

Dept:	Maritime and Coastguard Agency
Name of measure:	The Merchant Shipping (EPIRB and PLB Registration) (Radiocommunications) (Amendment) Regulations 2026
RP Register ref:	[RPC to complete]

Please provide evidence supporting the consideration and discounting alternatives for regulation

The Merchant Shipping (EPIRB and PLB Registration) (Radiocommunications) (Amendment) Regulations 2026 will revoke and replace The Merchant Shipping (EPIRB Registration) Regulations 2000. This legislation will update existing registration requirements for Emergency Position Indicating Radio Beacons (EPIRBs) as a result of changes in technology and introduce new registration requirements for PLBs (Personal Locator Beacons). The new regulations will update these requirements for UK flagged ships, hovercraft and watercraft. Three options have been considered: Do nothing, a non-regulatory approach and a regulatory approach. The regulatory option of revoking and replacing the Merchant Shipping (EPIRB Registration) Regulations 2000 is the preferred option, a non-regulatory approach has been considered which would include providing guidance and advice to industry, however this would not result in a desired outcome/meet the regulatory objectives as it would not guarantee registration of PLBs and would not meet international requirements for EPIRBs. The MCA has an international obligation to ensure that EPIRBs on UK flagged vessels of any type are registered whereas it is a UK only decision to ensure that PLBs are registered. Both EPIRB and PLB registration will aid His Majesty's Coastguard (HMCG) Search and Rescue (SAR) situations – once any SAR response has been initiated, the process of verification is performed by HMCG, and this is made more efficient through the use of registered information. Thus, the amendment being done in the proposed regulations is purely domestically originated. In this case, it qualifies to be assessed by use of do nothing as a counterfactual.

Please provide consideration of any relevant past evaluation (including PIRs)

No past evaluations or Post-Implementation Reviews (PIRs) have been considered for the currently enforced Merchant Shipping (EPIRB Registration) Regulations 2000 due to the review clause originating from the Small Business, Enterprise and Employment Act 2015 (SBEE Act 2015) not being enacted at the time. The proposed Regulations will amend the Merchant Shipping (Radiocommunications) (Amendment) Regulations 2021 (the 2021 Regulations) for which there is an existing review clause. This review clause requires that a report must be published before 24 December 2026, along with subsequent reports at intervals not exceeding 5 years. Section 30(4) of the SBEE Act 2015 requires that the report published under the 2021 Regulations must, in particular - (a) set out the objectives intended to be achieved by the regulatory provision referred to in paragraph (1); (b) assess the extent to which those objectives are achieved; (c) assess whether those objectives remain appropriate; and (d) if those objectives remain appropriate, assess the extent to which they could be achieved in another way which involves less onerous regulatory provision.

Please provide an assessment (or estimate) of direct business impacts (EANDCB) justifying the application of de minimis

The equivalent annual net direct cost to business (EANDCB) for these regulations is £1.65m in 2023 prices and in 2025 present value, in the central scenario, well within the +/- £10m EANDCB de minimis assessment (DMA) criteria. Even in the high scenario (worst-case scenario), the EANDCB is £3.92m, still below the £10 million boundary. The measure does not have contentious or novel elements, significant wider social, environmental, financial or economic impacts, distributional impacts, large gross impacts, or disproportionate impacts on small, micro and medium businesses.

Please provide a short qualitative summary of the wider impacts on the new regulatory scorecard

There will be an impact to the public sector arising from training for Maritime and Coastguard Agency (MCA) surveyors on the proposed regulations, and a non-monetised benefit of preserving the reputation of the United Kingdom and maintaining the attractiveness of the UK flag. The main direct costs to business will include the cost of familiarising with the new statutory instrument and accompanying guidance notes, the registration of PLBs, and additional time for surveyors to confirm registration during inspections. Another non-monetised benefit is that seafarers and crews will feel more confident of their safety on board vessels, given that the structural and operational safety requirements are now legally enforceable, and that search and rescue action is more efficient.

De-Minimis Options assessment

Title: The Merchant Shipping (EPIRB and PLB Registration) (Radiocommunications) (Amendment) Regulations 2026

Type of measure: Secondary

Department or agency: Maritime and Coastguard Agency

DMOA number: DfTDMA340o

RPC Register Reference: ...

Contact for enquiries: Radio@mcga.gov.uk

Date: ...

1. Summary of proposal

This DMOA relates to the Merchant Shipping (EPIRB and PLB Registration) (Radiocommunications) (Amendment) Regulations 2026. The requirements for EPIRB registration are currently governed by the Merchant Shipping (EPIRB Registration) Regulations 2000, but this legislation needs to be updated to amend existing registration requirements for Emergency Position Indicating Radio Beacons (EPIRBs) as a result of changes in technology and introduce new registration requirements for PLBs (Personal Locator Beacons).

The proposed regulations aim to update these requirements for UK flagged ships, hovercraft, and watercraft. The proposed regulations will also amend four other SIs. The Merchant Shipping (Radiocommunications) (Amendment) Regulations 2021 will be amended by implementing discrete changes to international safety requirements under Chapter IV (Radiocommunications) of the International Convention for the Safety of Life at Sea, 1974. Another SI is amended to update a definition and remove reference to domestic radio regulations not applying to vessels operating in category A, B, C and D waters, and there are minor consequential amendments to one further SI.

The Merchant Shipping (Watercraft) Order 2023 will be amended by making changes which are a necessary consequence of the requirements being introduced in the proposed Regulations to apply the new registration requirements to watercraft.

The largest impact of the proposed regulations relates to the introduction of new requirements to register PLBs (Personal Locator Beacons) on the United Kingdom's online registration platform. The basic function of EPIRBs and PLBs in the maritime environment allow a ship or individual to notify a distress situation to SAR (Search and Rescue) services via satellite. The proposed regulations will revoke and replace the Merchant Shipping (EPIRB Registration) Regulations 2000. The proposed Regulations will also prescribe enforcement mechanisms for failure to comply with the requirements.

2. Strategic case for proposed regulation

The Maritime Safety Committee (MSC) at the International Maritime Organization (IMO) recognised in 2006 the importance of registering 406MHz EPIRBs in an international database to aid Search and Rescue (SAR) situations.

The international obligation for EPIRBs to be registered can be identified in SOLAS IV regulation 5-1 where it states: "Each Contracting Government undertakes to ensure that suitable arrangements are made for registering global maritime distress and safety system (GMDSS) identities and for making information on these identities available to rescue co-ordination centres on a 24-hour basis." PLB registration is only relative to HMCG search and rescue action and verification of whether this is a legitimate maritime emergency prior to allocating assets. Carriage of EPIRBs and PLBs in respect to maritime usage is mandated in some cases or is voluntary in others. This is mostly dependent on vessel type.

Revoking and replacing the existing regulations and their associated documents will bring the regulatory framework up to date with technological advances and the latest requirements for EPIRBs and PLBs, thereby preventing non-compliance and aiding more efficient search and rescue action.

The main economic rationale for intervention is to mitigate the effects of market failures, namely negative externality and information asymmetry. In the “do nothing” scenario there is an enhanced risk of non-compliance by industry. Ship owners do not face the full costs of under-investing in safety equipment such as EPIRBs and PLBs. This creates a negative externality, as it is society which will bear some of the costs (e.g. grievance, loss of production and consumption) for which it will not be compensated. Underinvestment in EPIRBs and PLBs would lead to an increase in the severity of incidents by prolonging response, thus worsening injuries and potentially leading to fatalities at sea. As ship owners do not bear the full social costs of their actions, they have an incentive to underinvest in safety as a cost saving measure. Additionally, ship owners have more information than the MCA on the status and condition of their safety equipment, giving them an informational advantage, which can be used to underinvest in safety, therefore causing more accidents.

Without regulation, incentives to ensure the best possible safety precautions are suboptimal since they do not incur the full social costs associated with such incidents. There is a risk that other solutions (e.g. a market-led solution, subsidies for incentivisation) would lead to some stakeholders not following all protocols for the safety in order to save costs, increasing the probability of incidents. Hence, the market failures would not be addressed.

Government intervention is required to internalise this negative externality and the information asymmetry, by ensuring compliance with the internationally required standards with respect to the requirements for carriage and registration of EPIRBs and PLBs ensure that the UK is compliant with the latest standards and that these are enforceable.

No past evaluations or Post-Implementation Reviews (PIRs) have been considered for the currently enforced Merchant Shipping (EPIRB Registration) Regulations 2000 due to the review clause originating from the Small Business, Enterprise and Employment Act 2015 (SBEE Act 2015) not being enacted at the time.

3. SMART objectives for intervention

- These regulations are specific, measurable, achievable, relevant and timely (SMART).

The main objective of making the proposed regulations is to include the allowance of additional information which can be traced during or for a SAR action. Access to both EPIRB and PLB registration information allows HMCG to take action more efficiently, as the search target will be known plus further amplifying information could be gained through the emergency contacts, further assisting search efforts. Currently, there is no explicit requirement to register a PLB. This is what the proposed regulations will address and change. This will be measured by observing the HMCG’s rescue records on emergencies and the registration rate among all the PLBs which are involved. This will be done in a timely manner through periodic non-statutory assessments to monitor the effectiveness of the regulations and inform any future policy adjustments.

Another objective is for the proposed regulations to align the UK legislation with changes in technology, update requirements for UK flagged vessels, include additional registration requirements and, moreover, be a means of amending other SIs. The number of PLBs that have been registered can be monitored on the UK’s online registration platform, thus, the

objective can be measured by ascertaining if there has been an increase in numbers since the introduction of the new SI.

This aligns with two of the Maritime and Coastguard Agency's objectives, in becoming the world's best performing flag state and being a modern, progressive regulator. This also meets the UK's approach to regulatory reform, by modernising and allowing for the use of new technologies, easing burden on business by allowing them to make minor cost savings.

A ten-year appraisal period is used for the analysis in the sections below, with an implementation year of 2026.

.¹ The performance of the regulations will be monitored through periodic non-statutory assessments to evaluate their effectiveness and support any future policy development.

4. Description of proposed intervention options and explanation of the logical change process whereby this achieves SMART objectives

There have been previous considerations to amend the current EPIRB SI since it was made in 2000. The original proposed changes to the SI however were time sensitive, so it was decided to publish MGN 665 (M+F) in order to establish a means to avoid delay in introducing changes in line with the introduction of the online registration platform in early 2022. Therefore, the below options have been considered.

Three options are considered in the impact assessment:

Option 0 – Do Nothing. This option will result in the continuation of out of date and incorrect safety requirements and information. This will not be acceptable for a multitude of reasons, primarily the potential risk to life and the UK's reputation internationally.

Option 1 – Publish MIN/advice to industry (Non-regulatory) This option would not sufficiently meet the regulatory objective as, the existing legislation does not reflect operational needs, changes to technology or international obligations. This option would not address the potential market failure identified as a new MIN would not meet international obligations for EPIRBs and there is no certainty that a recommendation will ensure registration of PLBs, creating a safety risk.

¹ [Producing post-implementation reviews: principles of best practice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/producing-post-implementation-reviews-principles-of-best-practice)

Option 2 – Publish/amend SI (Regulatory). This option would bring UK law up to date by replacing and revoking the Merchant Shipping (EPIRB Registration) Regulations 2000. Alongside the proposed regulations, the Marine Guidance Note (MGN) 665 (M+F) also needs to be updated and a new Merchant Shipping Notice (MSN) needs to be issued containing details of the information required to be registered. A justification for the new MSN is that some of the registration requirements may change at international level. If this is the case, without an MSN, the SI will need to be amended. In order to avoid this unnecessary work, the specific information required to be registered can be set out in the MSN which can more easily be amended without the need to amend the SI itself. It is anticipated that PLBs may be associated with other types of maritime emergency beacon in the future and this would allow new explicit requirements for appropriate information within the registration. **This is the preferred option.**

The objectives are specific (provide additional registration requirements for EPIRBs and PLBs to aid Search and Rescue situations as access to both EPIRB and PLB registration information allows HMCG to take action more efficiently. This option also provides an opportunity to make amendments to other SIs.), measurable (via a non-statutory review), achievable (via an SI, MIN and updated MGN), relevant to the shipping industry and HMCG, and timely (periodically after the proposed regulations come into force).

5. Summary of long-list and alternatives

In the initial stages of the long list appraisal of the regulatory options there was consideration of adapting online registration to enforce capture of all required information to complete registration. Beacons complying with different technical standards require different information to be stored and this would require various levels of knowledge on behalf of the person registering their information. While satisfying international requirements for EPIRBs, this may or may not capture all desired registration information and would not require owners of PLBs to register thus this option did not qualify to be included in the long list. With no further alternatives available for implementing the additional requirements for PLBs registration, a non-regulatory option has been considered as part of the short list.

Implementation costs are assumed to be one-off and incurred in the implementation year of 2026.

These regulations pose little to no risk of disproportionately affecting small, micro and medium businesses. Indeed, smaller vessels are expected to have a smaller workforce. Hence, the number of PLBs required to be registered will be smaller, compared to larger ships which are expected to have larger crews. The impact on smaller businesses is not disproportionate. No exemptions are in place for micro or small businesses, so if any small, micro or medium businesses were in scope, then they would have to comply with the regulations in the same way large businesses do. Indeed, costs for EPIRBs are related to the number of ships a company owns, so the costs for small, micro and medium businesses are not likely to be disproportionate. An exemption has not been considered as business exemptions would not be compliant with the requirements of the regulations and the same safety standards need to be met regardless of firm size.

Note that all UK flagged vessels are assumed to be in scope of these amendments with a +/- 50% assumption used for the growth rate of the fleet to account for some uncertainty in

vessel numbers, with 53,480 vessels estimated to be impacted by the regulatory change in the central scenario in the implementation year of 2026. The UK Ships Register database was used to obtain the number of existing ships in the UK flag (in 2023).² According to the UK Ships Register, there are currently 56,987 registered ships, based on the last observation of the database on 18/10/23. No direct access to the UK ships register was available, hence the annual growth rate over the appraisal period was based on the available observations of the data, on 04/10/2022 and on 18/10/2023. Even if the timeframe between the two observations is slightly higher than a year, it was assumed that the growth rate between these two observations would be a good enough proxy for the annual growth rate of the number of ships in the UK fleet. It was also assumed for simplicity that the current number of ships in the UK Register would be used as the number of ships for 2023, even if it will change slightly as the calendar year was not finished at the time of the latest datapoint. This will not lead to an underestimation of the costs, as in most scenarios the number of UK-flagged ships in the register was going to be slightly lower than the current estimate at that time by the end of the year.

The growth rates were estimated for each part of the UK Register: Part 1 (large commercial vessels), Part 2 (fishing vessels), Part 3 (small vessels) and Part 4 (bareboat merchant vessels). It was found that the number of bareboat merchant vessels was very low with the total number being between 22 and 26 ships, accounting for less than 0.1% of all UK flagged ships. As such, it was concluded that they could be excluded from the process to generate the growth rates to predict the future number of UK flagged vessels.

6. Description of shortlisted Regulatory options carried forward

Option 2, replace and revoke The Merchant Shipping (EPIRB Registration) Regulations 2000, update the MGN and produce an MSN was identified as the preferred option as it is the most likely to meet the regulatory objectives.

This is the only option costed in the analysis below, as the costs would be the same or lower in Option 1, but with lower benefits overall due to lower levels of take up.

Option 2 is the lowest risk option, with minimal risk of uncertainty or misinterpretation compared to the less formal guidance option in Option 1.

7. Regulatory scorecard for preferred option

Any costs or benefits in this score card are given in 2023 prices, 2025 present value.

Part A: Overall and stakeholder impacts

(1) Overall impacts on total welfare		Directional rating
Description of overall	The proposed regulations have no significant impact on the public sector nor businesses, charities or voluntary bodies. However, businesses	Positive

² <https://www.ukshipregister.co.uk/>

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<p>business impact</p>	<p>are expected to benefit from a reduction in time taken to produce registration cards. This is not expected to have any negative impacts on the safety of the vessel, personnel or natural environment. There are likely to be additional costs on the MCA, which is a public sector cost, to account for MCA surveyor familiarisation costs.</p> <p>No impact on households or wider welfare impacts (such as environmental impacts) have been anticipated as part of these regulations.</p>	<p>Based on all impacts (incl. non-monetised)</p>
<p>Monetised impacts</p>	<p>The total net social present value is estimated to be -£14.2m in the central scenario, ranging from -£4.9m to -£33.7m in the low and high scenarios.</p> <p>It should be noted the net social present value, in reality, would be greater. Indeed, multiple significant benefits have been identified such as a reduction in fatalities and severity of injuries due to more efficient SAR action, as well as being seen to make the UK Flag more appealing as it is an additional safety element. However, none of them have been monetised due to the unavailability of data. Hence, if these benefits were monetised and included in the calculation of the net costs to businesses, these measures of net impacts would be larger.</p> <p>These costs are predominately made up of training costs for MCA surveyors and costs to businesses.</p>	<p>Negative</p> <p>Based on likely £NPSV</p>
<p>Non-monetised impacts</p>	<p>The basic function of EPIRBs and PLBs in the maritime environment allow a ship or individual to notify a distress situation to SAR (Search and Rescue) services via satellite. Therefore, an increase in information held by HMCG will mean that any potential rescues could be conducted in a more efficient manner as a result of prior registration. Ensuring high compliance in safety standards could also reduce the frequency of injuries and fatalities at sea.</p>	<p>Positive</p>
<p>Any significant or adverse distributional impacts?</p>	<p>No impact</p>	<p>Neutral</p>

(2) Expected impacts on businesses		
Description of overall business impact	The proposed regulations have no significant impact on the public sector nor businesses, charities or voluntary bodies, however businesses are expected to get a minor benefit from a reduction in time taken to produce registration cards. This measure is expected to increase safety of the vessels and personnel.	Negative
Monetised impacts	<p>The business net present value is estimated at -£14.2m in the central scenario, ranging from -£4.9m to -£33.7m.</p> <p>This results in an equivalent annual net direct cost to business of £1.65m in the central scenario.</p> <p>The costs to businesses include costs of familiarisation, registration of PLBs (opportunity cost) and cost of additional time for surveyors to confirm registration of PLBs.</p>	Negative Based on likely business £NPV
Non-monetised impacts	There will be a minor benefit to Businesses, as manufacturers previously sent out a registration card with products. With the creation of the online registration platform, there is no longer a requirement for manufacturers to produce these registration cards. Ensuring high compliance in safety standards could be seen to make the UK Flag more appealing and also reduce the frequency of injuries and fatalities at sea. It could also lead to lower insurance premiums due to lower rates of incidents. None of the benefits have been monetised due to data unavailability.	Positive
Any significant or adverse distributional impacts?	No impact	Neutral

(3) Expected impacts on households		
Description of overall household impact	No expected monetary impact on households (or individuals if more appropriate) directly impacted by the regulations. Registration of EPIRBs and PLBs is free, the regulations do not mandate people to purchase equipment but to register if they have it.	Neutral

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Monetised impacts	As no impacts are anticipated, the household NPV and EANDCH are expected to be £0. No pass-through costs are anticipated.	Neutral Based on likely household £NPV
Non-monetised impacts	No non-monetised costs or benefits to households have been identified.	Neutral
Any significant or adverse distributional impacts?	As no impacts have been identified, no adverse distributional impacts are expected.	Neutral

Part B: Impacts on wider government priorities

Category	Description of impact	Directional rating
Business environment: Does the measure impact on the ease of doing business in the UK?	Introduction of PLB registration, alongside prior EPIRB registration, has the potential to make the UK flag more appealing to those in the maritime environment. This is due to more efficient SAR response. Registration of equipment is free and ultimately lifesaving. Registration has no impact on entry, market concentration or competition, foreign investment but may benefit (in the very long term) scope for businesses to develop more innovative products to the market. This however would need approval from international bodies.	Supports
International Considerations: Does the measure support international trade and investment?	This updated regulation neither negatively nor positively impacts international trade. All commercial vessels with EPIRBs or PLBs should already have equipment registered as part of contractual agreements. International investment is not applicable, the registration requirement is set by international standards. By including the PLB registration the UK will be fully adhering to these requirements.	Neutral

<p>Natural capital and Decarbonisation: Does the measure support commitments to improve the environment and decarbonise?</p>	<p>No impact.</p>	<p>Neutral</p>
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8. Monitoring and evaluation of preferred option

Monitoring and evaluation of the proposed regulations will be conducted through periodic non-statutory assessments to evaluate their effectiveness and support any future policy development.

The only realistic way to check whether the regulations have been implemented correctly by PLB owners is to establish whether PLBs involved in emergencies were registered. It is recommended that a generic exercise to research HMCG rescue records takes place over 3 to 5 years. No personal information needs to be collected other than whether an individual owning a PLB lives in the UK if not permanently associated with a UK vessel. Trends may also be inferred from the take up of the registration process.

Commercial vessels (those usually carrying EPIRBs) will be surveyed as per MCA guidelines – therefore tracking EPIRB registration is a much simpler process. Without an update to the 2000 SI regulations, the main issue is lack of PLB registration. However, the majority of PLBs may be privately owned and members of the public may not know, or understand, the registration process. Therefore, an awareness campaign should occur when the law is introduced, targeting PLB ownership together with manufacturers providing information to register with new products.

There will be minimal, low, additional pressure on MCA resourcing to review these regulations. The information should already be accessible, but there may be issues in sharing the level of detail as it is a sensitive area. However, the level of evidence will be high because HMCG already maintain full records on all rescues allowing detection of changes in proportion of unregistered devices activated in emergencies. Also, some evidence will be available on numbers of PLBs and EPIRBs registered within the database for the online registration. No additional resource should be required with respect to EPIRBs as these are already checked at survey. The online system can provide users with a record of registration for PLBs which can be shown as evidence during vessel surveys for vessel associated devices.

Evaluation will primarily be conducted in the form of an impact assessment relative to HMT's Green Book with particular reference to ROAMEF and SMART objectives. These will also be tied into MCA Business Plan objectives as they are updated.

Internal stakeholders will have regular meetings to ensure that any regulatory issues can be rectified. Separately, the new SI consultation questions, as below, can be adapted for an awareness campaign once the proposed regulations are in place.

9. Minimising administrative and compliance costs for preferred option

The impact on industry by these regulatory measures will be low. Ultimately, the proposed regulations have no significant impact on the public sector nor businesses, charities or voluntary bodies. The costs from these regulations will be the cost of familiarisation, the registration of EPIRBs, the registration of PLBs and additional inspection times by surveyors which will all be a direct cost to businesses. There will also be some costs to the public sector, namely the costs to train MCA surveyors. It is assumed that no retraining is needed for MCA surveyors who have been trained as the checks performed by MCA surveyors for these regulations are relatively simple requirements which are quite constant.

Declaration

Department:

Contact details for enquiries:

Director responsible:

I have read the Options Assessment, and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed:

Date:

Summary: Analysis and evidence

For Options Assessment, it is not a requirement to complete all the below, but please complete as much as you can where possible.

Price base year:2023

PV base year:2025

This table may be reformatted provided the side-by-side comparison of options is retained	1. Business as usual (baseline)	3. Preferred way forward
Net present social value (with brief description, including ranges, of individual costs and benefits)	£0, as this is the counterfactual against which other options are assessed.	The net social present value is estimated at between -£4.9m to -£33.7m, with a central estimate of -£14.2m.
Public sector financial costs (with brief description, including ranges)	£0, as this is the counterfactual against which other options are assessed.	Public sector costs are (in 2023 prices, undiscounted) estimated to be between £2.5k and £7.6k, with a central estimate of £5.1k. This is due to familiarisation and administrative costs.
Significant un-quantified benefits and costs (description, with scale where possible)	£0, as this is the counterfactual against which other options are assessed.	A non-monetised benefit is more efficient Search and rescue action during emergency rescue operations. The benefits of this intervention are expected to have a medium impact.
Key risks (and risk costs, and optimism bias, where relevant)	The risks involved with not updating the SI as soon as possible could mean that a SAR operation conducted by His Majesty's Coastguard (HMCG) does not have access to sufficient information to be able to task the right resources to the right places. For example, if an EPIRB or PLB	The risks associated with this intervention are considered to be low. Direct implementation of the domestic requirements will meet one of the key objectives of ensuring that the UK EPIRB regime remains up to date and in line with current operational requirements.

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	was not registered with HMCG, then coordinators may not be able to contact someone with knowledge of the person(s) in distress which could potentially cause loss of life.	
Results of sensitivity analysis	None.	Low, central and high scenarios have been included in the analysis. The EANDCB is estimated to range between £0.6m and £3.9m. This indicates that it is unlikely to exceed the +/-£10m EANDCB threshold.