# **Stakeholder Engagement: Marine Guidance Note 627(M) Amendment 2**

This email seeks your views on updates to [Marine Guidance Note (MGN) 627 amendment 1](https://www.gov.uk/government/publications/mgn-627m-amendment-1-guidance-on-changes-and-available-exemptions-against-requirements-introduced-by-the-merchant-shipping-safety-standards-for-p/annex-1-mgn-627-amendment-1), which provides an overview of the changes made by the Merchant Shipping (Safety Standards for Passenger Ships on Domestic Voyages) (Miscellaneous Amendments) Regulations 2022 (colloquially known as the “Grandfather Rights Regulations”) and its associated Marine Notices.

Since the publication of MGN 627 Amendment 1, the Maritime and Coastguard Agency (the “MCA”) has received several queries on the requirements contained therein. While these queries have been addressed on a case-by-case basis, it is believed that it would be beneficial to update the MGN to provide clarity on the issues which have been brought to light. This will help to promote reader understanding, as well as consistency in application across the UK.

Please find attached the draft MGN 627 Amendment 2, which contains the following enhancements:

1. additional text in paragraph 2.3 to clarify that lifejackets (and, where applicable, Buoyancy Aids) on all relevant passenger vessels operating on Category C and D waters be fitted with approved, automatically activated lights;
2. text in paragraph 2.4 on fire detection requirements is amended to align more closely with the Merchant Shipping (Fire Protection: Small Ships) Regulations 1998;
3. text in paragraph 2.5 on fixed firefighting amended to clarify that, where the requirement for a fixed firefighting system is satisfied by the use of an aerosol fixed firefighting system, the system shall be installed in accordance with section 5 of MGN 657 (M/F) - Requirements for fixed aerosol fire extinguishing systems for use in small vessel machinery spaces, as amended;
4. text in 2.6 amended to clarify that, although a second means of powered bilge pumping must be powered from a source independent of the main engine pump, the sources of power are not required to be in separate locations;
5. text in paragraph 2.7 amended to align the bilge alarm requirements more closely with the Merchant Shipping (Passenger Ship Construction: Ships of Classes III to VI(A) Regulations 1998. Additional clarification added to confirm that an alarm may be isolated in certain circumstances.
6. text added to paragraph 2.9 to clarify that a risk assessment is required before some types of vessels may be exempted from the damage stability requirements detailed in Merchant Shipping Notice 1699(M).

Your views are sought in respect of these proposed changes.Please send responses to [dpv@mcga.gov.uk](mailto:dpv@mcga.gov.uk). The attached response form can be used if desired, but is not essential. Representative groups are asked to give a summary of the people and organisations they represent, and, where relevant, who else they have consulted in reaching their conclusions.

Responses are welcomed from 5 September to 4 October 2024.

Following the conclusion of this consultation and consideration of the feedback, the updates to this MGN will be finalised.

**Response form – Marine Guidance Note 627(M) Amendment 2**

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| What is your name? |  |
| What is your email address? |  |
| What is your job title? |  |

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| **When responding please state whether you are responding as an individual or representing the views of an organisation:** | | | |
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|  | I am responding as an individual | |  |
|  | I am responding on behalf of an organisation | |  |
|  | (name of organisation) |  | |

**Please check the box that best describes you as a respondent and the size of your organisation:**

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| Respondent Type | | | Size of Organisation | | |
|  | Classification Society | |  | Large business (over 250 staff) |
|  | Government Agency/Department | |  | Medium business (50 to 250 staff) | |
|  | Individual | |  | Micro business (up to 9 staff) | |
|  | Legal representative | |  | Small business (10 to 49 staff) | |
|  | Protection & Indemnity | |  |  | |
|  | Seafarer | |  |  | |
|  | Ship Operator | |  |  | |
|  | Ship Owner | |  |  | |
|  | Trade Union | |  |  | |
|  | Other | |  |  | |
|  | (please describe) |  | | | |

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| 1. | Is the MGN free of typographical errors? |
|  | Yes |
|  | No (if you tick this, please provide detail in the space below, continuing on a separate sheet if necessary) |
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| 2. | Do you believe the content is clear? |
|  | Yes |
|  | No (if you tick this, please provide detail in the space below, continuing on a separate sheet if necessary) |
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| 3. | Do you believe the content included is appropriate for an MGN? |
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|  | Yes, I agree |
|  | No, I disagree (if you tick this, please provide detail in the space below, continuing on a separate sheet if necessary) |

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| 4. | Do you believe there is any potentially helpful guidance which has been omitted? |
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| 5. | Do you have any additional comments to add to the response? |
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Return a copy of the completed version of this form to [dpv@mcga.gov.uk](mailto:dpv@mcga.gov.uk).