

A Widening Channel

Integrated Maritime Policy for Managing Maritime Migration in the English Channel: A Comprehensive Approach

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About the Author

Matthew is a proven strategic leader in the maritime sector, and is a qualified and experienced Captain in the field of maritime search and rescue (SAR), having served in the field for over 15 years as a Commander and instructor on coastal, offshore and ocean going SAR vessels and hovercrafts in the UK and across Europe in a variety of maritime SAR contexts. He has spent the last 8 years working as a maritime search and rescue consultant, working with government and non-government organisations around the world to drive forward and advance maritime search and rescue capabilities in areas such as maritime migration SAR, crew and commander competence, search and rescue governance, SAR operation scoping and implementation, risk and legal compliance.



He is an internationally recognised maritime search and rescue subject matter expert, having been called upon to provide expert evidence and analysis in several high-profile international SAR legal cases. These cases have involved migrant SAR, large-scale loss of life, mass casualty rescues, SAR operation implementation at operational, tactical, and strategic levels, interoperability in maritime SAR, and the interpretation of SAR law and regulation. He regularly appears in international media, offering expert commentary on notable SAR events, including the European migrant crisis, the foundering of the superyacht Bayesian in the Mediterranean, the loss of the Titan submersible in the North Atlantic and the MV Stena Immaculate and MV Solong allision in the North Sea. He is recognised by the European EFCA as an authorised Coastguard Operations Subject Matter Expert.

Matthew has been awarded Fellowships from both the Institute of Search and Technical Rescue and the Maritime Search and Rescue Council for his contributions to SAR. He currently serves as Chairman of the not-for-profit Maritime Search and Rescue Council, where he provides strategic direction and management for various global SAR projects. He is also the co-founder of the Maritime Emergency and Coastguard Policy Institute, where he leads evidence-based research and policy recommendations on maritime emergency response and SAR.

He holds a Master's of Science Degree in Emergency Management and Resilience from Coventry University, where he completed his thesis titled "Maritime Mass Rescue Operations: A Search and Rescue Surface Asset Suitability Framework for 21st Century Challenges". He is currently authoring the book "Maritime Search and Rescue: A Commander's Guide" which is due to be published in early 2026, and has professional interests in the integration of AI technology into SAR, conflicts between maritime law enforcement and maritime SAR policy, and research into SAR competency levels within the commercial maritime sector under STCW regulations. More information on his background and work can be found at www.mschanck.co.uk.

Section 1 – Evaluation of the UK’s English Channel Migrant SAR Response Model

Current Situation

The current policy of His Majesty's Coastguard (HMCG) is that any migrant vessel entering the UK Search and Rescue Region (SRR)—which, in the context of migrant search and rescue operations in the English Channel, mostly includes UK territorial waters—is classed as in distress. This is the highest category of maritime emergency, as defined by the International Convention on Maritime Search and Rescue 1979 (SAR1979), to which the UK is a signatory.

HMCG typically becomes aware of migrant distress situations through surveillance operations conducted by UK government agencies, information from French authorities, alerts from passing vessels, or calls to through the 999/112 phone system. Once alerted, HMCG assesses the information provided, along with any other relevant data, to determine the appropriate course of action to resolve the search and rescue (SAR) incident in line with HMCG Mission Conduct protocols.

The response may involve deploying surface assets, aerial assets (such as HMCG helicopters), or, in some cases, no asset deployment at all.

In the context of migrant search and rescue operations in the English Channel, SAR assets include a range of vessels and aircraft. These include RNLI All Weather Lifeboats (ALBs), RNLI Inshore Lifeboats (ILBs), Border Force Cutters, Border Force Coastal Patrol Vessels (CPVs), Offshore Energy Support Vessels (OESVs) chartered by the Home Office, and SAR Helicopters chartered by the Maritime & Coastguard Agency (MCA). These assets are coordinated by HMCG through the Dover Maritime Rescue Coordination Centre (MRCC) to carry out the search and rescue operations, sometimes with the support of Fareham Joint Rescue Coordination Centre in Hampshire.

While Royal Navy vessels are not part of routine SAR taskings, as these fall outside their operational remit, they are still legally obligated to respond to confirmed serious incidents under maritime law (referred to as SOLAS cases). These incidents, such as a vessel capsizing or people in the water, are responded to by the Royal Navy when necessary.

A map of the current locations of surface and aerial assets is provided below:



The assets that are available for tasking to migrant SAR incidents in the English Channel are:

Ramsgate ALB/Dover ALB/Dungeness ALB

- Operated by RNLI
- Constructed and operated as search and rescue vessels
- Mixture of lifeboat classes (Trent Class/Severn Class/Shannon Class)
- Volunteer crewed with 5 or 6 crew on a pager system supported by 1 or 2 full time staff on a pager system
- Top Speed 25kts (29mph)
- Survivor capacity between 73 and 185 persons



Ramsgate ILB/Walmer ILB/Littlestone-on-Sea ILB/Rye Harbour ILB

- Operated by RNLI
- Constructed and operated as search and rescue vessels
- Volunteer crewed with 3 or 4 crew on a pager system
- Top Speed 35kts (40mph)
- Survivor capacity 20 persons
- Limited to “strong breeze” conditions (Force 6)



BF Ranger/BF Hurricane/BF Typhoon/BF Defender/BF Volunteer

- Operated by commercial companies Seacat Services (Aeolian Offshore) and CWind Offshore
- Constructed and operated as Windfarm Support Vessels (OESVs) before charter
- Chartered by Home Office for Border Force operations
- Crewed with 2/3 commercial mariners with unknown number of Border Force Officers
- Top Speed 25kts (29mph)
- Unknown survivor capacity, legally limited to 12 survivors due to vessel certification



HMC Seeker/HMC Searcher/HMC Valiant/HMC Vigilant*

- Operated by Border Force (Home Office)
- UK Border Force 42m Customs Cutter class
- Constructed and operated as law enforcement vessels
- Crewed with 12 commercial mariners and Border Force officers
- Top Speed 25kts (29mph)
- Unknown survivor capacity, legally limited to 12 survivors due to vessel certification



HMC Active/HMC Alert/HMC Eagle/HMC Nimrod/HMC Hunter /HMC Speedwell*

- Operated by Border Force (Home Office)
- Oil & Gas ARRC 18m vessel
- Constructed and operated as Autonomous Rescue and Recovery Craft for oil and gas industry
- Crewed with 6 commercial mariners and Border Force officers
- Top Speed 25kts (29mph)
- Unknown survivor capacity, legally limited to 12 survivors due to vessel certification



*** Border Force vessels operate in different numbers and locations and do not all operate in the English Channel at the same time.**

Rescue 163 Helicopter

- Operated by Bristow Helicopters on behalf of HM Coastguard
- AW-189 SAR Helicopter
- Constructed and operated as a maritime search and rescue helicopter
- Crewed with 4 crew
- Top Speed 169kts (194mph)
- Survivor capacity 19 persons



Analysis

Justification for maritime SAR response to migrant vessels

A maritime SAR response to migrant vessels is widely considered both morally and legally justified.

The International Convention on Maritime Search and Rescue (SAR1979), of which the UK is a signatory, provides clear guidance on what constitutes a distress situation, defined as:

“A situation wherein there is a reasonable certainty that a vessel or a person is threatened by grave and imminent danger and requires immediate assistance.”¹

It gives further clarification on defining a distress phase situation as:

“when positive information is received that a vessel or a person is in grave and imminent danger and in need of immediate assistance; or

when, following the alert phase, further unsuccessful attempts to establish contact with the vessel and more widespread unsuccessful inquiries point to the probability that the vessel is in distress; or

when information is received which indicates that the operating efficiency of a vessel has been impaired to the extent that a distress situation is likely.”²

HMCG policy of categorising migrant vessels as being in the distress phase and requiring

¹ International Convention on Maritime Search and Rescue 1979, Chapter 1, part 1.3.11

² International Convention on Maritime Search and Rescue 1979, Chapter 1, part 5.2.1.3

immediate assistance aligns with these provisions. This classification is justified because migrant vessels:

- Lack maritime certification required for their intended voyage;
- Lack of navigational lights or signalling devices required to conduct a voyage safely at night;
- Are poorly constructed and lack proof of appropriate vessel construction in line with the appropriate maritime construction standards;
- Lack maritime navigational systems, equipment and facilities;
- Lack maritime communication systems, equipment and facilities;
- Are documented as being overcrowded on most occasions which consistently risks the safety and the stability of the vessel at sea;
- Lack adequate provisions of food, drinking water and medical equipment;
- Have unknown quantities and unknown quality of fuel on board needed to safely complete the vessel's intended voyage;
- Are unable to guarantee the welfare and safety of the people on board the vessel through lack of lifejackets, safety equipment, distress alerting capabilities and medically trained people;
- Lack qualified mariners on-board with the appropriate maritime training and certification which makes them unable to safely command a vessel across the English Channel on an international voyage.

HMCG's stance on classifying migrant vessels as being in distress, as well as the recognised dangers of migrant sea crossings, is strongly supported by sobering statistics. Since 2014, over 31,000 migrants have lost their lives in the Mediterranean SAR context³, while more than 131 fatalities have occurred at sea on both sides of the English Channel⁴ over the same period. In this year alone, 54 migrants, including 11 babies and children, have tragically died in the English Channel, all within the French Search and Rescue Region (SRR).⁵ Given this data and the reasons outlined earlier, it is my professional opinion that HMCG is correct in categorising these vessels as being in distress, and as the UK's designated authority for maritime search and rescue, it is correct that their primary and rightful concern is the preservation of life at sea.⁶

Suitability of SAR assets in the English Channel – Border Force Assets

It is well-established that a SAR response is appropriate for migrant vessels in the English Channel. However, significant concerns remain regarding the type, quantity, availability, response times, and expertise of SAR assets and teams operating in the region.

An analysis of information from Coastguard incident logs related to migrant SAR cases, the recent Marine Accident Investigation Branch (MAIB) report on the December 2021 migrant vessel sinking, and current tracking data for SAR and Border Force vessels in the English Channel highlights two key issues:

³ <https://missingmigrants.iom.int/region/mediterranean>

⁴

https://missingmigrants.iom.int/region/europe?region_incident=4061&route=3896&incident_date%5Bmin%5D=&incident_date%5Bmax%5D=

⁵

https://missingmigrants.iom.int/region/europe?region_incident=4061&route=3896&incident_date%5Bmin%5D=&incident_date%5Bmax%5D=

⁶ <https://hmcoastguard.uk/about-us>

1. Many migrant SAR incidents reported to HM Coastguard do not result in the deployment of any SAR resources, despite being classified as in distress and requiring immediate assistance.⁷
2. When resources are deployed, they are predominantly non SAR vessels consisting of Border Force assets, such as Cutters, Coastal Patrol Vessels (CPVs), or Offshore Energy Support Vessels (OESVs).

Below: Extract from one HMCG migrant SAR incident log illustrating the danger the vessel reported being in. Despite this, no rescue assets were deployed, and the incident was subsequently closed by HMCG without any explanation or confirmation that the people involved were safe or accounted for. Unfortunately, such cases are far from uncommon.

Summary SIERRA □ POB - 35 - 45 □ MEN AND WOMEN □ COLOUR OF BOAT IS GREY □ 5 HOURS AGO BOULOGNE □ DOES IT HAVE A MOTOR // NOT GOOD □ WATER IS INSIDE □ ANYONE HAVE WHATSAPP? // TELEPHONE NUMBER? □ NO POSITION AVAILABLE □ FIF PUT THE PHONE TO A CRYING BABY		
06:05:36	****	Call Collection SIERRA POB - 35 - 45 MEN AND WOMEN COLOUR OF BOAT IS GREY 5 HOURS AGO BOULOGNE DOES IT HAVE A MOTOR // NOT GOOD WATER IS INSIDE ANYONE HAVE WHATSAPP? // TELEPHONE NUMBER? NO POSITION AVAILABLE FIF PUT THE PHONE TO A CRYING BABY
06:06:33	****	Additional Type MIGRANT added
06:48:41	****	Call Collection Repeat 040972-20112021: MIGRANT CAN SEE A RED LIGHT NEAR FOLKSTONE BEACH MAYBE 10KM AWAY 40-45 POB - MEN, FEMALE AND CHILDREN AND BABY (CAN HEAR CHILD/BABY CRYING BACKGROUND) WATER COMING INSIDE BOAT. HIGH WAVES WHITE BOAT PLEASE COME QUICK WE ARE GOING TO DIE CANT SEE ANY OTHER BOATS
07:28:17	****	Call Collection Repeat 040995-20112021: 5KM- SENT TO WHATSAPP-- 45 PEOPLE ON BOAT-- BOAT IS BROKEN/// CONFIRMS HE HAS SENT HIS POSITION
07:28:31	****	Casualty Details 5KM- SENT TO WHATSAPP-- 45 PEOPLE ON BOAT-- BOAT IS BROKEN/// CONFIRMS HE HAS SENT HIS POSITION
15:55:57	****	SMC Comment NO FURTHER INFORMATION LKP NO LONGER VALID INCIDENT FINISHED
15:56:05	****	Status changed from U - Unserved to F - Finished

⁷ <https://www.theguardian.com/uk-news/2023/nov/04/revealed-uk-coastguard-downgraded-999-calls-from-refugees-in-days-before-mass-drowning>

In July 2022, an “Independent review of Border Force by Alexander Downer”, commissioned by Priti Patel MP, Secretary of State for the Home Department was released. It reviewed the entirety of Border Force and its capabilities, and came to the following conclusion when Border Force’s operations in the English Channel were analysed:

- “The current resource requirements in the Channel are not sustainable.”⁸
- “The problem of illegal entry by small boats is not solvable in the Channel by Border Force, A whole-system approach is needed.”⁹
- **“Border Force vessels (cutters) are not designed for conducting search and rescue operations.** They are designed for high-speed interception of vessels for law enforcement purposes. They are not particularly stable in the rough waters of the Channel which makes it particularly **difficult for the safe boarding of people (including children)** from small vessels that sit low on the water. HM Coastguard, which is the agency which has primacy for search and rescue operations, tasks the Royal National Lifeboat Institution (RNLI), **a charity organisation crewed by volunteers**, or Border Force to respond when coordinating such operations. **The Coastguard does not have any vessels of its own in the Channel.**”¹⁰
- “In addition to the lack of Coastguard assets, there appears to be a lack of coordination across the different parties involved.”¹¹
- “I feel the current operational arrangement needs to be reviewed, with the most appropriate assets used for tasks, rather than what might be readily available.”¹²

From the summary, the following conclusion and recommendation was made:

Recommendations

10.1 Border Force maritime should not be providing an ongoing search and rescue function in the English Channel. Neither Border Force nor Royal Navy vessels are appropriate to this task. Appropriate vessels and crews should be sought under contract to conduct this task

While any maritime asset should of course be made available for search and rescue when required, where it is predictable that search and rescue operations will be stood up on a semi-permanent basis, a more appropriate resource should be deployed to the task. Vessels that are better suited to the task should be contracted for and placed under the command and control of either the Coast Guard or Royal Navy so that Border Force are not used as the primary resource for such operations. I was pleased to see plans for this being developed while I was still working on the review.

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This recommendation unequivocally calls for the removal of Border Force from the English Channel SAR framework and advocates for SAR services to be “contracted”, rather than relying on charities and volunteers. Despite its clear rationale, this change has not yet been

⁸ Independent review of Border Force by Alexander Downer, p.41

⁹ Independent review of Border Force by Alexander Downer, p.41

¹⁰ Independent review of Border Force by Alexander Downer, p.42

¹¹ Independent review of Border Force by Alexander Downer, p.42

¹² Independent review of Border Force by Alexander Downer, p.42

¹³ Independent review of Border Force by Alexander Downer, p.43

implemented. The recommendation, initially made from a Border Force operational standpoint, is fully endorsed from a search and rescue operations perspective as well.

HMCG utilises two categories of assets for search and rescue: declared SAR facilities and additional facilities. The key distinction is that declared SAR facilities must meet specific standards or criteria related to civil maritime SAR, while additional facilities are not subject to such requirements. Under HMCG policy, Border Force vessels are categorised as "additional facilities" and fall under the definition of "marine craft under the control of various authorities, including lighthouse and pilotage authorities, HM Customs and Excise, and Police." Consequently, they are not obligated to meet any standards for SAR operations, including training, equipment, capabilities, and vessel design or construction.

Publicly available Border Force documents confirm that the agency does not prioritise SAR capabilities or maintain a dedicated SAR function. Border Force's primary role is law enforcement and related activities, not civil maritime rescue.¹⁴

Border Force Cutters

Border Force cutters are high-sided, narrow-bodied law enforcement vessels. These design features severely limit their ability to recover large numbers of people from the water efficiently during migrant maritime emergencies. Specific issues include:

- **Limited Medical Capabilities:** Medical facilities on cutters are equivalent to those found on similar-sized commercial vessels, offering little support in SAR operations.
- **Inadequate SAR Training:** Former Border Force personnel have reported that SAR training for cutter crews is minimal, even when previously deployed in high-risk areas such as the Aegean Sea.
- **RIB (Rigid Inflatable Boat) Challenges:** The cutters on board RIBs, intended for rescuing individuals, is unsuitable for mass casualty scenarios. It reportedly takes up to 20 minutes to launch and retrieve, is only operable in calm weather due to the cutter's narrow width and tendency to roll, and has a limited survivor capacity because of weight and size restrictions.
- **Safe Manning Certification:** Launching the RIB reportedly breaches the cutter's Safe Manning Certification, reducing the crew on board below safe and legal limits to handle emergencies on their own vessel.

Chartered Border Force Vessels (OESVs)

The challenges identified with the cutters are mirrored in the Offshore Emergency Support Vessels (OESVs) chartered by Border Force. However, OESVs are particularly unsuitable for mass casualty migrant SAR operations due to:

- **High Freeboard:** Their extreme height above the waterline complicates the recovery of individuals. Recovery options include climbing a wet metal ladder or using jet platforms located dangerously close to vessel propulsion systems, making it impossible to rescue unconscious or immobile casualties.
- **Lack of Rescue Boats:** Unlike cutters, OESVs are not equipped with RIBs or other small vessels, rendering them incapable of deploying assets for water-based recovery.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/200683/Our_fleet_of_cutters.pdf

Coastal Patrol Vessels (CPVs)

While Border Force CPVs, with their lower freeboard, are better suited for SAR operations than cutters or OESVs, they face the same deficiencies in training, equipment, and SAR capabilities as the other Border Force operated vessels.



Left: HMC Seeker's RIB



**Below: BF Hurricane (OESV)
attempts recovery a migrant vessel**

Contrary to popular belief, Border Force vessels, including the chartered Offshore Emergency Support Vessels (OESVs), are not military assets nor do they hold any form of specialised certification. Instead, they are certified, staffed, and managed in accordance with UK and international maritime law as commercial vessels. This classification means that these vessels are operated by civilian crews and staffed by civilian mariners, with both the vessels and their crews required to adhere to all civilian maritime regulations and laws appropriate to the vessel's size, type, and operational scope. However, this civilian framework inherently limits their role and effectiveness in maritime law enforcement.

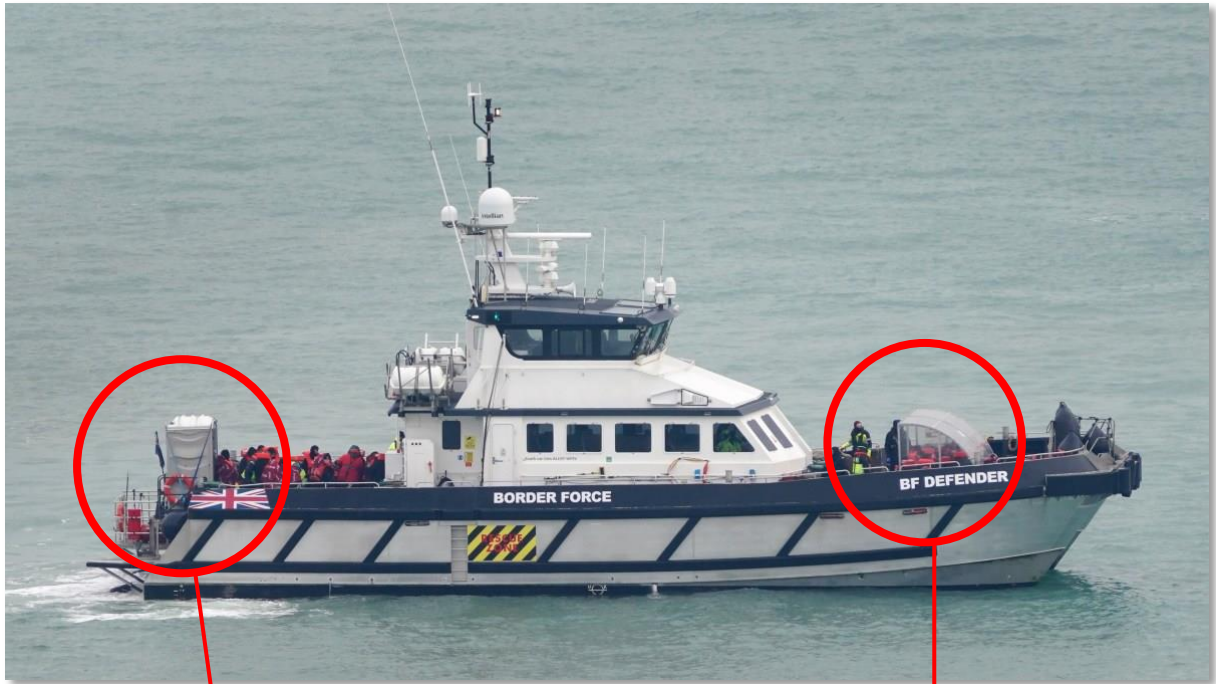
Given this clear legal context, concerns have arisen regarding the Maritime Coastguard Agency (MCA) certifications held by these vessels, including both Border Force-owned and commercially chartered craft. Specifically, these vessels are routinely exceeding their certified passenger capacities during daily rescue operations involving large numbers of people. This practice raises serious safety and legal issues. Border Force vessels are understood to be certified under either the "High-Speed Offshore Service Craft Code (HSOSC)" or the "Workboat Code," both of which define strict limitations and operational parameters, and specify the following legal definitions:

- "Crew" means all persons carried on board the ship to provide navigation and maintenance of the ship, its machinery, systems, and arrangements essential for propulsion and safe navigation or to provide services for other persons on board.
- "Passenger" is every person other than:
 - (i) the master and the members of the crew or other persons employed or engaged in any capacity on board a ship on the business of that ship;
 - (ii) any industrial personnel; and
 - (iii) a child under one year of age.

This clearly establishes that any individuals outside the defined roles on board these vessels should legally be classed as passengers under the vessel's certification and UK maritime legislation. Despite this, these vessels regularly carry more passengers than they are certified to accommodate, **with all Border Force vessels being legally restricted to a maximum of 12 passengers**. To put it plainly, the UK government is knowingly operating these vessels illegally by deploying them repeatedly in a search and rescue capacity for which they are neither trained, certified, nor equipped. Furthermore, the vessels are consistently sent out with the expectation of recovering more people than their certifications legally allow.

The apparent "blind eye" turned to these breaches by the Department for Transport (DfT) and the MCA is deeply concerning. In contrast, other coastal states operating in the Mediterranean SAR context routinely detain civilian SAR vessels that exceed certified passenger limits following migrant rescue operations. Notably, the MCA itself has detained and removed certification from a UK SAR vessel operating in the Mediterranean for alleged breaches of its certification¹⁵. These regulations exist for valid and critical reasons. Vessels certified to carry more than 12 passengers must comply with stricter maritime standards, including enhanced requirements for lifesaving appliances, safety systems, fire protection and response, pollution prevention measures, communication capabilities, and on board medical facilities. None of these enhanced regulations are met by Border Force's fleet, including the chartered vessels, making them inadequate and unsafe to use in a migrant SAR context:

¹⁵ <https://inews.co.uk/news/british-coastguard-blocks-rnli-lifeboat-rescuing-migrants-mediterranean-1701950>



Left: Portable toilets tied down to the vessel deck for migrants to use in breach of maritime regulations



Right: Plastic bike sheds used to shelter migrants post rescue on deck in breach of maritime regulations

It is essential to remember the intended purpose of Border Force and its Maritime Command, along with their objectives and the use of taxpayer funding. According to their mandate:

“Border Force is a law enforcement command within the Home Office. Border Force secures the border and promotes national prosperity by facilitating the legitimate movement of individuals and goods, whilst preventing those that would cause harm from entering the UK.”¹⁶

¹⁶ <https://www.gov.uk/government/organisations/border-force/about>

24M BV CLASS OESV SPECIFICATION



GENERAL

Builder: South Boats Isle of Wight Ltd

Design: South Catamaran 24M

Capacity: 12 pax, 3 crew

Construction: Aluminium

Length Overall: 25.1m

Max Beam: 8.0m

Draft: 1.2m

GRT: 100.17 tonnes

Certification: 1 HULL MACH Wind farms service ship High Speed Craft; sea area 3 and Category 1, 150 NM from safe haven. MLC Compliant.

Above & Below: Data sheets from the operator of the chartered OESV's for Border Force stating the maximum passenger's the vessels can legally and safely carry.

HURRICANE TOW 25m Catamaran

OVERVIEW

The 25m Catamarans enhance CWind's capabilities and our ability to serve client requirements. The 25m version incorporates 20-ton cargo capacity, large 18,000 litre fuel oil tanks and the ability to carry 2 x 20' containers. Combined with above-deck accommodation for 3 crew and 12 passengers, the vessels are able to remain out at sea for extended periods of time.

KEY CAPABILITIES

Year built	2015		
Class	DNV + 1A1 HSLC R2Wind Farm Service 1		
Hull Material	Aluminium		
Passengers	12	Crew	3

DIMENSIONS

Length overall	25m
Beam	8.2m
Draft	1.45m

MACHINERY

INTERNAL EQUIPMENT

Accommodation Fully air-conditioned, personalised suspension seating for passengers and crew, lockers & shelving for technician bags, microwave, fridge, hot water, changing area

NAVIGATION/COMMUNICATION EQUIPMENT

Radar	Furuno
Electronic chart	Furuno
AIS	Furuno
Compass	Furuno SC 50
Depth sounder	TBC
Crew finder	Sea Marshall SARfinder
VHF	Sailor 6222 DSC VHF x 2

DECK EQUIPMENT

Fuel transfer	yes	HP washer	yes
Crane, A-Frame	2x fixed boom	Secondary access	optional

Maritime search and rescue is notably absent from Border Force's stated responsibilities, with no legal basis or expectation within their operational remit to perform such functions. This raises significant questions about why the Home Office is chartering and funding Border Force vessels to primarily undertake SAR operations, a statutory responsibility that clearly falls under the remit of HMCG and the DfT.

In summary, Border Force vessels are not equipped or suitable for performing regular maritime search and rescue functions due to the following reasons:

- A complete lack of SAR-specific training and equipment for the crews.
- Limited medical capabilities, which are insufficient for managing the scale of emergencies often encountered in migrant SAR operations.
- The design and construction of these vessels, which make it impossible to recover large numbers of casualties from the water, as is frequently required in migrant rescue scenarios.
- Breaches of Border Force Cutter, CPV, and chartered OESV vessel certifications, and the associated safety risks involved in repeatedly taking on mass numbers of people when these vessels are not designed, equipped, or certified for such operations.
- The conclusions and recommendations in Mr. Alexander Downer's report, which further emphasise the unsuitability of Border Force vessels for SAR functions.

These factors collectively highlight the pressing need to reassess the use of Border Force assets in SAR operations and reaffirm the statutory responsibilities of HMCG in this critical area.

Suitability of SAR assets in the English Channel – RNLi Assets

Inshore Lifeboats (ILBs) operated by the RNLi are unsuitable for migrant SAR operations in the English Channel. This is well known by HMCG due to the limited survivor capacity of ILBs and the small number of crew members they can carry, which makes it difficult to safely manage migrant SAR cases. As a result, ILBs are rarely tasked for migrant SAR incidents, and when they are, they are typically supported by an All-Weather Lifeboat (ALB) or a Border Force vessel.

On the other hand, ALBs operated by the RNLi are regularly tasked with migrant SAR incidents, although they are still deployed less frequently than Border Force vessels. These vessels are specifically designed, constructed, and equipped for maritime SAR, making them the most suitable surface assets available for migrant SAR operations in the English Channel at present. However, there are still significant concerns regarding these assets, including:

- The sustainability of volunteer crewing models in the high-demand context of migrant SAR operations in the English Channel.
- A lack of specialist equipment and training necessary for effective migrant SAR interventions.
- Over-reliance on a charity and donations to provide and fund a response to a large-scale crisis, despite the statutory responsibility theoretically resting with a government body.
- The limited availability and insufficient number of these assets – currently, only three ALBs are available in the entire English Channel migrant SAR context.
- The time required to launch these assets and for them to reach casualty locations.

Operating a volunteer-crewed maritime SAR service in the context of high callout numbers, particularly in the case of migrant SAR operations, presents considerable challenges that hinder an effective SAR response. While the commitment of volunteers is admirable, several practical and logistical issues have emerged in recent years, particularly with RNLI assets and crews responding to migrant SAR tasking. Volunteer crews at Dover, Ramsgate, and Dungeness Lifeboat stations have reported struggling with fatigue due to frequent night time callouts, as well as balancing their duties with full-time jobs, family commitments, and other responsibilities. This has led to crew members resigning, difficulties in assembling sufficient crews to launch lifeboats, and a significant impact on the mental health of volunteers.¹⁷

In addition, a significant capability gap and lack of resilience has been revealed within the UK's maritime search and rescue framework, highlighted by instances where the RNLI refused to respond to certain migrant SAR incidents, leaving vessels in distress for hours without rescue. One particularly concerning case involved a boat carrying 25 people, which was left adrift in the middle of the night in winter after the RNLI declined repeated request from HMCG to assist.¹⁸ It is important to note that this incident happened 4 days before at least 32 people drowned in UK waters when their migrant boat sank. This heavy reliance on the RNLI, a volunteer-driven charity, underscores systemic deficiencies in the UK's approach to SAR, particularly as the migrant crisis in the English Channel continues to escalate. Despite being the primary government agency for maritime SAR, HMCG lacks any vessels of their own, frequently tasking Border Force and the RNLI to undertake SAR operations. The increasing burden placed on RNLI volunteers to bridge this gap is proving unsustainable, as they are repeatedly called upon to assume governmental responsibilities under demanding and often dangerous conditions. This reliance not only strains the RNLI's volunteer resources but also raises serious concerns about the sufficiency of current SAR provisions to meet growing demands, putting lives at risk and exposing critical shortcomings in the UK's ability to respond to an escalating humanitarian crisis. It is increasingly unacceptable, after years of crisis that the UK government continues to place this level of pressure on volunteers, their families, and a charity, especially when it is the government's legal responsibility to ensure adequate SAR provision across the UK.

Serious concerns persist about the RNLI's ability to effectively manage the on-going migrant crisis in the English Channel, exacerbated by a lack of appropriate equipment, adequate support, and experienced management within the organisation.¹⁹ From first-hand experience with the RNLI and its crews operating at Channel stations, it is evident that these issues are particularly acute in the context of migrant SAR operations. The current approach has proven unsustainable, with little indication that the RNLI has adjusted its strategy despite repeated concerns raised by crews and experts. These challenges underscore the urgent need for systemic changes to ensure the safety and well-being of its volunteers or those they aim to rescue.²⁰

Reports from RNLI crews at Dover, Ramsgate and Dungeness include:²¹

¹⁷ <https://www.theguardian.com/uk-news/2022/oct/02/lifeboat-crews-accuse-rnli-managers-complacency-channel-crisis>

¹⁸ <https://www.theguardian.com/global-development/2024/mar/03/rnli-lifeboats-coastguard-border-force-channel-tragedy-migrants>

¹⁹ <https://www.theguardian.com/uk-news/2022/oct/02/lifeboat-crews-accuse-rnli-managers-complacency-channel-crisis>

²⁰ <https://www.theguardian.com/uk-news/2022/oct/02/lifeboat-crews-accuse-rnli-managers-complacency-channel-crisis>

²¹ <https://www.theguardian.com/uk-news/2022/oct/02/lifeboat-crews-accuse-rnli-managers-complacency-channel-crisis>

“We know we couldn’t cope with 30 people in the water and they have never arranged any training for what to do.”

“Crews, who are not allowed to speak to the media, have told the Guardian they lack equipment and up-to-date guidance, amid a shortage of qualified staff to deal with the extra workload, and inadequate mental health support”

“Staff also claim the RNLI is too reliant on volunteers, a problem they say will get worse under new management proposals aimed at easing the burden on full-time crew by relying more on volunteers.”

In the Central and Eastern Mediterranean migrant SAR context, strict crew management protocols are implemented to limit the number of callouts and time spent on rescue missions, addressing documented mental health concerns arising from repeated exposure to traumatic events. This approach improves SAR effectiveness and safeguards crew health and safety by mitigating fatigue. However, the RNLI has not adopted this proven model for operations in the English Channel migrant SAR context, despite being aware of its benefits. The RNLI reportedly lacks sufficient volunteer numbers to implement such a system and continues to rely exclusively on volunteers rather than introducing full-time paid crews on a rotational basis, as is standard in comparable SAR contexts. This decision has significantly affected crew mental health and undermined the effectiveness of the RNLI’s response in this increasingly demanding operational environment.

Dover Lifeboat

2.08am 3 December 2023
10.55am 2 December 2023
1.37am 2 December 2023
7.59am 1 December 2023
6.34am 30 November 2023
2.26am 30 November 2023

Dungeness Lifeboat

7.37pm 2 December 2023
3.11am 2 December 2023
9.37am 1 December 2023
6.29am 30 November 2023
9.52pm 29 November 2023

Left: A selection of launches attended by volunteers at Dover and Dungeness RNLI over the end of November/beginning of December 2023. This frequency is unsustainable and is heavily disruptive to volunteer’s personal, family and professional lives.

RNLI assets lack appropriate specialised mass casualty SAR equipment, which has proven effective in the Mediterranean migrant rescue context. Without essential equipment, such as high-capacity flotation devices, large life rafts, and centifloats, the RNLI’s effectiveness in responding to migrant mass casualty events is significantly restricted. The RNLI has collaborated with the maritime industry to develop equipment specifically for the English Channel, including inflatable throw lines and the "Sea Stair" embarkation system. However, feedback from crews and RNLI staff involved in trials suggests that these tools are suboptimal and may hinder response efforts. This approach has been perceived by some as prioritising the RNLI’s reputation and positioning as an expert over incorporating input from experienced individuals and organisations with proven expertise in migrant SAR operations. Despite these concerns, the RNLI has continued to deploy the equipment, raising questions about the adequacy of its approach to addressing the challenges of migrant SAR.



Above: RNLI Ramsgate Lifeboat's Trent Class which is utilised in migrant SAR tasking with no migrant mass casualty equipment

Below: Aurora SAR, an Ex-RNLI Trent Class lifeboat appropriately equipped for migrant SAR tasking in the Central Mediterranean (Circled is the migrant mass casualty event equipment – lifejackets, rescue rafts and centifloats)



RNLI assets are tasked to incidents by HMCG via a pager system. The typical sequence for launching a lifeboat follows a structured process, with estimated best-case scenario timings for each stage:

1. HM Coastguard is alerted to a maritime SAR event (**1 minute**).
2. HM Coastguard assesses the incident and determines that tasking an RNLI lifeboat is the appropriate response (**2 minutes**).
3. HM Coastguard activates the pager for the station's Lifeboat Operations Manager (LOM) or Deputy Launching Authority (DLA) (**1 minute**).
4. The LOM/DLA receives the pager message and calls HM Coastguard for tasking details and information (**1 minute**).
5. The LOM/DLA then authorises or declines the lifeboat launch (**1 minute**).
6. If the launch is authorised, HM Coastguard activates the crew pagers (**1 minute**).
7. Crew receive the pager message alerting them to the lifeboat launch (**1 minute**).
8. Crew travel to the station at legal road speed (**5 minutes**).
9. Crew arrive at the station and are assigned by the LOM/DLA/Lifeboat Commander to the SAR asset (**1 minute**).
10. Crew change into their PPE and prepare the lifeboat for launch (**3 minutes**).
11. Crew receive a briefing from the LOM/DLA and Lifeboat Commander regarding the SAR tasking (**2 minutes**).
12. The lifeboat is launched (**1 minute**)

On average, it takes 20 minutes from the moment a distress case is notified to HM Coastguard to the lifeboat leaving its station. While this may seem like a long time, it is necessary for several reasons. The process allows time to assess the situation, ensuring that launching an RNLI lifeboat is safe and appropriate. It also provides the crew time to cease their current activities (or wake up if they are asleep), travel safely to the station, and conduct essential checks on the lifeboat to ensure it is ready for launch. Additionally, crew members must don their PPE and receive a briefing on the SAR operation. However, in the context of a migrant mass casualty event, particularly with people already in the water, this response time is far too slow. It's important to note that these 20 minutes may be extended, especially during night time launches or when the launch procedure is complex, such as at Dungeness Lifeboat Station. Furthermore, this time does not account for the duration it takes the asset to reach the incident location after launch.



Dungeness Lifeboat being launched from a beach as is standard for this station responding to migrant SAR incidents

The lack of timely response in all fatal migrant SAR cases within UK waters is evident from the fact that these incidents are initially located and assisted by commercial or fishing vessels, rather than SAR assets. This delayed response may be acceptable for general maritime SAR, such as for adrift vessels, but it is insufficient in the case of potential mass casualty events or imminent risks to life, such as those seen in migrant SAR operations. Both the RNLI and HM Coastguard are aware of the necessary response to such situations, as demonstrated by their actions on the River Thames. In the aftermath of the 1989 Marchioness disaster, which claimed 51 lives, the inadequacy of the existing SAR framework was acknowledged, leading to the establishment of three full-time lifeboat stations on the Thames. These stations are crewed in shifts 24/7, with a declared response time of just 90 seconds. It remains unclear why this effective response model has not been replicated in the English Channel, especially given the escalating risks associated with migrant crossings.

Suitability of SAR assets in the English Channel – HMCG Helicopter Assets

HM Coastguard helicopters are a valuable asset in SAR operations, offering excellent capabilities, extensive training, and well-equipped systems. However, their limitations include restricted survivor capacity and a limited number of assets, with only one helicopter available in close proximity to the English Channel. While helicopters are effective for rapid evacuation of seriously ill casualties or assisting in search efforts, their role should not extend to mass casualty events within the migrant SAR context. These operations require surface SAR assets, with appropriate types and numbers to handle large-scale rescues. Helicopters are vital for specific roles, such as searching for and locating incidents, but cannot address the full scope of mass casualty situations, which demand a more robust surface response.

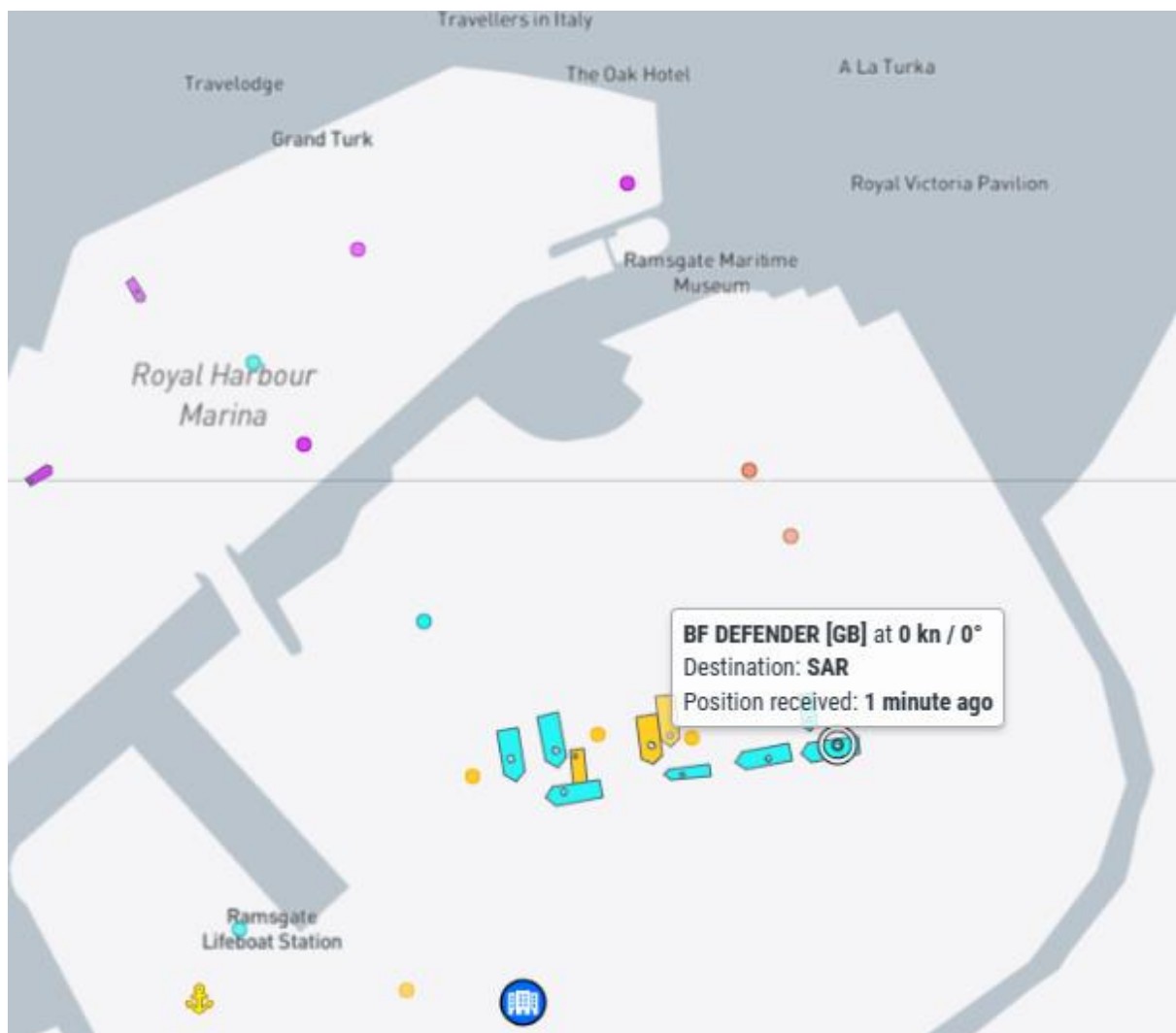
Suitability of surface SAR assets in the English Channel – Tabular Summary

In collaboration with other maritime SAR personnel, a tabular summary of SAR asset effectiveness has been created to assess the capabilities of assets available in the English Channel. The summary uses a color-coded system: green indicates that an asset fully meets the required criteria; amber means it partially meets the criteria, and red signifies that it does not meet the criteria. The criteria and evidence required to determine each asset's effectiveness are outlined in the analysis section of this document. This approach provides a clear and systematic evaluation of available SAR resources in the region:

Asset	Speed	Survivor Capacity	Vessel Certification	Migrant SAR Equipment	General SAR Competency	Migrant SAR Competency	Recovery of Mass Casualties from the Water	Launch Time	Number of Assets	Overall Effectiveness Rating
RNLI ALBs				Limited Appropriate Mass Casualty Equipment			Limited Appropriate Mass Casualty Equipment			
RNLI ILBs										
BF Cutters		Vessel Certs								
BF CPVs		Vessel Certs								
BF OESVs		Vessel Certs								

SAR Asset – Patrolling Capability

The absence of a dedicated patrolling SAR capability within the UK Search and Rescue Region (SRR) in the English Channel is a significant concern. Given the nature of migrant SAR operations, the risk of mass casualty events, and the delays associated with launching RNLI assets, this gap in capability requires urgent attention. As established, RNLI lifeboats are only deployed once an incident has occurred, requiring longer response times due to the distance from shore side stations and delays in mobilising crews. Furthermore, RNLI policy prevents their assets from patrolling, limiting their ability to proactively address emergencies. Similarly, Border Force assets are only deployed when necessary and are not designed for extended periods at sea, as their crews require shore side accommodation for rest. This severely restricts their patrol capacity, making it rare to see Border Force assets conducting patrols without prior indication of an incident.



All 5 Border Force OESVs (BF Ranger/BF Hurricane/BF Typhoon/BF Defender/BF Volunteer) in the port of Ramsgate at 1530LT on 13/12/23 – there were no Border Force assets detected at sea at this time

There is a clear and urgent need for appropriate SAR assets to be on scene as quickly as possible to recover large numbers of people from the water during a migrant SAR incident. The only way to achieve this rapid response is by having a SAR asset permanently deployed at sea, ready to respond instantly. Currently, this capability is lacking, but a viable solution could involve chartering commercially available Emergency Response and Rescue Vessels (ERRVs), which have proven SAR and mass casualty capabilities in the Oil & Gas industry. These vessels could provide the necessary resources to address the critical gaps in response time and capacity for migrant SAR operations.



Above: A standard ERRV with high-speed daughter craft and high levels of mass casualty equipment, SAR capability and medical facilities

HMCG Operations

In November 2011, the government unveiled a modernised structure for HM Coastguard following two rounds of public consultation over the previous 11 months. The Future Coastguard Programme began in 2012 and concluded at the end of 2015, with a subsequent period dedicated to consolidating skills and expertise. The modernised structure now operates as a single national network, centred around the Joint Rescue Coordination Centre (JRCC) in Fareham, supported by Maritime Rescue Coordination Centres (MRCCs) in Shetland, Aberdeen, Humber, Dover, Falmouth, Milford Haven, Holyhead, Belfast, and Stornoway. The River Thames is managed separately by the London Coastguard, and several MRCCs, including those in Forth, Clyde, Yarmouth, Solent, Portland, Brixham, Liverpool, Swansea, and Thames, have since been closed.

From as early as 2011, numerous concerns were raised about the Future Coastguard Programme, particularly regarding inadequate resources, HM Coastguard's ability to coordinate maritime SAR with reduced local staff, and the major issues arising from reliance on MRCCs located hundreds of miles away during emergencies. These concerns, raised by

industry experts, HM Coastguard employees, and Members of Parliament during the consultation (with all evidence available through the House of Commons Library) have since been confirmed. The MAIB investigation into the tragic loss of 32 lives in the English Channel when a migrant vessel sank in November 2021²² highlighted many of the issues foreseen in 2011, including:

- Staffing shortages
- The limited effectiveness of the Integrated Coastguard Network
- Shortcomings in Coastguard experience and mission conduct procedures

These systemic issues have also surfaced in other fatal maritime incidents, such as the sinking of the fishing vessel “Solstice” in 2017²³ and the death of Christine Robinson in 2020 off Merseyside. The MAIB report on the Solstice sinking echoed the same concerns as did the Coroner’s Regulation 28 Prevention of Future Deaths Notice issued after the “Solstice” incident, urging an urgent review of the Coastguard Network Support function and HM Coastguard’s SAR capabilities. Despite action plans presented by HM Coastguard in response to these concerns, the problems remain unaddressed, as evidenced by the recent MAIB report on the November 2021 disaster.

Additionally, the investigation into Christine Robinson’s death by Merseyside Police, which included scrutiny of HM Coastguard’s incident coordination, staffing, and SAR operations, revealed further dysfunction in the Future Coastguard Programme and its support network.

Given the findings in numerous MAIB reports and media coverage, it is clear that HM Coastguard’s operations are struggling, especially in the face of the migrant crisis in the English Channel, which has overwhelmed its capacity. This has contributed to an increasing number of fatalities, both in migrant contexts and in general maritime SAR.

A recurring concern in the maritime SAR sector is the lack of accountability within HM Coastguard. Unlike other emergency services, which are subjected to public scrutiny following high-profile incidents like the 7/7 terror attacks, the Manchester Arena attack, and the Grenfell Fire, HM Coastguard appears to operate without the same level of accountability. Public servants in the fire, police, and ambulance services are held responsible through independent bodies, such as His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services, the Independent Office for Police Conduct, and the Care Quality Commission. Even Border Force has an independent oversight body, the Independent Chief Inspector of Borders and Immigration, as does the Prison Services (HM Inspector of Prisons) and schools (Ofsted). However, no such body exists for HM Coastguard, leaving them without external scrutiny or accountability.

HM Coastguard’s stated purpose is to coordinate all maritime SAR operations in the UK through a network of stations, operating 24/7. However, the legal basis for this role remains unclear. In 2019, the MCA commissioned a report by the legal firm DWF²⁴, which revealed troubling gaps in the statutory framework governing HM Coastguard’s responsibilities. The report highlighted that the Coastguard Act 1925, which outlines the Coastguard’s duties, is outdated and vague, failing to adequately reflect the modern responsibilities of HM

²² <https://www.gov.uk/maib-reports/flooding-and-partial-sinking-of-an-inflatable-migrant-boat-with-at-least-27-lives-lost>

²³ <https://www.gov.uk/maib-reports/capsize-and-sinking-of-fishing-vessel-solstice-with-loss-of-1-life>

²⁴ <https://www.gov.uk/government/publications/review-of-the-legal-responsibility-for-beach-safety>

Coastguard, especially compared to other emergency services, such as the Fire and Rescue Service.²⁵

The findings suggest that the statutory duty governing HM Coastguard requires urgent review, as the Coastguard Act 1925 no longer meets the needs of modern SAR operations. This lack of a clear and contemporary legal basis for HM Coastguard's duties is unacceptable in 2023, especially when compared to the well-defined legal frameworks guiding other emergency services.

The above is best summarised within the report as:

"The statutory duty governing the HM Coastguard requires review as the Coastguard Act 1925 is woefully vague. While undoubtedly those operating under it are excellent and have been making do with the duties as they know it, it is unclear of the legal basis for those duties."²⁶

English Channel Policy and Strategic Direction

One of the primary challenges and underlying causes for the lack of effective SAR capability in the English Channel is the lack of clarity and coordination in the policies and operational frameworks designed to address migrant vessels. To ensure the safety of individuals attempting to cross the Channel in dangerous, overcrowded vessels, the most effective solution would be to prevent these vessels from attempting the journey in the first place. However, as we are all acutely aware, this is a complex and multifaceted issue that is easier said than done. While strategies to curb the flow of migrants, such as deterrence measures or addressing the root causes of migration, are being explored, they have yet to produce the desired results. However, there is a potential deterrent that targets breaches of the Merchant Shipping Act, focusing on vessel safety rather than immigration offenses. This approach could result in arrests being carried out on every migrant vessel entering UK waters, acting as a significant deterrent. **This policy is proposed in detail in Section 2 of this report.**

Until a comprehensive and effective strategy is successfully developed and implemented, we are still legally and morally obligated to provide adequate SAR provision for those in distress at sea, particularly in the migrant context. Regrettably, we are far from meeting this obligation. In my professional opinion, this deficiency stems from the fragmented and disjointed approach currently being adopted by various government bodies and organisations involved in the operational response to migrant SAR incidents in the English Channel.

A key challenge undermining the effectiveness of SAR operations and the reliance on charities in the English Channel is the lack of adequate and coordinated funding to support the required capabilities. To address this, a comprehensive maritime SAR and security funding policy has already been developed, which tackles these issues without incurring any cost to the taxpayer. **This policy is proposed in detail in Section 3 of this report.**

Currently, several key stakeholders are involved in the English Channel migrant SAR context, including HM Coastguard, Border Force, and the RNLI. Each of these organisations has distinct objectives, which leads to confusion and inefficiencies in the SAR response. For instance, HM Coastguard's primary mission is to coordinate maritime SAR efforts and save lives, which aligns with the principles of humanitarian aid and assistance to those in distress at sea. Border Force, however, is primarily tasked with law enforcement and immigration

²⁵ Legal Responsibility for Beach Safety p15-p16

²⁶ Legal Responsibility for Beach Safety p128

control, focusing on detaining individuals and enforcing border security measures. This can create a conflict of interest when their duties intersect with SAR operations, as their priorities often clash with those of agencies focused on life-saving measures.

The RNLI, a respected charity with a long history of providing SAR services, plays a vital role in saving lives at sea. However, as a charity, it faces constraints driven by public opinion, fundraising efforts, and its own operational goals, which can influence how and when it responds to incidents. While the RNLI's role in SAR is essential, it is important to note that it is not a government agency and has no legal obligation to respond to migrant-related SAR cases. This creates a situation where the RNLI's actions and priorities may not always align with those of governmental bodies or with the overall need for a coordinated, seamless SAR operation in the English Channel.

This patchwork of organisations with conflicting priorities—each operating within their own jurisdiction—leads to confusion, inefficiency, and delayed responses. The fragmentation of authority and responsibility creates operational silos, where the coordination of efforts between agencies is often inadequate. This is especially concerning when lives are at stake, and timely intervention is critical. The lack of a unified command and a single, cohesive strategy has resulted in a chaotic, reactive approach, rather than a proactive, coordinated one. The consequences of this operational disarray are clear: slower response times, gaps in coverage, and, ultimately, preventable loss of life.

One potential solution to address this issue is to merge the various agencies involved in maritime SAR, law enforcement, and border control into a single, unified organisation that is responsible for both SAR operations and maritime law enforcement in the English Channel. The benefits of such a merger would be numerous and would address many of the current shortcomings in the system. **This policy is proposed in detail in Section 4 of this report.**

Conclusions and Recommendations

In summary, the current search and rescue service in the English Channel is fragile, under-resourced, and poorly coordinated, failing to meet the demands of migrant SAR operations. The available vessels are insufficient in both type and number, and those that are suitable are often operated by charities without legal obligations, with crews who are fatigued and overworked, leading to delayed response times. Moreover, there is a lack of accountability in the maritime SAR sector, with HM Coastguard operating without sufficient public scrutiny or independent oversight. This has contributed to understaffed Maritime Rescue Coordination Centres and a coastguard network that is unable to effectively manage the migrant SAR situation, resulting in tragic loss of life. The existing framework is further complicated by a disjointed network of government and non-government organisations, each with different objectives, preventing the formation of a unified, strategic approach to address the crisis.

To address these issues, I recommend the following actions:

1. Discontinue reliance on Border Force assets and volunteer-crewed RNLI vessels, and engage with professional search and rescue providers to ensure the availability of adequately staffed, full-time SAR vessels.
2. Deploy a dedicated 24/7 patrolling SAR asset in the English Channel to provide rapid response capability during mass casualty incidents.
3. Implement Section 94 of the Merchant Shipping Act 1995 as a maritime deterrent in the English Channel (**see section 2 of this report**).

4. Adopt a SAR Dues system, modelled on Light Dues, to fund enhanced SAR and security operations in the English Channel and other areas (**see section 3 of this report**).
5. Merge Border Force Maritime Command and HM Coastguard into a single organisation with legal responsibility for maritime SAR, maritime law enforcement, and immigration enforcement at sea to establish clear accountability and leadership in the context of migrant SAR operations in the English Channel (**see section 4 of this report**).
6. Establish an independent regulatory body to assess the effectiveness and efficiency of HM Coastguard and SAR operators. This body should monitor, inspect, and regulate the UK's SAR and maritime border security operations.

Section 2 – Shifting Perspective: A Change in Focus from Immigration Offences to Merchant Shipping Offences in the English Channel Migrant Context

This short brief is aimed at introducing the concept of a new deterrent in the English Channel migrant context with a shift in focus from the Government pursuing immigration offences committed by migrants on small boats entering UK territorial waters to breaches of merchant shipping legislation by migrants on small boats, covering two specific areas:

- The seaworthiness of the vessel and the risks to migrant's lives taken by the person "driving" the migrant vessel on its voyage;
- The refusal of Search and Rescue assistance by migrant vessels from authorities in the French Search and Rescue Region (SRR) in favour of receiving assistance from UK SAR resources when inside the UK SRR

The Illegal Migration Act 2023 was the key concept brought in by the previous Government as a deterrent and as can be seen, this has been subject to legal challenge and has proven to be inefficient both in its ability to act as a deterrent and to provide value for money.

I have personally worked as an Expert Witness on criminal cases involving English Channel migrants, most notably the case of *R. v Ibrahima Bah* in 2023. Whilst he was convicted for manslaughter, he was also convicted with various immigration offences under the Immigration Act 1971, with this work giving me key insights into how the current focus on immigration breaches in the English Channel are proving very difficult to work with given the current legal situation.

However, I believe there is a simpler, more efficient and cost effective deterrent that would change the entire approach in the English Channel, and that is a shift from a focus on Immigration Act offences to Merchant Shipping Act offences.

Given the rising number of people crossing and escalating death toll, it is clear current deterrents are not sufficient enough to prevent people taking these risks. 2024 has been a tragedy with over 50 deaths and a rise in larger vessels being used with more people onboard, and I expect to see more loss of life on both sides of the English Channel in the 2025 if we do not start to plan and propose truly workable deterrents to stop people risking their lives whilst 100% guaranteeing their safety. This can only be achieved through a multifaceted approach, which includes ensuring adequate deterrents to dissuade people from embarking on dangerous journeys (which this document focuses on), but also ensuring adequate maritime SAR resources and infrastructure to respond when distressed vessels do cross (as discussed in the document titled Briefing Document: Evaluation of the UK's English Channel Migrant SAR Response Model).

It is generally agreed that migrant vessels are classified as in distress when at sea (again as discussed in the document titled Briefing Document: Evaluation of the UK's English Channel Migrant SAR Response Model), and this is because they:

- Lack maritime certification required for their intended voyage;
- Lack of navigational lights or signaling devices required to conduct a voyage safely at night;
- Are poorly constructed and lack proof of appropriate vessel construction in line with the appropriate maritime construction standards;
- Lack maritime navigational systems, equipment and facilities;
- Lack maritime communication systems, equipment and facilities;
- Are documented as being overcrowded on most occasions which consistently risks the safety and the stability of the vessel at sea;

- Lack adequate provisions of food, drinking water and medical equipment;
- Have unknown quantities and unknown quality of fuel on board needed to safely complete the vessel's intended voyage;
- Are unable to guarantee the welfare and safety of the people on board the vessel through lack of lifejackets, safety equipment, distress alerting capabilities and medically trained people;
- Lack qualified mariners on-board with the appropriate maritime training and certification which makes them unable to safely command a vessel across the English Channel on an international voyage.

The above justification for a lack of migrant vessel seaworthiness and that they are in distress has been accepted as my professional reasoning as a maritime expert on a number of these cases and is in line with regulations such as EU Regulation No 656/2014²⁷, the definition of distress phase under the International Convention on Maritime Search and Rescue²⁸, and under HM Coastguard policy²⁹.

The Merchant Shipping Act 1995 make clear what is considered an “unsafe ship” with section 94 of the Act stating:

- “For the purposes of those sections a ship at sea is “dangerously unsafe” if, having regard to the nature of the service for which it is being used or is intended, the ship is, by reason of the matters mentioned in subsection (2) below, either—
 - (a) unfit to remain at sea without serious danger to human life, or
 - (b) unfit to go on a voyage without serious danger to human life.
- (2) Those matters are—
 - (a) the condition, or the unsuitability for its purpose, of—
 - (i) the ship or its machinery or equipment, or
 - (ii) any part of the ship or its machinery or equipment;
 - (b) under manning;
 - (c) overloading or unsafe or improper loading;
 - (d) any other matter relevant to the safety of the ship; and are referred to in those sections, in relation to any ship, as “the matters relevant to its safety”.³⁰

It is clear that migrant vessels meet every part of this definition, however important to ensure a migrant vessel meets the definition of a “ship” in order to for the above to apply. The Merchant Shipping Act 1995 section 313 defines a “ship” as:

- ““ship” includes every description of vessel used in navigation”³¹

Obviously, as a small boat is a vessel and it is used in navigation, it is clear it meets the definition of a ship under the Act in my professional opinion.

The Act defines the responsibility of the “unsafe ship” as resting with the “Master” and “owner” of the vessel. It is clear that in this case, there is no official owner of the vessel as there would be with a commercial vessel or pleasure vessel, so for the purpose of a migrant

²⁷ <http://data.europa.eu/eli/reg/2014/656/oj> - Regulation (EU) No 656/2014 of the European Parliament and of the Council of 15 May 2014 establishing rules for the surveillance of the external sea borders in the context of operational cooperation coordinated by the European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union

²⁸ International Convention on Maritime Search and Rescue, part 5.2.1.3

²⁹ HM Coastguard Document: Broadcast Action for Migrant Incidents (Retrieved May 2022)

³⁰ Merchant Shipping Act 1995, section 94

³¹ Merchant Shipping Act 1995, section 313

vessel this would not apply. However, the act clearly states that the “Master” shall also be guilty of an offence in respect of a dangerously unsafe ship³². Upon conviction on indictment, the person can be imprisoned for a term not exceeding two years, receive a fine, or both.³³

The definition of the “Master” under the Merchant Shipping Act 1995 is covered in section 313 also, and states:

- ““master” includes every person (except a pilot) having command or charge of a ship and, in relation to a fishing vessel, means the skipper;”³⁴

The key concern here is the applicability of the terms “command or charge of a ship” in relation to migrant vessels. Obviously, this language works very well for commercial vessels and even most pleasure vessels, but the applicability of this term in relation to migrant vessels can be a significant legal arguing point as I have first account experience of. The issue faced is based on the argument that the person who is steering the boat, or “driving” it may not necessarily be in charge of the vessel and making all the decisions as one would expect with a “Master”. This is apparent when you look at the commercial maritime sector or please craft sector – just because someone is on the wheel of the boat does not make them the “Master”, the Master is responsible for a lot more than just the speed and direction of the boat. And this is where problems may arise.

It would be worthwhile explore this legal definition in detail or look at options to add additional clarification for the definition of “Master” on various vessel types such as pleasure craft, SAR vessels and of course migrant vessels. This has been done with fishing vessels in the Act which defines the Master of the fishing vessel as a “Skipper” under the legislation, therefore this could also be applied to migrant vessels such as in the below example which amends the definition in the Act:

- ““master” includes every person (except a pilot) having command or charge of a ship and;
 - in relation to a fishing vessel, means the skipper;
 - in relation to a migrant vessel, means the person who has control of the speed and/or direction of the vessel

Obviously, including something like this would also require an amendment to section 313 of the Merchant Shipping Act 1995 to add the definition of a migrant vessel, but it is something I would recommend in order to ensure the definition of “Master” can be applied without challenge to “drivers” of migrant vessels, thus allowing the “unsafe ship” section of the Act to fully apply to migrant vessels and their “drivers”.

This would allow the UK to seek prosecution for migrant vessel “drivers” for knowingly taking unseaworthy vessels to sea, and risking the lives of all onboard which is evidently the case each time a migrant vessel leaves shore. I am confident that this will act as a strong deterrent and will decrease the number of people willing to pilot migrant vessel across the English Channel if they faced arrest and potential imprisonment for breach of this Act. I believe with minor adjustments to the Merchant Shipping Act 1995, the likelihood of prosecution under Act would be a very realistic prospect for every boat arriving in UK territorial waters with minimal possibility of technicalities being argued given the clear focus on safety and unseaworthiness in the Act.

³² Merchant Shipping Act 1995, section 98

³³ Merchant Shipping Act 1995, section 98

³⁴ Merchant Shipping Act 1995, section 313

In addition, I also believe in my professional opinion that we should explore options for legislation surrounding failure to accept maritime search and rescue intervention. There have been recorded cases of migrant vessel's refusing assistance from French authority vessels despite their clear distress³⁵ which then means vessels are in effect "escorted" to the UK SRR before a UK SAR asset or Border Force asset is tasked to receive the vessel. This is obviously not acceptable and it is not right nor safe for migrant vessels to decide which side of the border they receive SAR intervention when there is such huge risk to life. It is clear that this is done so that the rescued people can be landed ashore in the UK, but the risk to both the people onboard the migrant vessel and also the SAR crews who are dispatched from the UK side to carry out the task is not acceptable when the SAR intervention could have been carried out by French authorities earlier. This area however would need more exploring by legal experts given the fact that the "crime" is being committed in French territorial waters when the migrant vessel refuses SAR intervention.

By having the ability to pursue prosecution under the Merchant Shipping Act for both operating an "unsafe ship" and also for refusing SAR intervention for the cases in which there has been interaction with French authority vessels, there is the ability to have at least two distinct and separate deterrents that can be applied to the "driver" of the migrant vessel.

It is key to also note that there is a heavy focus on the boat "drivers" for these deterrents and this is because attempting to positively identify other people onboard a migrant vessel as having the duties and required levels of responsibility to apply the definition of a "Master" under the Act as quite difficult, especially from an evidential perspective. However, identifying the "driver" of the vessel tends to be easier and providing the legislation is adjusted to reflect the unique nature of a Migrant vessel "Master", I am confident this would provide real options for prosecution of people onboard for each vessel that arrives in UK territorial waters, which in turn would deter people from agreeing to be the "driver" of the vessel. Without a "driver" for the vessel, the boats will be unable to leave shore.

In conclusion, it is my professional opinion that whilst it is correct to continue pursuing the criminal gangs who run these operations, there is a level of responsibility that lies with the people or person who decides to take charge of a migrant vessel at sea given the well-known risks to life and complete unseaworthiness of the vessels. Migrants are well aware of the dangers of the crossing and the risks involved, and by agreeing to "drive" a migrant vessel, it is my professional opinion that the "driver" is taking on the responsibility and accountability (in the same way as a "Master") for the risks to the lives of these people in what can be described under the Act as an "unsafe ship".

By focusing on applying breaches of the Merchant Shipping Act 1995 and focusing away from immigration offences, it removes the ability to argue the legal status of the people involved (asylum seeker, migrant, etc.) and removes compatibility issues with international legislation and conventions surrounding asylum seeking and migration that we are currently facing. The evidence regarding the unseaworthiness of migrant vessels is clear, physical and quantifiable, and by pursuing prosecutions for this under the Act will dissuade people from agreeing to "drive" migrant vessels across the English Channel.

³⁵ <https://www.dailymail.co.uk/news/article-12124935/Fifty-migrants-boat-middle-English-Channel-refused-rescued-French-warship.html>

Section 3 – Navigating Sustainable Funding: A Proposal for a Maritime Search and Rescue and Security Due System in the UK

The purpose of this short brief is to initiate exploration into a system of maritime search and rescue and security funding to primarily address the identified issues with providing a sustainable and efficient maritime SAR and security operation in the English Channel migrant context but also for the rest of the United Kingdom.

In the United Kingdom, maritime search and rescue operations are primarily funded and coordinated by the His Majesty's Coastguard (HMCG) which is part of the Maritime and Coastguard Agency (MCA), which itself is an executive agency of the Department for Transport. HMCG/MCA oversee the provision of search and rescue services around the UK coast and coordinates with various organisations and agencies to ensure response to maritime incidents.

The funding for maritime search and rescue in the UK comes from the government's budget allocated to the MCA. The MCA, in turn, works with several partners, of which most are charities, to provide a maritime SAR provision around the UK. The largest maritime SAR provider, the Royal National Lifeboat Institution (RNLI) that has 240 lifeboat stations around the country received 2%³⁶ of its funding for its operations from the government, which worked out at to approximately £4.4 million in 2022 based on this percentage figure.

With the options in the English Channel surrounding the reduction in stakeholders (such as SAR charities and numerous government departments) and the amalgamation of maritime SAR and security operations into one government body (merging of HM Coastguard and Border Force Maritime Command) requiring the government taking more a direct approach to the English Channel migrant context, sustainable funding sources are vital to ensure its success. One potential system that has been explored is a similar approach to "Light Dues" collected in the UK from commercial shipping and fishing.

Light dues are charges levied on vessels using UK ports to fund the provision and maintenance of navigational aids, such as lighthouses and buoys in the UK. The collection of light dues is managed by the UK's General Lighthouse Authorities (GLAs) which consist of three organisations: the Northern Lighthouse Board (NLB) covering Scotland, the Commissioners of Irish Lights (CIL) covering Ireland, and Trinity House covering England, Wales, the Channel Islands, and Gibraltar.

The funds generated from light dues are used to operate and maintain aids to navigation, ensuring the safety of shipping in and around UK waters. The amount of light dues is typically calculated based on a vessel's net registered tonnage (NRT). The dues are paid by shipowners or operators and are an essential source of funding for the ongoing work of the GLAs in providing and updating navigational aids.

In 2022-2023, Light Dues generated £83 million in revenue for the UK.³⁷

It can be considered that if this type of approach is carried out correctly, a similar amount of revenue could be collected to contribute towards the development of government run maritime SAR and security services in the English Channel and support of SAR provisions elsewhere in country.

³⁶ <https://www.faqsclear.com/why-isnt-the-rnli-government-funded/#:~:text=Our%20lifeboat%20service%20receives%20no%20UK%20government%20funding,service%20relies%20on%20the%20generosity%20of%20our%20supporters.>

³⁷ <https://assets.publishing.service.gov.uk/media/65e1bed82f2b3b001c7cd824/general-lighthouse-fund-ara-23-print-version.pdf>

The current reliance on government funding from the general MCA budget and charitable donations for SAR and security provisions poses challenges to financial sustainability especially given the scale of change needed to combat the migrant situation in the English Channel. By introducing a SAR and security due, the sector contributes to its own safety and security infrastructure, reducing the burden on public funds and charitable donations whilst also providing additional funding streams for new approaches in the English Channel that are very much needed.

This approach not only ensures the continuity of these vital SAR and security services but also allows for long-term planning and investment, and more direct control and oversight by the government on how maritime SAR and security provisions are carried out in the UK, which has a direct impact on how we deal with the English Channel migration issue.

The maintenance of RNLI and independent SAR providers in areas around the UK is also important in the bigger picture of the UK SAR framework, and grants and donations from this fund to maintain and develop their services could also be considered. Donating to these SAR organisations showcases the government's commitment to social responsibility and community welfare, bolstering its public image and demonstrating a proactive role in addressing societal needs. Additionally, it fosters a sense of cooperation with non-governmental entities, promoting collaboration for positive social impact across the SAR context in the UK, benefiting the government, the organisations and the public.

Aside from the obvious financial benefits of implementing this type of system, there are secondary benefits that will bring positive changes to the UK maritime sector in general:

Industry Accountability:

Ship operators play a pivotal role in the maritime ecosystem and should bear a proportionate responsibility for the maintenance and enhancement of SAR and security measures that they benefit from. A legislated fee structure ensures that the industry is directly accountable for its impact on these services, creating a culture of responsibility and reinforcing the notion that safety is a shared commitment.

Risk Mitigation and Prevention:

Charging ship operators for SAR and security provisions introduces a risk mitigation mechanism. The fee structure incentivises operators to invest in preventive measures, advanced training, and technology that reduce the likelihood of incidents requiring extensive search and rescue operations. This proactive approach aligns with industry best practices and enhances overall safety standards.

Transparent Allocation of Funds:

Similar to the light dues system, a ship operator fee ensures transparency in fund allocation. Operators can witness a direct correlation between their contributions and the improvement of SAR and security infrastructure. This transparency builds trust within the industry, enhances cooperation with regulatory bodies, and facilitates a more efficient utilisation of funds for the benefit of all stakeholders.

There are numerous case studies that prove the importance of maritime SAR and security services for the commercial maritime sector that will provide the clear basis for this due system, such as:

January 2015 – HOEGH OSAKA – Large car carrying cargo ship that capsized between Southampton and the Isle of Wight – 24 crew rescued



January 2008 – ICE PRINCE – 132m Large timber carrying cargo ship capsized and sank in the English Channel – 20 crew rescued



January 2015 – CEMFJORD – 83m Cement carrier sank in Pentland Firth, 8 crew lost



October 2020 – NAVE ANDROMEDA – 228m Oil Tanker suspected hijacking by 7 stowaways off the Isle of Wight



In conclusion, the analysis of the current system for funding maritime SAR and security in the United Kingdom highlights significant challenges in financial sustainability and the need for a more direct and stable funding mechanism. The reliance on government budgets and charitable donations poses risks to the continuity and effectiveness of vital services, particularly in addressing complex issues such as the English Channel migrant situation.

The proposed solution, modeled after the successful light dues system, presents a compelling approach to securing sustainable funding for further government-run maritime SAR and security services. By implementing a SAR and security due collected from commercial shipping, the maritime sector actively contributes to its own safety infrastructure, reducing dependency on public funds and charitable donations. This strategic shift not only ensures the continuity of essential services but also allows for long-term planning, investment, and increased government oversight in addressing maritime SAR and security challenges.

The potential revenue generated from a SAR and security due, akin to the successful £83 million generated by light dues in 2022-2023, could significantly contribute to the development and enhancement of SAR and security services in the English Channel and across the country.

Furthermore, introducing a due system promotes industry accountability, incentivises risk mitigation and prevention measures among ship operators, and ensures transparent allocation of funds. This not only enhances safety standards but also fosters trust, cooperation, and efficient utilisation of resources within the maritime sector.

Recognising the broader context, maintaining support for independent SAR providers like the RNLI is crucial for the overall UK SAR framework outside of the English Channel. Contributions to these organisations, facilitated by the proposed due system, underscore the government's commitment to social responsibility, community welfare, and collaborative efforts in addressing societal needs.

In addition to the immediate benefits for SAR and security, the proposed system brings positive change to the UK maritime sector as a whole. It establishes a culture of responsibility, incentivises proactive safety measures, and ensures transparent financial practices, reinforcing the government's commitment to maintaining a safe and secure maritime environment. This comprehensive approach not only addresses the challenges identified in the English Channel but also lays the foundation for a more resilient and accountable maritime safety framework in the United Kingdom.

Section 4 – Unified Maritime Response: Merging Border Force Maritime Command and HM Coastguard for Enhanced English Channel Operations

The ongoing migrant crisis in the English Channel underscores the need for an integrated maritime approach that balances humanitarian obligations, law enforcement responsibilities, and operational efficiency. The current separation between Border Force Maritime Command (BFMC) and His Majesty's Coastguard (HMCG) results in duplicated efforts, inefficiencies, and a lack of cohesive accountability. This policy proposal advocates for merging these entities into a single, unified maritime agency, modelled on successful structures like the United States Coast Guard, Italian Coast Guard, and Greek Coast Guard, which address similar maritime migration challenges with streamlined operations.

Maritime search and rescue and maritime law enforcement share nearly identical operational requirements. Both involve searching for objects, gathering intelligence, and conducting operations at sea using the same equipment, methods, and infrastructure. In the UK, this duplication creates inefficiencies, with separate chains of command, resources, and training systems. BFMC lacks the SAR training, vessels, and equipment to manage large-scale rescue operations, while HMCG does not have the mandate or resources to enforce border security. The fragmented approach delays responses, wastes resources, and undermines operational effectiveness.

In contrast, the Greek Coast Guard, with 250 vessels, 8,000 personnel, and jurisdiction over 8,500 miles of coastline, efficiently integrates SAR and law enforcement functions under a single command. Similarly, the Italian Coast Guard operates 600 vessels with 10,700 staff to manage a 4,900-mile coastline. Both nations face intense migrant pressures and have demonstrated the value of a unified maritime structure. By comparison, the UK Coastguard has zero vessels, only 400 shore-based staff, and must manage a 7,700-mile coastline.

This proposal recommends the absorption of BFMC into HMCG as a single organisation with centralised accountability, a unified command structure, and dual SAR and law enforcement capabilities. Operating under the Home Office in a similar way to the management of Police and Fire and Rescue, the new HMCG would provide a holistic solution to managing the migrant crisis and broader maritime responsibilities beyond the migrant crisis, in areas such as maritime security, emergency response and fishery protection.

A unified command eliminates duplication, reducing delays caused by inter-agency coordination. Resources such as vessels, training programs, and personnel would be shared, maximising efficiency. By repurposing and dual-qualifying existing assets, such as control centres and staff, the new HMCG would meet both SAR and law enforcement needs without unnecessary command expansion. Aligning with successful models like the US, Italian, and Greek Coast Guards ensures HMCG is equipped to handle both SAR obligations under international conventions (SAR1979, UNCLOS) and border enforcement responsibilities. With the Coastguard Act 1925 nearing its centenary and no longer reflecting the modern duties and role of HMCG³⁸, this initiative presents a timely opportunity to introduce updated legislation, replacing the outdated framework with a more relevant and robust legal foundation, incorporating maritime security and border enforcement at sea.

HMCG would rationalise existing assets, converting suitable vessels for dual SAR and enforcement roles. For example, the UK could procure SAR-enabled patrol boats, akin to the multipurpose fleets of the Italian and Greek Coast Guards, ensuring readiness for varied operations. All HMCG personnel would receive comprehensive training, equipping them for

³⁸ Legal Responsibility for Beach Safety p128

both SAR and law enforcement tasks. This approach reduces redundancy and ensures operational flexibility. A single chain of command would centralise decision-making, reducing delays and ensuring consistent policy application.

To transition to the new HMCG, a feasibility study would audit assets, personnel, and legal frameworks to identify challenges and opportunities. Policies and legislation would be aligned to draft necessary protocols, including coordination with external partners like RNLI, Royal Navy, and international entities. Integrated models would be tested in defined operational areas to evaluate resource utilisation and response times. Over time, HMCG would consolidate assets, personnel, and operations nationwide, ensuring seamless integration.

Challenges such as institutional resistance can be mitigated by engaging stakeholders early and emphasising the benefits of integration. Funding for initial costs, including fleet upgrades, would be secured through the policy defined in “Section 3 – Navigating Sustainable Funding: A Proposal for a Maritime Search and Rescue and Security Due System in the UK”, with long-term savings from efficiency gains. **Having consulted with the PCS Union regarding this policy proposal, we have received positive feedback from representatives of both HMCG and BFMC. There is broad agreement that merging the two organisations would be a beneficial step and would also support their members working in this context.**

The expected outcomes of this integration include improved operational efficiency, enhanced safety, cost savings, and clearer accountability. Centralised command and shared assets will improve response times and resource utilisation. Dual-trained personnel and multipurpose vessels will ensure better outcomes for SAR and law enforcement operations. Streamlined operations and shared resources will reduce duplication, saving taxpayer funds. A single organisation ensures clear responsibility for SAR and law enforcement, fostering public trust and adherence to legal obligations.

Merging BFMC into HMCG is a strategic, necessary step to address the migrant crisis and broader maritime challenges in the English Channel and beyond. By aligning with international best practices and creating a streamlined, accountable organisation, the UK will be better equipped to manage its 7,700-mile coastline effectively and humanely. The new HMCG represents a sustainable, efficient, and integrated approach to safeguarding lives and securing borders.

Timeline

Year 1: Planning and Feasibility Assessment

25/26 Q1–Q2: Initial Planning and Stakeholder Engagement

- Define Objectives and Scope: Establish a detailed mandate for the new HMCG, focusing on integration of SAR and law enforcement functions.
- Engage Key Stakeholders: Initiate consultations with relevant stakeholders (Home Office, Department for Transport, Border Force, HMCG, RNLI, Royal Navy, international partners, and union representatives) to build support and address concerns.
- Legislative and Policy Review: Begin review of existing policies, legislation, and international agreements, identifying necessary changes to accommodate the creation of the new HMCG.

25/26 Q3–Q4: Feasibility Study and Resource Audit

- Conduct a Feasibility Study: Audit existing resources, personnel, equipment, and infrastructure across both BFMC and HMCG to assess their suitability for integration.
- Identify Legal and Operational Barriers: Review legal frameworks governing maritime law enforcement and SAR operations, including necessary adjustments to ensure alignment with international conventions (SAR1979, UNCLOS).
- Prepare a Draft Implementation Plan: Create a roadmap for the full integration of BFMC into HMCG, detailing the phased transition, key performance metrics, and timeline for rollout.

Year 2: Legislative Changes, Policy Development, and Pilot Programs

26/27 Q1–Q2: Legislative Framework, Procurement and Policy Development

- Draft Legislation and Amendments: Work with the Home Office and Department for Transport to draft necessary amendments to current maritime law to reflect the new HMCG structure and its functions.
- Develop Unified Command Structure: Design the new governance structure, including the dual chain of command, shared resource management, and integration protocols with external partners.
- Procure SAR/Law Enforcement Enabled Vessels: Begin procurement of specialised patrol boats and other necessary assets to expand HMCG's operational capacity, based on lessons learned from the pilot phase.
- Finalise Operational Guidelines: Draft operational procedures and safety protocols for SAR and law enforcement, ensuring a seamless integration of personnel and resources.

26/27 Q3–Q4: Pilot Programs and Testing

- Select Pilot Regions for Testing: Choose specific maritime regions where HMCG's integrated functions (SAR and law enforcement) can be tested in real-world scenarios.
- Test Resource Utilisation and Response Times: Deploy HMCG assets in pilot areas, focusing on optimising response times and resource use for both SAR and law enforcement operations.
- Evaluate Pilot Results: Assess the outcomes of the pilot programs, refining operational procedures and addressing any operational or resource challenges.

Year 3: Full Implementation and Transition to the new HMCG

27/28 Q1–Q2: Training and Integration

- Upgrade Training Programs: Develop comprehensive training programs for all personnel, focusing on dual SAR and law enforcement capabilities, ensuring that all staff are prepared for the unified operational approach.
- Integrate Systems: Ensure that IT systems, communication networks, and data sharing platforms are unified across HMCG, facilitating seamless coordination and decision-making within the one organisation.

27/28 Q3–Q4: Full-Scale Rollout

- Deploy the new HMCG Nationwide: Begin full-scale integration of BFMC and HMCG into the new HMCG, with all personnel, resources, and operations consolidated under the new structure.
- Launch Centralised Command and Operations: Activate the new centralised command structure, with full integration of assets, personnel, and procedures across the 7,700-mile coastline.
- Final Evaluation and Adjustments: Conduct a nationwide evaluation of HMCG's performance, addressing any operational issues, and making necessary adjustments to ensure maximum efficiency and effectiveness.