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**Consultation question 1: Do you agree that retaining 24/7 sub-centres at both Shetland and Stornoway adequately addresses the concerns expressed? Do you think that there is a more cost effective way of addressing these concerns?**

In its response to the first consultation, the RYA made it clear that it fell beyond its remit to comment on the structure and location of sub-centres and that the final choice would be made by the MCA dependant on a number of parameters, political pressures, the opinion of other consultees and stakeholders. However, we understand the principal conclusions that have emerged from the first consultation and which have shaped the revised concept of operations.

**Consultation question 2: Do you agree that retaining the 24/7 sub-centre at Holyhead rather than the station at Liverpool with which Holyhead is currently paired best addresses the concerns expressed in consultation?**

See the RYA response to Question 1 of this consultation response.

**Consultation question 3: Does the new structure as described provide appropriate resilience to cover the UK coastguard operational needs?**

The revised proposals for a single MOC capable of functioning as the normal focus for national UK Coastguard operations backed up by a second site equipped and available for use is based on well tested military command and control procedures. In the event of extended problems generated by infrastructure failure or other unforeseen circumstances, the proposed concept of operations will enable staff to move promptly to the alternative MOC to maintain efficient and effective control over operations wherever they may be.



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**Consultation question 4: In proposing the retention of Milford Haven rather than Swansea, are there any other factors that need to be addressed?**

See the RYA response to Question 1 of this consultation response.

**Do you wish to make any further comments?**

The RYA makes the following further comments

**Local Knowledge**

In its response to the first consultation, the RYA commented in some detail on the value and nature of local knowledge and noted that the MCA had for the greater part failed to convince the boating public that their proposals properly address this issue. It is clear from the independent review that the matter has yet to be satisfactorily resolved and we further note that concern over the loss of local knowledge was by far the biggest area of concern (32%), particularly among the leisure and recreational sectors where the modernisation proposals were not seen to provide a reasonable level of assurance against delayed or incorrect responses.

However, and in spite of these concerns, a clear understanding of what 'local knowledge' is in the context of current coastguard operations and within the future concept of operations is not set out in either consultation. The inevitable result is that there is a wide range of meanings and expectations in the minds of many respondents. The 'characterisation descriptors of Local Knowledge and Local Intelligence' in Annex H, page 36 are limited to simple definitions.

The RYA believes that in order to limit further contradictory comments among respondents, including ourselves, it would be highly desirable to publish a paper which explains what is meant by local knowledge, how it is currently acquired and how it will be acquired within the new national network, how it will be maintained and validated, how it is and will be integrated with GIS data for incident response purposes and finally how it will be accessed and used by incident response teams



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locally and nationally.

If this could be done in the immediate future and before the closing deadline for comments, it would provide greater clarity and reassurance about the future quality of coastguard services. However, if that is not possible, publication of such guidance will still be required as discussion goes forward.

### **Regulation**

The Independent Review Team's Executive Summary of the Report on the Consultation Responses lists five major themes and messages emerging from responses to the first consultation. Of the five, there is a single paragraph under the title of Regulation [of the small boat and leisure sector]. This particular theme is not supported by detailed discussion or analysis in the main body of the Report except for one line item under 'Other Ideas' on page 62. Without that detail, it is difficult to understand how it was decided that 'regulation' was a major theme.

This suggests that it has received unjustified emphasis within the Executive Summary. Although there is a clear case for modernising existing regulation within the leisure sector which is now not compatible with the new concept of operations, the RYA would challenge the assumption that regulation of itself would lead to greater safety, less call on the coastguard service. Furthermore there is no discussion or explanation of how funds would be raised and how they might be used to offset the MCAs costs.



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## **Technology**

The Report on Consultation Responses in part addresses public concerns on the technological improvements needed to underpin the modernisation plan in the light of costly Public Sector failures to successfully deliver major system/technology.

However, in its response to the first consultation, the RYA commented that the recreational community is still very much in transition when it comes to the use of technology and this may affect the future accuracy of the marine intelligence picture if not fully considered as a factor in the proposals.

We note that the internal review team has reported that the proposals were wholly cognizant of the technology available and in use within the small boats and leisure sector and that there was never any reduction in the quality of service provided to these sectors within the proposal.

However, we would have felt happier with an explicit statement of precisely what will be provided under the future concept of operations. The recreational boating community is still concerned, in particular, about the retention of VHF Channel 16 as a primary calling frequency, over reliance on Digital Selective Calling and the continuation of the Inshore Waters Forecast. To this list may be added the planned national, and hence HMCG, mitigation of the recognised vulnerabilities of Global Navigation Satellite Systems and Automatic Identification Systems.