Item 15: Impact assessment

Consequences for the industry

The proposed Regulations being circulated for review largely maintain existing provisions while introducing some new requirements and relaxations. Overall, the NMA believes the proposed Regulations are more appropriate for this category of vessels and will contribute to enhanced maritime safety. The anticipated total profits from the proposal are expected to surpass the incurred costs.

Significantly, the proposed modifications concerning equipment requirements, along with the obligations for companies, will influence the producers and suppliers of equipment intended for onboard use. This is especially pertinent to the deck equipment discussed in chapter 7.

According to section 152 second paragraph, approved companies may issue trading permits for individual journeys. The associated costs will stem from the processing of permit applications by the approved companies. The NMA estimates this process will require 1–2 hours of work.

Moreover, if companies have cited provisions from existing legislation in their normative documents, they will need to revise those references to comply with the new Regulations, resulting in associated costs.

<u>New ships</u>

The impact of the proposed Regulations will differ based on the categories of vessel affected. Accurately estimating the actual cost of constructing a new ship under the proposed provisions, as opposed to building an equivalent ship today, poses challenges. The costs for newbuildings will rely on various factors that may vary among companies. Most of the proposed provisions in chapters 6 to 12 will apply exclusively to newbuildings. If these requirements are considered during the design phase, the NMA does not anticipate any significant negative economic impact on the industry as a whole.

Additional requirements for ships operating on international voyages more than 30 nautical miles from a port or approved anchorage may complicate the construction of a ship intended for domestic voyages that will later be converted for international operation. During the design phase, companies should thoroughly evaluate the intended trade area for the ship. However, the NMA assesses that ships in this size category typically operate within the specified area, which includes international voyages within 30 nautical miles of a port or approved anchorage. Consequently, the NMA believes this proposal will have limited consequences for the industry.

New ships intended to support offshore renewable energy will be mandated to have a vessel instruction or trading certificate, likely increasing the construction costs of such ships.

Existing ships

In section 2 first paragraph subparagraphs b, d and e, the NMA is implementing new requirements for certain ships to have a vessel instruction or trading certificate. These ships are those not subject to applicable requirements under current regulations. The proposed changes in subparagraphs b and d are not expected to significantly impact the industry. Ships that currently perform anchoring-handling operations usually also engage in other activities that already necessitate a vessel instruction. Additionally, it is uncommon for a ship to have a lifting device installed on bord that is not in use. While the NMA lacks precise data on how many ships are currently used for transferring personnel between the ship and offshore renewable energy production facilities, it is assumed that this number is limited.

The cost of initial registration to obtain vessel instructions will vary depending on the vessel's size and complexity. For ships being certified for the first time, additional costs may apply for the preparation of drawings and stability calculations, if these have not already been prepared.

The proposal to mandate that all ships be equipped with GNSS introduces a new obligation for vessels of less than 8 metres in overall length. However, since chart plotters typically include integrated GNSS, ships in this category that already have a chart plotter will generally satisfy the requirement. If a ship chooses to use charts and a chart table instead, a separate GNSS will need to be purchased.

For the proposed requirement in section 52, it is assumed that the primary cost will relate to developing a procedure for transferring personnel to other ships or offshore installations. Additionally, companies lacking a 360-degree rotating light will need to acquire one.

Additional requirements for ships operating on international voyages more than 30 nautical miles from a port or approved anchorage will apply to existing ships only if they plan to expand their trade area. The proposal does not impact current operations.

For the other provisions suggested for existing ships, the NMA believes these requirements will have minimal or no impact on the industry.

Consequences for the administration
The financial impact on the public sector is expected to be minimal.

The new Regulations will introduce additional inspection tasks for approved companies, particularly concerning the processing of trading permits and issuing vessel instructions, as more vessels will be subject to these requirements. A slight increase in the number of inspections is anticipated, largely depending on the number of ships of less than 15 metres in length currently carrying up to 12 passengers to renewable energy facilities or installations, as well as the potential growth of this activity in the future.

The NMA is responsible for preparing normative documents used by approved companies for vessel certification and reporting, such as vessel instructions and inspection forms. Several of these documents will need updates to align with the proposed changes.

Additionally, the NMA will need to review and update internal checklists and procedures. All related forms must also be reviewed and revised. Training will be necessary for personnel responsible for implementing and overseeing the new Regulations.

There may be an initial surge in demand for guidance on the Regulations, resulting in a temporary increase in the NMA’s workload. Additional resources will need to be allocated to effectively manage this demand.