in the ocean in terms of the overall DfT budget, but the loss of these services could make the difference between life and death or a major environmental disaster.

THE COASTGUARD

The MCA has also announced details of proposals for “very big change” in the structure of the Coastguard. This includes a reduction in the number of MRCCs from 18 to eight, of which five would run on a daytime-only basis. It would also mean the loss of 226 Coastguard staff over the next five years. Whilst the consultation documents suggest these proposals have been tabled to reflect advances in technology, it is hard for Nautilus and Prospect to avoid the suspicion that cost-cutting is also a significant influence in the proposals—indeed the scale of the likely savings is referred to. Certainly, the Unions believe much more must be done to demonstrate that valuable local knowledge and expertise will not be lost as a result of redundancies and centralisation of the MRCCS. This concern has been present since previous Coastguard station reductions were tabled in the 1980s and 1990s, and was the subject of an investigation by Lord Donaldson which expressed caution over the need to retain such expertise.

SUPPORT FOR SHIPPING

Nautilus and Prospect have extreme concerns about the government’s decision to review the future of its Support for Maritime Training (SMarT) scheme, which is administered by the MCA. The shipping minister has announced that work will be carried out over the coming year to “consider the continuing requirement for government support for training and skills development in this sector”.

Although the government has ring-fenced £12 million of SMarT funding for the next financial year, to help contribute to the training of up to 1,000 new cadets and ratings, and for ratings studying for officer qualifications, it has put the long-term future of the support into doubt.

Given the new research showing the critical need to maintain recruitment and training to avert a major national and international seafaring skills crisis, it is essential for the UK’s future as a maritime nation that we continue to safeguard our supply of officers and ratings.

A separate review of UK tax allowances—including the tonnage tax scheme, also in part administered by the MCA—has raised further questions about the government’s continued support for the shipping industry.

The Unions are very concerned that there is a broad picture in which the entire network of maritime-related expenditure is apparently at risk. The way in which the framework of support for the shipping infrastructure is being chipped away at raises major questions about the government’s commitment to the maritime sector. Spending on shipping adds up to a tiny fraction of the overall DfT budget, yet the industry has been one of the country’s biggest earners and ministers acknowledge that the industry, and its role in international trade, is of critical importance to economic recovery.

Shipowners repeatedly say that the thing they need is fiscal stability, but these cutbacks are also helping to destabilise the financial regime that they work within and do nothing to help the competitiveness of the UK flag. Nautilus and Prospect believe the government must now work with the industry to develop an agreed maritime policy with clearly defined strategic objectives for the future of the UK fleet and the national seafarer skills base. It is time to revisit the goals that were set in the Charting a New Course policy package at the start of this decade and to provide the industry with reassurance that the government is committed to the future of its maritime sector.

Conclusions

— Nautilus and Prospect believe this is an extremely important inquiry and the subject is one that has immense implications for the safety of ships, the safety of seafarers and the protection of the environment.

— We do not believe the MCA has been given the resources and staffing it needs to meet increasing national and international regulatory responsibilities

— Serious problems are arising as a consequence, raising concerns about the Agency’s ability to maintain the quality of UK ships and their crews and the UK’s broader commitment to “decent work” and other “human factor” policy programmes

— Staffing and resources issues are particularly acute in the professional areas of the MCA and measures are required to address recruitment and retention

— Proposed cutbacks, leading to the loss of vital services such as ETVS and specialist offshore emergency services, threaten to have grave consequences for safety in UK waters

— Further cuts in shipping and seafarer-related support measures administered by the MCA could reverse the recovery in the UK flagged merchant fleet and the recent growth in UK seafarer training

— The government needs to reassess the shipping policies laid out in the Charting a New Course programme and work with all sides of the industry to set agreed strategic goals and objectives for the UK maritime sector

January 2011

Written evidence from the Department for Transport (MCA 10)

1. This note sets out the work of the Maritime and Coastguard Agency (MCA).

Background

2. The MCA was established on 1 April 1998. It is an executive agency of the Department for Transport (DfT). The MCA’s income from services to shipping and seafarers is a relatively small part of its resources. Unlike other DfT Agencies, the MCA is not a trading fund. The Agency’s responsibilities are for the implementation of the Government’s maritime safety policies, including providing the DfT with technical expertise in support of its broader role to develop maritime policy. The Agency Owner is Richard Hatfield, Director-General for International, Strategy and the Environment in the DfT.

3. Vice Admiral Sir Alan Massey became the Agency’s Chief Executive in July 2010. The Agency is organised principally into three Directorates dealing with all customer-facing operations (Maritime Services), people and infrastructure (Corporate Support) and financial management and corporate compliance (Finance and Governance).

4. The MCA’s headquarters is in Southampton. The Registry of Shipping and Seamen is in Cardiff. The MCA’s operational functions are currently managed from 18 Maritime Rescue Coordination Centres (MRCCs), a separate London search and rescue unit based with the Port of London Authority, and 18 Marine Offices
providing a ship survey and inspection service. The Agency has an estate of some 500 properties, the bulk of which are small sites for the volunteer Coastguard Rescue Teams (CRTs), and include remote radio sites around the coast of the UK.

**Staffing**

5. As of 31 December 2010, the Agency had the following posts:
   - Regular Coastguards—549.
   - Marine Surveyors—192.
   - Other Operational Delivery/Support—333.
   - Business Support—106.
   - **Total**—1,180.

**Agency Activity**

6. The Agency’s work ranges across a spectrum of activity that has accident prevention measures at one end, and maritime search and rescue coupled with emergency response at the other. The Agency represents the UK’s interests internationally on many technical matters and implements agreed standards, sets technical safety standards domestically, manages the UK Ship Register, surveys UK-registered vessels and uses periodic inspections to check the ongoing safety of UK vessels (and foreign vessels visiting the UK), provides examination and certification services for seafarers, manages the hydrographic survey programme and maritime weather forecasts, monitors shipping traffic in the busy Dover Strait and the approaches to the Thames, and responds to maritime emergencies to save lives and protect the marine environment. The Agency’s work and ethos is captured in its strap line: Safer Lives, Safer Ships, Cleaner Seas.

**International representation**

7. Shipping is an international business. Many safety standards are agreed across the whole maritime industry primarily through the International Maritime Organization (IMO) and the International Labour Organization (ILO), or at the European level. In these international forums, the UK is a respected, prominent and effective player and the MCA will often lead technical negotiations for the UK. The Agency works closely with policy colleagues in the DfT and other Government Departments.

8. Once negotiated, international safety conventions, instruments and Directives must be transposed into UK law with associated interpretations and guidance. As well as legislation, the MCA issues expert advice and safety recommendations on good practice through its Marine Notices.

**Domestic technical safety standards**

9. Not all standards are set internationally. The safety of fishing vessels is an example. This has been a concern for the Marine Accident Investigation Branch (MAIB) for several years, who judge fishing to be the UK’s most dangerous occupation. In the last few years the Agency has had improvements in fishing vessel safety as one of its safety themes. The Agency works with the industry training organisation, “Seafish”, and fishermen’s representative bodies to encourage fishing safety. Work has included the development of Codes of Practice, the production of a DVD with the RNLI and Seafish on flooding, and using Facebook to engage with young potential and actual fishermen to build a safety culture from an early age. This is a slow, careful process and an impact on accident rates will take time.

**The UK Ship Register**

10. The Agency manages the UK Ship Register. There are currently 1,502 merchant ships over 100 gross tonnage (GT) on the UK Ship Register with a combined gross tonnage of 17 million GT. In the DfT’s Business Plan 2011–2015 the Government has stated its commitment to encouraging new ships, or existing ships with a good safety record, to join the UK Ship Register. One broad indication of quality is a ship’s age and the average age of vessels on the UK Ship Register is has fallen in the last three years from 20 to 18 years. This is because older ships have left the Register to be replaced by newer tonnage. The average age of ships leaving the UK Ship Register in the last three years has been over 15 years, while those joining have been less than five years old.

11. The MCA target in relation to the quality of the UK Ship Register is Maintain the quality of the UK Ship Register by reducing the level of deficiencies recorded on UK ships inspected abroad, and maintain a position on the Paris MOU White List which is comparable to registers of a similar size and reputation. Few UK-registered ships are detained abroad, and the UK Ship Register has consistently maintained a high position on the Paris MOU White List of ship registers.

12. The Registry of Shipping and Seamen, based in Cardiff, is responsible for the registration of all UK flagged vessels, including maintaining the Fishing and the Small Ships Register. Other responsibilities include issuing seafarer Discharge Books, revalidation of Certificates of Competency, the registration of births and deaths at sea, and the issue of Merchant Navy Campaign Medals.
Surveys of UK-Registered Vessels

13. Merchant ships on the UK Ship Register undergo in-depth ship surveys. Under international maritime law all vessels must hold relevant, up to date safety certificates. Surveys are periodic and mandatory and are undertaken either by the Agency’s surveyors or a recognised Classification Society before certificates are issued or renewed. They cover specific items such as construction, equipment or operations on board a ship. Certificates are valid for between one and five years and may require intermediate surveys at set intervals. Vessel owners must ensure that surveys are undertaken and, with the exception of security-related surveys and, currently, International Labour Organisation inspections, they must pay for them.

14. Around 85% of this work is delegated to Classification Societies, which are audited by the MCA. The Agency’s own Marine Surveyors carry out the non-delegated survey work for all passenger ships, and surveys for other ship types focused on safety equipment and ship operations (compliance with the International Ship Management, or ISM, Code). The emphasis on ship operations reflects MAIB evidence that around 80% of shipping accidents are attributable to human error. The Agency oversees around 3,600 surveys annually.

15. About half of the ships on the UK Ship Register never visit the UK and their surveys are conducted overseas. The MCA charges fees for the ship survey service on a full cost-recovery basis.

Inspections to check the safety of UK and foreign vessels visiting the UK.

16. Compliance with safety requirements is also enforced through the MCA’s inspection regime. The highest profile inspections are of foreign ships visiting UK ports through the Paris MOU Port State Control arrangements. Under a new European Directive that took effect on 1 January 2011, high risk vessels are inspected according to a risk scoring matrix built around safety factors. The new regime moves away from setting a 25% blanket inspection target where good ships were as likely to be inspected as poor ships just to meet the percentage target. The New Inspection Regime (NIR) aims to eliminate substandard shipping by increasing the frequency of inspection of “high risk” ships, while reducing the frequency of inspection of “low risk” ships, to reward good operators.

17. The Agency has a target to Meet the internationally required targets to inspect foreign vessels in UK ports under Port State Control arrangements, with an increasing emphasis on inspecting available ships judged to be high risk. In 2009–10 this target was focused on the 25% hit rate for inspections. The Agency achieved that inspecting 25.75% of foreign ships visiting the UK.

18. Other inspections include checks on the safety of fishing vessels, and the domestic fleet of small passenger ships, including the ro-ro passenger ships operating between the mainland and the many islands off our coast, and also the sightseeing vessels on the tidal River Thames. Annually the Agency conducts around 7,600 inspections, of which only 1,700 are Port State Control inspections of foreign ships.

19. Inspections are selective and check that vessels continue to meet the conditions under which its certificates were issued. Inspections are not delegated to Classification Societies. The Marine Surveyor will use their professional judgement to determine the scope and depth of an inspection. Any deficiencies are recorded and the owner must take action by a deadline. If deficiencies are significant, a Marine Surveyor can detain the vessel until satisfied it is safe to set sail. There is no charge for inspections, except where there is the need for a follow up inspection after a detention.

20. MAIB reports have indicated that seafarer fatigue is a major contributor to maritime accidents. The MCA has adopted tackling seafarer fatigue as a safety theme. The Agency’s inspectors look closely at ships’ records of work and rest. Surveyors draw on their professional expertise to assess whether the records appear accurate. The Department is working at the IMO to encourage a review ship safe manning requirements, and is implementing the provisions of the consolidated Maritime Labour Convention into UK law. The Convention has been developed internationally with the full involvement of the ship owning community and the seafarer unions.

Supportive of the Shipping Industry

21. The MCA’s survey and inspection arrangements aim to support vessel owners and operators by encouraging compliance with safety rules and standards. Marine Surveyors are flexible and pragmatic in their approach and will consider alternative and equivalent ways of meeting safety standards.

22. However, when operations are clearly unsafe and owners, operators or individuals are jeopardising safety, the Agency will investigate and take prosecution action where necessary. The MCA investigate around 100 significant breaches of merchant shipping legislation annually.

Examination and certification services for seafarers

23. As well as inspecting ships, the MCA has a role in making sure that seafarers are properly qualified to serve on UK-registered ships. Seafarers must hold a valid Certificate of Competency to serve on a UK-registered ship, or a Certificate of Equivalent Competency based on a valid CoC issued by another recognised State. The MCA checks that seafarers have the right skills and sea-time for these certificates, and through its Approved Doctor arrangements the Agency also checks that seafarers are medically fit. This work includes the
oral examination of seafarers as they move through the officer ranks through to Master Mariner and Chief Engineer level. Work also includes the certification of skippers on inland waterways vessels through the Boat Master’s Licence requirements, introduced after the 1989 Marchioness tragedy on the River Thames. The Agency deals with around 15,000 seafarer documents annually.

**Hydrographic survey programme and maritime weather forecasts,**

24. The MCA also manages the national programme of Civil Hydrography which lets contracts for hydrographic surveys of the seabed, the data from which is then used by the UK Hydrographic Office to update nautical charts and publications. The Agency invests around £5.4 million annually in the Civil Hydrography Programme and priorities for checks are set in consultation with the shipping industry and other interested parties. Similarly the Agency works with the Met Office to provide mariners with bespoke weather services, including the BBC Radio 4 Shipping Forecast.

**Recreational Safety**

25. Although the MCA have no regulatory remit for non-commercial recreational boats, or in relation to the public use of beaches or our coastline, it makes sense for the Agency to educate the public to reduce the risk of accidents in order to optimise the deployment of search and rescue resources. The MCA’s Recreational Safety Strategy encourages people to: get trained; check the tides and weather; avoid alcohol; wear a lifejacket; and keep in touch. The MCA has been working particularly closely with the RNLI and the RYA on a joint lifejacket campaign. Through the National Water Safety Forum the Agency has been a strong supporter of the Water-related Incident Database (WAID) which will bring together all water-related incident data into one comprehensive dataset. The 2009 data will be the first to be finalised and made available through WAID. Extensive work is underway to check, match and merge all incidents recorded from all sources.

**Her Majesty’s Coastguard and Emergency Response**

26. The sea is a hazardous environment. Accidents are thankfully rare, but the MCA is ready to respond to all maritime emergencies.

27. One of the Agency’s targets is to:

   Maintain the quality of maritime emergency co-ordination and response by the Coastguard. The Agency uses a basket of measures to monitor its performance against this target, including staff competence levels and training, professional development, the number of coastguards maintaining a watch, and peer reviews of incident handling.

28. Her Majesty’s Coastguard has two distinct elements. The “regular” Coastguards are salaried, uniformed staff who maintain a 24-hour watch around the UK coast, principally in listening for radio traffic and responding to 999 calls. These Coastguards coordinate responses to incidents and can call on a matrix of search and rescue assets, including helicopters, lifeboats, other vessels in the vicinity of an incident (all of which have an obligation to respond to vessels in distress), beach lifeguards, and the volunteer Coastguard Rescue Service for mud and cliff rescues. Typically, Coastguard Coordination Centres receive around 22,000 calls each year. Around 40% of those are in the busy months of June, July and August, and 70% of incidents happen during the day.

29. The “regular” Coastguards in coordination centres may task volunteer Coastguard Rescue Officers (CROs) to respond to incidents in their local community. These 3,500 volunteer CROs are organised into 368 teams covering the whole of the UK coast, and they make up the other distinct element of Her Majesty’s Coastguard. The volunteers are trained in supporting local searches, and in rope, cliff and mud rescue techniques. It is the volunteers in their local communities that provide the Coastguard service with detailed local knowledge and meet the Agency’s commitments as a Category 1 Responder under the Civil Contingencies Act.

30. On 16 December 2010, the start of a 14 week consultation entitled “Protecting Our Seas and Shores in the 21st Century” about modernising the coordination element of Her Majesty’s Coastguard was announced. A copy of the consultation was sent to the Committee, and is attached to this Memorandum for ease of reference. It can also be reached through the following link:

   [http://www.mcga.gov.uk/c4mca/consultation_on_the_proposals_for_modernising_the_coastguard.pdf](http://www.mcga.gov.uk/c4mca/consultation_on_the_proposals_for_modernising_the_coastguard.pdf)

31. The proposals would:

   — establish two nationally networked maritime operations centres, located at Aberdeen and the Southampton/Portsmouth area, capable of managing maritime incidents wherever and whenever they occur and with improved information systems, together with a 24-hour centre at Dover looking over the busy channel traffic separation scheme;
32. The proposals do not affect the small centre operated by the coastguard alongside the Port of London Authority on the Thames in London.

33. Another of the rescue assets available to Coastguard Coordination Centres are search and rescue helicopters. Currently, search and rescue helicopters are available under a commercial contract with CHC Helicopters managed by the MCA from four bases (Lee-On-Solent, Portland, Stornoway and Shetland), while RAF and Royal Navy military search and rescue helicopters operate from eight military bases.

34. There are two MCA targets relevant to the existing search and rescue helicopter arrangements and the contract that the Agency manages: Helicopters tasked to respond to incidents will be airborne within 15 minutes during daylight hours and 45 minutes at night in at least 98% of cases; and At each MCA Search and Rescue helicopter base, a helicopter will be available at least 98% of the contracted time to respond to incidents. In 2009–10 the MCA's search and rescue helicopters were tasked to 747 incidents. The response time target was met 99.59% of the time, and the availability measure was met 98.17% of the time. Both measures continue to improve.

35. The planned procurement, initiated by the previous administration, for a harmonised future search and rescue helicopter service under a single commercial contract has been under review. Most recently, the Secretaries of State for Transport and for Defence announced on 16 December that the preferred bidder had alerted the Government to a potential issue with their bid which remains under investigation.

36. The MCA’s top priority is safety of life, followed by the protection of the marine environment. When a ship is in difficulty and there is the threat or potential threat of pollution, the Agency may invoke the National Contingency Plan (NCP) which sets out the roles and responsibilities of the Agency and Local Authorities and others in responding to a pollution incident. The Agency can call on stockpiles of containment boom and dispersant to help manage a pollution spill. The MCA’s target in this area of work is to: Respond promptly to potential and actual pollution from ships around the UK coast, drawing effectively on resources including our emergency tugs, and following the procedures set out in the National Contingency Plan. The Agency measures its achievement of this target using a basket of indicators including the deployment of counter pollution and salvage resources, the number of pollution reports received, the training given to Local Authorities and the contingency plan (NCP) which sets out the roles and responsibilities of the Agency and Local Authorities and others in responding to a pollution incident. The Agency can call on stockpiles of containment boom and dispersant to help manage a pollution spill. The MCA’s target in this area of work is to: Respond promptly to potential and actual pollution from ships around the UK coast, drawing effectively on resources including our emergency tugs, and following the procedures set out in the National Contingency Plan. The Agency measures its achievement of this target using a basket of indicators including the deployment of counter pollution and salvage resources, the number of pollution reports received, the training given to Local Authorities and the availability of spraying aircraft.

37. The Secretary of State’s Representative for Maritime Intervention and Salvage (SOSREP) is an Agency employee and has powers to intervene in an emergency and can give binding directions to ships and to ports in the interests of safety of life and protecting the marine environment. The SOSREP system has proved highly successful since its introduction. It provides clarity about who is the decision-maker in an operational emergency. In making his decisions, SOSREP can take advice from a range of technical experts, including through the establishment of an Environment Group to provide expertise on environmental and conservation issues.

38. In cases such as the NAPOLI (January 2007) and the ICE PRINCE (January 2008) where material from a ship incident has washed up onshore, the MCA’s Receiver of Wreck function will work to reunite material with its rightful owner.

**MCA FINANCES AND THE SPENDING REVIEW**

39. As part of the recent Spending Review, it was decided that the current Emergency Towing Vessel (ETV) contract should not be renewed when it expires in September 2011. This will save £10 million annually. The Government believes that emergency towing operations are properly a matter for commercial ship owners and their insurers, using the services of commercial towing vessels. Accordingly, the Government judged that the risk in not renewing the ETV contract from September 2011 is acceptable in the light of the need to reduce the fiscal deficit.

40. The ETVs currently operate in the Dover Strait, the south west approaches (based in Falmouth), the Minches, and the Fair Isle Channel. The MCA is actively working with the commercial tug broker and operator communities, as well as with other interested parties, to explore what protocols could be put in place from September 2011 to maximise the availability of commercial tugs in case ships get into difficulty.
41. It has also been decided that the arrangements for the Maritime Incident Response Group (MIRG) firefighting at-sea capability should be reviewed. The current arrangement is built around training and equipping 50 firefighters from each of 15 coastal fire and rescue services to tackle fires at sea by being flown out to a ship on fire. In practice, this capability has been deployed only six times in four years, and has not had a significant impact on the outcome of any fire incident. The MCA is in discussion with the Chief Fire Officers’ Association (CFOA) to explore the affordability of a reduced level of MIRG provision.

42. Modernising the Coastguard assumes an eventual annual steady state saving of around £7.5 million per year.

43. Following the outcome of the Spending Review (SR), the Government has set indicative budgets for the four years (2011–12 to 2014–15). Also as part of the SR, the MCA was required to separate its Resource budget into Programme and Administration. The MCA Resource budget for this year (2010–11) is currently all classified as Programme.

44. Consistent with the position across Whitehall, the Agency will be required to reduce its Administrative budget costs by one third by the end of the SR period (2014–15).

| RESOURCE BUDGET (NET OF INCOME) |
|--------------------|-----|-----|-----|-----|-----|
| Programme            | 131.0   | 106.9  | 104.8  | 82.2   | 77.0   |
| Admin                | 12.9    | 11.9   | 11.0   | 10.3   |        |
| Total                | 131.0   | 119.8  | 116.7  | 93.2   | 87.3   |
| Capital              | 6.2     | tbc    | tbc    | tbc    | tbc    |

The programme reflects Spending Review decisions, principal among which were measures affecting ETVs, MIRG and Coastguard Modernisation.

January 2011

Supplementary evidence from the Department for Transport, sent by Sir Alan Massey (MCA 10a)

Thank you for the opportunity to review the transcript from my appearance before the Transport Select Committee on 8 February. I attach an amended version with a small number of “typos” corrected, and to note when Mrs Ketteridge illustrated her comment with a gesture.

As for substantive matters, I would like to offer the Committee the following points of clarification.

In response to Q51 from Mr Leech, I have looked again at the overall reliability of telecoms in Shetland and I can confirm that the figure I should have quoted was 99.88%, rather than 99.98%.

In response to Q95 through to Q98, also from Mr Leech, we have taken the opportunity to check our records, which we only maintain for a three month period, and I am able to confirm that in the last three months we have not missed any 999 calls. Anecdotally, we are confident that this is the norm, given the relatively low number of 999 calls that we need to deal with.

In response to Q130 from Mr Baker, we have contacted the RAF SAR Force and they have confirmed that it is not possible to determine the number of search and rescue scenarios in which air to surface radar was considered as “needed”. However, the SAR Force tell us that it is rare that air to surface radar is the only search sensor.

Finally, in response to Q132 from Mr Leech, rather than the £80,000 figure in one year that I quoted, it is probably more accurate to say that in the financial year 2009–10 we received £64,603 back from the ETV commercial contract arrangements, and we anticipate an income in this financial year of around £23,000.

I hope these points are helpful to the Committee.

February 2011

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2 Adjusted figure as at December 2010, will be reflected in the Spring Supplementary Estimates.

3 Excludes provision for SAR H.
Letter from the Chair to Sir Alan Massey sent 7 March 2011 (MCA 506)

Thank you for appearing before the Transport Committee to discuss the work of the Maritime and Coastguard Agency. You will have seen that we have subsequently decided to hold a full inquiry into the Government’s proposals for the future of the Coastguard Service as well as changes to the arrangements for emergency towing vessels and the Maritime Incident Response Group. Consequently we have a number of questions arising from your oral evidence which we would be grateful if you could respond to, either by replying to this letter before the deadline for written evidence on 26 April or as part of a wider memorandum on the issues we will be scrutinising.

Our questions are as follows:

— Could we receive the detailed analysis of the impact of the closure of the Tyne, Oban and Pentland coastguard centres in 2001, referred to in Q16?

— Could you confirm when the risk assessment of the proposal to put the provision of emergency towing vessels on a commercial basis will be published (Q111) and provide us with a copy in due course?

— Could you clarify what response the Department for Transport has received from the French authorities to the proposed changes to emergency towing vessels (Q145) and let us know who in France the Department is corresponding with on this issue?

— The consultation document on the future of the Coastguard Service states that the proposals will save £20 million in the next four years. In oral evidence you said that there will be no savings in the first three years of the spending review, but savings of £7.5 million a year from year four onwards (Q123). Could you clarify when savings will arise from your proposals and what you expect them to amount to over the spending review period?

— We also remain unclear about the overall spending profile for the MCA over the spending review period and would be grateful if you could clarify this, differentiating between administration, programme and capital spending for the whole period.

— Finally, in relation to Q150, we would be grateful to receive a report entitled Emergency Towing Vessels Assessment of Requirements, UK MCA (258) ETV which is dated November 2008.

Finally, a number of coastguards have contacted us to express reservations about contributing to our inquiry because of the fear of reprisals or discrimination from their management. I am sure you will share my view that all coastguards, whether professional or voluntary, should feel able to contribute to our inquiry and your consultation exercise, should they wish, without fear of adverse consequences to themselves. You will also be aware that any interference with evidence provided to a select committee could constitute a contempt of the House which we, and the House as a whole, would regard as an extremely serious matter. I would be grateful if you could confirm that the MCA will not take action of any sort in relation to coastguards who choose to submit evidence to our inquiry and make sure coastguards are aware of this.

March 2011

Letter from Sir Alan Massey to the Chair, sent 11 March 2011 (MCA 10b)

Thank you for your letter of 7 March seeking further information as part of your Committee’s ongoing inquiry into the future of the coastguard and decisions around Emergency Towing Vessels (ETVs) and the Maritime Incident Response Group (MIRG).

We will cover the bulk of the questions in your letter through a further written Memorandum which we will submit by your 26 April deadline.

Colleagues in the Agency have supplied Mark Egan with the relevant website link to the report we have published called “Emergency Towing Vessels Assessment of Requirements”. Mark has kindly assured us that this meets your request for a copy of that report.

You will be aware that on 10 March Ministers announced an extension of the consultation exercise for the submission of written responses for six weeks to 5 May. I have written to all my staff to encourage them to take the opportunity of this additional time to submit any new or amended thoughts and alternative proposals, and I have also encouraged them to copy that material to your Committee as a contribution to your inquiry. I have also told staff that, subject of course to the need to take account of their Terms and Conditions of employment, colleagues are free to make representations to your Committee. Under such circumstances, I can assure you that we will not take action against any member of staff for simply expressing a personal point of view or an opinion.

March 2011
Supplementary written evidence from the Department for Transport (MCA 10c)

1. This Memorandum supplements the information the MCA submitted to the Committee in January, and the oral evidence session of 8 February. It also addresses specifically a number of questions posed by the Chair of the Committee in a letter of 7 March to Sir Alan Massey.

MODERNISATION OF THE COASTGUARD SERVICE

2. On 11 February the Agency published a suite of documents that set out the extensive consideration of risks that have been considered at every step of the development of the proposals in the Consultation document issued on 16 December 2010.

3. The Agency held meetings with the public at 20 separate locations to provide opportunities to engage with the consultation process. They used the services of independent chairs to provide an assurance of the Agency’s and the Department’s willingness to hear views and to listen to alternative proposals. That has proved a valuable exercise and we have welcomed the input from the public. We have also welcomed the opportunities we have been given to present the rationale for the proposals to Members of Parliament and to the Devolved Administrations, as well as our continuing engagement with staff members across the length and breadth of the United Kingdom and Northern Ireland.

4. Recognising the importance of providing those attending the meetings with the public and others with more time to develop and submit their considered input to this consultation process, Ministers announced on 10 March that the deadline for written responses would be extended for six weeks to 5 May 2011. Ministers have also signalled a willingness to reopen the consultation exercise for a short period in the summer to provide an opportunity for the Report of the Committee’s inquiry to be taken into account, alongside any further submissions that Report may prompt.

5. Respondents to the consultation have been encouraged to copy their submissions simultaneously to the Committee and the Committee will have noted that a number of alternative proposals have now been developed, including those from MCA Coastguard staff. Whilst they inevitably vary in detail, many of those submitted to date do accept the fundamental principle that the Coastguard coordination service needs to be modernised and should operate in the future from significantly fewer locations with a reduced workforce.

6. The Agency has started to consider responses and categorise them into those that are part of a protest campaign, those that raise specific issues for consideration, and those that set out alternative proposals, which may need to be costed as part of the assessment and evaluation process.

Impact of Closure of Oban, Tyne and Pentland

7. The Committee has asked for a detailed analysis of the impact of these closures in 2000 and 2001. As Sir Alan Massey explained in his oral evidence of 8 February, this is in effect a negative assessment on the basis that we have no evidence from MAIB reports, Fatal Accident Inquiries in Scotland, Coroners recommendations, or our own peer review processes following incidents to suggest that the mishandling or outcome of any incident could be associated directly with these closures. The Chief Coastguard has recently reviewed this matter and a copy of his analysis is annexed to this Memorandum.

Costs

8. The Chair’s letter of 7 March asked for further clarification of the costs around the proposals in the Consultation Document. You asked for clarification of when savings will arise if the proposals outlined on 16 December 2010 were implemented. The MCA expect to reduce their programme costs by £7.4 million from 2014–15 onwards, and avoid excess capital costs of some £12.6 million across the spending review period. The proposal set out in the consultation document is therefore £20 million less expensive than the cost of running on as now. There are no planned coastguard-related savings against the Agency’s programme budget in the first three years of the spending review, nor are there any against the total Agency capital budget across all four years. These assumptions are subject to change depending on the outcome of consultation.

9. The following table sets out the overall spending profile for the MCA over the spending review period, differentiating between administration, programme and capital spending for the whole period.

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4 Includes SAR Helicopter current contract costs, but excludes provision for future contract
EMERGENCY TOWING VESSELS (ETVs)

10. The need for standby Emergency Towing Vessels was first suggested by Lord Donaldson of Lymington in his 1994 report in response to the grounding of the oil tanker BRAER off the Shetland Islands in January 1993. Recommendation 85 called on the Government to set up a system to ensure tugs with adequate salvage capacity are available at key points around UK shores. The recommendation said: “There should be interim arrangements during the winter months until the new system is fully operational: the UK Government should be prepared to bear the full cost of such interim arrangements”

11. The Government decided that the interim solution should provide dedicated large ocean going tugs to be on stand-by to assist maritime casualties and disabled vessels at the positions around the coast of the UK that present the greatest risk of oil tankers going aground or being driven onto a lee shore. The initial arrangement was for the charter of two vessels to cover the Dover Strait and The Western Isles (the Minches) during the winter of 1994–95.

12. In 1995 a study team led by Captain CPR Belton RN articulated the ETV Principle. This principle is simply that once a ship has broken down and is drifting towards the shore, tugs (in the generic sense), represent the first and only line of defence. Harbour and coastal tugs cannot always be relied upon to provide the level of assistance required and this premise is supported by the experience of other countries that have not placed their trust solely in such vessels.

13. On Captain Belton’s recommendation a decision was taken to provide publicly funded ETV coverage at four locations around the coast of the UK as follows:
   — Dover Strait (Year round).
   — South West approaches (Year round).
   — The Western Isles : The Minches (Year round).
   — The Shetland Islands : Fair Isle (Winter only).

14. Marine Accident Investigation Branch (MAIB) Reports into the grounding of the GREEN LILY off the Shetland Islands in November 1997 and the grounding of BALTIC CHAMP off Kirkwall in February 1999 both recommended year-round cover at each of the four UK locations.

15. That provision was formalised in a contract with a commercial towage and offshore operator in 2001. The resulting 10 year contract provided for large seagoing tugs to remain on permanent standby at the four locations.

16. In 2008 a review of requirements for ETVs by Marico Marine recognised that the risk environment had changed in recent years (see below) and, on an understanding at that time that ETVs would continue to be funded publicly, concluded that the current deployment of four ETVs strategically located throughout the UK Pollution Control Zone (UKPCZ) was still appropriate to the shipping market, though some repositioning of stand-by location may be warranted.

17. The maritime risk picture has changed in the past decade. Shipping activities are more regulated, better managed and more closely monitored. The average age of the world fleet is lower, ships are more reliable and are subjected to greater scrutiny. Conversely, ships are on average much larger and their technical complexity makes them more prone to single point failure. Taken overall, these changes mean that there is less likelihood of a maritime casualty occurring.

18. ETVs on their own do not stop accidents. At best and as part of the overall maritime risk management system, they provide partial assurance that the effects of an incident can be minimised.

19. The following table shows the use of ETVs to attend shipping casualties over the past six years.

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<td>11</td>
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20. Once an ETV is tasked to support a shipping casualty, the ship owners will contract direct with the tug owners for the service and the ETV is “off hire” from the MCA contract.

21. As part of the recent Spending Review, Ministers took the option not to renew the current Emergency Towing Vessel (ETV) contract when it expires in September 2011. This will save around £10 million annually, or £32 million over the spending review period. With an average of 10 deployments annually, each deployment could be said to cost around £1 million. Although the MCA receives some income for when ETVs are being used commercially, that income is tiny in comparison to the fixed contract cost. In the financial year 2009–10, the Agency received £64,603 back from the ETV commercial contract arrangements. Full cost recovery on the basis of towing work would not be feasible given the unpredictability of demand.
22. Ministers took the decision not to renew the contract understanding that the risk of grounding still exists in UK waters, and that towage capacity is an important mitigating factor of that risk. But they judged that publicly-funded ETVs did not represent best value for money and the safety of ships is a matter for owners and operators. The need for a tow or for salvage is a commercial matter that is no longer appropriate to be funded from the public purse. The ETVs currently operate in the Dover Strait, the south west approaches (based in Falmouth), the Minches, and the Fair Isle Channel.

23. The MCA is actively working with the commercial tug broker and operator communities, as well as with other interested parties, to explore what protocols could be put in place from September 2011 to maximise the availability of commercial tugs in case ships get into difficulty. As part of that engagement, the Agency’s technical experts have held consultative discussions in Edinburgh on 4 March and in London on 11 March. That engagement has been positive and constructive.

24. Between now and the end of September the MCA will be working with interested parties in the UK to assess the alternative arrangements following the expiry of the existing contract. The key outcome of the meetings they have held with interested parties is an ongoing review of requirements to be facilitated through working groups, looking primarily at tug provision and the Coastguard Agreement for Salvage and Towage (CAST). This will include a review of alternative funding streams, navigational restrictions, free base porting for commercial tug operators and other considerations identified at the meetings. Although the MCA will be fully engaged within these workshops, the process will be led by local interest groups such as the relevant Local Authorities.

25. More information about the history of ETVs, their use and the assessment of the risks associated with the decision not to renew the contract from September 2011 has been made available on the MCA website.

26. The French authorities wrote to Ministers on 13 January setting out their concerns with the decision to remove the tug in the Dover Strait that is currently funded by the MCA with the French Maritime Administration giving the Agency a contribution to reflect its use for their needs. The French Government were concerned that there was no prior consultation. Ministers have explained to them that the nature of decisions in the Comprehensive Spending Review meant that it was appropriate first to make announcements to Parliament.

27. Officials from the MCA have since met with their opposite numbers at the French Embassy and in France to explain why the UK Government has taken the decision not to continue with the public funding of ETVs from September 2011. They have also explained the steps being taken to encourage private sector capacity. Whether the French Government continues to provide an ETV capability for the Dover Strait is a matter for them.

THE MARITIME INCIDENT RESPONSE GROUP (MIRG) AND FIREFIGHTING AT SEA

28. Ministers also agreed as part of the Spending Review that the arrangements for the Maritime Incident Response Group (MIRG) firefighting at sea capability should be reviewed. The money for a future service is no longer included in the Agency’s budget allocation from April 2011. The current arrangement is built around training and equipping 50 firefighters from each of 15 coastal fire and rescue services to tackle fires at sea by being flown out to a ship on fire. In practice, this capability has been deployed only six times in four years, and has not had a significant impact on the outcome of any fire incident. The MCA is discussing with the Chief Fire Officers’ Association (CFOA) a much more modest arrangement that could be provided at no cost to the MCA, other than the cost of flying a search and rescue helicopter, which might be offset against its existing training flying hours. These discussions continue at the time of writing this Memorandum.

29. The MCA is making arrangements to provide more information on its website about the risks associated with the MIRG. The Committee will be notified as soon as this is available.

Annex

AN ASSESSMENT OF THE IMPACTS OF CLOSING THE COASTGUARD CENTRES AT OBAN, PENTLAND AND TYNE

1. Executive Summary

1.1 Between 2000 and 2001, three Coastguard Rescue Co-ordination Centres (Oban, Pentland and Tyne) were closed and their work transferred to other stations. This closure programme was part of a more general restructuring of HM Coastguard enabled by new technology, and in the face of a general rise in demand for its services. This restructuring was limited to the management and co-ordination of search and rescue incidents, and not to those units that actually respond on the ground.

1.2 An assessment of the available evidence has been carried out and shows that based on outcomes, sufficient mitigation was employed by the Maritime and Coastguard Agency to manage the risks of death or serious injury being caused by poor or delayed decision making, where the underlying factors were overloading of the officers on watch or a lack of adequate local knowledge.
2. PURPOSE

2.1 This paper reviews the effects of the closure of three Rescue Centres in 2000 and 2001 on the integrity of Coastguard operations. In May 1999 Lord Donaldson was asked by the Deputy Prime Minister to provide advice on the HM Coastguard Five Year Strategy; that advice then informed the decision by the Government of the day to close the three Rescue Centres. This paper examines that advice, and tests it against the 12 years of operational experience and progress that has followed.

2.2 In particular it examines the impact of these station closures on:
   — The time taken to decide on appropriate search and rescue responses and to initiate action.
   — The time taken for Coastguard Response Units to arrive at the scene of an incident.
   — The prevalence of incidents, accidents and deaths.

3. METHODOLOGY

3.1 The following evidence has been considered in the formulation of this paper.
   — HM Coastguard Five Year Strategy.
   — Review of the Five year Strategy for HM Coastguard (Donaldson).
   — Reports of fatalities in the North East of England, the Orkney Islands and the Inner Hebrides.
   — Reports of the Marine Accident Investigation Branch.
   — Interviews with serving senior Coastguard Officers.
   — Coastguard Act 1925.
   — HM Coastguard: Civil Maritime Search and Rescue 1998—NAO.
   — HM Coastguard incident statistics.

4. BACKGROUND

4.1 The modern Coastguard came into being in the late 1970s and early 1980s with the establishment of a chain of six Maritime Rescue Coordination Centres supported by 22 Rescue Sub Centres. These stations used VHF and MF radio piped in from remote radio sites to coordinate civil maritime search and rescue operations around the coast of the UK and across the UK Search and Rescue Region.

4.2 As the 20th century progressed, rapid advances in communications technology, the rise of computing and an increasingly busy marine environment made increasing demands upon the Coastguard such that in 1992 the Secretary of State for Transport, using his powers under the 1925 Coastguard Act, redefined the job of HM Coastguard to “mobilise, organise and task adequate resources to respond to persons in distress at sea, or to persons at risk of injury or death on the cliffs and shoreline of the United Kingdom”.

4.3 By 1994, 15 years after its most radical modernisation, the Chief Coastguard initiated a review of the service to determine whether or not its structure and staffing were efficient and fit for purpose. By this time there were 21 Coastguard Rescue Centres, a reduction of seven on the original 28. This review, known as Focus For Change, was incorporated into the Five Year Strategy, unveiled by the Chief Coastguard in 1998. In that same year the National Audit Office produced its report on HM Coastguard, as did the Public Accounts Committee. Recognising all of this work, the Five Year Strategy proposed that changes in staffing, the increase in responsibility of key officers, and new communications technology would allow for the closure of four Coastguard stations and the merger of a further two without loss of efficiency or a reduction in the standard of service.

4.4 The proposed modernisation was the subject of an inquiry by the Transport Select Committee, and following that the Deputy Prime Minister asked Lord Donaldson of Lymington to provide advice on the effects of the Five Year Strategy.

4.5 Lord Donaldson’s advice, published in 1999, covered such matters as new communications technology and the risks associated with the proposed closing of stations. This advice recommended the closure of three of the four stations, and not to proceed with the merger of two.

4.6 The closures were completed in 2001, with the remaining stations absorbing the work by increasing their staffing complements. In 2010 the Maritime and Coastguard Agency put forward plans for a further modernisation programme for public consultation.

5. TECHNOLOGICAL PROGRESS

5.1 Lord Donaldson’s examination of HM Coastguard in 1999 would have revealed operations rooms fitted with communications and information technology coming to the end of its useful life. Waiting in the wings was the Integrated Coastguard Communications System (ICCS), already the industry standard communications switch in the emergency services.
5.2 ICCS has been in service with the Coastguard for over 10 years and is now receiving its first major upgrade as a part of the Radio Equipment Replacement programme.

5.3 ICCS has allowed for Rescue Centres to be organised into mutually supportive pairs, such that the radio aerals covered by a particular site can be operated from its paired station if the need arises. These pairs now operate as Areas, replacing the old District concept. Both stations in the pair are responsible for the joint Area, instead of each station having a closely defined territory of its own.

5.4 Lord Donaldson would also have seen the first generation of a computer based incident management system, which has since been superseded by a more capable system using GIS mapping and more effectively interfaced with ICCS. This new system, ViSION, is capable of sharing its data between the paired site arrangements such that normal operations can be conducted from either or both sites at will.

5.5. The ability to do this is a combination of technical and procedural effectiveness, and the arrangement operates with varying degrees of success. The Shetland—Stornoway “pair” is not a pair at all in the technical sense as the UK’s ICT infrastructure will not support it. The Milford Haven—Swansea pair is virtually seamless. Other pairings fall somewhere in between, but towards the upper end of the scale.

5.6 The Digital Selective Calling (DSC) equipment for VHF and MF have been computerised and integrated with ICCS, as has Navtex equipment.

5.7 The reliability of this equipment and its infrastructure has been high, although in recent times the increased demand upon the PCs at workstations have not benefited from the demands of new IT security software and have occasionally faltered. More powerful replacement PCs now being introduced have stabilised this situation.

5.8 999 calls received by HM Coastguard, whether borne by a terrestrial or a mobile network, now benefit from systems that present the location of the caller to the operator. The system is not infallible, particularly for mobiles, but the use of special legal powers enable operators to pinpoint mobile calls within the limitations of the cellular system, which can be to within tens of metres. Operators familiar with the limitations of the system can use it effectively to assist with or precisely determine the position of the caller.

5.9 Lord Donaldson identified limitations with regard to technical resilience within pairs, and IT systems generally. These limitations are for the most part still with us, and could best be improved by introducing a nationally networked system employing the latest in resilient architecture. Our existing technology is capable of being configured in this way.

6. LOCAL KNOWLEDGE

6.1 Lord Donaldson’s examination of the deployment of local knowledge, and his observations regarding the manner in which local knowledge is deployed by different groups of officers, are still valid.

6.2 Officers at the existing Rescue Coordination Centres are trained and tested locally. However, although Coastguard doctrine sets out the objectives to be achieved by this training, the manner in which these objectives are achieved, maintained and assessed are not carried out to a national standard.

6.3 Lord Donaldson observed that “some information such as the location of the distress call and the state of the wind and tides, is vital to the search and rescue operation. It must be available to the Watch Keeping Officer within a minute or two. As a rule, it would be better if all the knowledge needed by the co-ordination officers can be found within the co-ordination centres that operate 24 hours a day, rather than having to rely on outside assistance which may or may not be available at a moment of crisis. However, it does not follow that it always has to be stored in the personal memory bank of an officer.”

6.4 An examination of the local knowledge syllabi of the stations now covering Oban, Pentland and Tyne Districts reveals that they are generally fit for purpose in the context of the broad objectives laid out in current instructions. There is at present an over reliance on the “personal memory bank” in that the opportunities to share and systemise much local knowledge by the use of ViSION have not been universally taken up. However, the stations now covering Oban, Pentland and Tyne Districts have extended their databases in their own particular format to cover them. Some gaps have been identified at Area boundaries, where officers at one station have insufficient visibility of the state and availability of assets “over the border” in the adjoining Area, and these gaps may have contributed to a delayed or inappropriate response in one recent incident, which is currently the subject of a formal Fatal Accident Inquiry and cannot be discussed further in this document.

6.5 Lord Donaldson also went on to observe that “It is unrealistic to expect a Coastguard in a coordination centre to have an intimate knowledge of every mile of coastline in the region. Even with the existing number of co-ordination centres it will be a lucky casualty who owes his or her life to a Watch Keeping Officer possessing a level of local knowledge which vastly exceeds the expected level of competence.”

6.6 It is true to say that officers who live and work in a coastal community develop a greatly enhanced level of local knowledge which may be diminished if the Rescue Centre within that community closes. However, as Lord Donaldson points out, this intimate knowledge vastly exceeds the expected level and is heavily localised. Closing a station may dilute local knowledge, but not to a point where normal operations are threatened. There is no express link between where officers live and the effectiveness of local knowledge.
6.7 In summary, therefore, the acquisition and deployment of local knowledge as described by Lord Donaldson remains valid today with regard to scope, depth and utility. The opportunities to increase the effectiveness of the knowledge base of the Coastguard using systems currently available have not been fully taken up, but there is no evidence to show that this has had an explicit contribution to repeated mission failure. Lord Donaldson’s observations were of a service using a highly territorial concept of operations, and may not be fully applicable to a different, more networked concept.

7. THE EFFECTS OF CLOSING STATIONS

7.1 In his advice to the Deputy Prime Minister, Lord Donaldson explored the popular misconceptions often held about Coastguard Co-ordination Centres. In particular, he observed that "...some people mistakenly reason that the closure of a co-ordination centre will inevitably lead to the withdrawal of search and rescue personnel, their equipment and the cessation of radio services. In reality these will remain wholly intact after the closure of a co-ordination centre. The radio cover will remain unchanged, the equipment and the personnel used to undertake search and rescue operations will remain at their posts. The difference is that the focus for distress messages and the co-ordination effort will be located elsewhere."

7.2 The closure of Oban, Pentland and Tyne therefore changed the focus for the co-ordination effort for the centres that took on their territorial responsibilities. The decision to close those centres took account of the anticipated resulting workloads and demands on the centres that remained. If what materialised in practice was an excessive workload for the officers at the flank covering stations, or persistent and repeated operational errors attributable to a lack in local knowledge, then that decision would have been incorrect.

7.3 The manifestations of a lack of effectiveness could, in the most extreme circumstances, contribute to the death of the person or persons at risk. A more probable manifestation would be revealed by incident debriefs that might contain examples of poor or delayed decision making that did not materially threaten the outcome of an incident.

7.4 The Maritime and Coastguard Agency maintains a suite of Key Performance Indicators, leading and lagging, that measure the general effectiveness of response. Amongst other things they measure the time taken to act upon information received, and the time taken to arrive at the scene of an incident from the point at which the responders mustered. The time limits for both contain a degree of artificiality, as they are arbitrary. The circumstances of a particular case may mean that a response outside of these service standards is not an indication of a poor response, and so these service standards are not used to diagnose performance at the operational level. We have therefore turned our attention to gauge other indices of evidence.

7.5 It is the practice of Coastguard Officers to review incidents, and there has always been a means by which lessons learned can be captured, analysed, and acted upon.

7.6 The Maritime and Coastguard Agency records incident statistics, including fatalities. The volume of incidents rises annually, driven principally by better recording, an increased leisure use of the sea and coastlines and a more general increased public expectation of a response or intervention.

7.7 To determine the effects of the closure of Oban, Pentland and Tyne, enquiries were made of Coroners, Sheriffs and the Marine Accident Investigation Branch to determine whether or not, in the course of their proceedings, they had identified that in the former Oban, Pentland or Tyne districts death or serious injury had occurred attributable to a delayed or ineffective response that may have been caused by overloading or a lack of local knowledge.5 The responses received have not revealed any evidence that the closures have directly led to fatalities or mishandled incidents.

7.8 Senior Coastguard Officers now responsible for the former Oban, Tyne and Pentland districts were requested to examine the post incident debriefs for examples of poor or delayed decision making caused by excessive workload or a lack of local knowledge. Additionally, it is the practice for HM Coastguard to chair local meetings of search and rescue practitioners to review incidents. No examples have been located either within records or of the proceedings of these meetings to suggest that operations have been materially delayed or disrupted because of excessive workload or a lack of local knowledge.

7.9 Senior Coastguard Officers were interviewed to determine what procedures had been followed pre and post closure to mitigate the effects of changing the focus for the receipt of distress messages and co-ordination effort.

7.10 Firstly, measures were taken to ensure that watchkeeping officers acquired the requisite local knowledge, and that trust and confidence was built between watchkeeping officers and key players such as lifeboat coxswains and volunteer Coastguards.

7.11 This was carried out by a programme of structured visits pre and post closure, as well as periods of secondment to closing stations by staff based at those stations to which the work would pass. This took place over a period of some two years. Local knowledge visits continued, both as a component of basic training and for the professional development of experienced officers.

5 At the time of writing two Fatal Accident Enquiries are in train, one in the Orkney Islands and one in the Inner Hebrides, where the response of HM Coastguard is being examined.
Some staff from closing stations relocated to their flank stations taking their experience with them, and this was capitalised upon by managers.

7.12 Local knowledge records were transferred in an orderly manner.

7.13 Concerns were raised by lifeboat crews who feared that a more remote station might not be familiar with local custom and practice that dictated which lifeboats were sent where. Whilst lifeboat stations do not operate within defined territories, some lifeboat crews have an expectation that they will be despatched to casualties if they are the nearest boat, regardless of the capability of the class of lifeboat on station. There was anecdotal evidence to suggest that immediately following the closure of Tyne, operators at Humber would overlook the Sunderland and Cullercoats lifeboats in favour of the larger lifeboat based at the mouth of the Tyne, perhaps cued by the text of the distress or urgency message referring to the mouth of the Tyne as the nearest geographical reference.

7.14 No concerns were raised by volunteer Coastguards, but Coastguard Rescue teams in the former Tyne district expressed a preference for working with Humber Coastguard post closure because they found that the general attitude of staff at Humber to be more positive towards them.

7.15 There were no incidents of volunteer Coastguards seeking to resign their membership because of the station closure programme.

8. Conclusions

8.1 The closures of Oban, Pentland and Tyne were part of a wider strategy to restructure HM Coastguard to take advantage of efficiencies brought about by new technology.

8.2 This restructuring was not intended to change the concept of operations of HM Coastguard, which would remain territorial in nature. A rescue centre would be associated with a defined area and would act autonomously within it.

8.3 Rescue personnel and key players in the maritime world within that district built up relationships with the parent rescue centre over time. Watchkeepers within those stations acquired a social and geographical knowledge that deepened with time and experience, but which was of a very personal nature and often exceeded the level required to co-ordinate search and rescue activity.

8.4 The resilience of a rescue centre would be enhanced. Instead of having to rely on a business continuity plan based upon scattering watchkeeping staff to work off site, a linkage to a flank station would allow operations to be continued remotely.

8.5 Lord Donaldson identified that it is not possible to determine beyond reasonable doubt whether it is safe or not to close a co-ordination centre, but that the decision to do so would be made in the absence of absolute proofs and rely on judgement made on the balance of arguments.

8.6 He further identified that the risks involved in closing a station lay in the effectiveness of co-ordination effort being undermined by excessive workload, insufficient local knowledge at an appropriate level, and an over reliance on technology without possibility of backup.

8.7 The risks of closure were mitigated by the training of personnel at flank stations in local knowledge, and by providing enduring opportunities to meet and form relationships with key players on the ground. Complements were increased at flank stations, and where those transfers were from closure stations the experience that was also transferred was capitalised upon. Local knowledge records and information was transferred and incorporated into the databases held at the responsible stations.

8.8 There were early localised teething troubles of a minor nature but they were not significant and were easily resolved by existing mechanisms and procedures.

8.9 There is no evidence to suggest that the closures have had any impact on the effective conduct of operations either from internal records or the proceedings of external bodies. There are, however, two current Fatal Accident Inquiries examining the response made by HM Coastguard to two specific incidents—one off Orkney and one off the west coast of Scotland.

April 2011
Letter from the Chair to Mike Penning MP sent 31 March 2011 (MCA 507)

I am writing to follow up the written ministerial statement you made on the modernisation of the Coastguard Service on 14 March and your comments in the Westminster Hall debate on the Coastguard Service on 24 March.

In your statement you said “provided the Transport Select Committee is able to produce its report in a timely manner, I would expect to allow a further short period for consultation following publication of that report”. In Westminster Hall you said you would not “under any circumstances” come to any conclusions about the future of the Coastguard Service until the Committee has reported.

I welcome your commitment to engage with the Committee and, in particular, your assurance that you will not reach conclusions on this important subject until we have had a chance to conduct our inquiry and publish our report. As you will be aware, select committee inquiries involve taking written and oral evidence and we wish to visit at least one coastguard station during the course of our work. We considered our future programme at our meeting this week and have agreed to take evidence between Easter and Whit, with a view to publishing a report in the third week of June. Our first oral evidence session will be on 26 April. This is a tight timetable, given the other demands on our time and our wish to be as thorough as possible in hearing from as many interested parties as we can, but we appreciate the importance of contributing to the consultation process you have initiated. The Committee staff will keep in close touch with your department and the Maritime and Coastguard Agency about the inquiry timetable and publication arrangements.

I am grateful that you have agreed to appear before us on Tuesday 24 May at 10.15am, and I am looking forward to the chance to discuss your proposals with you.

We are currently considering options for visiting at least one coastguard station and the Committee staff will be in touch with the MCA about this in due course. I am grateful for the help they have offered in facilitating visits.

I am also grateful for your comments in the Westminster Hall debate about making information available to the Committee. We await your memorandum with interest and we have also received a number of documents from the MCA as well as numerous submissions to our inquiry from coastguards and others. I note that you have received a large number of submissions to your consultation exercise. Would it be possible to provide us with a list of submissions received to date and for that list to be updated on a weekly basis for the next few weeks? We could then indicate which submissions we might be interested in receiving. If we have any further requests for information I will let you know in writing.

March 2011

Letter from Mike Penning MP to the Chair, sent 10 May 2011 (MCA 10d)

Thank you for your letter of 31 March about the consultation on our proposals for modernising the Coastguard. I am sorry that Easter and other holidays have prevented me from responding sooner.

I note your plans for how the Transport Committee’s Inquiry will proceed and I welcome your intention to produce a Report in June. That is a helpful timetable. As I said in my recent Written Statements and in Westminster Hall, we will not reach final conclusions or take decisions until we have had an opportunity to consider the Committee’s Report, and I plan to re-open the consultation for a short period to facilitate that engagement.

I have also asked officials at the MCA to supply your Clerk with a list of the respondents so far to the formal consultation exercise.

However, it has also been brought to my attention that the Committee has invited regular Coastguard Officers from several MRCCs formally to give evidence to the Committee during the evidence sessions planned for Falmouth, Stornoway and London. As you know, the MCA is an executive agency of the Department for Transport and all the Agency’s staff, including its regular Coastguard Officers, are Civil Servants. It is a long standing principle that Civil Servants appearing formally before a Parliamentary Select Committees do so on behalf of Ministers and are there to represent the policies of the Government. This is very clear in the July 2005 Cabinet Office document “Departmental Evidence and Response to Select Committees”.

Inviting relatively junior civil servants, particularly those who may not have been party to the development of the proposals on which the Government is currently consulting both staff and the public, to give evidence to the committee cuts across the principles in the Cabinet Office Guidance. A formal public hearing, in the full glare of the media spotlight, risks encouraging individuals to express personal views in a way that may be at odds with their personal obligations under their terms and conditions of employment, including the Civil Service Code. This is not something to which I could agree and, in the interests of protecting our Coastguard staff, I have instructed regular Coastguards to decline your invitation. If you wish to write to me with alternative names from whom you may wish to take evidence, I will of course consider the request.

I know that officials at the MCA are facilitating your visits to the Maritime Rescue Coordination Centres at Falmouth, Clyde and Stornoway and I am confident that you can be assured of an exceptionally warm welcome
from the staff at those locations. I am aware that Sir Alan Massey has expressly encouraged some staff from other MRCCs to be present when you visit and his team will ensure that the Committee can use those opportunities to talk to regular Coastguards about their views.

For my part, of course, I am very much looking forward to appearing before the Committee on 24 May. I will be joined by Sir Alan Massey and Philip Naylor from the MCA.

May 2011

Letter from the Chair to Mike Penning MP, sent 10 May 2011 (MCA 508)

Thank you for your letter of 10 May.

As part of our inquiry into the future of the coastguard service, the Committee agreed to invite coastguards from eight UK Maritime Rescue Coordination Centres (Aberdeen, Belfast, Brixham, Falmouth, Liverpool, Milford Haven, Shetland and Stornoway), as well as volunteer coastguards, to give oral evidence. As per usual, the Committee based its decision partly on the written evidence submitted by coastguards in these areas.

I was extremely disappointed to learn that you have instructed regular Coastguards to decline the invitation to give oral evidence. Your decision is in stark contrast to your previous public statements on this matter and the assurances that you have given to me and other Members of Parliament.

You will recall, during the Westminster Hall debate on 24 March 2011, that several Members of Parliament expressed concern that coastguards could be victimised for contributing to the Committee’s inquiry. Responding to one of my questions, you said (HC Deb, c344WH):

“May I reiterate that any member of staff has the right not only to give evidence to the Select Committee, but to the consultation.”

You later said (HC Deb, c378W):

“The staff should feel confident that if they wish to do so, they can express their views robustly”.

In a letter dated 19 April, you provided further assurances to me about this matter:

“I have been very clear throughout that we want to give everyone the opportunity to offer their thoughts, concerns and any alternative plans. [...] It is in that spirit of engagement that I welcome your Committee’s attention [...]”

In light of these statements, I was naturally extremely surprised to learn that ministers were re-assessing whether coastguards could give oral evidence to the Committee. There was never any previous suggestion made by the Department, nor the Maritime and Coastguard Agency, that coastguards who had already submitted written evidence would be unable to give oral evidence to the Committee.

We have already received much written evidence from coastguards around the country. This evidence has been published on our website, or made available in the Parliamentary Archives. The vast majority of the evidence from coastguards has not been submitted anonymously, and has been published in a personal or joint capacity. It is standard practice for select committees to invite those who have submitted written evidence to give oral evidence. We would have expected coastguards to outline and reiterate the key points made in their written evidence which is publicly available and, more often than not, published in their names.

The sessions would have also been an opportunity for the coastguards to present their detailed alternative proposals: which, of course, you have encouraged them to develop and submit. After making such efforts to encourage coastguards to develop and submit alternative proposals, it seems to me highly unusual to prevent them from talking about the proposals.

I will discuss this matter with my colleagues. The Committee will wish to consider how to pursue this matter by other means. We will also raise it with you during the oral evidence session on 24 May.

May 2011

Letter from the Chair to Mike Penning MP, sent 16 May 2011 (MCA 509)

Further to my letter of 10 May, I understand that the MCA has now permitted coastguards serving as local union representatives to give oral evidence to the Committee. This has enabled us to hear from some of those people we had initially invited to give evidence. I am glad that the Department appreciates the importance of the Committee being able hear the views of local coastguards on the record.

I reiterate my serious concerns, however, about your instructions to coastguards not to give evidence to the Committee’s inquiry, despite your specific assurances to Parliament that they should be encouraged to do so. On 24 March you stated:

“May I reiterate that any member of staff has the right not only to give evidence to the Select Committee, but to the consultation. (HC Deb, c344WH)”
I am concerned that your instructions to coastguards are creating an atmosphere of fear amongst the coastguard community. It is imperative that no intimidation takes place in relation to coastguards who have either submitted written evidence or express a critical opinion about the proposed re-organisation. I seek assurances from both you and the MCA that no-one will be subject to such action as a consequence of giving evidence to the Committee or speaking to the Committee informally.

The Committee had also invited coastguards to give evidence at Westminster on 24 May. Unless your instructions change, we would like to meet these coastguards informally. I have, however, been informed that the MCA would not permit coastguards to meet the Committee informally at any location except MCA premises. This is unacceptable. I seek your assurance that no obstacles will be put in the way of coastguards meeting with Committee Members informally, in private, in the House of Commons and that you will confirm that you have no objection to this.

May 2011

Letter from Mike Penning MP to the Chair, sent 16 May 2011 (MCA 10e)

Thank you for your letter of 10 May in response to my letter of the same date about Coastguards appearing before your Select Committee.

It is a fundamental principle, set out in the Civil Service Code, that civil servants are accountable to Ministers, who in turn are accountable to Parliament. Where civil servants give evidence to Select committees they are doing so, not in a personal capacity, but as representatives of their Ministers. This does not mean, of course, that officials may not be called upon to give evidence but their purpose in doing so is to contribute to the central process of Ministerial accountability, not to offer personal views or judgements on Government policy. To ask civil servants to do so could undermine their political impartiality.

It is of course also the case that I would wish to be as helpful as possible to Select Committees. As you highlight in your letter, and in line with my statements in the House and my correspondence with you, I have been consistent in my encouragement to the many Coastguards that I have met over the past three months that they should not be afraid to share their views about our proposals for modernising Her Majesty’s Coastguard with your Committee. Sir Alan Massey has been equally consistent in his encouragement to MCA staff, but has also been careful, rightly, to remind his people of their obligations as Civil Servants. It is against that background that the Committee has received written views and a number of submissions setting out alternative proposals from serving Coastguards.

But that encouragement to make a contribution to your inquiry has always been in the context of submitting written material that has had the benefit of full consideration.

The prospect of relatively junior Civil Servants, such as Coastguards, appearing formally as witnesses before a Parliamentary Select Committee, subject to in-depth questioning and rigorous cross-examination, is a very different proposition. It is a very clear and long-standing principle that this is properly a role reserved for Ministers, Permanent Secretaries, Chief Executives and other senior Civil Servants.

It is to protect the integrity and impartiality of individual serving Coastguards that I have decided they should not take up the invitations your Committee has issued. I hope that the Committee will nevertheless take the opportunity of its visits next week to the Maritime Rescue Coordination Centres at Falmouth, Clyde and Stornoway to talk to the operational Coastguards on site about their work. Sir Alan Massey has encouraged representatives from other locations to make arrangements to be on site too during the Committee's visits.

I am also happy that Trade Union representatives should be able to appear in front of your Committee, as they did on 26 April, but in doing so it should be clear that they are there as Trade Union representatives, representing the views of their members, rather than giving evidence on my behalf.

May 2011

Letter from Mike Penning MP to the Chair, sent 23 May 2011 (MCA 10f)

Thank you for your further letter of 16 May which crossed with my letter of the same date.

In my letter I explained why we continue to believe it is inappropriate for operational Coastguards to appear formally as witnesses to give evidence to the Transport Select Committee. It would be similarly inappropriate for the Committee to meet privately with operational Coastguards in an official capacity other than at MCA premises.

However, in line with the arrangements for many similar events up and down the country, the MCA has facilitated opportunities this week for the Committee to meet operational coastguards at the Coastguard Centres at Falmouth, Clyde and Stornoway, and coastguards from other centres were encouraged to attend those sessions too.
I also confirmed in my most recent letter that members of the PCS Union can, of course, give formal evidence to your Committee, providing they do so in their capacity as union representatives and not on behalf of Her Majesty’s Coastguard.

May 2011

Written evidence from the Chief Fire Officers Association (CFOA) (MCA 19)

INTRODUCTION

1. CFOA is the professional voice of the UK fire and rescue service, supporting its members to fulfil their leadership role in protecting our local communities and making life safer through improved service delivery. CFOA provides professional advice to inform government policy and is committed to developing both strategic and technical guidance and sharing notable practice within the wider FRS.

2. Membership of the Association comprises almost all the senior management of fire and rescue services in the United Kingdom. CFOA is the driving force in managing change and implementing reforms in the service.

BACKGROUND

3. There are 39 coastal Fire Authorities who have a prominent coastal “risk”. In the past many declared their land based resources available to carry out the non statutory role of firefighting at sea outside the area of their Local Authority.

4. Historically, the Coastguard has relied on this “first response” to assist with such fire related incidents due predominantly to the availability of FRS resources that can be deployed within a short time span.

5. The Fire Service provides a professional application to the role of firefighting at sea and has the pre-eminent capability to fulfill this role. This has been demonstrated at various incidents over the years.

6. In 1998, the CFOA Operations Committee instigated a review of the way FRSs responded to firefighting at sea. The subsequent “Operations Committee Offshore Operations Working Report” highlighted a number of key issues. In particular FRSs “should co-operate to achieve mutual support and standard operating procedures that reduce resource demands and facilitate effective, efficient operations. This co-operation will provide the potential for individual fire brigades to operate small teams of well qualified firefighters that additionally reduces the demands on the finite training resources available nationally”.

7. The primary driver for this review was to improve and ensure the maintenance of firefighter safety whilst operating within a hostile environment at sea.

8. Later in 1998, the CFOA Operations Committee introduced the Marine Operations Group (MOG). This was instigated as one of the outcomes from the 1998 report and consisted of practitioners from all UK coastal FRS, HMCG, SAR providers and other stakeholder agencies. Its main aims were to develop the “firefighting at sea” role of many of the coastal FRSs.

9. By 2001, the number of FRSs providing support to HMCG had reduced to less than 12. This was due predominantly to the role being non statutory business and subsequently FRSs were unable to support the training and equipping of firefighters to respond to incidents at sea.

10. This increasing decline in UK resilience for dealing with fires at sea and the fallout from a fire on board a vessel in the North Sea in 2002, provided the catalyst for the “Sea of Change” project, which at the request of the Secretary of State for transport was launched by the MCA in partnership with CFOA in January 2003.

11. In April 2006, three years after the commencement of the project, the Secretary of State for Transport, formally launched the implementation of the new MCA/FRS partnership to be known as the MCA Maritime Incident Response Group (MIRG).

12. The uniqueness of this project, the first of its kind in the world, culminated in the provision of an integrated, interagency national strategy for dealing with incidents in the maritime environment.

13. Funding of over £3 million from both the MCA and DfT, together with additional funding from the Department for Communities and Local Government (DCLG), previously the Office of The Deputy Prime Minister (ODPM), and each of the 15 FRSs involved, has enabled the MCA/DfT to enhance its role in line with the Civil Contingencies Act 2004.

14. The financial support provided by the MCA ensures the capability for a national approach to the provision of specialist equipment and services, particularly for the transportation of FRS personnel to incidents at sea.

15. As agents for the MCA, the MIRG FRS teams now provide an additional resource to UK maritime resilience. This is a vital and much valued element of UK Search and Rescue (UKSAR).

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6 Ferry—“Norsea”
Maritime Incident Response Group

16. The MIRG currently consists of fifteen strategically located shore based FRSs who provide a 24/7 response to incidents at sea where there is risk to life or high environmental risk for which fire fighting, chemical hazard and/or rescue teams may be required.

17. The Mission Statement for the MIRG:

— To save life.
— To reduce loss and mitigate environmental and ecological damage.
— Render where appropriate all humanitarian services.

underpins the MCA Vision:

“To be a world class organisation that is committed to preventing loss of life, continuously improving maritime safety and protecting the marine environment”.

This is whilst providing the MCA with additional capacity to directly influence key Ministerial targets, as set by the Secretary of State.

18. In 2010, the MCA commissioned an independent review of its requirements to assist with incidents involving fire, chemical hazards and industrial accidents at sea.

19. This review was undertaken by BMT Isis Ltd and reported in October 2010. The review identified 30 conclusions and 28 recommendations.

20. Significantly the report identifies that:

— There is no statutory duty on MCA or FRS to make provision for response to fires onboard vessels “at sea”.

— Notwithstanding the above, “The risk assessment has confirmed that a response is needed around most of the UK, to attend and contain vessel fires with the purpose of preventing loss of life”. That “Eliminating the provision is not considered an option” in the context of the identified risk.

— A commercial replacement of the MIRG would be expensive and that “The existing form of provision (MIRG) has inherent cost advantages because all the basic training and non-MIRG firefighter training time is funded elsewhere”.

— The most appropriate option identified for future provision of an at-sea response to fire chemical hazards and industrial accidents is a continuation of the MIRG but with a realignment to match the resources to the identified risk.

21. Cognisant of the review findings the current MIRG provision has been assessed with a view to realigning to the identified risk. It is considered that UK MIRG resilience arrangements could continue to be maintained within ten FRSs with a reduction in the cadre of specialist fire fighters necessary in each. The annual MCA funding requirement for this provision would be in the order of £340,000, a significant reduction on the previous figure of £600,000.

Conclusion

22. Without the provision of the necessary funding to maintain the role of the MIRG it could quickly fall into decline and become vulnerable to similar issues which first initiated the formation of the “Sea of Change” project.

23. It is anticipated that individual MIRG FRSs will not be able to provide a response to these incidents if funding is withdrawn. A formal position on future MCA funding has yet to be submitted to CFOA, but initial indications are that funding has been withdrawn from April 2011. On that basis there may be no provision for FRS deployment to vessels at sea within significant areas of the United Kingdom Search and Rescue Region (UKSRR).

24. In areas where individual FRSs decide that they will continue to maintain a provision, it will not provide an integrated response as currently inherent in the UK MIRG strategy.

February 2011
Further written evidence from the Chief Fire Officers Association (CFOA) (MCA 19a)

INTRODUCTION

1. CFOA is the professional voice of the UK Fire and Rescue Service (FRS), supporting its members to fulfil their leadership role in protecting our local communities and making life safer through improved service delivery. CFOA provides technical professional advice to inform Government policy and is committed to developing both strategic and technical guidance and sharing notable practice within the wider FRS.

2. Membership of the Association comprises almost all the senior management of FRS in the United Kingdom. CFOA is the driving force in managing change and implementing reforms in the Service.

3. CFOA has previously provided written evidence relating to the Maritime Incident Response Group (MIRG) for the Transport Select Committee (TSC) inquiry held on 8 February 2011.

4. The attached submission will expand on and make reference to the initial evidence to inform the new inquiry that is to be conducted by the TSC into the Coastguard, Emergency Towing Vessels and the Maritime Incident Response Group.

MARITIME INCIDENT RESPONSE GROUP

5. In 2010, the Maritime and Coastguard Agency (MCA) commissioned an independent “Review of Requirements in Relation to Assisting with Incidents Involving Fire, Chemical Hazards and Industrial Accidents at Sea” (MCA Consultancy Project Ref CO96).

6. This review was undertaken at a direct cost to the MCA of £81.9K by BMT Isis Ltd and concluded in October 2010 in the form of a 233 page report.

7. The report is underpinned by an assessment of risk around the whole of the UK coastline and proposes a reasonable worst case scenario that would involve “a passenger vessel fire that potentially needs to be controlled for up to two days, has the potential to cause loss of life and cannot be contained by the ship’s finite resources”.

8. The primary aim regarding passenger ship emergencies is to maintain the integrity of the ship so that the ship does not have to be evacuated at sea. Large passenger ship design is regulated by the International Maritime Organisation (IMO). A review of passenger ship safety by the IMO has determined that such ships should be so designed that fires or flooding should be contained by means of sub-division; and that the ship should remain upright so that she can reach a place of safety with her passengers and crew safe aboard.

9. While the intention is that the ship should be so designed and equipped and her crew so trained that she should be able to deal with fires aboard from her own resources until she reaches port, the IMO have also recognised the need for external support.

10. The IMO’s Maritime Safety Committee (MSC) published a Circular in 2006, “Guidelines on the provision of external support as an aid to incident containment for Search And Rescue authorities and others concerned” (MSC.1/Circ.1183). The Circular lists, inter alia, “fire-fighting personnel and equipment” as its prime example of such support:

11. “Teams of shore-based fire-fighters, suitably trained and equipped for incidents at sea, may be brought to the ship in distress by helicopter and/or by surface craft, to advise and assist the ship’s crew in tackling and/or containing fires, smoke, and/or chemical hazards arising from spilled, leaking or burning materials. Fire and/or salvage teams may also be able to bring additional equipment to the ship to assist in dealing with such hazards.” (MSC.1/Circ.1183, paragraph 2.1.1)

12. The overarching MIRG FRS strategy for this scenario at sea, is to stabilise and contain the incident sufficiently to prevent a mass evacuation until the casualty vessel can be brought alongside and sufficient resources deployed to conclude the incident. This strategy fully supports and aligns with the ethos of the IMO MSC guidance.

13. It is well-documented that the masters of ships dealing with fires at sea very much welcome such support, and especially professional firefighting advice. The alternative may be a complete or precautionary partial evacuation of the ship at sea, exposing passengers and non-essential crew to very significant additional risks.

14. Two approaches are utilised to provide the assessment of risk undertaken by BMT Isis Ltd. The first which is based on a dataset provided by the Marine Accident Investigation Branch (MAIB) considers fires that had the potential to cause multiple fatalities within UK territorial waters.

15. The report identifies that the overall frequency of these potential incidents is approximately two per year for the whole of the UK and that “this approach identifies that a response capability is required for all of the UK coastline”.

16. The second approach identifies fires that have actually occurred in Europe within the last 50 years and have resulted in multiple fatalities involving passengers. The report estimates that the probability of such an incident in UK waters is 1 in 100 per year and concludes “that the second approach corroborates the finding that a response is required”.

17. The report is based on a dataset provided by the Marine Accident Investigation Branch (MAIB) considers fires that had the potential to cause multiple fatalities within UK territorial waters.
17. Both of these approaches determine that the potential risk exceeds the tolerable/intolerable risk threshold identified within the report as the probability of an incident being greater than 1 in 1000 per year.

18. The report authors identify that the Civil Contingencies Act 2004 Guidance on Emergency Preparedness considers a “Significant” transport accident scenario as one in which the accident involves 10 fatalities and further that the guidance “states that an incident with a likelihood of 1 in 200 over a five year period (equivalent to 1 in 1,000 per year where the incident rate is constant) is described with a likelihood of ‘Level 3—Unlikely’”.

19. The Guidance also proposes that for the reasonable worst case scenario, with a likelihood of “Unlikely” and an impact of “Significant” since it is a transport accident that would result in more than 10 fatalities, the risk classification of this scenario is “Very High Risk”.

20. The guidance defines “Very High Risk” as:

“These are classed as primary or critical risks requiring immediate attention. They may have a high or low likelihood of occurrence, but their potential consequences are such that they must be treated as a high priority. This may mean that strategies should be developed to reduce or eliminate the risks, but also that mitigation in the form of (multi-agency) planning, exercising and training for these hazards should be put in place and the risk monitored on a regular frequency. Consideration should be given to planning being specific to the risk rather than generic”;

21. The Appendix provides a breakdown of passenger vessel fires that have occurred within International, European and UK waters since 1963. These incidents substantiate the worst case scenario as above, in some examples with a significant loss of life.

22. Whilst UK waters have not yet experienced a passenger vessel fire culminating in loss of life there are several recorded incidents where this potential existed. The first deployment of MIRG (May 2006) to the Cruise Ship Calypso occurred within one month of its introduction. The vessel had 708 people on board and requested assistance to deal with a serious engine room fire. Her Master considered a partial evacuation of the ship, at night, in the Dover Strait Traffic Separation Scheme as a precaution. Deployment of the MIRG helped avoid this scenario and the resultant risks to the safety of the passengers.

23. Unfortunately within European waters there have been incidents involving fire that have resulted in a significant loss of life.

— The LAKONIA 128 fatalities.
— The SCANDINAVIAN STAR 159 fatalities.
— The MOBY PRINCE 143 fatalities.

24. Anecdotal evidence also supports the BMT Isis Ltd assessment of risk. The MCA “Consultation on Proposals for Modernising the Coastguard document (2010), considers that ‘our seas are becoming more congested, ‘ships are getting larger’ whilst the ‘coastline is getting busier’.”

25. There is increasing demand and scale within the Cruise Liner industry which represents one of the largest growing sectors of the holiday market (Department for Transport (DfT) statistics).

26. The expansion of green energy sites at sea and the associated numbers of people that will be located within these areas will provide for significant future life risk.

27. It is envisaged that there will be a significant increase in passenger numbers arriving in UK ports in the lead up to the London 2012 Olympic Games. Any incident involving fire on a passenger vessel will provide for high profile international interest, whilst presenting an increased risk to Coalition Government priorities and DfT business objectives “contribute to a successful 2012 Olympics” (Business Plan 2011–15).

28. CFOA is a current member of the Association of Chief Police Officer’s Maritime Advisory Group (MAG), a national, multi agency community that has been established to assist in the development of measures to ensure the effective co-ordination of the national response to a Maritime Terrorist incident within UK waters and surrounding seas. Within this context the group has considered if MIRG would have any capability to assist in a terrorist marine incident, either along the lines of London 7/7 or in a post Chemical Biological Radiological Nuclear (CBRN) scenario. Preliminary work has identified that subject to a “permissive environment” having been established, MIRG could provide a capability if required to assist in resolving the consequences arising from terrorist activity on a ship.

29. The DfT, Transport Spending Review Press Notice (20/10/10) Annex F, announced that a review of MIRG would be undertaken and that “since the MIRG teams began operating in 2006 they have not been involved in any significant incidents. All ships’ crews are trained in basic fire fighting techniques and there is little evidence that MIRG has changed the outcome of ship fires”.

30. Fire fighting training that ships crews undertake is regulated by The Standards of Training, Certification & Watch keeping (STCW) Convention. All mariners are initially required to undertake basic training in fire prevention and fire fighting, a two day course, and may subsequently undertake advanced training in fire fighting, a four day course, subject to requirements set out in Section A-VI/3 of the STCW Code.

31. Within the convention there is no requirement for any revalidation and/or additional fire fighting training.
32. The MIRG have attended six significant incidents at sea since its inception. In each case there has been the potential for loss of life and the Ship’s Master had requested assistance in the form of additional fire fighting resources to augment the vessel’s capability.

33. Each MIRG deployment has provided the Master with an additional, highly trained and professional resource that can assist them with both the strategic and tactical dimensions of a fire incident on board their vessel.

34. The MAIB investigation (Report No 8/2007) into the Calypso incident above reported that the MIRG “provided much needed support and advice to the ships master and to the rescue authorities”.

35. The Marine Safety Act 2003 provides for powers of intervention and directions to the Secretary of States Representative (SOSREP) inclusive of powers in relation to places of refuge. In determining a suitable place of refuge a risk assessment must be carried out by the SOSREP to carefully consider both the economic and environmental impact to the UK if the incident deteriorates.

36. As the use of places of refuge could encounter local opposition and involve political decisions the UK Government has recognised that a properly argued technical case, based on a clear description of the state of the casualty, would be of great value in any decision making which may take place.

37. The most recent MIRG deployment (October 2010) was to the large fish factory vessel ATHENA from which 81 persons evacuated whilst the crew remained to contain the fire. MIRG was deployed to this incident at the request of the SOSREP to provide an at sea assessment on the condition of the ship and to assist in the containment of the fire. MIRG also provided an invaluable link between the vessel and the Local Authority FRS within whose area of responsibility the vessel would ultimately berth.

38. The Review report identifies that MIRG currently provides a professional, specific and specialised response to incidents at sea. A commercial replacement of the MIRG would be expensive and that “The existing form of provision (MIRG) has inherent cost advantages because all the basic training and non-MIRG Firefighter training time is funded elsewhere”.

39. It considers that the most appropriate option identified for future provision of an at sea response to fire, chemical hazards and industrial accidents is a continuation of the MIRG model but with a realignment to match the resources to the identified risk.

40. Cognisant of the Review findings the current MIRG provision has been assessed with a view to realigning to the identified risk. It is considered that UK MIRG resilience arrangements could continue to be maintained within nine FRS’s with a reduction in the cadre of specialist Fire-fighters necessary in each.

41. The MCA currently provide £600k direct funding to support the MIRG provision, whilst the FRS collectively provides an equal amount. The annual direct funding requirement from the MCA necessary to maintain the revised arrangements would be in the order of £340k, a significant reduction on the previous figure of £600k.

42. The previous evidence submitted by CFOA to the TCS inquiry provided the background to the “Sea of Change” project and the subsequent introduction of the MIRG. An increasing decline in UK resilience for dealing with fires at sea and the fallout from a fire on board a vessel in the North Sea in 2001, provided the catalyst for the “Sea of Change” project, which at the request of the Secretary of State for Transport was commenced by the MCA in partnership with CFOA in January 2003. In April 2006, 3 years after the commencement of the project, the Secretary of State for Transport formally launched the implementation of MIRG.

CONCLUSION

43. The independent assessment of risk conducted by BMT Isis Ltd considers that there is a “Very High Risk” of a “Significant” incident involving a passenger vessel at sea within the territorial waters of the UK. “The risk assessment has confirmed that a response is needed around most of the UK, to attend and contain vessel fires with the purpose of preventing loss of life”. That “Eliminating the provision is not considered an option” in the context of the identified risk.

44. Whilst there is no statutory duty on the MCA or FRS to make provision for a response to fires at sea, the current financial support provided by the MCA and equally matched by the FRS, ensures an integrated, interagency national strategy for dealing with incidents in the maritime environment.

45. The independent review commissioned by the MCA concludes that MIRG provides a cost effective and timely emergency response to incidents involving Fire, Chemical Hazards and Industrial Accidents at Sea. “Any commercial equivalent would be expensive and unlikely to constitute an emergency service”.

46. A revised cost effective MIRG model has been proposed that will maintain the current UK resilience to deploy FRS assets to incidents at sea.

47. Without the provision of the necessary funding to maintain the role of the MIRG it will quickly fall into decline and become vulnerable to similar issues which first initiated the formation of the “Sea of Change” project.
48. There will be no provision for the UK to deploy FRS resources to vessels at sea within significant areas of the United Kingdom Search and Rescue Region (UKSRR), this within the context of the Review findings and an escalating risk profile.

49. This issue is entering a critical phase in respect of funding. Individual MIRG FRS’s are currently in the process of presenting papers to their respective Fire Authorities to determine the continuation or withdrawal of their involvement in MIRG. Early indications are that the majority, if not all, FRS would not be able to continue to provide this capability if the funding currently provided by the MCA is withdrawn.

50. MIRG has an important role to play in the safety of passengers travelling by sea off the UK coastline and this has been recognised in the Review report. It is an extremely cost effective model that has been developed and enhanced over a number of years and an excellent example of partnership working across Government departments. CFOA would encourage the Transport Select Committee to recognise the service provided by MIRG teams across the UK and recommend its continuation through the provision of adequate national funding.

APPENDIX

PASSENGER VESSEL FIRES—DATA REPRESENTATIVE OF WORST CASE SCENARIO
(WORLDWIDE)

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Written evidence from KIMO UK (MCA 20)

Thank you for your letter of the 25 of November. I am pleased to see that you have raised the issue of the Emergency Towing Vessels with Philip Hammond in the Transport Select Committee. I note that the committee will shortly be taking evidence from MCA representatives. There are a number of points I would like to make prior to the meeting, some of which you may wish to pursue at the committee.

KIMO UK believes that the proposed modernisation of the Coastguard has been rushed and that there are flaws in operating the service from a vastly reduced geographical base. The consultation does not look beyond the search and rescue services of the Coastguard, while obviously the services primary aim, the Coastguard offers a number of other local services that will be lost with the proposed reorganisation.

Reading the consultation documents it would appear that the decision to close or reduce the opening hours of stations have been based on the number of incidents and not on the severity of an incident or the risk it poses to lives and the environment. In the more peripheral areas with more extreme weather regimes responses may occasionally take more than one day but would still only class as one response. The response to the Bourbon Dolphin took four days was only classed as one response the same as a response to a bather in difficulty in the SW that will take minutes to rectify.

The consultation document seems to focus on the career path of employees rather than the impacts of the change on safety at sea. The current system of pairing is being replaced with one pair. It could be argued that one pair is less resilient than many pairs. I also have it on reliable authority that no new technology will be introduced after the reorganisation as the stations are already using said technology. It would appear the only development will be the ability to share the information, something other workplaces have been doing for sometime now.

We feel that although the Coastguard should be striving to modernise and make use of the best available technology the changes being proposed are more to do with cost savings rather than protecting lives and the marine environment. We do not think that a valid case has been made for closing the station.

I have met Mike Penning the shipping Minister regarding the removal of the four Emergency Towing Vessels and I am worried that the decision has been made entirely with the department's budget in mind and with little thought to the consequences for our marine environment and those who rely on them for their primary income. With regards to the ETV issue I would recommend reading the MCA document “Protection of the United Kingdom Marine Environment: A review of ETV provision around the coast of the United Kingdom” January 2001.

I have asked the DfT and the MCA for copies of studies and risk assessments used to justify the decision, the only document they have showed us falls well short of the mark. It only focuses on the amount of oil the ETVs may have prevented from being spilt, ignoring the possibility of other pollution incidents such as chemicals and container losses. The document also ignores the number of incidents that the vessels attend without intervening, the bread and butter work of the ETV. The MCA have acknowledged the importance of this passive escort and deterrent work but now chose to omit it when making a very important decision. One would expect a decision of this importance to have detailed review documents to back it up. Finally on this matter, it would seem that the DfT negotiated poor contracts when putting the ETVs in place and perhaps a more prudent choice would have been to start my renegotiating these contracts.

KIMO UK is worried that a number of bad decisions that are being taken separately will have a disproportionate impact on the UK’s coastal environment and the safety of those who live and work there. Despite requests no one can tell us if there has been a risk assessment (or similar document) that assesses the removal of the ETVs, the reduction in Coastguard capabilities, the loss of the Nimrod fleet and the possible removal of the Marine Incident Response Group.
It beggars belief that at a time when our near neighbours see fit to improve their maritime search and rescue and environmental protection capabilities we are dramatically reducing ours.

January 2011

Further written evidence from KIMO UK (MCA 20b)

KIMO UK POINTS TO MAKE TO THE TRANSPORT SELECT COMMITTEE

1. Meetings were held in Edinburgh and London to discuss the future of the tugs. MCA officials at the meeting seemed to think that some sensible suggestions were made during the course of the day, but from what I have heard since the event, the DfT/MCA are unwilling to pursue the two most salient suggestions (the Light Dues and the Crown Estate income).

2. Indeed in the case of the Light Dues the funds have been promised to plug a pension commitment that cannot be met. As I understand it the Light dues should only be used for purposes that aid navigation, a description that the ETVs surely fit better than a pension pot.

3. It is evident that there is no private interest capable of running an Emergency Towing Vessel service in the Minch and Fair Isle areas. In fact there are a number of reports prepared for the MCA that confirm all four tugs are located where there is a gap in private tug provision and where the impact of pollution is likely to be greatest.

4. The 2008 Marico report commissioned by the MCA begins “The United Kingdom appears to have little option but to continue its involvement in the contracting of Emergency Towing Vessels (ETV). Lack of capability within the commercial tug and towage sector (in effect market failure), European Union obligations, and societal expectations (zero tolerance of major marine environmental incidents) combine to dictate the need for this contingent capability.”

5. It continues “In cost benefit terms, averting one major shipping disaster and environmental incident of the scale of the PRESTIGE would justify a contract price far in excess of that currently being paid until its expiry in 2011 and beyond.”

6. It unbelievable that the MCA/DfT feel that so much has changed in the intervening year and a bit. By cancelling the tugs it appears that the government are happy to take responsibility for much larger costs for the clear up of an event such as the Braer and for local economies and communities to be disseminated by such an accident.

7. There is dubious use of the English language that has been employed to misreport the frequency of use of the tugs. It would appear that the tugs are tasked up to seventy times per year, a figure greater than that used by your department. Any other figure reported ignores the fact that the ETVs were probably the only tugs in the area and hence the only boat likely to win a contract put in place, to report otherwise is disingenuous.

8. At the Edinburgh Discussions we were told that the Minches tug was not tasked last year but since the decision was announced it has pulled the HMS Astute from Skye and Towed the Red Duchess away from Rum, two high profile cases that could have resulted in serious pollution.

9. As I understand it both the IMO (Assembly Resolution A.949(23) Part 3 Section 3.1) and the EU (because all EU states have signed UNCLOS and therefore obliged by the above IMO resolution) oblige member states to facilitate places of refuge for disabled ships and, with that, to have in place a suitable salvage service to meet their needs ie an ETV.

10. CAST—The MCA have declared that the CAST system is not fit for purpose and have said they would have to seriously review it if this becomes their source of vessels to respond to an emergency.

April 2011

Written evidence from Comhairle nan Eilean Siar (Western Isles Council) and Shetland Islands Council (MCA 29)

STORNOWAY AND SHETLAND COASTGUARD STATION: KEY MESSAGES

Overarching Message

— We support the modernisation of the coastguard service.

But

— the present proposals will increase the risk to, and compromise the safety of, shipping around the North and West of Scotland;

— have not been fully thought through or analysed; and

— will have very little impact on costs despite being driven by the need to make savings.
These flaws in the Maritime and Coastguard Agency’s modernisation programme are compounded by the decision to cut Stornoway and Fair Isle’s Emergency Tow Vessels (ETV).

**COASTGUARD PROPOSALS**

— *Axing Stornoway or Shetland Coastguard Station risks the safety of shipping*
  - Coastguard stations are Britain’s insurance policy against serious maritime incidents. This is particularly important in the Minches, which are amongst the busiest shipping lanes in the UK.
  - Stornoway and Shetland Coastguards’ local knowledge is vital to keeping the area safe.
  - Shipping regularly includes oil tankers and nuclear submarines. An accident involving such a vessel could have a catastrophic environmental impact and lead to a massive loss of life.

— *The proposed reforms have not been fully thought through or analysed*
  - The Maritime Coastguard Agency (MCA) admits that no proper risk assessment has been carried out on the proposals. This is extraordinary given the possible severity of a future incident.
  - So little evidence is available on the impact of the reforms that the Stornoway and Shetland task force has commissioned its own research. No decision on the future of the coastguard should be taken until this is published in March and fully considered.
  - The proposals are technically flawed. For example, there are serious doubts about the reliability of the communications technology on which the proposals rest. We cannot afford the risk of closing Coastguard stations, only to find that the replacement is not fit for purpose.

— *The potential cost savings are minimal*
  - The proposed reforms being touted as an efficiency saving, but the potential gains are minimal. The reforms are estimated to save just £120 million over the next 25 years, or £4.8 million per year.
  - This figure is such a small part of the DfT’s budget that it was not even included in the department’s Comprehensive Spending Review.
  - Any cost savings could be immediately wiped out by a single serious incident. The cost of cleaning up the Braer oil spill off Shetland alone was around £100 million.

**THE ETV**

— *Scraping Stornoway ETV would put shipping at risk*
  - The ETV responded to 106 incidents last year. Should the Stornoway tug be scrapped, help would have to come from elsewhere, potentially 18 hours away. This is simply too long.
  - The last review of tug provision was Lord Donaldson’s report into the Braer disaster. Lord Donaldson recommended the Stornoway tug and nothing has changed since this report. Indeed, shipping frequency has increased significantly in the last 15 years.
  - There is no commercial alternative to the current arrangements, particularly on the West coast. There is simply not enough work to make a commercial enterprise profitable. Scraping the ETVs without an alternative leaves the North and West of Scotland unprotected.

*February 2011*

**Written evidence from Captain Mark Sansom, Falmouth Harbour Commissioner (MCA 87)**

My name is Mark Sansom and I am the Harbour Master and Chief Executive of Falmouth Harbour Commissioners. I have worked for Falmouth Harbour Commissioners since 1992 and was promoted to Harbour Master and Chief Executive in 2000. Prior to working for the Commissioners, I was a Salvage and Mooring Officer for the Ministry of Defence.

During my time with Falmouth Harbour Commissioners, I have dealt with a number of shipping casualties. I have presented a paper on casualty reception to a British Ports Association Conference and was called as a witness at the Devon County Council inquiry into the beaching of the MSC NAPOLI.

A number of casualties received in Falmouth have been under tow from the Emergency Towing Vessels (ETVs). The most recent occurrence was last October where the MV ATHENA was taken under tow whilst in Falmouth Bay and towed clear of the Harbour Area.

The Board of Falmouth Harbour Commissioners are concerned about the removal of the SW approaches based Emergency Towing Vessel. They consider that they have a responsibility to their local stakeholders and feel that this decision is likely to adversely affect their interests. The Board have asked me, as an informed person, to make a submission to the Transport Select Committee.
It is of concern that the decision has been taken to discontinue the ETVs without any consultation. The grounds for the decision are not convincing and a consultation exercise would allow the many and varied issues involved in this complex area to be properly considered.

The Shipping Minister’s statement, when announcing his decision that state “provision of ETVs does not represent a correct use of taxpayers’ money” and that “ship salvage should be a commercial matter between a ship’s operator and a salvor” is potentially misleading. It implies that the current ETV arrangements have been developed primarily to benefit the shipowner rather than the taxpayer which is not the case. The taxpayer funding of ETV was initiated to ensure that there was a suitable resource capable of towing large vessels available to protect parts of the UK coast where there were unlikely to be suitable towage assets stationed for ordinary commercial purposes. In fact, even with the current ETV contract, salvage is usually conducted as a “commercial matter between the ship’s operator and a salvor” as the current agreement provides for the ETV owner to undertake salvage on a commercial basis to improve the value for money to the taxpayer.

Whether the ETV represents “correct” use of taxpayers’ money needs to be judged in the context of the public appetite for the increased risk of a large vessel stranding with resulting large scale pollution. Recent events have indicated increasingly heightened public concern about such incidents. A consultation exercise would have allowed for the views of the public on this matter to be considered.

The setting up of the ETVs came as a result of risk assessments undertaken after the report from Lord Donaldson’s inquiry into the loss of the BRAER in 1993. A trial was undertaken during 1993 and 1994 which resulted with ETVs being assigned to four UK stations in 1995. The situation was reviewed by an MCA internal study in 2001 and a further review was undertaken in 2008 by Marico Marine. All of the studies undertaken to date have confirmed the need for ETVs. There is no further study that I am aware of indicating that the ETVs have become unnecessary.

Since the decision was taken, the Maritime and Coastguard Agency have commenced a consultation with a wide range of stakeholders aimed at identifying possible alternative provision of ETVs. They have made it clear that the implementation of the Secretary of State’s decision is not dependent upon an alternative solution being found.

During the consultation, they pointed out that the Donaldson recommendation was for state funded ETVs as an interim measure until another “system” could be set up. There is no indication that the setting up of a “system” is well advanced and it appears almost certain that there will be no alternative provision when the current ETV contract is terminated.

In the absence of the ETV, reliance is placed on the timely appearance of commercial towing resources of suitable capability to prevent a disabled casualty being driven ashore. It is my understanding that no study has been undertaken to assess whether suitable resources are regularly stationed in the areas currently protected by the ETVs.

Although once common, anecdotal evidence suggests that salvage companies no longer favour the approach of maintaining capable salvage tugs on station as it is generally not cost effective. When the ETV is discontinued, it is possible that the low level of effective salvage cover for the South West Approaches will be unprecedented.

It does not follow that as casualties are becoming rarer, the ETVs are less necessary. Whilst it is demonstrably true that incidents are reducing, they have certainly not ceased. With ship sizes generally increasing, the potential consequences of a wrecked vessel are even greater than they were when the ETVs were introduced. Whilst the reduction in incidents is obviously welcome, it has reduced the opportunity for regular commercial salvage which makes it still less likely that the stationing of suitable commercial salvage tugs in areas currently covered by ETVs will become attractive.

It also does not follow that the general availability of harbour tugs can effectively be used to effectively mitigate the threat of a major marine casualty. Large vessels require proportionately greater tug capability. Modern harbour tugs, although powerful, are frequently designed for sheltered water use and may be unsuitable for towing in open sea conditions. Where suitable harbour tugs are available, the assistance they could offer is likely to be ineffective in bad weather conditions.

The decision to remove ETV cover completely does not appear to have been based on an analysis of the risks involved. The consultation process which could have informed a risk analysis has been omitted. The savings to taxpayers are projected on the basis of no major casualties occurring. These incidents inevitably require costly responses from government and local authorities where costs are seldom fully recovered and may be very substantial.

April 2011
Written evidence from Oil & Gas UK (MCA 89)

This paper sets out the position of Oil & Gas UK on the proposals for modernising the Coastguard in relation to offshore oil and gas operations. It therefore focuses on the proposed restructuring of the Coastguard service; offshore oil and gas installations are outside the current scope of MIRG and the emergency towing vessels are provided as part of oil spill contingency planning to deal with near-shore shipping incidents rather than offshore events. Neither of the two latter considerations are therefore of direct relevance to the offshore oil and gas industry. This paper draws upon the content of Oil & Gas UK’s formal response to the MCA consultation document.

1. INTRODUCTION

Oil & Gas UK is a trade association representing 120 member companies, including operators and companies from across the UK offshore oil and gas industry supply chain. There are presently 291 oil and gas installations on the UK Continental Shelf and typically around 15,000 people working offshore on or in support of these installations on a daily basis. The offshore location of the installations and the inherently hazardous nature of hydrocarbon exploration and production operations mean that the Coastguard service is a crucial component of the industry’s emergency preparedness and response arrangements.

2. GENERAL ISSUES ARISING FROM THE COASTGUARD MODERNISATION PROPOSALS

The following sections set out some general points arising from our assessment of the Coastguard modernisation proposals.

2.1 We contend that the offshore oil and gas industry is generally well served by the Coastguard service in its current form and the weaknesses cited in the MCA consultation document are not readily apparent to the industry.

2.2 We acknowledge and accept the basic drivers of the overall service improvement and system resilience enhancement that are at the core of the modernisation proposals. We also note however, that cost reduction imperatives appear to unduly influence certain proposals where security of tenure considerations may prevail over more operationally significant factors.

2.3 We express reservation that many of the service improvements appear to be predicated on the implementation of new or upgraded IT and communications infrastructure. This steers towards caution on our part in light of the challenges presented by major IT projects and the significant risk of failure that is typically associated with such projects.

2.4 The proposed changes are by any measure significant and will require effective change management to avoid adverse and unintended consequences during a transition period. We note for example that a number of personnel will take on new or enhanced roles and that will add to the burden of management, supervisory and experienced Watch personnel as they monitor and steer less experienced personnel as they attain new competences.

2.5 The proposed manpower reduction appears to be radical and the revised organisation’s capacity to cope with peak or abnormal demand may be tested. The reduction in operational centres also increases the likelihood of a requirement to deal with concurrent events and that may also stress the revised organisation.

That aspect is most evident at Maritime Operations Centre (MOC) level during night time hours when two centres will carry the full loading.

2.6 We believe that the MCA restructuring proposals need to take account of a number of other factors that potentially compound the effect of changes within the Coastguard service and may impair the effectiveness of a response to offshore emergencies, namely:

— the aborted procurement process relating to contracted search and rescue helicopters;
— the Government decision not to renew the contract for emergency towing vessels on its expiry in September 2011;
— the possibility of Moray air bases closure or removal of military search and rescue helicopter assets;
— the extended life of many existing fields and new developments meaning that offshore oil and gas installations will be in play for decades to come yet; and
— the increasing scale and diversity of offshore industrial development with the renewables industry introducing new challenges and operational risks.

3. ISSUES SPECIFICALLY AFFECTING THE OFFSHORE OIL AND GAS INDUSTRY

The following sections set out our evaluation of specific impacts of the proposed changes to the Coastguard service and in particular notes the concern we have that currently effective arrangements may be impaired by certain aspects of the proposals.

3.1 In relation to the offshore oil and gas industry we would highlight a key differentiator in the type of emergencies the Coastguard may be called upon to manage. Although infrequent, offshore oil
and gas emergencies may be high consequence events and may be more protracted than those typically handled by Coastguard operations personnel. In relation to incidents occurring during day time and being handled initially by a day-manned sub-centre, there is an obvious real potential for an ongoing incident being handed over to a MOC (and possibly back again). Such a continuity break causes some concern. This aspect has a bearing on a number of associated issues highlighted within this section.

3.2 The current MRCC configuration means that there is a centre located within all of the offshore oil and gas regions. This delivers clear benefits in respect of:
- local knowledge of the industry within Coastguard resources likely to respond to offshore oil and gas emergencies;
- proximity to oil and gas operating companies to encourage and foster working relationships; and
- ability of operating companies to deploy resources to MRCC in the event of an offshore emergency or for exercises to support and inform the Coastguard response.

3.3 The proposed establishment of two 24/7 MOCs supported by six day-manned sub-centres, although potentially sustainable, raises the following issues for the offshore oil and gas industry:
- **Our insistence that MOC North be sited at Aberdeen**: although this does not appear to be in dispute in the consultation document, we recognize that others may make a case for the MOC North to be located elsewhere. That would seriously disadvantage our industry and break a strong bond established over many years of interaction between the industry and Coastguard personnel. We see no alternative to Aberdeen as the MOC North location that would satisfy the requirements of our industry.

- **Our selection of Shetland and Liverpool as preferred sub-centres** where that option is offered. In particular, we would regard the selection of Belfast as a sub-centre at the expense of Liverpool as a retrograde and potentially harmful change. Our member companies operating in the East Irish Sea have the same affinity with Liverpool as operators in the Northern North Sea have with Aberdeen. We note that using determinants applied to other areas, Liverpool should in fact be a preferred location. Not least among those considerations is that Liverpool currently records significantly higher levels of activity than Belfast.

- **Great Yarmouth would better serve the oil and gas industry as a sub-centre than Humber** on the basis that there is a greater intensity of offshore oil and gas operations in the Great Yarmouth area. The local presence benefits outlined at 3.2 above apply.

3.4 We make a case for a change to the proposed association between Humber (or Great Yarmouth, if that option should prevail) and MOC South. This would result in an offshore oil and gas incident in the Southern North Sea which runs past a day-shift end at the sub-centre being handed over to MOC South, or an incident in that area occurring during the night being handled by MOC South. We propose that all offshore oil and gas incidents be handed over to MOC North based in Aberdeen, irrespective of its geographical location. Familiarity with the industry makes that a pragmatic proposition as MOC South personnel are less likely to be familiar with the offshore oil and gas industry.

3.5 We strongly urge the retention of the Offshore Energy Liaison (OEL) team roles currently situated in Aberdeen. The team provides a crucial link between the offshore oil and gas industry and MCA. Although not specifically addressed in the proposals, we greatly value the support provided by this team and would expect separate consultation should these roles be threatened by restructuring or a proposal be made to integrate the team functions into other operational roles.

3.6 We are mindful that in any reorganisation resulting in reduced manpower, there is always a potential to stretch the revised organisation and for important tasks to “fall between the cracks”. An example of this might be the maintenance of data bases of information on oil and gas installations. These are currently maintained by MRCC personnel but with significant support from the Offshore Energy Liaison team members. The loss or diminution of the OEL team would adversely affect that task and could easily lead to out-of-date information remaining in the data base. That threat may also arise from reduced manpower at operational centres and the assignment of additional “unsupported” tasks (such as data base management) to Watch personnel.

3.7 We note the retention of three Counter Pollution Officers in the revised organisation. In light of the current scrutiny of oil spill response preparedness in our industry, we support that proposal and advise against any additional tasking of those positions that might weaken their primary function.

4. Conclusions

Oil & Gas UK accepts, in very general terms, the rationale for the modernisation of the Coastguard service and is supportive of measures to improve the overall effectiveness and resilience of that service. We do however recognize the scale of the proposed change and voice concern at the potential impacts on our member companies’ operations, as set out in the points above. We highlight the loss of MRCCs “local” to offshore oil and gas companies and their operations, and the loss of the benefits that such proximity currently offers. In
particular, we make the case for the confirmation of Aberdeen as North MOC and the selection of sub-centre locations which are optimally sited in Shetland, Liverpool and Great Yarmouth to support offshore oil and gas operations. We also stress our support for the Offshore Energy Liaison team and urge retention of that team. We note that the overall reduction in manpower may place stress on the revised organisation and test its capacity to manage peak or abnormal workloads, and to respond effectively to concurrent incidents. Finally, we urge caution in respect of the reliance on new or upgraded communications and IT infrastructure for the successful implementation of the revised arrangements. These major projects need to be well managed from the outset as part of an overall approach to change management that considers and responds to all of the barriers to success.

April 2011

Supplementary written evidence from Oil & Gas UK (MCA 89a)

Further to the evidence given by Robert Paterson, Oil & Gas UK’s Director of Health and Safety, before the Transport Committee on Thursday, 19 May in Stornoway, Oil & Gas UK would welcome the opportunity to brief committee members in order to clarify a statement made by one of the other witnesses at the session.

The statement related to the issue of insurance to cover third party costs of cleaning up on-shore oil pollution resulting from an incident, including a blow-out, on an offshore oil and gas production facility.

Oil & Gas UK would like to make the following points:

1. Within the UK Continental Shelf (UKCS), there is no legal limit to the liability of companies with a licence to explore for and produce oil and gas offshore; all licensees are (jointly and severally) responsible for the consequences for their activities. In addition, DECC, through the UK licensing regime, has the power to request that operators provide evidence of their ability to meet liabilities which are not covered by OPOL (see below). Companies typically purchase a programme of insurances that embrace:
   - Physical loss and damages to property;
   - Control of well expenses (including drilling relief well(s)); and
   - Third party liabilities, including ring-fenced cover at least commensurate with OPOL membership requirements.

2. OPOL is an agreement between operating companies that:
   - Each individual operator will reimburse the costs of remedial measures incurred by public authorities and pay compensation on direct costs on a strict liability basis to third parties for pollution damage, providing claims are made within a year of the event, up to the OPOL limit. Members are required to submit evidence of financial responsibility (ie, their ability to pay out) to OPOL to confirm these liabilities can be met. Beyond that limit, claimants still have redress, but at law.
   - In the event of an individual operator defaulting, they will provide a mutual industry guarantee, up to the OPOL limit.

3. The purpose of OPOL is to ensure that claimants can recover quickly and efficiently without having to go to court. The reference to “direct” loss or damage was made with this in mind so that both claimants and operators have clarity on the nature of the loss and damage covered by OPOL, and with a view to avoiding lengthy legal debate which would delay payment/recovery. The concept of “direct” loss and damage is one commonly used in English law agreements and there is plenty of precedent to give clarity to its meaning.

4. OPOL provides an effective, safety-net mechanism to assure government. However, it does not provide a physical fund or weaken or limit the legal liability of licensees/operators. OPOL is legally binding on its members and, in practice, is not voluntary, as it is a DECC requirement for all Operators to be bound into membership before they can conduct activities on the UKCS.

5. The OPOL limit of $250 million per incident is considered, based on previous independent oil spill studies, to be more than sufficient for the vast majority of wells in the North Sea. As the majority of well activities are adequately covered by the current limit, raising the universal limit further to address the few higher-risk (but low probability) wells would unnecessarily burden and could even jeopardise normal UKCS operations.

6. Oil & Gas UK acknowledges that there may be a case for potentially high impact wells in the West of Shetland to have an additional “top up” cover in addition to OPOL. DECC already has the power to request such a top up under existing regulations. DECC could therefore set the requirement for this additional level of coverage for this small number of wells.

May 2011
Written evidence from National Coastwatch Institution (NCI) (MCA 90)

We are pleased to introduce NCI and to offer our comments concerning the proposed modernisation of the Coastguard.

Formed as a charity in 1994, NCI currently operates 45 Watchstations around the coast of which 96% have Declared Facility Status. All are manned by over 2,000 carefully trained personnel in daylight hours using high tech surveillance equipment including radar, AIS and high quality optical aids. In 2010 NCI offered over 190,000 hours of organised coastal surveillance at no cost to the public.

Our highly competent operational membership comes from all walks of life offering a wide variety of skills. Training takes up to 12 months and all are regularly assessed with updated training programmes in place to maintain standards.

Hundreds of incidents are reported to Coastguard annually. Many are life threatening, or potentially so.

A steady, planned programme of new Station development continues. Plans to develop Stations in Scotland are in hand. MCA modernisation as proposed, will certainly affect NCI.

SUBMISSION

1. Communication. Routing of contact between NCI and Coastguard Stations will have to be well ordered and robust. We cannot comment in detail about our modus operandi with any reshaped MCA until we know how it will end up, other than to say that the NCI role will have to be extended in order to satisfy the needs of widely separated centres. We believe that communication will be the major factor on the basis that Coastguard Stations will be much overloaded, particularly in busy periods—April to October, where leisure traffic looks for advice and assistance. NCI will always have VHF radio qualified watchkeepers on duty and MCA will have to change its attitude on this matter where we are restricted in the use of VHF operation which is essential during emergencies.

2. MCA Stations, with a few exceptions, do not have radar. This is required equipment for NCI surveillance purposes and assists in many incidents at sea.

3. The removal of a number of MCA Rescue Coordination centres brings more emphasis on their Voluntary Rescue Service with which we regularly operate, resulting from our “Spot, Plot and Report” system. Points of contact must be clearly defined under any new arrangement. NCI does not undertake cliff and similar physical rescue work but remains in full support when incidents arise.

4. First Aid equipment is available in all Stations (although we do not offer treatment). We call for Ambulance and Police assistance when needed.

5. Our liaison with the RNLI Lifeboat teams local to our Stations is close. We regularly train together—an example of essential radio communication. Helicopters are often involved, also.

6. It is being said that local knowledge will cease in the areas of current MCA operations. Not true. Coastguard Auxiliaries will have this as well as all NCI Watchkeepers in situ who are trained and regularly assessed for their local knowledge being vital when reporting incident locations, etc.

7. We believe that towing, fire-fighting and similar equipment should be available at short notice. The Lifeboat cannot and is not equipped for this purpose when large vessels are in difficulty.

8. NCI remains in full support of MCA and all Search and Rescue services and will continue “Business as Usual” whilst developments are in progress.

We are happy to offer further oral evidence to the Committee if required.

April 2011

Written evidence from Cornwall Fire & Rescue Service (MCA 94)

INTRODUCTION

1. At almost 300 miles, Cornwall has the longest county coastline in the United Kingdom. It has three major estuaries The Fal, The Fowey and the Camel, all of which are environmentally sensitive. In all, there are 11 European and 61 nationally protected environmental sites in the county with approximately 40% of the coast undeveloped. Many of these areas are designated as areas of outstanding natural beauty with a number of new marine conservative areas being proposed.

2. Against this backdrop, the Southwest Approaches are extremely busy with maritime traffic. There are Maritime Traffic Separation Schemes (TSS) surrounding the county for example one to the West between Lands End and the Isles of Scilly and one running North/South into the Irish Sea. Following new regulations under low sulphur legislation, a sulphur emission control area operates within Cornish Waters. Falmouth Oil Services offer a transfer station which has seen a very significant increase in vessels steaming up the channel coming up to Falmouth Bay in order to transfer bulk fuel. Not only does this attract more shipping to the area
but it also adds to the potential for a marine accident such as collision, spillage, fire or explosion resulting in risk to life and widespread environmental pollution.

**BACKGROUND**

3. Since its inception in 1948, Cornwall County Fire Brigade (now Cornwall Fire & Rescue Service) provided an Offshore Firefighting and Rescue at Sea facility. The Service therefore has a long history in dealing with fires in vessels and preventing the sinking of ships from flooding. Provision of this service was paid for by Cornwall County Council and efforts were made to recoup costs through salvage claims or via ship’s insurers. In 2006, Cornwall County Fire Brigade became a member of the Marine Incident Response Group.

**CURRENT SITUATION**

4. Currently Cornwall Fire & Rescue Service is one of 15 Fire & Rescue Services that provide a response as part of the Maritime Incident Response Group (MIRG), deploying to incidents at sea where there is risk to life, risk of significant environmental pollution or chemical release. The MIRG teams work on a system of mutual support, reinforcing each other as required. Cornwall’s nearest MIRG neighbours are Hampshire and Mid & West Wales.

5. Since the formation of the Maritime Incident Response Group in 2006, Cornwall Fire & Rescue Service has deployed to several incidents, with the most recent being to the stricken factory ship ATHENA.

6. The Athena fire, as with all such incidents, requires a multi agency approach drawing in the skills, expertise and experience of a range of providers. These include the MCA Coastguard, RN or Coastguard Search & Rescue Helicopters, RNLI Lifeboats, Local Harbormasters, Salvage Tugs, towage, berthing and docking facilities. Key amongst these is the facility to provide specialist trained firefighting personnel who can assess, monitor, advise and report on the situation allowing vital decisions to be made on the best way to deal with the incident and whether or not that vessel will be allowed entry to a safe haven or ultimately into port. *Evidence/Testimony of this work can be found in Appendix one which is a letter from the Secretary of States Representation (SOSREP).*

7. In the case of Cornwall’s MIRG team, all the above assets and facilities are strategically located at the head of the south west approaches with reinforcement assets available from both Wales in the north and Hampshire to the east.

8. As a consequence, by being a member of the MCA MIRG, CFRS are able to sustain the necessary high level of training and maintain the experience of its officers in dealing with fire and rescue related maritime incidents. It can also support the maintenance needs of specialised equipment and clothing (Personal Protective Equipment) required to respond to offshore incidents for which the fire authority has no statutory duty.

**CONCLUSION**

9. Without the provision of necessary funding to maintain the role of MIRG and the facility of reinforcement of other Fire & Rescue Services (FRS) Cornwall Fire & Rescue Service are unlikely to be able to maintain its support, training and provision of a similar service in the future. Undoubtedly that future will bring with it many more instances of fire, environmental pollution and chemical release at sea, threatening the lives of mariners and the wellbeing of our coastline and its wildlife. However, once lost, it will be unlikely that it will be again possible to provide a maritime response to such incidents from within the Fire & Rescue Service, not only due to funding, but also because there is not a statutory duty to attend, personnel will not have the appropriate transportation training and competencies and very quickly the vast knowledge, skill and experience within the Service will be lost.

10. The loss of the MIRG across the UK and in particular in Cornwall will not only set back maritime safety by several years but to a position not seen since the second world war as CFRS will no longer have an offshore facility to help those mariners in distress nor protect its coastline from the resulting environmental pollution.

**APPENDIX**

**CORNWALL FIRE & RESCUE SERVICE RESPONSE TO FACTORY SHIP ATHENA**

Please accept my sincere apologies for not writing sooner but I would like to take this opportunity to personally thank you for Cornwall Fire and Rescue Service’s response to the above incident.

The Service not only assisted HM Coastguard in executing their Search and Rescue remit but also greatly assisted me in persuading Falmouth Port to offer the vessel a Place of Refuge thereby reducing the risk of further damage being caused to the environment.

For incidents within the United Kingdom’s Counter Pollution Zone I rely on an assessment team boarding the vessel for the purpose of gathering evaluation data. This enables me to make the final decision as to whether it will be allowed to enter a port or come closer to the coastline. To meet this need I rely on the MIRG teams being able to respond 24/7 and welcome their experience and professionalism. There are no other persons or assets readily available to perform this function.
Cornwall Fire and Rescue Service not only responded to the vessel when it arrived in Falmouth Port Limits but they kindly provided an at sea attendance during the salvage phase and crucially formed an integral part of the final assessment team which ultimately led to the decision to bring the vessel alongside.

For each of these services I am extremely grateful and it would be appreciated if you could pass on my thanks to all concerned.

I would also like to take this opportunity to give credit to your assistant Chief Fire Officer Ted Simpson who not only provided invaluable support throughout the operation but who also developed the Fire Risk Management Plan. This plan proved to be an invaluable document and with your kind permission I would like to promote its use as a best practice to other Fire and Rescue Services and Ports across the United Kingdom.

Finally I fully appreciate that the future of the MIRG Teams is under threat due a shortfall in the necessary funding. I do hope that the Transport Select Committee will, as a result of their consultation process, request that the matter be given serious consideration.

Any changes to the current UK system may well, in my opinion, seriously compromise the UK’s resilience to deal with maritime incidents in the future.

April 2011

Written evidence from the British Tug Owners Association (BTA) (MCA 95)

1. The British Tug Owners Association (BTA) welcomes the opportunity to provide written evidence to the Transport Select Committee in response to the MCA's consultation on the proposals to modernise the Coastguard and announcements relating to the removal of Emergency Towing Vessels (ETVs) and Maritime Incident Response Group (MIRG) provisions.

2. The BTA promotes the interests of port towage operators, representing their views on legislative and economic issues, providing training and career development portfolios and advancing safety and technical development within the industry. We represent nearly 80% of Harbour Tugs that operate in the UK waters. Towage is a vital element in the safe and efficient operation of the majority of ports in the UK. Hundreds of vessel movements every day are assisted by over 160 tugs operated by the members of the BTA. Tugs are equally a front-line resource. Constantly available around the UK, tugs play a key role in salvage, rescue, firefighting and pollution prevention.

3. Several BTA members are also professional salvors and are active members of the International Salvage Union.

4. MCA's duty as an Executive Agency of the Department of Transport should be to fully manage and respond to emergencies, co-ordinate rescue operations and prevent loss of life at sea. Mariners rely upon this given assurance and it makes our seas safer.

5. The UK is an island nation with a great maritime history. We also have a significant number of leisure and commercial users around our coast. So, maintaining our independent ability and resources to deal with any major maritime incident is critical. “Erika”, “Prestige”, “Sea Empress” or “Braer” all had significant environmental and trade consequences and such incidents had much to do with the implementation of ETV's.

6. BTA is aware of the decision that seeks to reduce funding across all Whitehall departments. But, whilst we support the proposals and the need toexploit new equipment and technology which would lead to an improved response capabilities of the Coastguard, this must not lead to an increase in risk that it cannot manage.

7. The concept of safety and prevention of loss of life at sea is founded on the International Convention for the Safety of Life at Sea (SOLAS). In BTA's view, government should ensure the provision of services to maintain such commitments and respond appropriately to an incident.

8. The following point should be considered prior to implementation of any of the proposed measures:

8.1 Withdrawal of Emergency Towage Vessel (ETV) coverage and the possible ending of the Maritime Incident Response Group (MIRG) should not lead to a vacuum in response provisions. There needs to be at least some form of alternative arrangement in place. Whilst funding for a future scheme may have to rely upon industry and local groups, until there is an agreement for a long term solution the MCA must retain its coordinating role in finding a workable and effective way ahead.

9. Recommendations:

9.1 There must be an alternative arrangement and a plan in place to deal with emergencies that threaten lives or the environment. The decision to remove both MIRG and ETVs is likely to place an increased burden on the Coastguards when dealing with maritime incidents. BTA therefore believe that this potential reduction in the external resources available to the Coastguard should be taken into consideration when making the final decision on modernisation of the service.
9.2 A thorough risk assessment should be conducted to identify potential environmental costs, as any potential financial savings in the short term could easily be outweighed as a result of a major incident.

9.3 BTA welcomes and acknowledges the intention to allow market forces to fill the gap and over time make available adequate resources to deal with emergencies.

9.4 BTA would like to highlight that commercial salvage is principally a matter of negotiation between two parties; the individual ship owner whose ship could be in distress and the salvage tug who responds to such an emergency ie tugowner.

9.5 BTA is not in a position to offer an explicit guarantee that the tugowners would be able to provide services and be able to respond to all emergencies. If a response is beyond a tug’s capabilities or is unavailable due to the nature of its operational business, safety or other pre-agreed commitments then it would need to be considered by the individual tugowner on case by case basis.

9.6 BTA would be willing to assist as required with the review of existing terms for the Coastguard Agreement on Salvage and Towage (CAST).

9.7 The MIRG should continue to exist. Its removal would represent a huge loss of expertise and an invaluable response mechanism for the cruise, ferry and the Tug sector. It could be focused and be made available at key specific locations and ports and this would reduce financial burden on the tax payer as well. BTA feels that the removal of MIRG would reduce the confidence in the Coastguard’s ability to deal with fire related incidents.

CONCLUSION

10. BTA welcomes and supports the idea of an open and fair market competition.

April 2011

Written evidence from J P Knight (MCA 96)

PURPOSE OF SUBMISSION

J P Knight is the current commercial contractor for the provision of Emergency Towing Vessel (ETV) services to the MCA. The purpose of our submission is to ensure that the select committee have a view from an organisation directly involved in the provision of marine services that works closely with both the Coastguard stations and MIRG. J P Knight are proud of the significant contribution we have made to the protection of the UK coastline and firmly believe the Minister’s decision will expose our coastline to considerably more risk of pollution in the future than it has been over the past decade.

MITIGATION

Members of the committee may consider this submission to be on the grounds of self interest but this is not the case. The ETV contract was due to go to tender this year for commencement of a new contract on 1 October 2011. J P Knight may have been in strong position to win such contract but this was by no means assured, with the likelihood of strong competition from NW European competitors.

SAFER LIVES, SAFER SHIPS, CLEANER SEAS

1. Lord Donaldson’s report “Safer Ships and Cleaner Seas” made 102 wide reaching recommendations to the UK government to reduce the risk of pollution to the UK coastline.

The recommendations included, ship construction, inspection, equipment, surveillance, resources, technology, ballast, culture, language, navigation, Insurance, liability and compensation, contingency and emergency planning.

2. These recommendations must have seemed to be almost unattainable, however, they have, almost without exception, been embraced by the international shipping community and the report revered as having had the most profound impact on the safety of ships and the protection of the marine environment over the last fifteen years.

3. Lord Donaldson highlighted the “Human Element” as the main cause of shipping accidents and this risk element remains undiminished.

4. Emergency response is vital to counter both human and technical failings; it is the last line of defence against the development of a “serious incident” into a “major event”, requiring the implementation of the national contingency plan, particularly in the case in pollution prevention.

5. The UK implementation of the emergency response element in particular (Belton Report) led to the introduction of emergency towing vessels in other countries including France, Germany, Spain, The Netherlands and Norway, however, the UK is alone in the appointment of a secretary of state’s representative (SOSREP) whose position is paramount in cases of emergency where The SOSREP is empowered to enforce the will of
the government on a vessel that potentially poses a danger within UK territorial waters. The ETV will then immediately act upon his instructions to reduce the risk, for example by taking the vessel under tow. The SOSREP will not have the ability to direct a commercial tug that is not under contract to the MCA to put a line aboard a casualty. The delay in being able to intervene promptly is therefore a major concern.

**Emergency Towing Vessels**

**Location and operations**

6. The ETVs now operate in the four strategic locations identified through the process of risk assessment as areas of high traffic density or Marine Environmental High Risk Areas (MEHRA’s).

7. The main function of an ETV is “Pollution Prevention” in particular the ability to tow a stricken vessel out of danger before it becomes an immediate threat to the UK coastline. The vessels are instantly available to respond to incidents, free of other commercial commitments and operational restrictions. Secondary functions of the vessels include on-scene commander, fire fighting, pollution clean up, SAR, guard ship duties, escort duties, provision of a salvage platform, surveillance, traffic separation schemes (TSS) identification duties and assistance to other government departments.

8. The purpose-built ETVs are manned with highly skilled and experienced personnel, equipped to respond to emergencies at sea 365 days a year. They operate under instruction from the Coastguard Stations and in case of emergency under the direction of the counter pollution officers or the SOSREP.

9. The ETVs undertake training exercises with the emergency services to ensure a coordinated response through the local coastguard stations and to maintain the skills required to perform emergency response when required. The recruitment and retention of qualified and experienced crews is becoming ever more difficult and those with salvage experience are a very rare breed.

**Reviews of the ETV Service**

10. In 2000 the MCA undertook an internal review of the then, winter only ETV provision and concluded that such provision should be extended to four vessels 365 days a year. The report highlighted the following:

   — Human Element in shipping casualties.
   — Public Awareness of environmentally sensitive areas.
   — Larger vessels carrying large quantities of bunker fuel.
   — MAIB recommendations into incidents.
   — Increased level of risk vs. heightened desire to protect the environment.

11. In 2008 an independent review was commissioned by the MCA:

   The report concluded that the retention of four ETVs is necessary in order to mitigate the continued risk of pollution in the UK pollution control zone (UKPCZ). It suggests these risks have changed over the period since 2001 in that vessel size, cargoes, traffic density and bunker capacities have increased, although was cautious with regard to future trends as a result of economic developments.

12. The report recommends that the MCA undertake research or development into areas such as:

   — AIS based risk methodology to improve assessment of ETV deployment.
   — Work with EU / EMSA to further improve efficiency of ship surveillance.
   — The ETV deployment policy in Australia.
   — Potential costs and benefits of requiring multiple propulsion systems by larger container ships.
   — Explore with other Bonn agreement members the efficacy of securing funding to assist with the costs of ETV provision.
   — Explore the potential options to maintain the viability of commercial salvage services particularly the essential Skills in this area.

13. These reports conclude that a significant risk of pollution to the UK coastline remains; that commercial alternatives to the ETVs do not currently exist and consequently the retention of ETVs within the UKPCZ is essential until such time as other preventive measures are proven as viable alternatives.

14. J P Knight endorse the review’s findings, however, also recognise that Lord Donaldson, Captain Belton and the authors of the reviews make clear that the UK Government should not have to fund the ETVs alone and steps should be taken to secure funding from other sources. Lord Donaldson in fact goes into some detail on alternative funding in his report.

15. We are unaware that any research has been undertaken into the recommendations of the reviews or that risk assessments have been reviewed to mitigate the risks highlighted in the 2001 and 2008 reports. We understand that shipping is an ever-changing international sector and that in the future there will be technological solutions to assist with the assessment and mitigation of the risks, but today this technology is not in place.
16. It is clear and understandable that the UK government need to reduce the deficit; however this is a budget issue, whilst the risks of pollution to our coastline and the subsequent consequences will remain. The current MCA consultation process with interested organisations is focused entirely on “alternative funding”; an alternative that has not been sought since the recommendations of Lord Donaldson and are therefore unlikely to be found in the few remaining months until the termination of the contract on 30th September 2011. The retention of the ETVs is essential whilst a proper process to achieve alternative funding is found.

17. ETV Statistics

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NDA = no data available

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**ETV Rescue Tows 2001 to 2010**

**Marine Incident Response Group (MIRG)**

18. MIRG plays a major role in the resilience of the MCA to respond to emergencies at sea. The specialist fire service teams at stations around the UK are specifically trained to deal with emergency response at sea. J P Knight has been fortunate to be in a position to support the MIRG teams in responding to emergencies from the ETVs. Fire fighting at sea is a particularly hazardous task and requires specific training, not normally available or cost effectively deliverable to all regular fire crews. The teams have built up a significant amount of knowledge and experience in fire fighting at sea and the current experience needs to be maintained in order to ensure it is not lost. The MCA must consider what is to replace MIRG and if there is no replacement, how it will respond to such emergencies.

**Coastguard Stations**

19. J P Knight has worked closely with the coastguard over many years both within our role as providers of the ETVs and in our other business of harbour, coastal and terminal towage activities. The coastguard of course have a much wider remit than just commercial shipping, as the safety of life of all who use our coastal waters rely on the coastguard to be ready and able to respond effectively to emergencies. We support the proposals for the introduction of technological innovations to improve the response capabilities of the coastguard,
however are concerned that the driver for change is to reduce the costs and this may lead to premature implementation of unproven or untested technologies that may have a detrimental impact on the service.

April 2011

Written evidence from the Highland Council (MCA 111)

In considering how these proposals affect the Highlands and Islands, it is necessary to review them in the context and totality of changes to the overall maritime emergency response capability.

— Withdrawal of the Nimrod long range maritime patrol aircraft has removed the capability to rapidly deploy an on scene communications and command platform.
— Continued uncertainty of the future provision of the helicopter search and rescue service.
— Withdrawal of Emergency Towing Vessels (ETVs).
— Closure of either Western Isles or Shetland Coastguard Stations and significant reductions in staffing.

Taken together this amounts to a critical reduction in the capability to respond effectively to a marine incident in the North of Scotland with a consequential increased risk of loss of life and environmental damage.

As you will see the Council is strongly of the view that to ensure effective resilience and retain the ability to rapidly respond to a marine incident, it is essential that coastguard stations are located on the west and east coasts of Scotland and that they are operational on a 24 hour basis.

The Council is also firmly of the view that the proposal to rely only on commercial alternatives to provide the ETVs is not possible as commercial alternatives with similar capability are simply not available in the Highlands and Islands.

In view of this the Council has suggested that an alternative model for the Highlands and Islands be developed which focuses on additional work and new support funding streams, which could include salvage fees, charging for escort duties and alternative sources of both public and private work.

By developing this alternative model the ETVs could still be provided in the Western Isles and Shetland at no or minimal cost to the UK Department of Transport.

The Council strongly urges that the existing contracts for ETVs based in the Western Isles and Shetland be extended temporarily until an alternative funding model can be put in place given the lack of any commercial alternatives and that the UK Government takes the lead in developing this alternative model.

I do hope you find this submission of help as you consider the Government’s proposals. I would delighted to come and give oral evidence on this alternative model if that would be helpful, meantime if you require any further information please do not hesitate to contact me.

1. Introduction

1.1 The UK Government has proposed significant reforms to modernise the Maritime and Coastguard Agency. In Scotland this will mean that the current five Co-ordination Centres based at Western Isles, Shetland, Aberdeen, Forth and Clyde will be replaced with one 24 hour Marine Operations Centre at Aberdeen and one Sub Centre in either Stornoway or Shetland, the latter of which will only operate during daylight hours.

1.2 The Government also proposes to withdraw funding for emergency towing vessels (ETV’s) on the basis that the public sector should not be subsidising the private sector and that commercial salvage vessels should provide the ETV service.

2. Coastguard Proposals—Implications for the Highlands and Islands

2.1 Background

2.1.1 For the Highlands and Islands the proposals for the Maritime and Coastguard Agency will result in only one Sub Centre located either in the Western Isles or Shetland, which will only operate during daylight hours.

2.2 Operational issues

2.2.1 The Coastguard stations in the Western Isles and Shetland cover some of the most remote and environmentally sensitive areas of the UK coastline. They have responsibility for monitoring a significant amount of shipping in often adverse weather.

2.2.2 The Government acknowledges that the seas are becoming more congested, ships are getting larger, the coastline is getting busier and the weather conditions are becoming more extreme. In view of this it does seem contradictory to close one of these stations and place the other on day light only availability. This will have a serious detrimental effect on the level of resilience in local areas.
2.2.4 These proposals will also result in a loss of local knowledge and people who understand the local place names, tides, weather and diverse dialects (Gaelic & Norse).

2.2.5 It is also important to retain the successful close working relationship between the volunteer coastguard personnel and the coastguard station.

2.2.6 While improvements in technology are welcome, it is understood that this new technology is only mandatory in larger vessels. While new technology can provide better situational awareness, it still needs human input to analyse and respond effectively to that information. This can be delivered best and most quickly on a local or regional basis. In addition it is critically important to have the capability and resilience to respond if the technology fails for any reason.

2.3 Summary

2.3.1 To ensure effective resilience and the ability to rapidly respond to a marine incident, it is essential that coastguard stations are located on the west and east coasts of Scotland and are operational on a 24 hour basis.

3. Emergency Towing Vessels—Implications for the Highlands and Islands

3.1 Background

3.1.1 Emergency towing vessels are provided in other European countries such as France, Germany, Norway and the Netherlands to respond to ships in distress. Their role is to help prevent the loss of lives and ships as well as the avoidance of pollution incidents.

3.1.2 The UK pollution avoidance fleet was introduced following the Braer oil tanker disaster in 1993 which resulted in 86,000 tonnes of oil polluting the Shetland seas, and after a decade long campaign by the former Highland Regional Council and Western Isles Council. A 550 page report by Lord Donaldson made the case for the ETV fleet.

3.1.3 The Government’s intention is that the purpose built offshore tugs will be withdrawn from their stations in the Western Isles and Shetland, when the current contract with private operator Lowestoft-based Klyne Tugs, owned by JP Knight, ends in September 2011.

3.2 ETV Activities

3.2.1 Emergency Response—Initially the Government view was that the ETV’s were under utilised and that this formed part of the reasoning for their withdrawal. This is a flawed argument. To demonstrate the emergency response activities of the ETV’s in Scotland a selection of high profile attendances is provided at annex 1 which between October 2010 and October 2011 were averaging one per month.

3.2.2 Marine Incident Response Group—The ETV’s are fully equipped with fire fighting capability which is an essential part of the Marine Incident Response Group (MIRG), They act as a Standby vessel for the MIRG, provide Offshore search and rescue capability, pollution response and have the ability to provide an on scene communications and command platform (critically important given the withdrawal of the RAF Nimrod aircraft).

3.2.3 Escort Duties in the Minch—As well as attending distressed and disabled vessels the ETV’s are utilised to escort certain vessels through the Minch on the grounds of safety. The MCA at Stornoway decide which vessels require such attendance on the basis of risk.

3.2.4 No figures are available on the number of escorts provided each year, however by monitoring the satellite tracking systems for the ETV’s the Council has determined that escorts are undertaken on average twice per week or over 100 escorts per year.

3.3 Commercial Cover

3.3.1 In relation to commercial alternatives, it may well be the case that commercial towing vessels can replace the ETVs in other areas of the United Kingdom. However there are simply no commercial vessels of a corresponding size (excess of 100 tonne bollard pull) available on the West Coast to replace the Stornoway ETV. (The current ETV has 170 tonnes). Indeed even on the Clyde the maximum bollard pull size vessel available is only 66 tonnes. In addition we know of no vessels on the West Coast of the UK that would be as well equipped to deal with all the potential situations that the ETV is currently outfitted for.

3.3.2 For Shetland, the nearest commercial large towing vessels on the east coast are based in Aberdeen, which are often far to the east in the North Sea. If one of these were to be used to deal with an emergency on the west Coast at Ardmamurchan, the steaming time at 10 Knots from Aberdeen would be 30 hours.

3.3.3 It is clear that commercial alternatives are not available in the Highlands and Islands within 1.5 days steaming and therefore an alternative model needs to be considered.
3.4 Proposed Alternative Model

3.4.1 Given that there is no commercial option is available, an alternative model for the Highlands and Islands needs to be developed which focuses on additional work and new support funding streams. This could include salvage fees, charging for escort duties and alternative sources of public and private work.

3.4.2 Salvage—The contract between ETV provider and the MCA already has provision for a percentage share of the salvage monies from an emergency response to be paid to the MCA. The Government should look at increasing this percentage from 15% to 50%.

3.4.3 Escort Duties—Consideration should be given to charging for escorting hazardous traffic through the Minches.

3.4.4 Light Dues—Explore a modest increase in funding from Light Dues via the General Lighthouse Authority (It is understood that this is ring fenced for aids to navigation and is currently in surplus).

3.4.5 Crown Estate—The Crown Estate has extensive marine assets throughout the UK, including over half of the foreshore and the entire seabed out to the 12 nautical miles limit, and to safeguard their future assets in renewable energy. In addition they also have extensive aquaculture interests with an annual rental income of £3 million in Highland alone. It is clearly in their interests to maintain a safe marine environment and they should be asked to contribute towards the cost of an ETV.

3.4.6 Alternative sources of UK Government public work—Explore the options for alternative sources of public work undertaken by the UK Government (Customs, MOD Diving Support—Kyle, Hydrographic Surveys Northern Lighthouse Board).

3.4.7 Alternative sources of Scottish Government public work—Also explore alternative sources of public work undertaken by the Scottish Government (Fisheries Research and protection, Scottish Environmental Protection Agency).

3.4.8 Alternative Sources of Private Sector work—Marine Insurance companies probably suffer the largest financial loss from maritime incidents. These can include not only the loss of the vessel, but also the cost of the environmental clean up operation. Marine insurance companies whose vessels operate in the waters off the West Coast of Scotland should be asked to contribute to the provision of an ETV, as a long term cost saving measure. In addition the oil industry is currently operating fields off the West Coast of Scotland at Schiehallion, Foinaven and Clair oil fields. Consideration should be given to approaching these companies (principally BP and Shell) to make a contribution to the cost of the ETV's.

3.5 Future Developments

3.5.1 There is an increase in the development of the oil and gas fields to the North and West of Shetland and decommissioning work is likely to begin to the East of Shetland. Sullom Voe and Scapa Flow are both important destinations for ship-to-ship operations.

3.5.2 There is an increase in the use of marine renewables and the vessels that survey sites and install and service the equipment.

3.5.3 There is a significant increase in the Cruise Ship and leisure market in Shetland and the North of Scotland.

3.5.4 There is also a massive increase in leisure yachting going through the Caledonian Cannel to the West Coast.

3.6 Summary

3.6.1 Commercial alternatives with similar capability are simply not available in the Highlands and Islands. However by developing an alternative model as outlined above the ETVs could still be provided in the Western Isles and Shetland at no or minimal cost to the UK Department of Transport.

3.6.2 The Department of Transport through the Maritime and Coastguard Agency should retain the lead role in the provision of the ETVs and in securing an alternative financial solution.

4. Conclusion

4.1 In considering these proposals, it is necessary to review them in the context and totality of changes to the overall maritime emergency response capability.

4.1.1 Withdrawal of the Nimrod long range maritime patrol aircraft has removed the capability to rapidly deploy an on scene communications and command platform.

4.1.2 Continued uncertainty of the future provision of the helicopter search and rescue service.

4.1.3 Withdrawal of Emergency Towing Vessels.

4.1.4 Closure of either Western Isles or Shetland Coastguard Stations and significant reductions in staffing.
4.2 Taken together this amounts to a critical reduction in the capability to respond effectively to a marine incident in the North of Scotland with a consequential increased risk of loss of life and environmental damage.

4.3 The Highland Council strongly urges that the existing contracts for Emergency Towing Vessels in the Western Isles and Shetland be extended temporarily until an alternative funding model can be put in place given the lack of any commercial alternatives and that the UK Government takes the lead in developing this alternative model.

4.4 The Council is also firmly of the view that both the coastguard stations in Shetland and the Western Isles be retained on 24 hour availability.

Annex 1

ETV ATTENDANCE

The following are brief accounts of incidents attended to by ETV’s based in the Highlands of Scotland over recent years. This is not an exhaustive list, but only those incidents that could be found in the public domain. The MCA have not published a list of attendances and the vessel operators are prevented from providing such information by a disclosure clause and a clause referring to the “Official Secrets Act” in their contract.

FISHING BOAT JACK ABRY II—2011 (1 FEBRUARY 2011)

The crew of a French fishing boat Jack Abry II based at Lochinver grounded on rocks off the west coast of Scotland has been airlifted to safety in severe weather overnight. The 14 men were winched on board the Stornoway Coastguard helicopter in gale force winds.

Mallaig Lifeboat and the Rum Coastguard Rescue Team were scrambled but the weather was too severe to attempt a lifeboat rescue. The coastguard helicopter arrived at 0100 GMT and winched all 14 crew off the vessel in about 55 minutes. The “Anglian Pearl” ETV based at Stornoway was in attendance.

RAF TORNADO CRASHED INTO THE SEA NORTH WEST OF GAIRLOCH—2011 (27 JANUARY 2011)

An RAF Tornado jet has crashed into the sea off the west coast of Scotland after reports of a fire on board. The crew ejected and were airlifted by a Stornoway Coastguard helicopter and were taken to hospital in Inverness. The Maritime and Coastguard Agency ETV also went to the site of the crash, as did the Royal Navy minchunter, HMS Blyth.

YEOMAN BONTRUP 2 JULY 2010

A fire, described as “fierce” by Clyde Coastguard and potentially polluting, broke out at approximately 3.30pm on the 100,000 tonne self-discharging bulk carrier Yeoman Bontrup, moored at the Glensanda Super Quarry in Morvern, opposite the Isle of Lismore. The fire broke out on a conveyor belt which carried the fire to the ship, causing gas cylinders onboard to explode.

The Anglian Sovereign attended the scene providing vital fire fighting support services helping to douse the fire and cool the hull preventing the ship from sinking at the berth. The fire was not fully extinguished until 6 July. The Anglian Sovereign (ETV) remained on the scene assisting with towing the stricken vessel to an anchorage, finally leaving the scene on 10 July. The nearest harbour tugs available were on the Clyde.

RED DUCHESS 9 NOVEMBER 2010

The Red Duchess was drifting within half a mile of the shoreline of the Isle of Rum (SAC Conservation Area) after she lost all power to the engines in a force seven gale. The Anglian Prince (ETV) attended the scene and escorted the thirteen hundred tonne ship to Stornoway. The tow took twenty hours and was undertaken in adverse weather conditions. No suitable commercial or harbour tug was available to rescue the vessel and were it not for the presence of the Anglian Prince (ETV), the Red Duchess would in all likelihood have foundered.

ATLANTIC TRADER 21 MARCH 2008

The 173m Atlantic Trader with 24 people on board lost power west of Hoy in storm force conditions. After originally declining, she finally accepted a tow by the Anglian Sovereign and was towed to safety in Scapa Flow.

WILSON DOVER 19 MARCH 2010

The Wilson Dover became disabled with steering problems in the early hours of 19 March approximately 50 miles north east of Cape Wrath.

Loaded with fertilizer, the 3,269 dwt vessel was trying to maintain position using its bow thruster, however it became clear the ship could not maintain its head in the storm force weather conditions and the Anglian Sovereign was tasked to take her under tow to safety. Initially, due to the extreme conditions the tow could not
be secured, however eventually a line was able to be placed aboard the Wilson Dover and she was towed to the safety of Kirkwall harbour.

**HMS Astute 22 October 2010**

HMS Astute ran aground on a shingle bank off the Isle of Skye during sea trials in fair weather conditions. The 7,800 tonne submarine which is the latest addition to the Royal Navy fleet remain stranded on a shingle bank until the following rising tide. The only tug available to attend within a reasonable distance and of sufficient size was the ETV Anglian Prince which was able to tow the submarine off the bank before she became further stranded.

Fortunately weather conditions at the time were favourable; however had there been adverse conditions and no ETV available this minor grounding could have escalated into a major environmental incident.

**MV Gerrita 19 February 2005**

THE 112,046dwt tanker Gerrita lost power 70 nautical miles North West of the Shetland Islands whilst on route from the Caribbean to Murmansk, Russia. The Maritime and Coastguard Agency sent the emergency response vessel Anglian Sovereign to tow the disabled tanker to Sullom Voe in heavy seas and winds at force 7 to 8.

**Mekahnik Semakov 22 October 2008**

The Captain of the Russian general cargo vessel Mekahnik Semakov reported problems to Stornoway Coastguard that he had difficulties with their engines and in particular their fuel oil. At the time a sister ship the Mekhanik Kraskovski was standing by.

The Mekahnik Semakov which is carrying timber was drifting at the time, and the crew reported they needed an hour to fix their engine. The vessel was around 2.6 miles offshore from the Isle of Skye at the time. The vessel was being constantly monitored from the Coastguard Centre on the Isle of Lewis on their automatic identification system (AIS) which reported the vessel drifting north eastwards at a rate of 0.3 knots.

As no tugs were in the immediate vicinity it was decided that the “Anglian Prince” should undertake the tow to bring the Mekahnik Semakov to a safe anchorage at Broad Bay, Isle of Lewis.

Jim Dickson, Counter Pollution and Salvage Of ficer for the MCA said:

The MCA uses ocean going tugs such as the “Anglian Prince” and which are stationed in the Minch for just such a set of circumstances. The Mekahnik Semakov represented a threat to the coastline and environment this morning, particularly as the repairs had not been effected as the day progressed, and our concern was the increased rate of drift of the vessel once forecast increased winds arrived.

We then took the decision that our ETV would take the vessel to a place of safety. The tow is continuing and likely to bring the Mekahnik Semakov to Broad Bay later tonight for full repairs to be carried out.

*April 2011*

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**Supplementary written evidence from the Highland Council (MCA 111a)**

I wanted to take this opportunity to advise you on some information that I have only very just been advised of in relation the Automatic Identification system (AIS).

In the Miches there are significant gaps in the AIS coverage North East of Ardnamurchan, East of Small Isles, the Sound of Sleat and the Inner Sound of Skye.

This is mitigated somewhat by the local knowledge of the Stornoway Coastguard Station in that they know where these gaps are and know when to expect the ships to reappear on the system.

It is therefore critical that the coastguard station in Stornoway continues to operate on a 24 hour basis given this gap in AIS coverage.

*May 2011*
Written evidence from the UK Harbour Masters’ Association (MCA 112)

SUMMARY OF MAIN POINTS
— The UK Harbour Masters’ Association (UKHMA) is a professional body consisting of over 300 Members who have been consulted widely on the issues discussed herein.

HM COAST GUARD PROPOSALS
— The UKHMA would generally acknowledge that the Coast Guard Service is in need of modernisation.
— The UKHMA believes that the proposal of two MOCs is technically feasible but queries the choice of location of the southern MOC and the resilience of the overall structure.
— UKHMA Members are generally supportive of the principle for change, but there remain real and deep concerns over certain elements of the proposals, most notably:
  — that there is a growing risk of incident to shipping around the UK coast due to traffic congestion, ships are getting bigger and weather conditions are becoming more extreme (all issues identified by the MCA);
  — the loss of local knowledge will adversely affect HMCG’s ability to undertake core functions; and
  — the further distancing of physical links between MOCs and MRCCs seems to be an inherent weakness.

ETV WITHDRAWAL
— The unilateral withdrawal of the ETVs is not justified on any rational risk based approach and the UKHMA strongly opposes the proposal.
— The lack of prior consultation with industry is deplorable and contrary to good practice.
— As the verifiers of compliance with the Port Marine Safety Code, it is inconsistent, misguided and ultimately unacceptable that the MCA has not followed industry-wide good practice and undertaken a formal risk assessment of the consequences of the ETV withdrawal.
— The UKHMA urges Government to make exceptional provision to extend the deadline for ETV provision until a safe, effective and practicable alternative may be considered.
— In the qualified and experienced opinion of UKHMA Members, the use of harbour tugs does not constitute a practicable alternative to ETV provision.

MIRG WITHDRAWAL
— There is a mixed opinion among UKHMA Members on this issue.
— The lack of prior consultation with industry is deplorable and contrary to good practice.
— On balance, the UKHMA believes that MIRG is a proven resource that has a real chance of saving lives at sea and bringing much-needed expert advice and support to ships masters and harbour masters in the event of serious fires at sea.

1. HM Coastguard Proposals
1.1 Submission

The UKHMA was pleased to be considered a formal consultee in this very important restructure proposal and we have undertaken an extensive and comprehensive internal consultation exercise with our membership.

The UKHMA would generally acknowledge that the Coast Guard Service is in need of modernisation and indeed has been for some time. Our members are generally supportive of the principle but there remain some very real and deep concerns about certain elements of the proposals.

These concerns have been fully set out in the UKHMA response to the formal MCA consultation on the modernisation proposals (attached as Annexe 1).

2. Withdrawal of Emergency Towing Vessels (ETV) provision

This issue is of paramount concern to the UKHMA.

Due to the many political and financial issues relating to this decision, the UKHMA has concentrated solely on the operational matters that it believes its Members are uniquely qualified to comment upon.

2.1 Return to pre-Donaldson Report lack of emergency response provision

The UKHMA is not aware of any substantial change to the risk of incident to shipping in UK waters since the publication of the Donaldson Report in 1994.
However, the UKHMA believes that the ETV provision, as identified in the Report, offered a significant mitigation of the risk of loss of life at sea and the danger of pollution of our coastlines.

The introduction of SOSREP, and in particular his ability to direct ETV standby or salvage activity without delay and without recourse to financial or political considerations, was a major benefit of Lord Donaldson’s recommendations. The UKHMA believes that the ETV provision is an essential element of SOSREP’s ability to respond efficiently and that the withdrawal of the provision will unnecessarily hinder SOSREP’s capabilities and effectiveness.

Through the Port Marine Safety Code, Harbour Masters are charged with reducing risk to a minimum in port environments. The UKHMA contends that the MCA have a similar duty in UK coastal waters and that part of this duty is provided by an ETV provision.

The UKHMA wholly supports the concept of the ETV provision and believes that an unnecessary and unacceptable risk will be taken with the safety of ships, the safety of those who work at sea, and protection of the UK’s marine environment if this dedicated and specialist marine asset is summarily withdrawn, especially as there is no alternative provision in place.

We believe the UK Government does not fully understand or appreciate the degree of risk and the quantum of consequences be they human, financial or environmental.

The unilateral withdrawal of the ETVs is not justified on any rational risk based approach and we, the UKHMA strongly oppose it.

The UKHMA urges Government to reinstate the ETV provision.

2.2 No Risk assessment

As referred to above the UKHMA is particularly concerned that no formal risk assessment has been undertaken by the MCA in connection with the ETV withdrawal. Indeed there is absolutely no justification in our view for not taking a formal risk based approach before taking the decision.

Despite repeatedly asking for a risk assessment to be carried out and published for marine industry scrutiny, the MCA continue to ignore our requests.

Risk assessment is a fundamental element in ensuring the safety of marine operations and is a keystone of the Port Marine Safety Code (PMSC), to which all harbours are required to adhere.

As the verifiers of compliance with the PMSC, it is inconsistent, misguided and ultimately unacceptable that the MCA has not followed similar industry-wide good practice and undertaken a formal risk assessment of the consequences of the ETV withdrawal.

2.3 No prior formal consultation with industry

The UKHMA considers it totally unacceptable for the MCA to make a decision of this magnitude without prior formal consultation with industry. Indeed since the decision was made in October last year it has taken much industry prompting to persuade the MCA to even discuss the decision. Belatedly some discussion has taken place but all that has served to highlight is the great difficulty (we would say near impossibility) of identifying, agreeing and implementing an ETV replacement strategy.

Any discussion on this issue is welcome and the UKHMA has and will continue to play its part in trying to identify a solution if HMG continues to adopt its current inflexible approach on the decision to abolish the provision of ETV resource.

Frankly the UKHMA has little confidence that an acceptable long term solution will be found in anything like the timescale required to implement that solution ahead of 30 September deadline and as a consequence the risks to shipping and the marine environment will increase significantly from that date.

In the MCAs own words, “Ships are getting bigger, Seas are getting more congested, the weather is getting worse……and yet all of these factors which we would argue only serve to increase risks around our coastline, appear to be being ignored by the withdrawal of a primary risk mitigation tool, the ETVs. It is not a question of ‘if’ an incident occurs it is simply ‘when’ it occurs. Government appear to want to accept the risk but will it so readily accept the consequences?”

Notwithstanding our strong concerns this Association will continue to enter into dialogue and discussions but we fear that any conclusions reached in such meetings will provide only “first-aid” solutions rather than fully effective, long term, realistic and appropriate, alternative provisions.

The UKHMA urges Government to make exceptional provision to extend the deadline for provision of ETV cover until a safe, effective and practicable alternative may be commissioned.
2.4 Use of harbour tugs

Members of the UKHMA have expressed deep concerns that harbour tugs are considered by the MCA as a viable “back-up” in the event that no other emergency salvage provision is available.

UKHMA Members wish the Committee to note the following issues:

- Modern harbour tugs are designed for purpose, ie to berth and manoeuvre vessels in the confines of harbours, not generally to operate in open sea conditions;
- Many harbour tugs, due to changes in propulsion configurations, now connect to ships with towlines passing “over the bow” rather than in the traditional “over the stern” towing mode. This configuration does not lend itself to conventional towing at sea;
- Salvage equipment is fundamentally different from harbour towing gear and risks of injury to crew and damage to the towing vessel may be enhanced as a consequence;
- Harbour tug crews are not normally trained in open sea salvage practices
- The manning levels of harbour tugs are designed for harbour operations and not normally appropriate to extended watchkeeping periods involved with an open sea tow or standby.
- The CAST agreement, often quoted by MCA as a risk mitigation strategy is not fit for purpose in its current form and the MCA have acknowledged this in recent discussions.

2.5 Impact on Harbour Operations

UKHMA members are extremely concerned that the withdrawal of ETVs will put more pressure on harbours and put the Harbour Master in an invidious position when it comes to the deployment of valuable towage assets when faced with a potential disaster somewhere close to their area of jurisdiction.

The disruption to ports operations which could be prolonged in an emergency situation caused by a casualty being inefficiently dealt with and consequently having a larger impact than necessary is very real and is unwelcome.

The environmental and financial impact on a port is potentially catastrophic!

Ports should not have to bear any consequences of the decision to abolish ETVs.

3. Withdrawal of MIRG provision

UKHMA Members have mixed opinions on this issue, ranging from reluctant acceptance that savings must be made in some areas, to wholehearted support for the retention of the existing MIRG provision.

Overall, there is a significant body of opinion that MIRG is a proven resource of trained and experienced ship fire-fighters that has a real chance of saving lives at sea and provides much needed expert advice and support to ships masters and harbour masters in the event of serious fires at sea.

The value of having this strategic specialist resource to hand is of genuine and significant comfort to Harbour Masters and Ship Masters faced with firstly bringing a fire under control at sea and then bringing that vessel into port where it can be dealt with effectively without causing further hazard to crew, passengers and/or shore side personnel.

The withdrawal of MIRG should not be seen in isolation and in the context of the withdrawal of ETVs and the concerns raised about CG Modernisation adds up to a significant reduction in overall Marine Safety response.

3.1 Lack of formal risk assessment

The UKHMA is again concerned that no formal risk assessment has been undertaken by the MCA in connection with the MIRG withdrawal.

Risk assessment is a fundamental element of any safety management system and in the Marine context is a keystone of the Port Marine Safety Code (PMSC), to which all harbours are required to adhere.

As the verifiers of compliance with the PMSC, it is inconsistent and unacceptable that the MCA has not followed similar industry-wide good practice and undertaken a formal risk assessment of the consequences of the MIRG withdrawal.

3.2 No prior formal consultation with industry

The UKHMA considers it totally unacceptable for the MCA to make a decision of this magnitude without prior formal consultation with industry.
The UKHMA urges Government to make exceptional provision to extend the deadline for provision of MIRG cover until all avenues for its retention have been investigated. The UKHMA would urge the Government to consider a smaller MIRG provision rather than abandoning the MIRG concept altogether.

April 2011

Written evidence from the Truro and Penryn Harbour Forum (MCA 113)

SUMMARY OF THE MAIN POINTS

— There is a distinct lack of detail regarding the role of a day time station.
— The strategic location of Falmouth has not been properly considered when downgrading it from 24/7 cover. In particular it’s location as the “first line of defence” in the western approaches and the ships transiting the Lands End Traffic Separation Scheme (an average of 950 reports per month).
— Loss of the direction finding VHF equipment locally is a major concern in locating distress calls. The majority of our inshore fishing fleet and leisure users do not currently have the VHF DSC facility, which will then be the only way to contact the Coastguard via VHF radio.
— Concern is expressed regarding the continued monitoring of the channel 16 distress channels, especially the capacity to do it.
— The loss of the VHF direction finding facility is a concern especially when it has been used successfully in a number of rescues.
— The reduced service for Leisure marine users is of concern when we represent a significant number of users and a large number navigate the waters around our coastline. The Ports of Penryn and Falmouth have about 1,800 moorings for leisure users.
— The amount of traffic in Falmouth Bay generated through the requirement to use low sulphur fuel in the English Channel. This risk to the sensitive waters of the SSSI in the Carrick Roads is a concern.
— There are a number of working ports within the area covered by Falmouth which would become less safe. There is a concern that the average leisure user and fisherman may not have powerful VHF equipment to contact the Coastguard service, especially out of hours!
— The area around the Cornish coast has long been used for significant international races, many over long distances.
— A larger number of incidents managed by Falmouth include coordination of the Search and Rescue services—over 60% of the incidents involve search and rescue.
— There are military activities in the area managed by Falmouth.
— The impact on the Tourist economy of Cornwall has not been quantified nor considered when making this decision.

A BRIEF INTRODUCTION

We are a representative body brought together from the varied users of the Ports of Truro and Penryn. We are formally constituted and recognised by the Harbours Board who manage the harbours.

FACTUAL INFORMATION YOU WOULD LIKE THE COMMITTEE TO BE AWARE OF

MRCC Falmouth Incident Data (taken from the Falmouth submission MCA17).

In 2009 MRCC Falmouth recorded 3754 Incidents, which included 2304 Search and Rescue Missions. MRCC Falmouth was the busiest station in the UK for Search and Rescue.

In 2010 MRCC Falmouth recorded 3602 Incidents, which included 2286 Search and Rescue Missions. Again MRCC Falmouth was the busiest station in the UK for Search and Rescue.

Under the proposal for the Modernisation of the CG Service, MRCC Falmouth would be closed at night-time (the times are unspecified), however 30% of recorded incidents commenced during night-time hours of 2000 to 0800.

In 2010 MRCC Falmouth tasked CG Coast Rescue Teams on 612 occasions, RNLI Lifeboats were requested to launch on 427 occasions, and Rescue Helicopters flew 282 SAR missions.

ANY RECOMMENDATIONS THAT YOU WOULD LIKE THE COMMITTEE TO CONSIDER INCLUDING IN ITS REPORT

That the facility at Falmouth be retained as a 24/7 facility due to its strategic position and internationally recognised role in assisting mariners worldwide.
The future of the specialist marine fire fighting team should be secured.

April 2011

Written evidence from East Sussex Fire Authority (MCA 121)

INTRODUCTION

1. East Sussex Fire Authority is the statutory body which provides the fire and rescue services covering East Sussex and the City of Brighton and Hove.

2. As part of its arrangements East Sussex Fire Authority has agreed to allow East Sussex Fire and Rescue Service to be one of the strategically located fully interoperable fire and rescue services that support the current MIRG response arrangements and funded by the Maritime Coastguard Agency.

3. East Sussex Fire Authority provides specific written evidence relating to the Maritime Incident Response Group (MIRG) for consideration by the Transport Select Committee (TSC) inquiry.

MARITIME INCIDENT RESPONSE GROUP

4. East Sussex Fire Authority (ESFA) is submitting evidence following the announcement that the Transport Select Committee have made a call for evidence for its Inquiry: The Coastguard, emergency towing vessels and the Maritime Incident Response Group (MIRG). The Primary concerns of ESFA are:

(a) that effective consultation, on the MCA decision to remove funding for MIRG, with the individual Fire and Rescue Authorities who have provided the operational teams that make up the MIRG has not taken place; and

(b) that the review of the MIRG arrangements on behalf of the MCA by independent consultants (BMT Isis Ltd), in 2010, has not been fully considered in reaching this decision. The report states that “a detailed assessment of risk based on available incident data, has identified that, given regulator norms, a capability to respond to incidents on ships involving fires, chemical hazards or industrial accidents covering the majority of the UK’s coastline should be provided. It should be noted that fire is the predominant accident type to which a response is required.”

that the decision by the MCA to remove funding for the arrangements for the MIRG, which responds to incidents at sea for which fire-fighting, chemical hazard and/or rescue teams may be required has been finance driven not risk based.

5. ESFA, along with other Fire & Rescue Authorities (FRAs), have significant statutory responsibilities laid down in the Fire & Rescue Service Act 2004, The Regulatory Reform (Fire Safety) Order 2005 and the Civil Contingencies Act 2004. Their respective Fire & Rescue Service (FRS) carries out implementation of Fire Authorities’ responsibilities on their behalf.

6. The Public Protection Committee of East Sussex County Council, at its meeting on 26 May 1994, determined to set up a Maritime Team comprising members of the then East Sussex County Fire Brigade as recognition of the risk to public safety within the maritime sector.

7. In 2002 due to the decline in coastal FRAs resources being declared to support HM Coastguard response to fires on ships at sea the Maritime and Coastguard Agency (MCA), Department for Transport (DfT) and the Chief Fire Officers’ Association (CFOA) reviewed the most appropriate capability required to respond to incidents involving fire, chemical hazards and industrial accidents at sea, using a risk-based approach. This review, the “Sea of Change Project” (which completed in April 2007), supported the need for a Maritime Incident Response Group (MIRG).

8. East Sussex Fire and Rescue Service is one of the strategically located fully interoperable FRAs that support the current MIRG response arrangements. Since its inception, in 2006, ESFRS have been the most operationally active member of MIRG and has been involved in a number of significant incidents, including the first test of the capabilities of the MIRG to a fire on the cruise ship MV Calypso in the English Channel with 708 souls onboard. The subsequent Marine Accident Investigation Branch investigation identified that there were flaws in the knowledge, experience and training of the on board crews allowing the fire to develop before the attendance of MIRG response and that the MIRG team provided much needed support and advise to the ship's master and to the rescue authorities.

9. As there is no statutory duty for provision for offshore firefighting imposed on the FRS or MCA there is no separate identified budget for funding this capability within the UK. Coastal FR’s, of which there are 39, do have a statutory duty to fight fires on vessels within their area by virtue of Section 72 of the Local Government Act 1972 which confirms that the area of responsibility for Fire Authorities in England, Wales and Northern Ireland generally extends to the mean low water mark (MLWM) at ordinary tide. As a result of the “Sea of Change” project, the MCA supported the provision of the additional training, equipment and PPE necessary to allow operational personnel to respond offshore (outside of the statutory responsibility) as well as the costs of any operational deployment.
10. A business review carried out in 2010 on behalf of the MCA by independent scrutineers (BMT Isis Ltd) as part of the implementation programme of MIRG concluded that for a proposed reasonable worst case scenario of:

- a passenger vessel (cruise liners now carry in excess of 4,000 pax and account for over 21 million passenger movements per annum);\(^7\)
- a fire that potentially needs to be controlled for up to two days;
- has the potential to cause loss of life; and
- cannot be contained by the ship’s finite resources.

a risk classification of “\textbf{Very High Risk}” is indicated.

This risk rating is derived from the following criteria:

- a likelihood of one in 200 over a five year period.\(^8\) (1 in 1,000 per annum); and
- an impact of “Significant” (likely to involve 10 or more fatalities).

It should be noted that there might also be harm to the environment (such as pollution) accompanying the reasonable worst-case scenario.

The report also goes on to state that even if a more cautious approach to risk indicates that a response is required for most of the UK’s coastline.

11. The HSE, in their document “Reducing Risks Protecting People”, propose in Paragraph 136, that where there is choice whether to accept a hazard or not that “\textit{the risk of an accident causing death of 50 people or more in a single event should be regarded as intolerable if the frequency is estimated to be more than one in 5,000 per annum}”.

The probability of incidents potentially requiring a response within UK Territorial Waters by coastal sector is a minimum of one in 15 per annum around all the UK coast and a maximum of one in three per annum for the south east coast ie far in excess of the HSE guidelines. This probability will increase when extrapolated to the entire UK Search & Rescue Region (UKSRR).

12. On this basis, ESFA believes that there is a requirement to continue to provide a firefighting at sea capability for the UKSRR as mitigation against this national risk, based upon the objective assessment of risk as well as national public maritime expectations as an island.

13. ESFA strongly believe that the most efficient and effective provision of a firefighting at sea capability is to have a strategically located, interoperable capability with an integrated governance arrangement across the UK and sufficient resilience to meet the anticipated demands. The strategic locations, based on risk, would ensure that the provision is matched to the demand and ensures that burdens are only placed on local FRS where necessary to mitigate the risk to public safety nationally. The integrated governance provides for the efficient procurement of training, personal protective equipment and equipment maintenance arrangements to be in place.

14. The benefits of providing a UK wide governance arrangement also ensures that firefighter safety is properly prioritised and managed. Risk assessments, operating procedures and safe schemes of work are all able to be coordinated to ensure that each Chief Fire Officer has the confidence in the process to allow their employees to respond and meet the demands of a potentially escalating incident in one of the most challenging and dangerous environments for firefighting.

15. With MIRG being mitigation against a national risk, firefighting within the UKSRR, ESFA believe that the funding for this capability should be supported centrally thus avoiding an additional local burden on those participating Fire Authorities.\(^9\) It is accepted that there are local benefits to having a MIRG capability in managing coastal risks so some local cost is anticipated but this should be minimal to reflect the proportionate benefit and offset against existing statutory duties.

16. The removal of central funding to support MIRG would place additional funding pressures on individual Fire Authorities who may consider their continued involvement and, in our opinion, lead to a reduction or complete loss of this strategic interoperable capability for the UK. This would have a detrimental impact on national public safety in the maritime sector, inconsistency of approach and resultant public confusion at best and frustration at worst as well as the adverse impact on firefighter safety responding to incidents at sea for what ostensibly is not a significant national cost compared to other issues.

17. In addition the loss of the overarching governance arrangements would increase the risks to firefighters responding offshore and to Principal Officers taking command decisions around the committing of their personnel to the “at sea” environment without assurances in place around the resilience of the response to manage an escalating incident that may take days to resolve.

\(^7\) DfT Transport Statistics
\(^8\) Civil Contingencies Act
\(^9\) or alternative FRS governance arrangement
18. The MIRG FRS’s are making significant efforts to become more efficient in how this arrangement could operate in the future and therefore reduce the financial burden on the MCA. However the total costs of the current MIRG arrangements are insignificant to the impact on the UK should there not be an effective, co-ordinated, tested and exercised response to a fire on a ship at sea. Any changes to the MIRG arrangements will need to be considered further to assess that the current safe systems of work are not comprised by any reductions in team, size, interoperability and expected time involvement of the capability and response.

19. In conclusion ESFA believe that there is a public safety requirement as well as public expectation for a strategically located, interoperable firefighting at sea capability predominantly centrally funded and governed but delivered by local FRS on a cost effective basis and it is considered that some of the measures being taken should be sufficient to meet enhanced value for money requirements and public expenditure constraints without making irretrievable damage to the national infrastructure for only a modest level of national investment.

April 2011

Written evidence from Public and Commercial Services Union Liverpool Branches (MCA 135)

1. **Who put this plan together and over what time span?**

   1.1 The plan advocates a complete change in the way Coastguard business is prosecuted. A change of this magnitude must have been mooted some years ago. The changes will therefore generate a huge training need. (This is barely mentioned in the plan). There is plenty of anecdotal evidence of the former Chief Operations Officer, Chief Coastguard and Acting Chief Executive Officer’s attitude towards ops room staff and his assertion that HM Coastguard Operation Rooms could be reduced to six. (He now runs a marine training organisation known as International Maritime Policy)

   1.2 Watch Officers have been downgraded and pay reduced consistently over a 15 year period. The new plan combines Watch Officers and Coastguard Watch Assistants in line with this attitude.

   1.3 This attitude has promoted the idea among later Chief Executives and MCA Senior Managers that Operation Room Staff maintain a stranglehold over the MCA as a whole with regard to change. The plan has been put together with this attitude in mind rather than the safety of the sea /coast user and the efficiency of the service uppermost.

   1.4 In addition it has become apparent that some of the team engaged in the planning of the proposal do not work for the organisation. This individual is, apparently employed on a consultative basis having left the MCA some years ago to work for a marine training organisation. (Petrofac)

   1.5 Both these individuals have strong connections to the Marine Training World.

2. **Adapting the Plan to counter resistance**

   2.1 During the public meetings senior managers have started mentioning the word “cell” when questioned about local knowledge. “Cells” are not mentioned in the original plan.

   Page 12 of the Public meeting transcript:

   “What we will have is...you know...a large control room with cells working in that control room looking after a specific geographical area...and the staff working in that area will have the training and the local knowledge to be able to do that and they will come in everyday and work in that geographical area”.

   2.2 Cells are mentioned in public meetings in:

   - Liverpool (3.3.11) page 51
   - Milford (4.3.11) page 23
   - Brixham (10.3.11) page 11
   - Swansea (7.3.11) page 10,12,14,41.

   According to a senior member of the management team, when asked about this he stated that they should not be “going off script”. When the point was made to him that the management team were adapting to deter opposition and counter criticism, he said that the team should not lie to anyone as it is under consultation and this cannot change until the review has been done.

   2.3 Also mentioned on thirteen separate occasions during the public meetings in Western Region is a “Disaster Recovery Site”.

   - Liverpool page 22 and page 24.
   - Holyhead page 8.
   - Milford page 8.
   - Swansea page 7.
   - Portland page 16, 19, 20, 31 and 24.
   - Falmouth page 7.
“Well….the thing is there, as I’ve said before…you’ve got the MOC North and the MOC South. You also have a third disaster recovery area.”) 8 March

However, there is no mention of this at Solent on 1 March and no mention at all in the original Consultation document.

3. Risk Assessment

3.1 The risk assessments are clearly written in haste to match the requirements of the MCA proposals.

3.2 The risk assessment document contains scant, factually incorrect information. For example, the information concerning the Liverpool site is, to say the least, inaccurate and missing key elements that are stated in full at stations the MCA are keen to use as the locations for the MOC’s. This has been pointed out to the Senior Management Team (emails already Submitted to TSC) but nothing has been amended.

4. RER Project

4.1 The MCA are spending £29.8 million on upgrading the following:
   (a) Command/Control systems.
   (b) Information/Mapping and Storage Systems.
   (c) Computer Terminals, and Digital Select Calling equipment.

This updated equipment is currently being installed at all 19 stations. This is surely a waste of taxpayers money as under the MCA’s proposals most of the stations are due to close.

4.2 The locating of servers for this equipment indicates that the choice of stations to remain open has been decided prior to the publication of the consultation document. The locations are:
   Falmouth and Swansea for the South West quadrant (proposed day stations).
   Belfast, Stornoway, for the Northwest (under consultation proposed day stations).
   Shetland and Aberdeen for the Northeast quadrant (proposed MOC and consultation day station).
   Humber and Solent for the South East quadrant (proposed day station and general area of MOC South).

4.3 According to the engineers schedule for the installation of the servers in the Southwest, the plan was for a server to go into MRCC Milford Haven, but this had been scrubbed out by hand, and replaced with MRCC Swansea. Which under proposals is due to remain a day station whilst MRCC Milford Haven is due to close.

4.4 All this would indicate that as far as the technical aspects of the proposals are concerned the consultation is a sham with there being no intention of changing anything after that consultation procedure is complete.

5. Criteria for Naming Stations

5.1 As previously stated in 3.2 the case for closing or siting a “Day Station” at MRCC Liverpool has been grossly misrepresented by the MCA to suit their desired outcome.

5.2 Facts omitted by the MCA:
   5.2.1 MRCC Liverpool is the 2nd largest freehold/leasehold property of any MRCC in the UK (The largest is Dover).
   5.2.2 MRCC Liverpool has the cheapest running cost of the co-located (MRCC and Marine Surveyors) stations, and newest MRCC, and has been built for purpose.
   5.2.3 MRCC Liverpool is the busiest station in respect of incidents of the four stations under consideration.
   5.2.4 MRCC Liverpool’s relationship with Isle of Man, her territorial waters, her co-ordination role with Liverpool MRCC and the RNLI.
   5.2.5 The situation regarding the relationship with the landowners and Sefton Council concerning the building should the MRCC close.
   5.2.6 The facilitating of SAR in the Lake District four major lakes.

5.3 An email to staff at the IOM harbour office/MOC indicates that the Chief Coastguard has told the IOM authorities that they will be charged by the MCA for co-ordination services if they fail to put their own co-ordination service for their territorial waters in place. Obviously this is an attempt to sideline the role played by Liverpool MRCC in the area and has put undue stress of the Isle of Man to conform with the MCA’s demands. The Isle of Man already assists the MCA in the location of important and necessary aerial sites which are used for the maritime area from Northern Ireland, Scotland, England and North Wales. Meaning this relationship should be nurtured to maintain mutual respect and working.
6. READING CONSULTATION DOCUMENTS

6.1 Louise Ellman and Maria Eagle (Shadow Secretary of State for Transport) have both recently stated that no responses should be read until after the consultation period ends on 5 May. However Mr. Philip Naylor (MCA’s Director of Maritime Services) stated on Friday 8 April 2011, that they had been sifting through the responses and putting them in piles… it is impossible to put a document in a pile unless you first read the document to determine into which pile it is to be placed.

6.2 Mr. Penning has also stated that many of the responses mention the loss of local knowledge issue. Again this would indicate that the responses are being reviewed as they arrive.

6.3 This further strengthens the belief that responses to questions put at the public meetings are being changed in an attempt to undermine resistance and cloud contentious issues.

6.4 A sift of responses had been organised for 18 April, this has since been cancelled after opposition by the PCS union. Apart from paragraph 6.1, any sift/review team should not be overseen by someone from an intended MOC site due to an obvious accusation of bias.

6.5 The Consultation response team has now been chosen, the manner in which the team were selected is still a mystery, there was no trawl so one can only assume that they were hand picked by the management.

7 MOC EXERCISE

7.1 An exercise has recently been carried out at the Coastguard Training Centre on 15 April 2011, to test the passing of Information despite management assertions, the whole thing was badly organised and did not go well, and was liken to the paper exercise that was commissioned over 2.5 years ago. The few experienced operation room staff who took part agreed it was an exercise designed to promote the proposed arrangements rather than to test them properly.

7.2 The exercise proved that MRCC Liverpool was extremely busy during this time period. The exercise attempted to remove some of the incidents from MRCC Liverpool to the MOC but the obvious point that if MRCC Liverpool is using an aerial site or frequency then MOC North or South will not be able use them at the same time. Then, they attempted to remove some of the routine calls, which resulted in some of the calls being redirected from the incidents to people who are unaware of the incident.

7.3 The exercise also proved that it took 1 minute 50 seconds to pass just a request for a “rapid response” search plan to be done from the MRCC to MOC, whilst it takes the same amount of time to input the data and produce one on station if adequately trained. The plan would still need to be compiled and checked by the originator before use, meaning a plan would take approximately 8 minutes longer if done remotely by another station than done by trained persons at the MRCC dealing with the incident.

7.4 The staff who were directing the exercise were also hand picked by MCA Management and are part of senior coastguards based at MCA HQ’s.

April 2011

Supplementary evidence from Public and Commercial Services Union Liverpool Branches (MCA 135a)

Q272 Concerning who was consulted during the formation of the plan.

As far as can be ascertained there was only one Watch Officer/Manager that had an input. The individual concerned is from Belfast MRCC and is also part of the RNLI, being an assessor for that organisation. This person was allegedly bought in at the last moment to counter criticism that the team that authored the document contained no one of operational experience.

No experienced, serving operational staff had any input into the document.

Staff at Liverpool MRCC work daily with a MOC on the Isle of Man. This MOC is newly commissioned. Common sense would therefore dictate that said Liverpool staff would be the ideal people to speak to concerning the problems that arise when working with that system.

Q279 According to Mr. Vlasto’s evidence the RNLI was not formally consulted on the proposals for the modernisation of the coastguard. However, annex C of the consultation document lists the RNLI as a consultee. Similarly, during questioning at Falmouth, a representative of the Harbour Masters Association stated that his organisation was not consulted. Again Annex C lists that organisation among the consultees.

This highlights the problem. The planning for the Modernisation of Search and Rescue in the United Kingdom has been carried out in a haphazard fashion. Relying on informal discussions between the senior management of the MCA and organisations involved in search and rescue. No formal planning meetings seem to have taken place. If this is the case with respect to the RNLI and the Harbour Masters Association, then how often and with which organisations did this form of “planning” take place.
Mr. Vlasto stated that “Assurances were given” and “We have a very close relationship at all levels with the coastguard.” However, nothing appears to have been minuted or formal.

This is a government agency putting together plans to radically change the shape and working practices of search and rescue. The decisions made will affect the way, in some cases, that potentially life threatening situations are handled, all meetings in the planning process should as a matter of protocol be formal and minuted.

Q355 Mr. Penning, at several stages alludes to the fact that the proposals were on the table long before he became a Minister. He speaks of previous ministers knowing that proposals similar to this were on the table.

All of which demonstrates this process goes back several years but serving operational coastguards knew nothing of it and were not part of the process to develop a strategy for the modernisation of the coastguard.

Q358 Mr. Penning stated that the review body was made up of serving, operational coastguards.

The review body contains no coastguard officers operational or otherwise from Liverpool MRCC, Holyhead MRCC, Milford Haven MRCC, Forth MRCC and Brixham MRCC. All stations threatened with closure. Yet, Aberdeen MRCC, which has been earmarked as one of the Marine Operation Centres has two officers taking part. In addition there is a question mark over the length of service and experience of some of the team. As no information is evident as to how this body was assembled, (there appears to have been no official trawl notice or request for officers to volunteer to take part), a request for information through the Freedom of Information Act has been submitted. To date nothing has been forthcoming.

Q359/426 “Lulls during an incident and dormant periods”.

Mr. Naylor speaks of Lulls during an incident. There are no “Lulls”. When ops room staff are dealing with an incident the intensity remains the same. Whatever is happening at the scene or area of operation, in the operations room search plans are being updated, further information being sought and procedures to ensure the safety of the SAR units activated. In addition, very often, particularly during the summer months, other incidents are ongoing. This is aside from normal routine working. Mr. Naylor, who appears to have no knowledge of operations room working practices, must stop thinking in terms of a single incident of the search at sea variety.

All concerned in the modernisation process should remind themselves that Coastguards spend their working day/night “On watch”. The term watch implies a level of alertness and responsibility not afforded to the term shift. Coastguard officers feel this responsibility and feel obliged to remain alert and vigilant due to the nature of the work. They are therefore working for the full 12 hours. Even whilst on a break.

This is no different from maintaining a bridge watch at sea. Just because nothing is happening does not mean the watch can relax. They are “On watch” until relieved. Similarly, in Royal Navy terms, when an operation is initiated and forces are deployed is there a “Lull” until arrival in theatre. Does the operations room team relax? I think not. In all cases the level of stress remains the same until the operation is over.

Mr. Naylor also fails to take into account, once again, routine working, routine broadcasting, various non SAR duties and the other SAR operations that may be, during busy periods, ongoing.

Q393 The statement by a senior coastguard regarding nine stations.

This was one persons view and does not represent the view of the staff at Liverpool MRCC. This was made clear to Mr. Naylor during a recent visit.

Q425 The question of Daylight Stations.

Mr. Penning refers to other nations having only one Rescue Coordination Centre. However, it should be remembered that none of these centres deal with coastal incidents. They deal solely with deep sea Search and Rescue. In most countries coastal SAR is dealt with by the police or local authorities. The figures quoted by Mr. Penning as regards to the amount of MRCC’s in other countries are inaccurate and misleading.

Throughout the process of the examination of witnesses not once has Mr. Penning, Sir Alan Massey or Mr. Naylor mentioned or considered the most important person affected by the modernisation of the coastguard. The casualty.

Any modernisation must:

1. Increase the casualty’s chances of survival.
2. Increase the safety and awareness of the general coast using and sea going public.
3. Improve the speed and efficiency of SAR coordination.

The modernisation proposals do none of these.

The proposals are unsafe.

The process adopted by the MCA to arrive at the modernisation document is flawed.
Therefore the entire document should be rejected and a new properly representative body set up to review the situation and develop a modernisation plan focused on the above.

May 2011

Written evidence from Comhairle nan Eilean Siar (Western Isles Council) (MCA 136)

MARINE COASTGUARD AGENCY: A FLAWED MODERNISATION PROPOSAL

1.1 Comhairle nan Eilean Siar (the Comhairle) welcomes the Transport Committee’s inquiry into the modernisation of the coastguard service and related issues and welcomes the opportunity to provide written evidence. Representatives of the Comhairle would be happy to provide oral evidence to the Committee if asked.

1.2 The Comhairle has carefully considered the proposals presented in the Marine Coastguard Agency (MCA) document: “Protecting Our Seas and Shores in the 21st Century: Consultation on Proposals for Modernising the Coastguard 2010”. Following extensive local consultation and detailed independent research the Comhairle takes the view that the MCA proposals are fundamentally flawed. The Comhairle does not believe that the proposals will enhance the service; instead we believe it will increase risk and compromise the safety of shipping and mariners around the UK in general and around the north and west of Scotland in particular.

1.3 The Comhairle is supportive of the modernisation of the coastguard service, but do not believe that the proposals brought forward by the MCA are appropriate for a number of reasons.

1.4 The Comhairle believes the MCA proposals to be ill thought through from both a technical and cost basis and as a result their implementation will inevitably lead to serious, detrimental safety and environmental impacts.

1.5 The MCA have not been able to credibly articulate the benefits arising from their proposals and as a result there is no confidence in their approach or in their proposals. Their proposals do not carry the confidence of the public of the Outer Hebrides; local coastguard staff; front-line volunteers; the fishing community or the Outer Hebrides Community Planning Partnership.

1.6 The community of the Outer Hebrides believes that the proposals, if implemented, will in effect dismantle both the local and the wider UK insurance policy against serious incidents.

1.7 The Comhairle is seriously concerned that the underpinning rationale behind the proposals does not appear to be maritime safety. From discussion with senior MCA officials it would appear that the proposals are driven by a mix of internal MCA issues such as resolving industrial relations; resolving lease issues arising from particular stations and as a method for the MCA to realise value from particular saleable assets.

1.8 The cost savings to be achieved from these proposals would appear marginal over a 25 year period—any savings will be lost if, for example, one major tanker incident occurs in the Minch.

1.9 The proposals are technically flawed with serious doubts in regard to the proposed technology solution. These concerns are underpinned by a March 2011 report from The Royal Academy of Engineering entitled “Global Navigation Space Systems: Reliance and Vulnerabilities”. The report overviews reliance issues and in the Executive Summary states:

“A failure, or loss of signal due to some outside influence, can result in a range of consequences depending on the application...where systems are used in safety of life critical applications, the consequences can be more severe—in some situations, even if operators are well-versed in procedures for a loss of GNSS (Global Navigation Satellite Systems) signals, the number of interlinked systems simultaneously activating alarms can lead to eroded situational awareness of operation in what could well be an emergency situation”.

1.10 It is due to this risk of “eroded situational awareness” that the Comhairle believes that the technology solution proposed by the MCA carries too high a level of risk and should not be implemented.

1.11 The proposals will lead to the loss of local knowledge, which is an issue of significant concern in an area where the Gaelic language predominates.

1.12 The proposals to base the service around two Marine Operation Centres is seriously flawed; has not been appropriately risk-assessed; will not provide the required resilience and will lead to staff employment/retention challenges.

1.13 The Comhairle is supportive of a well-thought through and thoroughly analysed modernisation of the coastguard service. The primary goal of that modernisation should be to enhance the safety of coastal communities and mariners.

1.14 The cumulative impact of the proposed modernisation; the withdrawal of the Emergency Towing Vessel (ETV); the withdrawal of the Maritime Incident Response Group; the withdrawal of Nimrod and the continuing uncertainty around the helicopter rescue service create unacceptable risk.
1.15 All of these issues would be challenging in their own right and would require careful planning and implementation. Implementing these elements simultaneously represents bad strategic planning and in the view of the Comhairle can only be characterised as dangerously reckless.

1.16 The proposed reforms are viewed as an efficiency saving but the potential gains are minimal. The savings are such a small part of the Department of Transport’s overall budget that they were not included in the Department’s Comprehensive Spending Review.

1.17 The Comhairle does, however, recognise the need for savings to be made to assist the reduction of the UK’s structural deficit. Reductions in lifeline services, such as the coastguard service, have to be carefully planned and thought through, with the primary goal being enhancement of marine safety. The Comhairle does not believe this has been achieved within the MCA consultation proposals. The Comhairle takes the view, however, that there are alternative models that will protect and enhance safety, while at the same time achieving cost savings. We believe that the following draft proposal will achieve these two critical goals.

Coastguard Modernisation: A Positive Alternative

2.1 As stated above the Comhairle is supportive of the modernisation of the coastguard service, but does not believe that the proposals brought forward by the MCA are the right approach for this critical and highly regarded service. Representatives of the Comhairle were therefore heartened to hear Mike Penning, the Parliamentary Under-Secretary, state on a recent visit to Stornoway that the MCA proposals would not be implemented in their present form and that he was looking for groups and individuals to bring forward alternative proposals. The Comhairle welcomes this approach and believes that there is a strong case for an alternative model to be developed.

2.2 It is the view of the Comhairle that there is a strategic need to provide adequate and well-resourced coastguard cover for the entirety of the UK coastline. In the view of the the Comhairle that cover requires to be 24-hour provision and as such we see little to no benefit in the provision of “daylight hours” stations.

2.3 To ensure the type of cover the Comhairle believes to be essential for the safety of our communities we would advocate the establishment of 12 Marine Rescue Coordination Centres (MRCC), each operating 24 hours per-day. This approach would see the reduction and evolution of the existing MCA estate while simultaneously enabling retention of the current workforce’s skills, experience and local knowledge. This approach would also allow sites to mutually support each other, should one be experiencing a particular surge in activity.

2.4 The Comhairle’s 12-centre model would propose six stations for England plus two stations for Wales, covering approximately 40% of the UK Search and Rescue Region (SRR). The model would have one station in Northern Ireland. In Scotland three MRCCs are proposed.

2.5 In Scotland the Comhairle take the view that a West Coast, North Coast and East Coast MRCC are appropriate. These would be located in Stornoway, Lerwick and Aberdeen, with the four (Scotland + Northern Ireland) stations covering 60% of the UK SRR. This will provide an appropriate spread of strategic centres and would provide a balanced service map across the UK.

2.6 Linking Stornoway, Lerwick and Aberdeen would create a Scottish “tri-service” centre, which would allow the co-location of resilience. Under the model Stornoway would have primary responsibility for the West Coast while Aberdeen would have primary responsibility for the East coast and Shetland the North Coast including Orkney and Shetland.

2.7 The most significant difference between this approach and the MCA’s proposals is that the “local” MRCC would retain overall command of any incident. This approach would ensure that the station with the best knowledge of the particular area would retain command of the incident. In the view of the Comhairle this approach would be significantly more resilient than the two MOC approach proposed in the MCA consultation.

2.8 In the view of the Comhairle it is essential that there is a full appreciation of what is meant by the term local knowledge. In the view of the Comhairle local knowledge is not the ability to remotely call up a “google map”. To us local knowledge is a detailed “situational awareness” of the coastal and maritime environment— it is a deep understanding of the geographical features; topography; weather; daily activity patterns; the users of the water (fishing/merchant/leisure etc.); the users of the coastline and littoral areas (walkers/anglers, etc.); the culture; the language and accents; the personalities; communities and lastly, it is the critical working relationship between the station and the units it calls out and the civil contingency partners with whom it works.

2.9 The proposed Comhairle model would deliver this critical local knowledge, but it would also be able to incorporate the “operational pairing” referred to by the MCA consultation document. The model would also have the added advantage of reducing manpower requirements while allowing appropriate system flexibility to facilitate leave, training, etc.

2.10 It is anticipated that each MRCC would require approximately 22 operations staff.
2.11 Each of the 12 MRCCs would provide:

- capacity for critical local knowledge;
- an embedded presence in local communities, which would command the confidence of the general public and marine users;
- direct or indirect links to all coastguard aerials, with the capability of receiving communications from vessels anywhere around the UK coast;
- more sites to spread the load will enable a major incident affecting any one site to be handled more efficiently thus increasing resilience;
- the ability to handle 999 calls made to the coastguard from any location within the UK on both landline and mobile phones;
- island-based stations (Stornoway, Shetland and Belfast) in remote sites, which will provide enhanced resilience in the event of a national crisis;
- staffing to cope with peak national demand, day and night, achieved at best cost via flexible staffing models, risk assessed staff reductions, etc.; and
- balanced work-loading across the service, providing greater flexibility to manage training, leave, sick absence, while also providing staff with opportunities for role enhancement/new responsibilities;

2.12 The Comhairle takes the view that the 12 MRCC model may prove to be more politically acceptable both to the devolved administrations of Scotland, Wales and Northern Ireland and to the Members of the Westminster Parliament who will be responsible for signing off on this modernisation.

2.13 In relation to Stornoway the Comhairle sees a series of overwhelming reasons for an MRCC presence. These can be summarised as follows:

- it is self-evident that the more remote a community the greater the risk—this is particularly true of a island community which faces some of the UK’s most hostile weather conditions;
- the Outer Hebrides (and indeed the north-west coast of Scotland) is a unique part of the UK that is heavily dependent on the sea and as such views the coastguard service as a major element of the emergency services;
- the Stornoway service has strong links and bonds to the community and the community in return has a high level of confidence in the service—that confidence would be detrimentally affected by the loss of the service;
- a critical understanding in relation to local Gaelic/Norse place names including duplications and spelling/phonetic difficulties;
- the provision of assistance to the police in the co-ordination of land Search and Rescue operations;
- the provision of assistance and indeed a lead role in non-maritime emergency incidents e.g weather related;
- detailed understanding of helicopter operations and the associated terminology/support requirements such as fuel sites, helicopter landing sites and safe helicopter transit through military danger areas etc.; and
- the existing Stornoway station is a modern, adaptable site, wholly owned by the MCA which already houses many functions and facilities.

2.14 It is also critical to be aware of the strategic location of the present Stornoway facility and the key role it undertakes in relation to international shipping in the north Atlantic. The coastguard station is a reporting station for international shipping entering, transiting and exiting European waters. This is a critical pan-European function that allows a full understanding of shipping active in British and European waters.

**Withdrawal of the Emergency Towing Vessel**

3.1 The Comhairle views the withdrawal of the ETVs as an entirely retrograde step. It is viewed as regrettable in the extreme that the withdrawal was announced with no formal consultation or discussion. It is understood that the need for ETV provision is not disputed but that the UK Government does not believe that it is now appropriate for the ETV provision to be publicly funded and that a commercial solution be brought to bear.

3.2 The approach and need for ETV provision is most eloquently stated within the MCA’s own documents. An MCA Report entitled “Emergency Towing Vessels Assessment of Requirements”, undertaken by Marico Marine and dated November 2008 states at the synopsis:

“The United Kingdom appears to have little option but to continue its involvement in the contracting of Emergency Towing Vessels (ETV). Lack of capability within the commercial tug and towage sector (in effect market failure), European Union obligations, and societal expectations (zero tolerance of major marine environmental incidents) combine to dictate the need for this contingent capability. In cost benefit terms, averting one major shipping disaster and environmental incident of the scale of
the Prestige would justify a contract price far in excess of that currently being paid until its expiry in 2011 and beyond.”

3.3 The Executive Summary is equally unambiguous. It states:

“The present contract, which operates until the end of September 2011, deploys four relatively large tugs sourced from the offshore oil sector on permanent stand-by at four strategic locations (Dover Strait, the Western Approaches, the Fair Isle Strait and The Minch). They represent a major resource capability in seeking to avert a major merchant-shipping casualty (grounding, foundering, sinking etc) and, in particular, a subsequent marine environmental pollution (oil and/or other hazardous substances) occurrence anywhere within the UK’s Pollution Control Zone (UKPCZ).

The key function of an ETV is to intercept ships that are disabled, largely the result of mechanical (engine and/or steering) breakdown, thence secure a tow to bring the crippled vessel under control to prevent catastrophic event escalation. The ETV may also be required to tow the casualty to a location of safety, generally known as a place of refuge. This must often be achieved in a limited time frame, or window of opportunity, prior to the vessel incurring significant damage and losing structural integrity, such as might follow being driven ashore, as seen in the loss of the tankers Amoco Cadiz and Braer, or simply succumbing to the elements, as was the case for the tanker Prestige.”

3.4 The ETVs were put in place following the recommendations of Lord Donaldson following the Braer disaster. Shipping movements and tonnages have greatly increased since the Braer. Given that increased activity, it is the view of the Comhairle that the loss of the ETV will inevitably lead to an incident, which will result in devastating environmental impacts. The costs of any such incident will be significantly greater than any savings to be realised through the ETVs’ withdrawal.

3.5 The Comhairle does not believe that there is a commercial solution available in the north west of Scotland. A commercial operator will not come in to fill the void left by the withdrawal of the ETV. As the MCA report states that is clear market failure.

3.6 Given available ETV capacity in the North Sea and English Channel, the view of the Comhairle is that there is a high probability of a market-based solution being brought to bear in these areas. That there may be a market-based solution in one part of the country should not, however, lead to the conclusion that there is a market solution readily available for the entirety of the UK.

3.7 The Comhairle would advocate a position where the southern ETVs are put out to market solution, but that the two northern ETVs are retained by the public sector until a mechanism can be developed to allow a revising of the contract arrangements.

3.8 There may be some merit in seeking a more commercial approach, but the unilateral cancellation of the ETV contract will significantly jeopardise that goal.

RECOMMENDATIONS

4.1 The Comhairle has thought carefully about the issues brought forward by the MCA modernisation proposals. We are supportive of the modernisation of the coastguard, but believe the proposals presented through the consultation to be seriously flawed. It is the view of the Comhairle that these proposals if implemented will increase risk to and compromise the safety of shipping; will have little impact on overall costs and that there are more appropriate alternative solutions.

4.2 The Comhairle would therefore respectfully recommend, based on the above conclusions, that the Transport Committee:

(a) advises the UK Government against progressing the proposals put forward by the MCA in relation to coastguard modernisation as they do not carry the confidence of the public and service users; are not in the best interests of the UK’s coastal communities and are not in the best interests of mariners due to the fact that the proposals carry an unacceptable level of risk;

(b) advises the UK Government to seek a fresh approach to coastguard modernisation based around a 12 MRCC solution operating 24 hours; this approach to have the goal of delivering savings, while providing wide geographic coverage and ensuring the retention of a robust, technologically sound service which maintains critical local knowledge and experience; and

(c) advises the UK Government to seek a fresh approach to the withdrawal of ETV services, with particular regard to the north-west of Scotland, where it is clear that there is market failure and no realistic prospect for a commercial solution.

April 2011
Written evidence from the Shetland Islands Council (MCA 140)

Written evidence for the House of Commons Select Committee on Transport, in the matter of the proposed closure of the:

— coastguard stations at Lerwick and Stornoway;
— withdrawal of the emergency tug (ETV) cover from the Northern and Western Isles; and
— withdrawal of the Maritime Incident Response Group.

1. BACKGROUND

1.1 The submission is on behalf of the Shetland Islands Council. Shetland Islands Council is one of the 32 local authorities across Scotland. It is the most northern local authority in Scotland and it is a major employer within the islands with over 3,000 employees. The Council consists of 22 elected members serving a population of approximately 22,000 people. The Council is a competent harbour authority, pilotage authority and also operates a range of marine vessels that serve both the local community and harbours.

1.2 Officers of the Council constructed the response with an operational interest in the services that the Coastguard and ETV provide. The response was authorised by the Shetland Islands Council before forwarding to the Transport Select Committee.

1.3 Shetland is situated at a major cross roads for the Northern shipping routes and is geographically closer to Bergen, Norway than to Aberdeen. The seas around Shetland, Orkney and the Western Isles support a large proportion of the population and are important to the local and national economy. In addition to many hundreds of islanders who are at sea every day as fishermen, salmon farm and shellfish farm workers, tug crews, pilot boat crews, ferry crews, dive charterers, sea anglers and tour boat operators, there are many thousands working all year round in the vast sea area covered by Shetland Coastguard. They include crews of the offshore oil and gas industry, which include platforms, rigs, accommodation barges, seismic research ships, oilfield supply vessels, and diving support ships. There are also hundreds of freighters, many of which carry dangerous and polluting goods, on passage through the Pentland Firth, the Fair Isle Channel and around Muckle Flugga at the north end of Shetland. In summer, the waters around the Northern Isles also see about 1,000 yachts and 100 cruise liners, some carrying thousands of passengers and crew on a single vessel.

1.4 Transport and communication links with the Shetland, Orkney and the Western Isles face additional challenges. Failures in communications do happen and transport links can be disrupted for days due to adverse weather.

1.5 We do not oppose reform and improvement in the Coastguard service. Indeed we would welcome it. It is essential always to keep working practices and technology under review. However we believe that the coastguard stations in Lerwick and Stornoway should remain open and operational 24 hours a day. We also believe the emergency towing vessels should be retained to cover the Northern and Western Isles.

2. COASTGUARD

2.1 Shetland is located at the very northern most point of the UK. It is located near major oil and gas developing regions and is a natural cross roads for shipping using Northern Routes to/from Europe, Scandinavia, Baltic, Russia and the Arctic regions. The island experiences some of the most extreme and varied weather in the UK. In the event of a major incident it is essential that Shetland can respond and deal with the incident until support can arrive. As seen with the Braer, the arrival of support can take days due to the harsh environment. The removal of the station would undoubtedly affect Shetland’s ability to respond effectively.

2.2 The Coastguard is the fourth 999 emergency service and, in remote areas such as Shetland, Orkney and the Western Isles, just as important to the public safety as the police, fire and ambulance services. The MCA proposal will affect co-ordinated emergency response and would appear to undermine the Governments duty of care to protect the public.

2.3 Scotland has approximately 60% of the UK coastline, however the proposals will mean that it has only 25% of the Coastguard stations.

2.4 Shetland:

— Shetland is 90 nautical miles from nearest part of UK mainland.
— It is approximately 85 nautical miles from Fair Isle to N. Unst.
— Never more than three miles from the sea in Shetland.
— The unusual “jigsaw” shape of the Shetland Islands packs a profusion of coastal and marine life into the 1,700-mile-long coastline of a land area of just 567 square miles. There is about 20 times as much coastline per square mile of land in Shetland as in Sussex or Norfolk. Add in islands of Arran, Islay, Jura, Orkney and Western Isles equates to approx 7380 miles.
— Growing oil and gas development to West and North.
— Increasing interest in marine renewables.
— Large and economically important fishing and aquaculture industries. (Worth £225 million in Shetland in 2006).
— Renowned natural environment.
  — The inshore waters around Shetland are still pristine, and certainly the cleanest in the North Sea.
  — The variety of inshore habitats over short distances is remarkable—from seabed over 120m deep to cliffs over 200m high; from tidal lagoons and sandy beaches to caves and kelp forest; from oxygen-depleted waters at the head of Sullom Voe to the turbulent, oxygen-rich waters of Bluemull Sound.
  — The continental shelf around the islands is one of the richest and most productive seas in the world. As a plankton producer it ranks with the Grand Banks of Newfoundland, Russia’s Sea of Okhotsk and the Gulf of Alaska. Like the deeper waters west of the shelf edge, it is far more “biodiverse” than a casual observer might suppose.
  — Populations of gannets, fulmars, puffins, guillemots, black guillemots, razorbills, kittiwakes, arctic and common terns, great and arctic skuas, shags, cormorants, eiders, red-breasted merganser and red-throated divers.
  — Shetland is a vital staging post for migratory birds and has a world-famous ornithological observatory on Fair Isle. Shore birds and wintering wildfowl are particularly vulnerable to coastal oil pollution.
  — Populations of grey and common seals and otters are nationally important. Shetland has the highest density of otters in the UK. Grey seals have been recorded as far as 70 miles out in the Atlantic.

2.5 Western Isles:
Almost all of what has been said about Shetland is equally applicable to the Western Isles:
— The island chain is 120 miles long.
— With very few exceptions, habitation is restricted to the coastal strip.
— Marine traffic funnels through the Little Minch, between Harris and Skye, with navigation constrained to IMO Recommended Routes with very little room for error.
— Similarly to Shetland, the waters are pristine and support an extremely broad variety of marine life, a fact that is recognised at European Level with the intended imposition of SAC (Special area of Conservation) status in the Sound of Barra and off Mingulay.
— St Kilda is a UNESCO world heritage site.
— Aquaculture is an increasingly valuable part of the UK economy, Government statistics attach a value of £377 million to this sector on the Scottish West Coast, with a further £89.3 million valuation of commercial fish landings at the various ports within the same area.

2.6 Communication between Shetland and the mainland is unreliable. In 2009 the connection went down 15 times and in 2010, 11 times. During these disruptions, the present Coastguard station continued to operate through it’s hard wired connection to the adjacent antenna. The Emergency Towing Vessel (ETV) was used to extend coverage and to act as a repeater/relay station between Shetland and the mainland.

2.7 The current connection is based on a commercial operator located on the mainland. Due to distance, availability of transport and weather, this has resulted in delays in getting parts and qualified technicians to Shetland to rectify problems. This is in spite of service level agreements and assurances.

2.8 If the proposals were to go ahead, a breakdown in the link to the mainland would cause a communications blackout in Shetland and the surrounding waters leaving it vulnerable and unmonitored.

2.9 Recently similar problems were experienced in Stornoway. Large areas of the Stornoway Coastguard district were without power with several radio masts out of action, including one, on the mainland (near Cape Wrath) that is controlled from Aberdeen. The situation was contained locally by the Coastguard, however the lack of electricity caused further problems with computer dependent communications throughout the Island Chain.

2.10 There appears to be no joined up strategic overview of the effects and impacts of the savings and cuts within the emergency services. The proposals only consider the Coastguard stations in isolation and do not consider the effect of other cuts and reviews both within the MCA (eg the ETV) and external to the MCA (eg Police, loss of Nimrods, Fire, MIRG etc.).

2.11 Preparing Scotland on Resilience states “Central government’s approach to civil contingency planning is built around the concept of resilience. This is defined as the ability “at every relevant level to detect, prevent and, if necessary, to handle and recover from disruptive challenges”. The processes which underpin resilience from the fundamental elements of civil protection.”

2.12 Removal of the Coastguard function in Shetland reduces our current level of resilience. The Civil Contingencies Act 2004 (Contingency Planning) (Scotland) Regulations 2005 place a statutory duty on Cat 1
responders to work with Integrated Emergency Management—by closing the Lerwick station, it would effectively knock out one the legs that support Integrated Emergency Management in Shetland through our Shetland Emergency Planning Forum. Likewise Stornoway Coastguard is a key participant in the Western Isles Emergency Planning Group.

2.13 Lerwick Port (with a turn over in 2009 £8,350,000) is the lifeline link for Shetland. The local Coastguard, situated overlooking the port, offers an increased resilience to harbour activities. When Lerwick Port has experienced communications failures Shetland Coastguard has been able to ensure that normal operations continue.

2.14 The “toolbox” available to deal with any major incident is slowly being eroded away. Currently either under threat or gone:
- Nimrod.
- ETV.
- Offshore fire fighting.
- Police.
- Lighthouses.

2.15 The consultation focuses on search and rescue co-ordination provided by the Coastguard and not on the many other services that the station provides to the local area, eg:
- Co-ordination of local resources in the event of extreme weather / landslides.
- Co-ordination and local tasking of local emergency helicopter and alternative landing/pick up sites.
- Co-ordination of out of hour’s local inter island ferries with other emergency services.
- Local and inshore leisure and small boat users—voyage plans, Local forecasts and information and reporting.
- Importance of incident prevention work.
- Contact between full time professional staff and the volunteer Coastguard Rescue Service.

2.16 The seas around Shetland, Orkney and the Western Isles are likely to become more populated with equipment and shipping associated with offshore wind, marine renewables and much of the UK’s oil and gas reserves. These seas are also rich fishing grounds and support an extensive aquaculture industry. The seas also support a wide variety of marine life. The weather events are also becoming more extreme and significant wave heights are increasing year on year. This has been highlighted in recent studies from the petrochemical industry, investing in equipment to the West of Shetland, and in the MCA’s own consultation document. There are on average about 100 days a year with winds of Force 7 or more. Prolonged gales and storms are frequent, regularly disrupting communications as well as problems for vessels at sea. Examples include the Force 11 winds accompanying the grounding of the Braer (January 1993) and the Green Lily (November 1997). Summer months brings with it fog that can blanket the islands for days on end, disrupting flights and thus delaying the arrival of technicians to repair defective equipment. Fog is frequently accompanied by high atmospheric pressure, which regularly disrupts microwave communications used by the emergency services. It would therefore seem ludicrous to close the facilities that help to protect life and the environment in the very areas that are most at risk.

2.17 The current station provides many benefits to the local community and marine users. The ability to talk directly to local Coastguard officers to get advice and to respond to Traffic Reports (TR’s) is much valued and potentially helps to stop accidents happening in the first place. The loss of the station would be detrimental in this regard, especially for leisure and small boat users that do not have sophisticated equipment onboard.

2.18 The presence of a local station also allows a liaison officer from other blue light services to be present eg the Greenpeace incident with the Stena Carron were a Police officer was located in the Lerwick Coastguard station.

2.19 The local knowledge that the station officers provide in tasking local assets to allow emergency services to reach the more remote islands, in all weathers, cannot be overstated.

2.20 Local knowledge is a crucial resource in achieving a prompt response within the first, or golden hour of any incident.

2.21 Shetland, Orkney, the North of Scotland and the Western Isles are remote areas with a wide range of dialects, accents and even language. Place names are not always unique and often can be found in all of the regions mentioned. As a result many places have local names for geographical features and locations that are not published on any book or chart.

2.22 Shetland and the Western Isles have many single track and challenging roads with numerous hills and radio black spots. Local knowledge of such features is crucial in the early co-ordination of any incident. The closure of the station would mean much, if not all of this local knowledge would be lost.
2.23 Shetland maintains good connections, not only culturally, but professionally through the local Coastguard with Faeroe and Norway. Loss of the local station would be detrimental to those connections.

2.24 There appears to have been no competent risk assessment of the proposed changes. There is no detailed local impact assessment. The review document merely suggests that there will be no negative impacts.

2.25 The evidence in the consultation document supporting diurnal and seasonal ranges does not hold true for the majority of the Scottish region. In Shetland, like most of Scotland, the level of response shows little variation throughout the year. This may partly be explained by differing types of shipping and maritime users in certain parts of the UK compared to Scotland. The daylight hours in the far North of Scotland, including Shetland, vary substantially dependent on the seasons. This would make the value of the proposed daylight operation scenario for either Stornoway or Shetland questionable.

2.26 The removal of 22 experienced and qualified coastguard officers will result in a reduction in resilience for Shetland. It would leave the islands particularly vulnerable to communications failures between here and the mainland. The current system has in built hard-wired resilience that allows the coastguard station to operate even when links to the mainland are severed. Under the current proposals, a loss of communications between Shetland and the mainland, would leave the volunteers with only handheld radios and binoculars to respond to any incident within the area.

2.27 In our view the proposals do not provide a more effective and better approach to handling maritime emergency messages. Modernisation and new technology may help the overall resilience of the Coastguard service especially on certain parts of the mainland. However technology cannot be the only factor considered. Indeed much of what is proposed is not new technology, rather technology based on phone and radio.

2.28 The proposals suggest that the new system will promote strong links between the officers in the new MOC’s and the volunteer service. It would be interesting to know how the removal and down grading of coastguard stations in remote locations will help to foster these greater links.

2.29 We fail to understand how the change will increase the geographical pool for recruitment. The coastguard already recruits from the length and breadth of the UK. It is our belief that the reverse is more accurate and jobs will undoubtedly be lost in remote areas.

2.30 We have a concern that the loss of so many Coastguard officers (approx 50%) will leave the service vulnerable to illness and stretched in the event of a major incident(s). It is also uncertain how the Coastguard will be able to provide the regular service during such an incident.

2.31 In the event of localised severe weather that lasts for days or longer (eg this recent severe UK winter) staff may not be able to reach the MOC. With the current proposals there is no indication of how long one MOC could be out of action and the remaining MOC maintain 24/7 coverage around the UK, especially if a major incident occurred. There would appear to be little resilience in such a scenario.

2.32 We also have a concern that the proposal will mean a large loss of staff that are unable, or unwilling, to move to the new locations. House prices and cost of living on the mainland will mean that many island-based staff will no be able to afford to move. Aberdeen, one of the sites proposed as a future MOC, has some of the most expensive house prices in Scotland. This would mean a large loss in skills and knowledge and a potential influx of “raw” inexperienced recruits leaving the mariner and coastline vulnerable for a number of years. (eg When Scottish Natural Heritage moved location they lost a high percentage of staff that were unwilling or unable to relocate.) It is therefore likely that it will be recently qualified staff with little or no previous local connection who will be willing and able to redeploy to the mainland. The staff in Shetland choose to work for the Coastguard service in Shetland because of their interest in and commitment to the job and local community that relies so heavily on the sea, not because of the financial rewards.

2.33 The consultation states that feedback is to be independently reviewed. However the person in charge of the review is a non-executive director of the MCA and a former Chief Coastguard. It is hard to understand how this can be described as independent. Therefore the Transport Select Committee review is welcomed.

2.34 There are certainly tasks that the local coastguards might take on, to make more efficient use of resources. Examples include co-ordination of SAR helicopters, responsibility for annual survey of small vessels, and perhaps in a shared emergency control centre.

3. **Emergency Towing Vessel**

3.1 The “Braer” was a tanker transiting the seas around Shetland. Following the incident and oil spill the Government implemented many of the recommendations of Lord Donaldson’s report. Four years later, following an inquiry into the loss of the freighter “Green Lily”, the Government acknowledged that an ETV based in Orkney and Shetland was essential for public safety and the protection of wildlife and the seafood industries. In 2000 the ETV review conducted for the MCA stated, “ETV cover in the existing geographical locations should be provided on ‘Year-round basis’. The deployment of ETV coverage in the existing four geographical locations has been fully endorsed and should be maintained.”
3.2 We do not believe that there is sufficient capacity in the islands all year round to provide the same response capability and time as the current ETV. There is no doubt that at times there are vessels in the vicinity that may be able to come to the aid of a vessel in distress. However:

- Few of these vessels will be as well equipped to deal with all the potential situations that the ETV is currently outfitted for.
- A vessel engaged in another operation such as anchor work or towing will not be able to respond quickly without putting others at risk or danger.
- Vessels in port may be unable to respond due to crewing, maintenance or contracts.
- There are periods of time when there are no other suitable vessels available.

3.3 There has been mention that harbour tugs may be able to help. However harbour tugs, are designed to work within sheltered waters and are not suitable or able to attend a vessel in bad weather in open waters. Harbour tugs have a primary role and contracts to work within their given ports. The tugs may not be able to be released without seriously affecting the ability of a port to operate safely. It is also worth noting that harbour tugs were discounted in the MCA’s last review in 2000 and that other nations have realised the need for specialised vessels eg Spain, France, Germany, and Norway.

3.4 The figures supplied by the MCA for use of the Emergency Towing Vessel are for active towing only and retrospective oil pollution incidents. They do not take into consideration passive escorting or other duties that the vessels currently fulfil, eg:

- Offshore fire fighting capability—essential part of the Marine Incident Response Group (MIRG).
- Standby by vessel for the MIRG.
- Offshore rescue vessel—rescue and recovery of personnel.
- Search and Rescue function.
- Pollution response.
- The ability to provide a on scene communications and command platform.

3.5 Nor is the information forward looking eg The Russian Export Blend Crude Oil passing Shetland much of which will then proceed West of the Hebrides or during extreme weather opt for passage through the Minches.

3.6 There is recognition of the difficulties that the country finds itself in this current financial climate. We do not believe that all possible avenues have been thoroughly examined in relation to revising the current ETV contract, searching for efficiencies and methods of funding. This should include a more strategic view across governmental maritime interests. The tug could possibly be tasked for other duties while still providing the essential cover around the UK. Has this been considered? Eg:

- Fishery Protection.
- The UK Border Agency duties.
- Hydrographic surveys.
- Defence related work.

Perhaps some of the options to be considered are:

- Could the current contract be re-negotiated to become a more viable operation?
- Escorting of vessels is currently done free of charge, has a charging structure and associate legal requirements been examined?

3.7 Can income from the Crown Estate be used to fund/partially fund the ETV?

4. Invitation

4.1 The Shetland Islands Council welcomes the opportunity to present this document to the Transport Select Committee and thank the committee for considering the points raised in this document. Shetland Islands Council would welcome the opportunity for members of the Transport Select Committee to visit Shetland in order to discuss any of the matters raised and to allow committee members to gain a better understanding of the concerns of Shetland.

April 2011
Supplementary written evidence from Shetlands Islands Council (MCA 140a)

Today I have received a letter and enclosures from the Director of Communications for UK Oil & Gas, which I understand has also been sent to you as “Further Evidence” on behalf of that organisation. She wishes to “clarify” the evidence I gave to the committee regarding insurance cover for offshore pollution. By this, I presume she means to criticise or contradict. At my age I am well able to do my own clarifying. She refers to the OPOL agreement between the oil and gas companies, regarding compensation for offshore spillages from installations, as distinct from vessels. In my response this evening to her letter, I have drawn her attention to three points:

1. The OPOL limit of $250 million per incident is highly unlikely to be sufficient in the event of a deepwater seabed blowout of long duration, as distinct from the single-point, shallow water, short duration spills for which it was designed.

2. The OPOL provisions cannot be enforced in international law, as far as I can see, and are in essence voluntary. The evidence of Client Earth to the Commons Energy Committee on 26 October last year seems to bear me out, unless the law has changed since then.

3. My conclusion, after observing the aftermath of oil spills in Brittany, Alaska, Shetland, Spain and Wales over the past 33 years, is that compensation is commonly inadequate, grudging and tardy. Her members may have decided very recently to change that scenario but it will take more than the OPOL arrangements to convince me. An international and enforcible regime of unlimited liability is what is required.

I have also sent the Director of Communications for UK Oil & Gas a copy of that expert legal opinion by the specialist lawyer Ms Susie Wilks, on behalf of the environmental litigation practice, Client Earth. I base my views partly on her 26/10/10 evidence to the Energy Select Committee, in which Ms Wilks commented as follows on offshore pollution liability and OPOL in particular:

Ms Wilks said, in answer to Question 215:

“Ms Wilks: My main concern is with the liability system and the absence of any regulatory framework or any clear, consistent and reliable regulatory framework for determining liability and compensation arrangements in the case of a spill. So we have the European environmental liability directive, but it is likely to be of limited application in the case of a big spill in European waters and, as a matter of UK law, there’s nothing to fill that gap. So I’d like to see something done about liability...”

See also Qq. 217–220, Q 224 in Energy and Climate Change Committee, Second Report of Session 2010–12, HC 450-i.

Written evidence from the RNLI (MCA 164a)

Having read the transcript of the oral evidence given by Mr Michael Vlasto at the hearing of the Select Committee on Tuesday 24 May, I believe that there are two points of clarification that I should make for the benefit of your committee.

Firstly, I understand that a request for written evidence to the Transport Select Committee was indeed sent to the RNLI Headquarters in late March. Due to an administrative oversight, this was not actioned, and it was not brought to Mr Vlasto’s attention. I apologise for this.

Secondly, in response to Q314 from Mr Harris, Mr Vlasto stated that we did not make any geographical comment in our response to consultation other than a mention of Belfast. This was inaccurate; we also wrote in our response that with respect to Stornoway/Shetland, the latter is the busier and therefore would be the logical choice.

I hope that these points of clarification are useful. Finally, I do not know when the MCA proposes to publish the responses to its consultation document but, for further clarification of the RNLI’s position, I have enclosed a copy of the RNLI’s response with this letter.

Please do not hesitate to get back to me if there is any further clarification that you require.

May 2011
Supplementary written evidence from the Department for Transport (MCA 10g)

It was a pleasure to appear in front of your Committee on the 24 May to discuss the Coastguard, ETVs and MIRG. At the Committee, I was asked by the Member for Glasgow South about the status of Highways Agency Patrol Officers (Q598). I am writing to you to clarify the position further to the response I made to the Committee.

In England, there is no one body which is termed “Highway Agency Patrol”. The police and Highways Agency both have a key role in the effective management and patrolling of the strategic road network.

The Highways Agency is responsible for operating the strategic road network carries out this responsibility primarily through a Traffic Management operating model including a uniformed Traffic Officer Service. The Traffic Officer Service is responsible for the management of traffic on the strategic road network. This service is made up of both on road staff, whose duties include managing traffic in and around incidents and the patrolling of the network; and staff within regional control centres who support the deployment of the on road staff to incidents and the setting of signs and signals. Traffic Officers (on road and in the control centres) are designated by the Secretary of State and are employed by the Highways Agency; as such they are civil servants.

The police role in patrolling the network focuses on their core activities of the prevention and detection of criminality. They also retain responsibility for managing and investigating serious incidents on the network where there is loss of life, injury or potential criminality and work in partnership with the Highways Agency in managing such incidents. Police Officers are not civil servants.

The Highways Agency Traffic Officer Service is supported by incident support units (ISUs). ISUs provide a range of equipment which can be used to set up emergency traffic management, clean up the carriageway and help Traffic Officers to carry out their work safely and efficiently. The ISUs are contracted by the Highways Agency through service providers and are therefore not civil servants.

June 2011

Supplementary evidence from Comhairle nan Eilean Siar (Western Isles Council) (MCA 136a)

I and my colleagues on the Outer Hebrides Coastguard Task Group are grateful to you and your fellow Committee members for holding a session of the Select Committee in Stornoway this week.

I hope you found this a productive and worthwhile visit and that you were able to get a first hand experience of the issues we are facing.

One area that I perhaps should have brought up in my evidence was that of the Coastguard volunteers. The Task Group did speak to a number of volunteers who were firmly against the MCA proposals. They also made the point that if they were being put into dangerous situations they would want to have the confidence that those who were instructing them had good local knowledge. Thought it was worth mentioning.

Given your Committee’s interest in the economic impacts of the MCA proposals, I have enclosed a copy of a piece of work undertaken by Highlands and Islands Enterprise which I hope you will find informative.

Thank you again for your interest in the Islands and if I can be of any further assistance please do not hesitate to contact me.

May 2011