



TURNING THE TIDE

A MISSION TO REVITALISE OUR NATION'S MARITIME SECTOR



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INTRODUCTION



As the tides of change sweep across our nation the UK maritime industry stands at a pivotal juncture. Our maritime professionals, the unsung heroes of our seas, navigate treacherous waters daily, ensuring the lifeblood of our economy flows unimpeded. But their challenges are immense: from climate change to technological disruption, from geopolitical shifts affecting safety of life at sea, to the lingering impact of the global health pandemic and the cost-of-living crisis.

The United Kingdom is a proud maritime nation. As an island nation, shipping is critical to everything we do. Over 95% of everything we use and consume enters and leaves the UK by sea, so the essential work of our maritime professionals is vital for a healthy and resilient economy.

The maritime industry as a whole contributes £18.7bn in gross value added (GVA) to the British economy and 227,100 jobs. At the heart of our maritime industry is the British Merchant Navy.

Shipping is the central nervous system of global trade; therefore it is so often at the mercy of geo-political shifts. The Chinese government's strategy of dominating shipping, the Russian invasion of Ukraine in February 2022 and increasing instability in the Middle East, including attacks on merchant shipping in the Red Sea, has shone a spotlight on the importance of national resilience, international trade and the protection of sea routes. Whilst others have rightly highlighted the importance of strong national defence, this is simply unachievable without a strong UK registered Merchant Navy and a commensurate British workforce. Professor Geoffrey Till, former Head of the Defence Studies Department at King's College London said in his book 'Seapower: A Guide for the 21st Century' "[A] healthy merchant marine and secure sea lines of communication are essential for national security in peace and war."

With rising geo-political precarity across the globe, the continued decline of the UK flag and number of resident seafarers should be cause for concern for an incoming government. In the event of widespread global conflict, with a weakened Merchant Navy, our capacity to secure food, fuel and trade will be significantly hampered. The lessons of the Covid-19

pandemic must be heeded, our nation was exposed. Investment in the Merchant Navy is critical to our national security and resilience.

Maritime 2050 is an ambitious joint plan between Government and the UK maritime industry, that charts a course toward a brighter, more resilient future. Nautilus International, as a core stakeholder in the development of Maritime 2050, supports its aims and in particular the People chapter. However, more must be done to make Maritime 2050 a reality for our nation's maritime professionals today and for the future.

Supporting our maritime industry must include a robust approach to protecting high-quality, well-paid jobs with decent working conditions reflective of local standards, not international minimums.

For too long weak UK labour laws have allowed maritime employers to reap the financial rewards of importing labour on below market rates and insecure contracts, to the detriment of our own highly skilled workforce. Poor workforce protections have permitted bad employers to exploit workers – the most egregious examples with far reaching consequences being in 2005 when Irish Ferries fired and rehired its UK crew, replacing many with exploited international labour, and in 2022 with the P&O Ferries' mass sacking of permanently contracted UK seafarers, replaced with overseas crew on exploitative temporary contracts providing wages far below UK minimum standards.

The incoming government must make a solemn commitment to tackle these issues, revitalising our nation's maritime industry and crucially our Merchant Navy. The next government must resolve themselves to work with unions and industry to reclaim our position as a pre-eminent maritime nation and restore our maritime heritage and pride. This manifesto sets out key policies that, if enacted, will realise this ambition to turn the tide and grow our maritime industry. Nautilus International and our members stand ready to co-operate with any government committed to this ambitious endeavour.

Mark Dickinson
General Secretary
Nautilus International



KEY ASKS:



Future proof skills and training: Our maritime professionals deserve world-class training. We call for increased funding for maritime education, cadetships, apprenticeships, and career development. Let's empower our maritime professionals to adapt to evolving technologies and environmental standards.



Full protection for maritime employment: Our maritime professionals are the backbone of our industry. We need robust employment protections, fair wages, and decent working conditions, to stop the race to the bottom in terms and conditions especially in UK and adjacent waters. They deserve at least the same protections as UK workers ashore.



Create a stronger UK shipping industry domestically and internationally: Our maritime professionals protect the national interest. Let's deliver an action plan for the growth of the UK flag, support jobs and training in strategic sectors like offshore renewables and consider the scope for cabotage in UK waters and with our neighbours.



Ensure continued international leadership on social and employment rights: Maritime is intrinsically an international activity, and the UK must continue to lead internationally on social and employment rights for seafarers. Building on its recognition of seafarers as key workers during the pandemic, we need to go further by supporting the continuous improvement in global minimums standards, ratifying the International Labour Organization (ILO) convention on Seafarers Identity Documents (C185), and push for a global review of ship registration practices to ensure effective control is exercised over all shipping through the enforcement of the "genuine link" required under the United Nations Convention of the Law of the Sea (UNCLOS).





TURNING THE TIDE

FUTURE-PROOFING UK SKILLS AND TRAINING

GUARANTEEING A JUST TRANSITION

Maintaining a robust, accessible, and world-class training regime is critical to turning the tide, re-vitalising our nation's maritime industry and guaranteeing a just transition as the maritime industry charts a course to net-zero.

We are calling for:

- 100% Government SMarT funding and minimum training allowance to support cadets with cost of living.
- A single national maritime training provider that is accountable to the Maritime Coastguard Agency and Department for Transport.
- Review and reform UK Tonnage Tax to ensure shipowners are incentivised to register their vessels on the UK flag and provide quality onboard training and subsequent employment.
- Play an active role in the STCW review to ensure that internationally agreed minimum standard of seafarer training to enhance safety and reduce unfair competition against highly trained UK seafarers.
- Develop a Just Transition fund to support training and upskilling to ensure people in maritime have the skills needed for the technologies and secure jobs of the future.

100% Government SMarT funding and minimum training allowance to support cadets with cost of living.

Shipowners have long argued that the UK is a very expensive place to train cadets and that support from government through the Support for Maritime Training Fund (SMarT) is welcomed but insufficient.

However, the high cost of undertaking cadet training in the UK is also a significant barrier to young people, particularly from lower socio-economic backgrounds considering careers at sea and in the maritime industry. It creates significant challenges for those who do undertake maritime training, with many dropping out due to financial challenges. Some cadets receive bursaries as little as £600 per month, from which they must pay for accommodation, food, and other general spending. In Nautilus's 'cadet cost-of-living survey' over a third of cadets said they had considered dropping out of training due to financial pressures.⁷

The government covers approximately 50% of the cost of training through SMarT. This falls short of the 100% funding recommended by the Maritime Skills Commission (MSC) established by the Department for Transport (DfT) in the Seafarer Cadet Review 2021⁸. It also falls short of the 100% funding provided by some of our competitors such as the Netherlands and other European Union neighbours who take full advantage of the maximum limits of support specified in the EU state aid rules applicable to the maritime industry (see also footnote 9).

An independent review by Oxford Economics into maritime training showed that for every £1 spent by government, £4.80 is returned to the nation's Gross Domestic Product (GDP).⁹

With 100% government funding of training, trainee bursaries can be placed at levels that support the cost-of-living pressures experienced by cadets in training, making it more attractive to our nation's young people and advance the UK as a competitive place to train future maritime professionals. This would increase the numbers in training towards targets¹⁰ set by the Government that have never been achieved in the past. It would also increase diversity by opening training to those who can't currently afford to enter, including more mature candidates or candidates from households with limited disposable incomes. It would help secure a steady stream of highly skilled maritime professionals fit for the future, while being of little additional cost, approximately £15 million, to the Treasury.

A single national maritime training provider that is accountable to the Maritime Coastguard Agency and Department for Transport.

Maritime training in the UK is currently fragmented, with cadets receiving varying quality of training, sea-time and support based on their training provider and sponsoring company.

Maritime training providers are organisations that manage the process of cadet training from college placement to sea-time. These organisations, either shipowners or more often third-party companies, are central to the current training regime.

Despite the significant role they play in cadet training, they are not directly accountable to the Maritime Coastguard Agency (MCA) or Department for Transport (DfT). The consequence of this has been a disjointed training regime

⁷ <https://www.nautilusint.org/en/news-insight/resources/nautilus-reports/cadet-survey-cost-of-living/>

⁸ <https://www.maritimeuk.org/priorities/people/skills-commission/reports/maritime-skills-commission-seafarer-cadet-review-report-june-2021/>

⁹ <https://assets.publishing.service.gov.uk/media/5a821babe5274a2e87dc12ec/support-for-maritime-training-review-annex-a.pdf>

¹⁰ https://assets.publishing.service.gov.uk/media/5ad07d8840f0b617dca7126c/MIN567_Complete.pdf



across the UK, marked by inconsistent quality of training experiences. Many of the providers exist as 'for profit' companies, leading to financial considerations overtaking the interests of cadets and the wider maritime industry.

Nautilus is aware of serious cases where training providers have failed in their duty of care to cadets, including failing to properly investigate alleged sexual assault. During the Covid-19 pandemic and the subsequent 'crew change crisis' there were cases of cadets who were refused repatriation due to national lockdowns and received little to no support from their training provider and were therefore left stranded at sea. Others were not provided the necessary sea-time by their sponsoring companies with delays persisting long after Covid -19 travel restrictions had been lifted. In some instances, cadet training programmes were extended by several years. Even in cases where the cadet has terminated their training due to such short comings, the provider will often pursue them for a refund of fees and costs, which the provider has already benefitted from through SMaT.

While there is a strong need to increase the visibility of maritime careers, as per Maritime 2050 commitments, we must ensure a training regime that offers high quality training for every cadet. The creation of a single national maritime training provider, that is publicly accountable, as recommended by the Maritime Skills Commission, can ensure a training regime that put's the interests of cadets and the needs of the maritime industry first.

Reform the UK Tonnage Tax to ensure that shipowners are incentivised to provide quality training and subsequent employment.

Tonnage Tax¹¹ was introduced in 2000 as a scheme to allow shipowners to pay tax on tonnage rather than profits, ensuring stability during fluctuations in profitability. It was designed as a mechanism to encourage investment in the UK maritime industry, its people and to support the growth of the UK flag. To qualify for the scheme, companies must commit to a minimum training obligation, including training one UK cadet per year for every 15 officer posts the company retains on vessels entered into the tonnage tax.

With the number of vessels registered to the UK reaching historic lows with just 311 vessels registered (2023) a fall of 47% from 2003 (587 vessels), the number of UK Merchant Navy officers also at historically low levels and, increasing concerns around the quality of training provision, it's clear to see tonnage tax, in its current form, is no longer serving its purpose (i.e., to promote UK flag and UK employment growth). Instead of fostering growth in UK shipping, it has coincided with a decline in both the number of UK-flagged vessels and British seafarers, both officers and ratings. This has an impact on the wider maritime industry as many seafarers continue their careers in the industry when moving ashore.

The inception of tonnage tax was undoubtedly a positive intervention, it increased the numbers of British officers in training from close to zero up to nearly 1,000 per year at its peak, but nearly 25 years on, the effectiveness of the scheme has waned despite a limited review announced in the 2021 budget. There is clearly a need for a more comprehensive review and for reform of the tonnage tax scheme to realign it with its stated aims and ensure a sustainable future for a maritime nation and in support of its national security and resilience.

Full and active participant in STCW review.

The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) is the basic international qualification for ships' officers. It is currently undergoing a comprehensive review.

An incoming UK government must play a full and active role in the International Maritime Organization's (IMO) review of the STCW, ensuring it is amended to reflect rapidly changing skills needs arising from new fuels and technologies, whilst campaigning for more robust implementation and enforcement of fit for purpose global minimum training requirements.

The government should also press for a swifter amendments procedure to be agreed in the STCW review for the future, ensuring training matches pace with the scale of technological change and measures to address fatigue by tackling manning levels and hours of work and rest (fitness for duty).

Develop a Just Transition fund to support future-proof training and upskilling.

The maritime industry is changing. The IMO has committed to the industry reaching net-zero around 2050, while the UK is committed to being a global leader in clean maritime.

To meet environmental targets, new technologies and cleaner fuels are constantly being adopted by shipowners, requiring continual changes in skills. A central tenet to the UK government's clean maritime plan is the 'Clean Maritime Demonstration Competition' a multi-million-pound fund to support technological innovation in clean maritime.

The government should ensure that our maritime skills base doesn't lag by linking this funding to training for maritime professionals to access the skills needed to remain in the ever-changing industry. Delivering a Just Transition for our seafarers to grow our skills base of UK maritime professionals, supporting them to remain at the cutting-edge of technological and environmental change, would contribute to ensuring that our nation's seafarers remain attractive in a globalised labour market.

¹¹ Originally introduced in compliance with Community Guidelines on State Aid to Maritime Transport (C(2004)43). Following Brexit the government stated it would continue with these fiscal incentives to support UK shipping and UK seafarer training and employment.





TURNING THE TIDE

FULL PROTECTIONS FOR MARITIME EMPLOYMENT

The scandalous actions of P&O Ferries in March 2022 caused widespread public outrage.¹² However, the actions of P&O Ferries, replacing almost its entire UK-resident crew with exploited labour from abroad, is not a new phenomenon in the UK maritime industry.

The race to the bottom in terms and conditions for UK seafarers didn't begin with P&O Ferries, nor will it end there, unless more is done.

We are calling for the next government to:

- Amend the Trade Union and Labour Relations (consolidation) Act 1992 to close loopholes to compel companies to consult workers ahead of planned workforce changes.
- Outlaw fire and rehire.
- Enact a mandatory Seafarers Welfare Charter building upon the existing voluntary approach.
- Support the establishment and advancement of regulatory corridors between the UK and neighbouring countries, including the imposition of minimum wages as a floor, not a ceiling, and thus ensuring the adoption of local employment conditions.
- Review practice of 'offshore employment' with a view to ensuring that UK seafarers benefit from full UK employment and social protections.

Amend Trade Union and Labour Relations (consolidation) Act 1992 to close loopholes to compel companies to consult workers ahead of planned workforce changes.

The Trade Union and Labour Relations (consolidation) Act 1992 aided the actions of P&O Ferries in March 2022.

Despite the act placing an obligation on companies to consult unions, the penalty for failing to do so is limited to 90 days' pay per employee affected, enabling unscrupulous employers to precisely calculate the costs of ignoring the obligation.

The Act, rather than ensuring employers are compelled to consult, simply allows an employer to factor in the limited cost of not consulting, as P&O Ferries did. Under the same legislation, P&O Ferries

was not compelled to inform the UK Secretary of State for Business ahead of the sackings as the vessels were not UK registered. Instead, they were registered in Cyprus, Bahamas, and Barbados – all 'flags of convenience.'¹³

It's clear the Act is no longer fit for purpose and in the more than two years since P&O Ferries' actions, these loopholes have still not been closed.

Alongside these gaps, if an employer proceeds with sacking its employees without consultation or notice, there is no injunctive relief available to affected individuals or their representatives in the unions. This needs to change.

The Act must be amended to ensure employers are compelled to consult and to notify all relevant competent authorities, including flag and port state. Injunctive relief must be available if the companies fail to do this.

Outlaw fire and rehire.

Approximately 90 P&O Ferries employees were 'fired and rehired' in March 2022.

Fire and rehire is a coercive practice used by employers to unilaterally weaken their employees' terms and conditions, deliberately bypassing consultation with recognised unions.

Since P&O Ferries, Nautilus has had two instances of companies threatening to 'fire and rehire' their workforce if their employees refused to accept significant changes to their terms and conditions.

The code of practice introduced by the government does not go far enough. It does not stop an employer from using this tactic.

Fire and rehire must be outlawed, no less.

Enact a mandatory seafarers welfare charter.

The Seafarers' Welfare Charter, introduced in March 2023, was part of the government's nine-point plan for seafarers in the aftermath of P&O Ferries.

¹² See also the actions of Irish Ferries in 2005. The company dismissed 547 UK and Irish seafarers in similar circumstances. See article here for more details.

¹³ Flags of Convenience (FOC's) represent an abrogation of international law and the specific requirement of Article 91 of UNCLOS that there must exist a genuine link between the shipowner and the flag of registration. See also Footnote 2: Four of the five REG Category 1 registers are designated by the International Transport Workers' Federation (ITF) as FOCs.



However, the charter is fundamentally flawed as it is entirely voluntary. Ferry operators face no penalty for failing to comply.

The contents of the charter, while a step in the right direction, does not go far enough. Many of the obligations simply reiterate the employer's existing obligations under the Maritime Labour Convention (MLC). Such international minimums, which in the appropriate context are fundamentally important, will do nothing to support local jobs in our domestic maritime industry.

To ensure another P&O Ferries cannot happen again and improve employment standards across the ferry sector, the Seafarers' Welfare Charter must be made mandatory, as supported by the Transport Select Committee¹⁴, with significant improvements in the provisions contained in the charter including on pay and roster patterns. The French government has done this, and we should follow suit¹⁵.

Support the establishment and advancement of regulatory corridors between the UK and neighbouring countries.

Despite operating vessels between countries with broadly similar workers' rights and social conditions, P&O Ferries and other ferry companies operate under 'flags of convenience', some deploying international minimums in their employment of seafarers on these routes. These international minimums are much less than local standards and less than the UK Minimum Wage.

The UK government, working with neighbouring European states, should create regulatory corridors for ferry routes between these countries to ensure operators cannot exploit seafarers, often from developing countries, to the detriment of our domestic labour supply.

These corridors must go beyond just setting minimum wages, they should be underpinned by collective bargaining agreements between employers and trade unions in the respective countries. The government must act to ensure seafarers are employed on pay and conditions reflective of local standards, not international minimums.

Review practice of 'offshore employment' with a view to ensuring that UK seafarers benefit from full UK employment and social protections.

Offshore employment contracts are commonplace within the shipping industry with UK resident seafarers often being employed through places such as Guernsey, Jersey, Singapore and other jurisdictions. This leads to many UK seafarers being denied the same statutory employment rights as shore-based employees.

This practice helps shipping companies to avoid paying employer national insurance, pension obligations and other liabilities in the UK while often limiting the legal recourse employees can avail of if they have been treated unfairly.

The situation is somewhat complex but can be explained as follows:

A UK resident seafarer working for a ferry company between Dover and Calais is employed through a holding company in Jersey. This seafarer is entitled to employment law protections in the UK as the employee is based in the UK for work purposes, because that is where the seafarer joins and leaves the ship.

A UK resident seafarer working for an international cargo company transiting internationally is employed through a holding company in Singapore and joins the ship outside the UK. This seafarer is not entitled to employment law protections in the UK as they are not based in the UK for work purposes and nor does their employment have a sufficiently close connection with the UK. The seafarer may be entitled to the employment protections of Singapore, but this is not certain as each case depends on its facts.

We are calling on an incoming government to review this practice and make recommendations on the desirability of seafarers being required to have contracts of employment that are subject to UK law and jurisdiction. This would help them to access UK statutory rights, increasing their prospects of meeting the 'close connection' test.

¹⁴ <https://committees.parliament.uk/work/6555/maritime-2050-objectives-implementation-and-effects/news/194252/government-should-invest-in-maritime-tech-cleaner-fuels-and-workforce-transport-committee-says/>

¹⁵ <https://www.nautilusint.org/en/news-insight/news/france-institutes-new-minimum-wage-law-to-protect-ferry-crew/#:~:text=On%20Tuesday%202019%20March%2C%20the,least%20%C2%A39.95%20per%20hour.>





TURNING THE TIDE

CREATING A STRONGER DOMESTIC INDUSTRY

The incoming government should commit, in line with ambitions in Maritime 2050, to creating good maritime jobs and growing the UK Ship Register.

The next government should consider:

- Favourable procurement for UK flagged vessels with UK resident crew employed in offshore renewable energy.
- Deliver action plan to support the growth of UK flag.
- Review and modernisation of the Merchant Shipping Act 1995
- Introduce cabotage for UK domestic shipping.

Favourable procurement for UK flagged vessels with UK resident crew employed in offshore renewable energy.

The UK's offshore renewable industry is predominantly operated by companies which are fully or partially owned by stakeholders in other European nations.

The establishment and upkeep of UK wind farms are similarly managed by companies using vessels not registered in the UK, with officers and crew sourced from abroad.

Much of the UK government's investment in offshore renewable energy fails to generate employment opportunities for UK citizens. The introduction of the 'Offshore Wind Workers Concession' in 2017 allowed companies working in the offshore renewable sector to employ foreign nationals to cheaply replace British workers. That concession has now ended after six extensions and many UK resident seafarers losing employment opportunities, but the status quo is unacceptable.

The employment of non-resident seafarers, often from developing nations, at lower wages and under different conditions, discourages companies from investing in the training and employment of local seafarers in what is an expanding sector with significant public investment.

Facilitating high-quality employment opportunities in the offshore renewable sector is crucial to ensuring a just transition for seafarers currently engaged in the oil and gas industry, enabling them to find employment in the offshore renewable sector and to re-generating our coastal communities.

Companies committed to flying the UK flag and employing UK resident seafarers should be preferred in any public procurement process for supporting UK jobs, particularly within coastal communities.

Deliver action plan to support the growth of the UK flag.

In the aftermath of the P&O Ferries scandal, the UK Government committed to encouraging more ships to operate under the UK flag. However, no specific action plan accompanied this ambition to assist in making it a reality.

The serial decline in the UK flag is a national security issue. With rising geo-political instability, the historic low level of UK registered vessels would hamper the UK's ability to secure supply chains in the event of escalating global conflict.

During the Falkland's War, 44 Merchant Navy vessels were requisitioned by the state, including several P&O Ferries' vessels. The British Merchant Navy was critical to Britain's ability to mobilise a taskforce and ultimate victory.

Investment in the maritime industry to support the growth of the UK Ship Register and the training and employment of UK crew should be seen as an investment in our future national defence and resilience capabilities.

As an island nation that relies on over 90% of goods entering by sea, we must be able to ensure supply chains and seaborne trade are secured.

¹² See also the actions of Irish Ferries in 2005. The company dismissed 547 UK and Irish seafarers in similar circumstances. See article here for more details.

¹³ Flags of Convenience (FOC's) represent an abrogation of international law and the specific requirement of Article 91 of UNCLOS that there must exist a genuine link between the shipowner and the flag of registration. See also Footnote 2: Four of the five REG Category 1 registers are designated by the International Transport Workers' Federation (ITF) as FOCs.



Review and modernisation of the Merchant Shipping Act 1995.

The Merchant Shipping Act 1995 is a key piece of legislation governing the UK maritime industry.

If the incoming government is committed to turning the tide on the industry's decline, this legislation should be reviewed and modernised with a view to supporting the growth of the UK flag and training and employment of local labour. It should recognise UK seafarers as key workers.

It should compel government to prioritise maritime activity and ensure effective cross departmental coordinating to guarantee social and employment rights of seafarers are maintained even in the face of global health pandemics.

Any review and modernisation should be used to address the prevailing inequalities that are currently permitted as barriers to creating a vibrant maritime industry that aligns with the values of 21st century Britain.

Consider the scope for introducing cabotage

The UK is one of the few maritime nations without any cabotage laws, which has left our domestic industry susceptible to unfair competition.¹⁶

A future government should conduct a full review into the merits of introducing cabotage to extend the Seafarers Wages Act beyond the current limitations of 120 visits to a port and apply a mandatory Seafarers Welfare Charter to all vessels engaged in UK cabotage.

The rapid growth of offshore renewables is a prime example of a new and growing sector that can support coastal and left behind communities with training and job opportunities.



The next government must resolve themselves to work with unions and industry to reclaim our position as a pre-eminent maritime nation and restore our maritime heritage and pride

Mark Dickinson
Nautilus General Secretary

¹⁶ Seafarers Rights International identified that ninety-one member states of the United Nations have cabotage laws restricting foreign activity in their domestic trades. www.seafarersrights.org/seafarers-subjects/cabotage/





TURNING THE TIDE

UK AS AN INTERNATIONAL LEADER ON SOCIAL AND EMPLOYMENT RIGHTS

The maritime industry, the central nervous system of the global economy, is inherently an international activity. During the pandemic, the UK was one of the first countries to recognise seafarers as key workers. The UK must continue to grow its influence on the international stage to ensure continuous improvement for the social and employment rights of seafarers who are often exploited as a result of lack of enforcement of international regulations.

The incoming government must:

- Push for continuous improvement in the ILO Maritime Labour Convention (MLC) 2006.
- Ratify the ILO 185: Seafarers Identity Documents Convention (Revised) 2003.
- Tackle Flags of Convenience reinforcing Articles 91 and 94 of UNCLOS.
- Review support for the Red Ensign Group.

Push for continuous improvement in the ILO Maritime Labour Convention (MLC) 2006.

The Maritime Labour Convention (MLC) 2006 governs the international minimum standards in the social and employment protections of seafarers. The convention is governed by the International Labour Organisation's Special Tripartite Committee (STC) that brings together seafarers' trade unions, shipowners and member states. The next meeting of the STC is due to take place on 7-11th April 2025.

The next UK government must work with unions and employers to support amendments to the convention ahead of the 2025 meeting. The MLC was not conceived as a static document, the next government must work with its social partners to ensure the provisions of the MLC are continuously improved therefore extending the social and employment rights of seafarers across the globe.

Ratify ILO 185: Seafarers Identity Documents Convention (Revised) 2003

The UK, as of yet, has not ratified the Seafarers Identity Documents Convention (Revised) 2003. The convention aims to prepare a framework for states to issue seafarer identity documents (SIDs) in a more secure and standardised way.

If ratified, the convention would allow seafarers easier access to foreign ports, this would support seafarers in their transit through countries to join vessels. It would also support seafarers with access to shore leave and repatriation, rights which were denied during the pandemic as countries implemented lockdowns.

Tackle Flags of Convenience reinforcing article 91 of UNCLOS

Flags of convenience¹⁷ plague the global shipping industry. They are often defined by low wages, poor on-board conditions, long periods of work without proper rest leading to stress and fatigue. Over 40% of the world's commercial fleet fly under just three national flags; Panama, Liberia and the Marshall Islands.

The COVID-19 pandemic exposed the frailties of the global ship registration business typified by flags of convenience with thousands of seafarers, key workers, stranded at sea denied shore leave and repatriation, some even denied access to shoreside medical support. Many countries, including some of the World's largest flags, simply ignored the MLC, denying seafarers their basic social and employment rights.

The pandemic highlighted the urgent need for a review of global ship registration practices. The UK government must work with like-minded governments to push for a global review to consider how Articles 91 and 94 of the UN Convention on the Law of the Sea (UNCLOS) which provide for a 'genuine link' between vessel and country of registration and for the 'effective control' of ships are properly adhered to and enforced.

Review support for the Red Ensign Group

We also believe the UK government should review its support for the Red Ensign Group which represents unfair competition to the UK ship register (UKSR), with UK shipowners registering their ships with a flag of convenience in the group for example Bermuda, Cayman Islands or Gibraltar yet expect support from the UK government during times of crisis.

The UK government must prioritise growing the UKSR, not guaranteeing the existence of competing flag of convenience regimes.

¹⁶ Seafarers Rights International identified that ninety-one member states of the United Nations have cabotage laws restricting foreign activity in their domestic trades. www.seafarersrights.org/seafarers-subjects/cabotage/

¹⁷ List of FOCs as determined by the International Transport Workers Federation (ITF) Fair Practices Committee here





About Nautilus International

Nautilus International is an independent, influential, global trade union and professional organisation, committed to organising and campaigning for a future for maritime professionals, delivering high quality services to members, and maritime welfare support.

enquiries@nautilusint.org

Nautilus International offices

Head office

Nautilus International
Nautilus House
Mariners' Park
Wallasey
CH45 7PH, UK
T: +44 (0)151 639 8454

London office

Nautilus International
ITF House
49-60 Borough Road
London
SE1 1DR, UK
Tel: +44 (0)20 8989 6677

Switzerland office

Gewerkschaftshaus
Rebgasse 1
4005 Basel
Switzerland
Tel: +41 (0)61 262 24 24

Netherlands office

Nautilus International
Pegasusweg 200
3067 KX
Rotterdam
Netherlands
Tel: +31 (0)10 477 1188

Nautilus Welfare Fund office

Trinity House Hub
Webster Avenue
Mariners' Park
Wallasey
CH44 0AE
UK
Tel: +44 (0)151 346 8840

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ITF Seafarers' Trust
'Sea Water'
by Veejay E. Brodit
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