

Response form

Boat registration charges proposals from 1 January 2022

This consultation will run for 8 weeks from Thursday 22 July to Thursday 16 Sep 2021. Any responses we receive after this date will not be included in the analysis.

Please read the <u>consultation document</u> before completing this response form. You may request hard copies of the consultation document or response form by <u>email</u> or 03708 506 506 Mon to Fri 8am – 6pm.

About you and your use of our waterways

organisation, trading body)

When we come to analyse the responses we receive we would like to understand more about ment you and the boat/s you own, operate or represent.

C1: Please tell us if you're responding as a private boat owner or on behalf of a commercial group or organisation.

Please select from the following options:

Private boat owner

Responding on behalf of commercial group

X Responding on behalf of another organisation (e.g. charity, not for profit

If you're responding on behalf of a commercial group or other organisation please tell us who you are responding on behalf of and include its type e.g. business, environmental group.

National Bargee Travellers Association (NBTA).

The NBTA is a volunteer organisation formed in 2009 that campaigns and provides advice and support for itinerant boat dwellers on Britain's inland and coastal waterways. This includes anyone whose home is a boat and who does not have a permanent mooring for their boat with planning permission for residential use. The NBTA is the only national organisation in Britain dedicated to upholding and defending the rights of itinerant boat dwellers. The NBTA has 1,500 members on all the major navigation authorities' waterways and beyond. The NBTA deals with approximately 200 individual cases each year. The navigable inland waterway system in Britain is home to an estimated 15,000 to 50,000 Bargee Travellers. There are as yet no accurate statistics for the number of people living on boats either with or without a permanent mooring in the UK.

Keeping you up to date

C2: Please tell us if you would like to (tick all that apply):

X Receive an email acknowledging your response
X Receive an email to let you know that the summary of responses has been published

If you have ticked any of the boxes above, please provide us with your email address:

Email:secretariat@bargee-traveller.org.uk

C3: Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

Please select one of the following:

X Yes
No

customer service line 03708 506 506 incident hotline 0800 80 70 60

If you do not want your response published please tell us why

floodline 03459 88 11 88



The members of the NBTA live and travel throughout the Environment Agency waterways but most are located on the Thames, Medway and Anglian waterways.

How we will use your information

The Environment Agency will look to make all responses publicly available during and after the consultation, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals who respond.

We will also publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

Consultation principles

We are running this consultation in accordance with the guidance set out in the government's consultation principles.

If you have any questions or complaints about the way this consultation has been carried out, please contact consultation.enquiries@environment-agency.gov.uk

Consultation Co-ordinator Environment Agency Horizon House Deanery Road Bristol BS1 5AH

Privacy notice

The Environment Agency would like to keep you informed about the outcomes of the consultation. If you would like to receive an email acknowledging your response and be notified that the summary of responses has been published please provide your email address with your response.

By providing us with your email address you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.

We will not share your details with any other third party without your explicit consent unless required to by law.

You can withdraw your consent to receive these emails at any time by contacting us at: enquiries@environment-agency.gov.uk

The Environment Agency is the data controller for the personal data you provide. For further information on how we deal with your personal data please see our Personal Information Charter on GOV.UK or contact our Data Protection team at:

Environment Agency Horizon House Deanery Road Bristol BS1 5AH

Email: dataprotection@environment-agency.gov.uk

Returning your response

Your response to this consultation needs to be returned by 16 September 2021

We would like you to use this form if you are not submitting your response online. You can return it by email using the title 'Boat registration charges proposals from 1 January 2022' to enquiries@environment-agency.gov.uk. Please use this email address if you have any questions regarding this consultation.

Or by post to:

Environment Agency
Boat registration charges proposals from 1 January 2022
National Customer Contact Centre
PO Box 544
Bow Bridge Close
Bradmarsh Business Park
Templeborough
Rotherham
S60 1BY

We welcome your views on our:

- proposed revised boat registration charging framework
- 3 year charging plan for each waterway
- Business requirements
- Forward look

Full details of our charge proposals are included in the Boat registration charges proposal from 1 January 2022 consultation document which should be read before answering the following questions.

Proposals for a consistent framework for charging across our waterways – Area based charge mechanism (consultation document section 3.1)

Q1: Do you support our proposals to use an area based charge for all powered and unpowered enclosed boats?

Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
☐ Not applicable
Proposals for a consistent framework for charging across our waterways – area based charging mechanism (consultation document section 3.1)
Q2: Do you support our proposals to remove the sailing boats with engines category on the Anglian Waterways?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
☐ Not applicable

Proposals for a consistent framework for charging across our waterways – area based charging mechanism (consultation document section 3.1)

Q3: Do you support our proposals to remove the under 4hp engine category on the Anglian Waterways?

Please tick the relevant box

□ X No
□ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways – common charges across all waterways – not for profit organisations (consultation document section 3.2.2)
Q4: Do you support our proposals for not-for-profit organisations and charities?
Please tick the relevant box
□ X Yes
□ No
☐ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways - common charges across all waterways - tenders (consultation document section 3.2.3)
25: Do you support our proposals for tenders?
25: Do you support our proposals for tenders? Please tick the relevant box
Please tick the relevant box
Please tick the relevant box □ Yes
Please tick the relevant box □ Yes □ X No
Please tick the relevant box Yes X No Do not know
Please tick the relevant box Yes X No Do not know Not applicable Proposals for a consistent framework for charging across our waterways - common charges across all waterways - workboats

Proposals for a consistent framework for charging across our waterways - common charges across all waterways - charging for business boats (consultation document section 3.2.5)

Q7: Do you support the new proposed approach for business boat charges?

Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways - common principles and approaches – short period registrations (consultation document section 3.3.1)
Q8: Do your support our proposals for short period registrations?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways - common principles and approaches – refunds (consultation document section 3.3.2
Q9: Do you support our proposals for refunds?
Please tick the relevant box
□ X Yes
□ No
□ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways - common principles and approaches – part year registrations (consultation document section 3.3.3)
Q10: Do you support our proposals for part year registration charges?
Please tick the relevant box
□ X Yes

□ No
☐ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways - common principles and approaches – exemptions (consultation document section 3.3.4)
Q11: Do you support our proposals for exemptions from charge?
Please tick the relevant box
□ X Yes
□ No
☐ Do not know
□ Not applicable
Proposals for a consistent framework for charging across our waterways - common principles and approaches – arrangements for boating trade (consultation document section 3.3.5)
Q12: Do you support our proposals for the boating trade?
Please tick the relevant box
Please tick the relevant box □ X Yes
□ X Yes
□ X Yes □ No
□ X Yes □ No □ Do not know
□ X Yes □ No □ Do not know
□ X Yes □ No □ Do not know □ Not applicable Proposals for a consistent framework for charging across our waterways – common principles and approaches – other charges
□ X Yes □ No □ Do not know □ Not applicable Proposals for a consistent framework for charging across our waterways – common principles and approaches – other charges (consultation document section 3.3.6)
□ X Yes □ No □ Do not know □ Not applicable Proposals for a consistent framework for charging across our waterways – common principles and approaches – other charges (consultation document section 3.3.6) Q13: Do you support our proposals for these other charges?
□ X Yes □ No □ Do not know □ Not applicable Proposals for a consistent framework for charging across our waterways – common principles and approaches – other charges (consultation document section 3.3.6) Q13: Do you support our proposals for these other charges? Please tick the relevant box
□ X Yes □ No □ Do not know □ Not applicable Proposals for a consistent framework for charging across our waterways – common principles and approaches – other charges (consultation document section 3.3.6) Q13: Do you support our proposals for these other charges? Please tick the relevant box □ Yes
□ X Yes □ No □ Do not know □ Not applicable Proposals for a consistent framework for charging across our waterways – common principles and approaches – other charges (consultation document section 3.3.6) Q13: Do you support our proposals for these other charges? Please tick the relevant box □ Yes □ X No

Proposals for a consistent framework for charging across our waterways – common principles and approaches – Gold licence (consultation document section 3.3.7)

Q14: Do you currently hold a Gold Licence?
Please tick the relevant box ☐ Yes ☐ No ☐ Do not know ☐ X Not applicable
Proposals for a consistent framework for charging across our waterways – common principles and approaches – Gold licence (consultation document section 3.3.7)
Q15: Do you understand that these proposals could impact the future Gold Licence charging levels?
Please tick the relevant box □ X Yes □ No □ Do not know □ Not applicable
Proposals for a consistent framework for charging across our waterways – common principles and approaches – Gold licence (consultation document section 3.3.7)
Q16: Do you think the current Gold Licence offers value for money?
Please tick the relevant box Yes X No Do not know Not applicable
Proposals for a consistent framework for charging across our waterways – common principles and approaches – Gold licence (consultation document section 3.3.7)
Q17: Do you have any suggestions or comments about the Gold Licence in relation to these proposals?

Please give us your comments

The Gold licence should be less expensive and it should be refundable.

Proposals for a consistent framework for charging across our waterways (consultation document section 3.3.7)

Q18: Overall do you support our proposals for a revised charge framework?

lease tick the relevant box
□ Yes
□ X No
□ Do not know
□ Not applicable
Do you have any other comments or suggestions on our proposals for the revised charge framework?
Please give us your comments These proposals will increase the charges for almost all private boats. This will have the greatest impact on boat dwellers, who depend on being able to pay the charges in order to keep their homes. The NBTA does not support any increases in registration charges apart from increases in line with inflation. The NBTA opposes the 10.2% increase in fees, the move to charging by boat area as opposed to length, the removal of price caps and discounts, and the reduction in business boat registration fees Registration charges are already high enough. The majority of people who live aboard are on low incomes and cannot afford to pay increased charges. The Covid-19 pandemic has resulted in many more people, including boat dwellers, experiencing loss of work and financial insecurity. Many boat dwellers are in low paid, insecure casual work. This is the worst time for charges to increase. The Environment Agency made an effort to look after boat dwellers during the pandemic and this effort needs to continue with the recognition that many boat dwellers will not be able to afford higher charges, especially as some extremely steep increases are proposed for some categories of boats and these are not equal across the board.
Proposed national navigation boat charges scheme –common charges – unpowered open boats (consultation document section 4.1.1)
Q19: Do you support our proposed charges for unpowered open boats on each waterway?
lease tick the relevant box □ Yes
□ X No
□ Do not know
□ Not applicable

Proposed national navigation boat charges scheme –common charges – explorer (consultation document section 4.1.2)

Q20: Do you support the introduction of an explorer charge for privately owned unpowered open boats for each waterway where the boat is used?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – tenders (consultation document section 4.1.3)
Q21: Do you support our proposed common charge for tenders across each waterway?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – common charges – tugs and maintenance workboats (consultation document section 4.1.4)
Q22: Do you support our proposed common charge for tugs and maintenance boats across each waterway?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – not-for-profit organisations and charity boats (consultation document section 4.1.5)
Q23: Do you support our proposed common charge for not-for-profit organisations and charities?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know

Proposed national navigation boat charges scheme –common charges – event registration for unpowered open boats (consultation document section 4.1.6)
Q24: Do you support our proposed common charges for registering an event of unpowered open boats?
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – trade plates and trade exemptions (consultation document section 4.1.7)
Q25: Do you support our proposed common charges for trade plates and trade exemptions?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – passenger boat out of service (consultation document section 4.1.8)
Q26: Do you support our proposed common charge for out of service passenger boats?
Please tick the relevant box
□ Yes
□ X No
□ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – temporary transit registration (consultation document section 4.1.9)

☐ Not applicable

Q27: Do you support our proposed common charges for temporary transit registration for each waterway?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – other common charges (consultation document section 4.1.10)
Q28: Do you support our proposed common charges for these other charges?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme –common charges – business boats (consultation document section 4.1.1)
Q29: Do you support our proposed common business charges for business boats?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – common charges (consultation document section 4.1.1)
Q30: Overall do you support our proposals to increase the common charges by 6% in 2022, 4% in 2023 and 0% in 2024?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
☐ Not applicable

Do you have any comments or suggestions on our proposed 'common charges'

Please give us your comments

The proposals amount to a 10.2% increase over two years. An increase at this level will disadvantage all liveaboard boaters, but especially those who are already struggling financially due to loss of work or illness during the Covid-19 pandemic. The majority of boaters will see their fees increase by £50 to £300, but some will rise by more than £600. Only a minority will see charges reduced. Fees for tenders and Gold licences will also increase. Conversely, the majority of business boats will see a reduction in their charges. It is unfair to give an advantage to business boats whilst imposing a 10.2% increase on private boats, some of whom, as detailed above, are the least able to afford such an increase. The NBTA is opposed to the 10.2% increase in fees, the move to charging by boat area as opposed to length, the removal of price caps and discounts, and the reduction in business boat registration fees. We believe that the proposed method of calculating boat area is unfair, because for cruisers and yachts it will over-estimate the area of the boat compared to its actual area. We do not accept the Environment Agency's assertion that charging by boat area will bring charges in line with Canal & River Trust boat licence fees. This is simply not true as Canal & River Trust charges boats by length with the addition of an extra fixed fee for boats over a specific width. If the Environment Agency implements the proposed increases this would amount to the unreasonable exercise of its statutory powers and an unreasonable interference with the Public Right of Navigation.

Proposed national navigation boat charges scheme – River Thames waterway charges – powered boats (consultation document section 4.2.1 and 4.2.2)

Q31: Do you support our proposed charges for powered boats on the River Thames?

Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – River Thames waterway charges - unpowered enclosed boat (consultation document section 4.2.3)
Q32: Do you support the proposed charges for unpowered enclosed boats on the River Thames?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
☐ Not applicable

Proposed national navigation boat charges scheme – River Thames waterway charges - passenger steamers (consultation document section 4.2.4)

Thames to register on the non-tidal River Thames?
Please tick the relevant box □ X Yes
□ No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – River Thames waterway charges – boats solely used for the carriage of goods (consultation document section 4.1.1) Q33a: Do you support our proposed charges for boats solely used for the carriage of goods on the River Thames?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – River Thames waterway charges – comments on charges (consultation document section 4.1.1)
Q34: Overall do you support our proposals to increase the River Thames charges by 6% in 2022, 4% in 2023 and 0% in 2024?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
Do you have any comments or suggestion on our proposed River Thames charge scheme?
Please give us your comments

Q33: Do you support our proposed charges for passenger steamers from the tidal River

As stated above, the NBTA does not support any increases in registration charges apart from increases in line with inflation. The majority of boat dwellers are on low incomes and cannot afford to pay increased charges. The Covid-19 pandemic has resulted in many more people, including boat dwellers, experiencing loss of work and financial insecurity. Many boat dwellers are in low paid, insecure, casual work. This is the worst time for charges to increase. The Environment Agency made an effort to look after boat dwellers during the pandemic and this effort needs to continue with the recognition that many boat dwellers will not be able to afford higher charges, especially as some extremely steep increases are proposed for some categories of boats and these are not equal across the board.

4.3.1 and 4.3.2 Proposed national navigation boat charges scheme – Upper Medway charges – powered boat charges (consultation document section 4.3.1 and 4.3.2)

Q35: Do you support our proposed charges for powered boats on Upper Medway?

Please tick the relevant box
□ Yes
□ X No
□ Do not know
□ Not applicable
4.3.3 Proposed national navigation boat charges scheme – Upper Medway – unpowered enclosed boat charges (consultation document section 4.3.3)
Q36: Do you support the proposed charges for unpowered enclosed boats on Upper Medway?
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable
4.3.3 Proposed national navigation boat charges scheme – Upper Medway – comments on charges (consultation document section 4.3.3)
Q37: Overall do you support our proposals to increase the Upper Medway charges by 6% in 2022, 4% in 2023 and 0% in 2024?
Please tick the relevant box □ Yes
□ X No
☐ Do not know
☐ Not applicable

Do you have any comments or suggestions on our proposed charge scheme for Upper Medway?

Please give us your comments

As stated above, the NBTA does not support any increases in registration charges apart from increases in line with inflation. The majority of boat dwellers are on low incomes and cannot afford to pay increased charges. The Covid-19 pandemic has resulted in many more people, including boat dwellers, experiencing loss of work and financial insecurity. Many boat dwellers are in low paid, insecure, casual work. This is the worst time for charges to increase. The Environment Agency made an effort to look after boat dwellers during the pandemic and this effort needs to continue with the recognition that many boat dwellers will not be able to afford higher charges, especially as some extremely steep increases are proposed for some categories of boats and these are not equal across the board.

4.4.1 and 4.4.2 Proposed national navigation boat charges scheme – Anglian Waterways – powered boat charges on Rivers Ouse and Nene (consultation document section 4.4.1 and 4.4.2)

Q38: Do you support our proposed charges for powered boats on Rivers Ouse and Nene - Anglian waterways?

- Anghan waterways:
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable
4.4.3 Proposed national navigation boat charges scheme – Anglian Waterways – unpowered enclosed boat charges on Rivers Ouse and Nene (consultation document section 4.4.3)
Q39: Do you support our proposed charge for unpowered enclosed boats on Rivers Ouse and Nene – Anglian waterways?
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – Anglian Waterways – powered boat charges on Lincolnshire rivers (consultation document section 4.5.1 and 4.5.2)
Q40: Do you support our proposed charges for powered boats on Lincolnshire rivers?
Please tick the relevant box □ Yes

□ X No
☐ Do not know
□ Not applicable
Proposed national navigation boat charges scheme – Anglian Waterways – unpowered enclosed boat charges on Lincolnshire rivers (consultation document section 4.5.3)
Q41: Do you support our proposed charge for unpowered enclosed boats on Lincolnshire rivers– Anglian waterways?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
4.5.4 Proposed national navigation boat charges scheme – Anglian Waterways – River Welland and River Glen – tidal boat charges (consultation document section 4.5.4)
Q42: Do you support our proposed charge for tidal boats for the Welland and Glen – Anglian waterways?
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable
4.6.1 and 4.6.2 Proposed national navigation boat charges scheme – Anglian Waterways – River Stour – powered boat charges (consultation document section 4.6.1 and 4.6.2)
Q43: Do you support our proposed charges for powered boats on River Stour - Anglian waterways?
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable

4.6.3 Proposed national navigation boat charges scheme – Anglian Waterways – River Stour – unpowered enclosed boat charges (consultation document section 4.6.3)

Q44: Do you support our proposed charge for unpowered enclosed boats on River Stour – Anglian waterways?

Please tick the relevant box
□ X No
☐ Do not know
□ Not applicable
4.6.3 Proposed national navigation boat charges scheme – Anglian Waterways -comments on charges (consultation document section 4.6.3) Q45: Overall do you support our proposals to increase the Anglian Waterway charges by 6% in 2022, 4% in 2023 and 0% in 2024?
We would like your views on our proposed charge schemes for Anglian Waterways.
Please tick the relevant box □ Yes
□ X No
☐ Do not know
□ Not applicable
We would like your views on our proposed charge schemes for Anglian Waterways.
Please give us your views As stated above, the NBTA does not support any increases in registration charges apart from increases in line with inflation. The majority of boat dwellers are on low incomes and cannot afford to pay increased charges. The Covid-19 pandemic has resulted in many more people, including boat dwellers, experiencing loss of work and financial insecurity. Many boat dwellers are in low paid, insecure, casual work. This is the worst time for charges to increase. The Environment Agency made an effort to look after boat dwellers during the pandemic and this effort needs to continue with the recognition that many boat dwellers will not be able to afford higher charges, especially as some extremely steep increases are proposed for some categories of boats and these are not equal across the board.
Business boat requirements – Code of Practice for Hire Boats (consultation document section 5.1)
Q46: Do you agree with our proposal to require compliance with the Code of Practice for Hire Boats from 1 January 2022?
Please tick the relevant box □ X Yes
□ No

☐ Do not know
☐ Not applicable
Business boat requirements – Inland Waters Small Passenger Boat Code (consultation document section 5.2)
Q47: Do you agree with our proposal to require compliance with the Inland Waters Small Passenger Boat Code from 1 January 2022?
Please tick the relevant box □ X Yes
□ No
☐ Do not know
□ Not applicable
5.3 Business boat requirements – the Merchants Shipping (Boatmasters' Qualifications, Crew and Hours of Work) Regulations 2015 (consultation document section 5.3)
Q48: Do you agree with our proposal to require confirmation of compliance with the Merchant Shipping (Boatmasters' Qualifications, Crew and Hours of Work) Regulations 2015?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
☐ Not applicable
5.4 Business boat requirements – Boat Safety Scheme (BSS) non-private standards (consultation document section 5.4)
Q49: Do you agree with our proposal to require a BSS non-private certification?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
☐ Not applicable
5.5 Business boat requirements – public liability insurance (consultation document section 5.5)

two million pounds for each claim?
Please tick the relevant box ☐ Yes
□ X No
☐ Do not know
□ Not applicable
5.6 Business boat requirements – third party insurance (consultation document section 5.6)
Q51: Do you agree with our proposal to introduce the requirement for all self-drive unpowered hire boats to be insured for a minimum sum of at least one million pounds for each claim?
Please tick the relevant box □ X Yes
□ No
☐ Do not know
□ Not applicable
5.6 Business boat requirements – comments on business boat requirements
Q52: Please provide any further comments on our proposals for business requirements
Regardless of the nature of the goods carried, it is disproportionate to impose a requirement on roving trading boats for the Skipper to hold a Boatmasters' licence and proof of compliance with the Merchant Shipping (Boatmasters' Qualifications, Crew and Hours of Work) Regulations 2015; for compliance with BSS non-private standards, and for for public liability insurance of £2 million. Many roving traders, including those who carry high-risk cargoes, are sole traders, couples or small families who live aboard. To impose these onerous requirements on very small businesses whose trading boat(s) is also their home is unfair and will have an significant adverse impact on their ability to earn an income, especially when taken with any increases in registration charges that may be imposed.
6.2 Forward Look – more flexible boat registration charging periods (consultation document section 6.2)
Q53: Would you support a move to a more flexible registration year in the future?
Please tick the relevant box
□ X Yes
□ No
☐ Do not know

Q50: Do you agree with our proposal to introduce the requirement for operators of all business boats to hold a policy of Public Liability Insurance covering liabilities of at least

□ Not applicable								
6.2 Forward Look – more flexible boat registration charging periods (consultation document section 6.2)								
Q54: Do you have any comments or suggestions about moving to a more flexible registration year in the future?								
A registration year that starts on the first day of any month will be of assistance to boat dwellers and indeed all boaters who are on a low income. Currently the inflexibility of the registration year causes financial hardship to those who live aboard.								
Forward Look – online digital boat registration service (consultation document section 6.3)								
Q55: Would you use an online digital boat registration service?								
Please tick the relevant box								
□ Yes								
□ No								
☐ Do not know								
□ X Not applicable								
If you selected 'no' please choose one of the following options								
☐ No access to the internet								
☐ Prefer not to use online service or payments								
☐ Other – please specify								
Forward Look – online digital boat registration service (consultation document section 6.3)								
Q55: We will be engaging with customers to get input to the new service as the project develops. Would you be interested in getting involved?								
Please tick the relevant box □ X Yes								
□ No								

If you answered yes, please enter your contact details (email, phone number, mailing address) in the text box. By providing us with your contact details, you consent for us to contact you about any future workshops

National Bargee Travellers Association secretariat@bargee-traveller.org.uk 0118 321 4128

6.4 Forward Look – boat naming and identification (consultation document section 6.4)

Q57: Do you support a consistent approach to boat identification across our waterways?
Please tick the relevant box
□ Yes
□ X No
☐ Do not know
□ Not applicable
If you selected 'no' please tell us why?
Standardisation of boat identification could result in boaters being penalised for not complying. Most waterway enforcement carries the ultimate threat of seizure and removal of the boat. For people whose boats are their homes, depending on the nature of the penalty, it would be unfair and disproportionate to impose this requirement.
6.4 Forward Look – boat naming and identification (consultation document section 6.4)
Q58: What do you think should be used as the unique identifier for a boat?
Please tick the relevant box
\square X the registration number
☐ the boat name
□ other, please specify

6.5 Forward Look – charging on the Rivers Wye and Lugg (consultation document section 6.5)

Q59: Do you agree that boat users on the Rivers Wye and Lugg should make a contribution towards the service we provide for their benefit?

Please tick the relevant box Yes		
□ X No		
☐ Don't know		
☐ Not applicable		

6.5 Forward Look – charging on the Rivers Wye and Lugg (consultation document section 6.5)

Q60: Please tell us if you have any suggestions about funding of the service we provide for boat users on the Rivers Wye and Lugg.

It would be unfair to impose charges to exercise the Public Right of Navigation on the Rivers Wye and Lugg given the limited navigability of these rivers.