

30 Park Street, London, SE1 9EQ

By email only:

Dear Mr Charles,

I write on behalf of the operators of the UK's largest port operators and their trade body the UK Major Ports Group ("UKMPG"). UKMPG represents the nine largest UK port operators who, via the 40 ports they run, handle three quarters of all the port volumes entering and leaving the UK and invest more than £500m of private sector capital each year in the UK's ports and surrounding coastal areas. These ports include 13 of the largest 15 ports in the UK and the largest ports in England, Scotland and Northern Ireland and in most instances our members are also the Statutory Harbour Authority. Appendix A to this document shows the UKMPG members and puts them in the context of the UK ports sector.

UKMPG and the British Ports Association are trade associations who support their members to interface with government and respond on behalf of the sector to emerging policy. We are not a regulator of our members and we do not feel it is for our organisations to clarify requirements or develop guidance to be followed. As an organisation we do champion the sharing of information and best practice to members, but that does not extend to developing guidance or interpretation of requirements.

We will support any guidance and actions suggested, but this must be led by the Maritime and Coastguard Agency (MCA) with input from industry associations. We are, of course, wholly ready to work in conjunction with industry partners and government, on the basis that the MCA own the guidance and lead on this work.

Yours sincerely,



Chief Executive, UK Major Ports Group

UK Major Ports Group Members Associated British Ports | Belfast Harbour Commissioners The Bristol Port Company | DP World UK | Forth Ports Ltd Hutchison Ports (UK) Ltd | PD Ports | Peel Ports | Port of London Authority



