

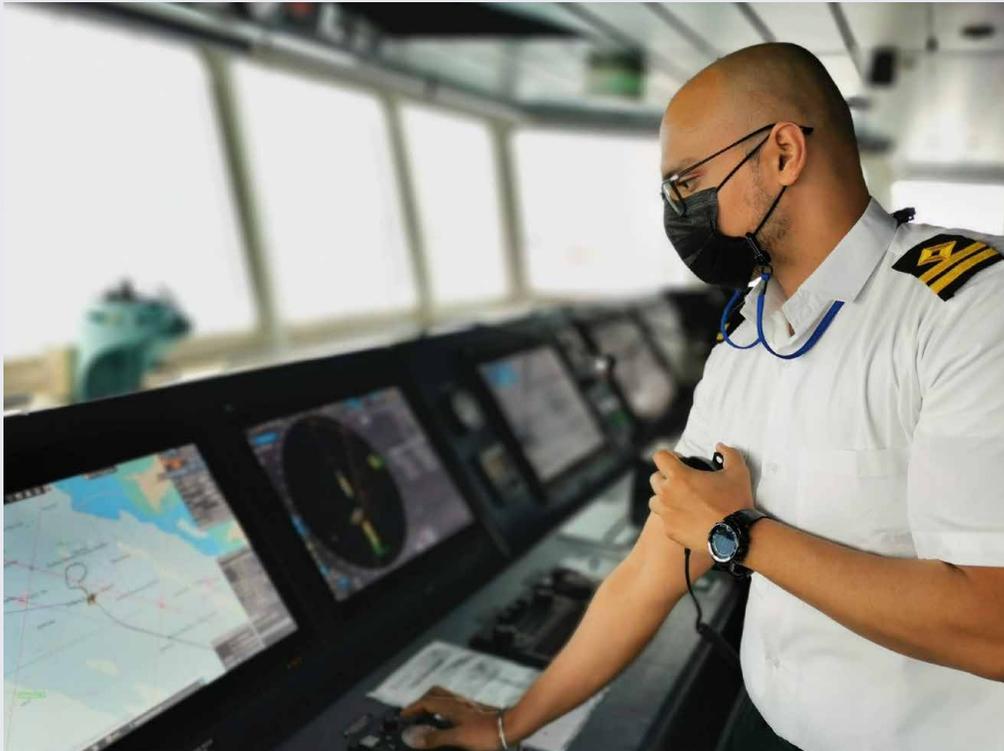


Delivering on seafarers' rights

2022 Progress Report



TABLE OF CONTENTS



About the authors	3
The Sustainable Shipping Initiative The Institute for Human Rights and Business	
Letter from leadership	4
Letter from a seafarer	5
Industry insights	6
LIFE AT SEA	
Mission to Seafarers International Transport Workers Federation Maritime Labour Convention, 2006: Seafarers' rights explained	
INDUSTRY ACTION	
Learning from the self-assessment questionnaire Building the Code of Conduct into binding contract conditions	
A look at the data	12
Data from the RightShip Crew Welfare Tool What does the data tell us?	
Call to action	20
Appendix	21

About the authors



The Sustainable Shipping Initiative

The Sustainable Shipping Initiative (SSI) is a multi-stakeholder collective catalysing change during this crucial decade of action for an environmentally, socially and economically sustainable shipping sector. Since 2010, SSI has brought together leaders across the maritime ecosystem to act on issues such as circular economy in shipping, seafarers' rights, and defining sustainability criteria for marine fuels. SSI's members include shipowners, operators and managers; cargo owners; classification societies; environmental and social non-profits; and service providers.

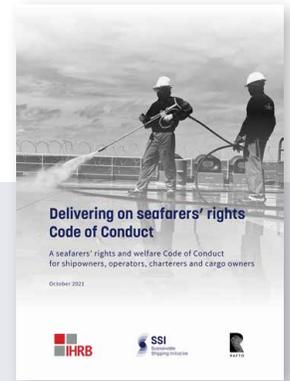
www.sustainableshipping.org

The Institute for Human Rights and Business



The Institute for Human Rights and Business (IHRB) is an international think-and-do with the mission to shape policy, advance practice, and strengthen accountability in order to make respect for human rights part of everyday business. IHRB works in various areas including the Built Environment, Migrant Workers, Just Transition, and Oceans. IHRB's [Ocean and Human Rights Platform](#) works specifically on [shipping](#), [ports and shipyards](#), [coastal wind energy](#), [aquaculture and fishing](#). The Oceans Platform focuses on the impacts of business activities on livelihoods and working conditions.

www.ihrb.org



IN COLLABORATION

IHRB and SSI, in collaboration with the [Rafto Foundation](#), in 2021 developed and published an industry [Code of Conduct for Delivering on Seafarers' Rights](#) with the aim of improving the human rights and welfare of the world's nearly two million seafarers.

The Code of Conduct can be used by shipowners and operators to realise if their current operations meet their seafarers' rights and welfare obligations. It is supplemented by a practical [self-assessment questionnaire](#) developed by IHRB and SSI in collaboration with RightShip, which provides guidance for companies on concrete ways to adopt the commitments outlined in the Code of Conduct and track progress against them.

Letter from leadership

AUTHORS: Frances House, IHRB; Andrew Stephens, SSI

The inaugural SEAFAIRER roundtable in Singapore on October 11th 2022 provided the ideal opportunity for stock-taking a year on from the launch of the Delivering on seafarers' rights Code of Conduct and Self-Assessment Questionnaire.

The discussion in Singapore, bringing together stakeholders across the seafarer ecosystem, allowed for qualitative reflections probing beyond the data and some of the persistent high-risk areas for seafarers, not least in this period of COVID recovery. While data in the Q3 2022 [Happiness Index](#) reports an increase in overall satisfaction among seafarers since the return to pre-COVID practices, ITF, Mission to Seafarers, ISWAN and others report continuing challenges including inadequate manning levels, excessive working hours, inadequate or non-existent shore leave, illegal recruitment fees and vessel abandonment, which quickly becomes a humanitarian crisis.

In addition to this, longer-term problems such as falling manning levels and issues with seafarer recruitment and retention outline some of the ways in which the COVID crew change crisis have permanently altered the landscape.

The roundtable saw shipowners, operators and cargo owners reiterate the hope that the Code of Conduct becomes mandatory across the industry, enabling a more level playing field and preventing a gap emerging between those implementing the Code and the rest of the global fleet. Recognising that verification and audits in isolation will never provide the full human rights picture, they are one critical part of the complex jigsaw and challenge of building a robust corporate accountability framework. **It is thus imperative now to focus on a robust, independent verification mechanism to build transparency and trust in the Code.** Verification is a clear next step, providing the assurance to, for example, enable cargo owners to include the Code in their contracts with shipping companies, moving from voluntary best practice to mandatory compliance.



Frances House
IHRB



Andrew Stephens
SSI

Beyond the nuts and bolts of the Code itself, it has provided a very valuable common reference point around which to convene multi-stakeholder dialogue, bringing together industry decision-makers, seafarers and welfare organisations to sit around the table and address areas of ongoing risk, exploitation, remedial measures and ways to tackle root causes of problems. The Code also serves as a constant reminder that, in a highly competitive and often data-driven industry, at its operational heart are **vulnerable individuals whose dignity and rights must be protected and upheld.**

As always, there are valuable lessons to be learned from human rights compliance in other sectors – successes and shortcomings – to inform this process. Shipping does not exist in a vacuum, and learning from those around us as well as sharing our learnings with others can create space for dialogue and collaboration and raise the bar for human rights across sectors.



Letter from a seafarer

AUTHOR: Anonymous, provided by Mission to Seafarers

“ I want to know that seafarers are appreciated and valued; that people around the world better understand how they rely on us. ”

Anonymous

Provided by Mission to Seafarers

The past couple of years have been more difficult than I can explain. There is no point looking back though, we should use the pandemic as a force for positive change and progress.

There are fundamental issues that need to be addressed. You will probably not be surprised to hear what they are. These are the basics of what it is to be at sea today: shore leave, connectivity and contracts. If we manage to make these better, then lockdowns, port bans, and vaccination worries will not have been in vain.

What the pandemic has done is highlight the problems, now we must make things better. With shore leave comes a chance for respite, to have a break, to see places, to reconnect and enjoy the world. At present, too many of us view port calls as a stressor which leads to more work.

With enhanced, improved and cost-controlled connectivity comes a chance to feel closer to home, an opportunity to talk and enjoy the bonds of loved ones. It also means that we can be proud of our jobs, of our ships, and share what we do.

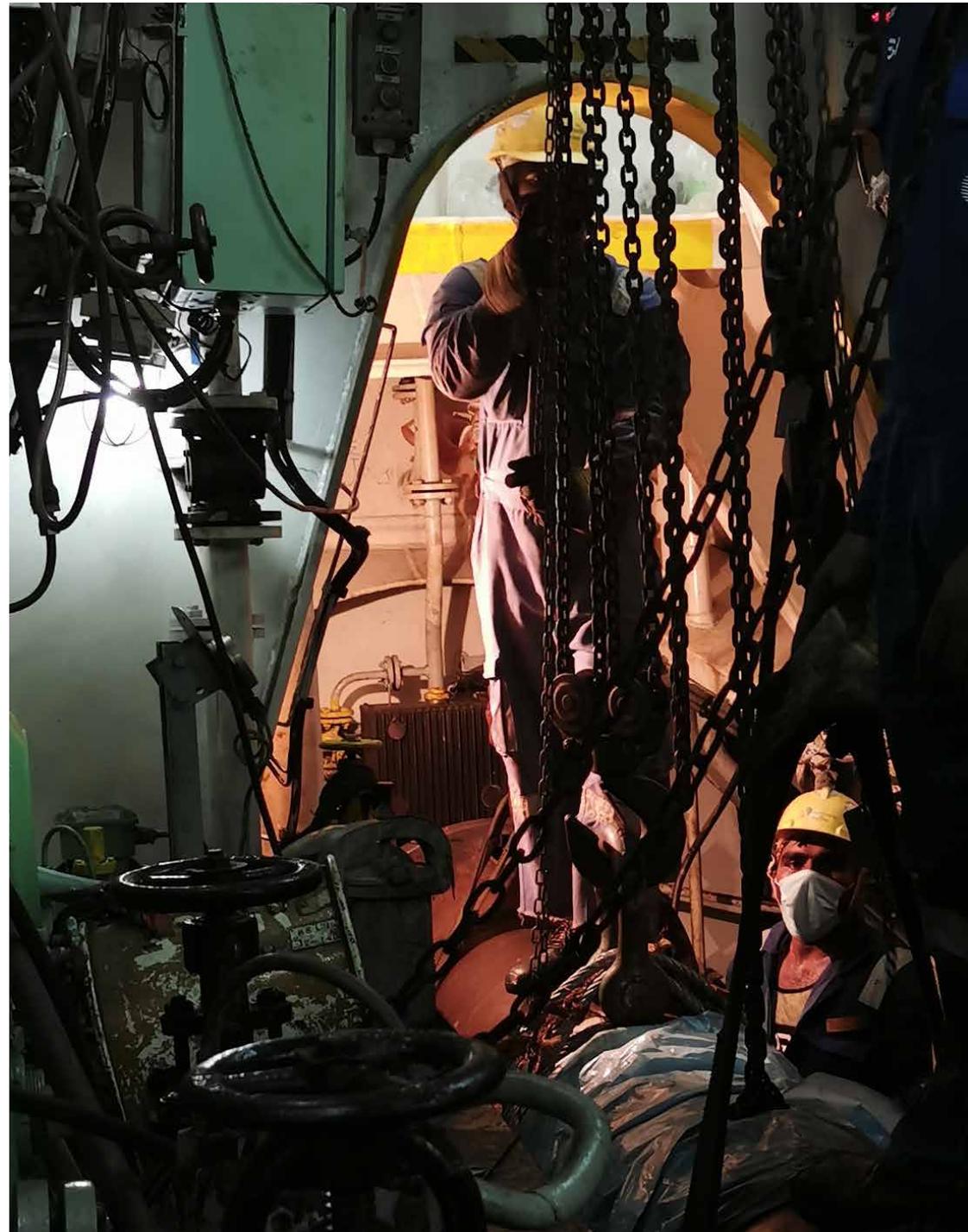
The issue of contracts is important, and it is not just about a fair and decent wage. This is about crew changes, and the need to ensure that people who have legally, figuratively, and emotionally reached the end of their time on board can go home to their loved ones. Keeping people at sea for any longer than is necessary, or desired, is bad for everyone. This needs to be fixed.

There is perhaps one more wish. I want to know that seafarers are appreciated and valued; that people around the world better understand how they rely on us. Without us... well, you know – but I want everyone else to know, too.

Industry insights

The Code of Conduct establishes a baseline understanding of a company's operations and their delivery of seafarers' rights. The past year has seen seafarers continue to face uncertainties and changing restrictions, and it remains as important as ever to provide the tools and guidance needed for more stakeholders to acknowledge and begin assessing their obligations to seafarers.

A year after its initial publication, the below is a set of reflections from seafarers' rights organisations, shipowners and a cargo owner on how the situation has changed in the past twelve months, how the Code of Conduct has assisted companies in their due diligence work, and a reminder to continue raising awareness of and working toward solutions to the issues faced by seafarers worldwide.



LIFE AT SEA

Mission to Seafarers

AUTHOR: Ben Bailey, Director of Programme, Mission to Seafarers



At The Mission to Seafarers, we have seen first-hand what happens to crews when their rights are denied. The threat of abandonment and the denial of shore leave are just two instances which can make a life on the ocean wave unpalatable. Throw in a global pandemic, and the situation becomes intolerable.

COVID-19 has taken a toll on seafarers' mental health and wellbeing. Through our ship visiting welfare programme in 200 ports across 50 countries, digital chaplaincy services and mental health and wellbeing resources, we have been inundated with requests for assistance. Crews have spoken of being tired and exhausted; of being treated as pariahs – unwelcome in port for fear of bringing the virus with them. There has, of course, been a cost to this, and we have seen a significant rise in mental health concerns for crews unable to step ashore. For some, the pressure has been so great, they have sadly taken their own lives.

The pandemic has also shone a light on abandonments, which now stand at a record high for the second consecutive year with no let-up in sight. Our teams have delivered food and water to those left with nothing, lobbied shipowners and flag states, and worked with partners to get crews remunerated and repatriated. But there is more to be done. For all the industry focus on abandonments, crews continue to be exploited with unenforceable contracts, broken promises and false hope, all the while enduring mental torture at theirs and their family's situation.

The pandemic has reaffirmed our view that seafarers are still misunderstood by the world, and that in most capitals, they remain a low to non-existent priority. As we enter a new post-pandemic world it is vital that we remember and protect the seafarers to whom this world owes a significant debt.

SEAFARER ABANDONMENT: A GROWING ISSUE

The 2001 IMO/ILO [guidelines on provision of financial security in case of abandonment of seafarers](#) define abandonment as follows:

***Abandonment** is characterised by the severance of ties between the shipowner and the seafarer. Abandonment occurs when the shipowner fails to fulfil certain fundamental obligations to the seafarer relating to timely repatriation and payment of outstanding remuneration and to provision of the basic necessities of life, inter alia, adequate food, accommodation and medical care. Abandonment will have occurred when the master of the ship has been left without any financial means in respect of ship operation.*

Abandonment cases are tracked through a [joint IMO and ILO database](#), which shows that in 2019, 40 instances of abandonment were recorded (affecting a total of 474 seafarers). In 2021, the number of new cases rose to 95. In the first half of 2022, 74 cases were reported.

Sources: <https://www.imo.org/en/OurWork/Legal/Pages/Seafarer-abandonment.aspx> ; <https://www.imo.org/en/MediaCentre/MeetingSummaries/Pages/C127Summary.aspx>

International Transport Workers Federation

AUTHOR: Ruwan Subasinghe, Legal Director, ITF



The International Transport Workers Federation (ITF) represents 40 million transport workers, including over 600,000 seafarers who are members of ITF affiliated unions. ITF works to improve conditions for seafarers and helps crews regardless of nationality or vessel flag, on an individual level as well as through government and industry advocacy.

ITF also has a network of 140 inspectors who carry out over 10,000 ship inspections a year to ensure the seafarers have decent pay, working conditions and living conditions.

ITF welcomes the publication of the Code of Conduct for Delivering on Seafarers' Rights last year - and is supportive of any meaningful and accountability-based initiative designed to improve seafarers' rights and welfare. All actors in the shipping industry have a responsibility to prevent the exploitation of seafarers and to ensure that their internationally recognized human rights are respected.

But a voluntary standardized tool like this is just a start. The Code of Conduct should be included in charter party agreements, charterers should refuse to work with shipowners who do not meet the standards of the Code of Conduct, while at the same time supporting shipowners in their improvement efforts; they should set targets on the number of ships that meet the Code of Conduct (as stipulated in the Code). Shipowners and operators should publish their performance on the self-assessment questionnaire, they should set public targets for improvement, and chart their progress. Stakeholder engagement with representative trade unions will be critical to achieve this goal as is ensuring collective bargaining coverage of vessels.

In addition to this, the Code of Conduct and self-assessment should undergo a periodic review to ensure that standards do not deteriorate and to maintain a high level of ambition.

ITF offers to work with companies to help them better understand their shipping and maritime service suppliers, and can advise them about concrete steps they can take to prevent and address human rights violations in their shipping supply chains. Companies are encouraged to email seafarershrdd@itf.org.uk to begin or continue their human rights due diligence journey.

Maritime Labour Convention, 2006: Seafarers' rights explained

AUTHOR: Mark Dickinson, General Secretary, Nautilus International



The MLC, 2006 consolidates various instruments adopted over many decades by the International Labour Organization (ILO) for the benefit of seafarers. **Over 100 states, including all the major flag states, have signed up, accounting for over 90% of the world's merchant fleet.** These states must implement the whole suite of rights within the MLC.

The MLC is a 'living instrument', amended through meetings of the ILO Special Tripartite Committee (STC) of seafarer representatives, governments, and shipowners. In May 2022 the seafarers' group, led by Nautilus International general secretary Mark Dickinson, put forward a suite of proposals, in particular, addressing problems that arose during COVID.

Eight amendments were agreed upon, including:

- Seafarers must receive free, good-quality drinking water
- Seafarers must have access to nutritious, well-balanced meals
- Seafarers must be provided with social connectivity by shipowners, including internet access, and charges, if any, should be reasonable. Port states should also provide internet access in port
- Seafarers are entitled to appropriately sized personal protective equipment (PPE)
- Recruitment and placement services must provide seafarers with details of their system of protection and compensation if a shipowner fails to meet its obligations to them
- States must facilitate the prompt repatriation of abandoned seafarers
- States must provide medical care for seafarers in need of immediate assistance and facilitate the repatriation of the remains of seafarers who have died on board
- All deaths of seafarers are to be recorded and reported annually to the ILO, which will publish the relevant data

Two amendments were 'parked' because an agreement was not reached. These covered the maximum period on board a ship before a seafarer has a right to be repatriated (from the current 12 months to a proposed 11 months – the de facto limit), as well as the cost of repatriation expenses, which the proposed amendment sought to ensure covered the entire journey from the ship to the seafarer's home. Both of these issues became acute during COVID, and the seafarers' group will return to these matters at STC5 in 2025.

INDUSTRY ACTION

Learning from the self-assessment questionnaire

AUTHOR: Simon Bennett, General Manager – Sustainable Development, Swire Shipping



Swire Shipping completed the Self-Assessment questionnaire in early 2022. I am sure that, like many of our peer group, we believe that we treat our crew with the greatest respect that they are due; and this is especially so after the difficult and unforeseen operational and logistical hurdles that we have all had to surmount the past two years during the Covid pandemic.

We are very satisfied that we scored as we did.

For us, the questionnaire provided the benefit of “a second pair of eyes”. In this particular case, the self-assessment questionnaire was compiled with technical expertise both within the shipping sector but crucially also from human rights stakeholders including IHRB, which is concerned with

raising human rights standards and bringing attention to the social leg of the Environment, Social and Governance (ESG) trial across all sectors.

Through this multi-stakeholder process, we ensure that we are not just accepting things as they’ve been previously done by our own industry or only meeting the minimum legal requirements, but bringing in expertise and best practice from the human rights space. For us, this has been a valuable exercise – in particular where we see good but not perfect ratings, prompting us to reflect on areas where we (and many others) can still do better.

We have thus taken all the ratings on board positively. In broad terms, we agree with the majority and have accepted

and adopted the intent to attend to them over the next twelve months, as well as to go reasonably beyond regulatory compliance.

This was a very useful and long overdue exercise, and we intend to continue self-assessing as a way to track progress and demonstrate our striving for continuous improvement in both our own processes and in the respect we pay our seafarers.

Building the Code of Conduct into binding contract conditions

AUTHORS: Sustainability and Human Rights Team, Cargo Division, MSC Mediterranean Shipping Company SA (MSC); Ethical Sourcing Team, Coles Group



Evolving geopolitics, developments in the corporate due diligence landscape, and the pandemic, led to an evolution in the human rights landscape for seafarers in recent years. As a result, MSC Mediterranean Shipping Company SA (MSC) witnessed an increase in human rights-related contractual requirements in commercial contracts between shipping companies and their customers. Promoting the respect of seafarers' human rights and wellbeing has become even more critical for a successful and sustainable shipping industry. A safe, healthy, and secure work environment for seafarers benefits everyone by facilitating a safe, secure, resilient, and smooth flow of goods around the world.

In light of the above considerations, and in line with its commitment to advance the global Business and Human Rights agenda, MSC has strengthened its advocacy work with regulators and the international community, calling for official guidance to support companies using ocean transportation in aligning due diligence processes. Through the Responsible Shipping Dialogue, MSC has engaged with major cargo owners, NGOs, seafarers' representatives

and others to suggest practical ways of translating key requirements included in the **Code of Conduct for Delivering on Seafarers' Rights** into model clauses for relevant stakeholders to add to contracts.

To build on this momentum, MSC has also been collaborating with customers and business partners to raise awareness of the need to address human rights standards for seafarers in due diligence processes. Efforts in this regard focus on operationalizing the United Nations Guiding Principles on Business and Human Rights (UNGPs) by promoting a shift from a "traditional" approach to Human Rights Due Diligence (HRDD) to a "risk-based approach" based on shared responsibility. This resulted in enhanced cross-sectoral collaboration, enabling stakeholders to better understand and address the root causes of systemic human rights and broader social challenges across supply chains.

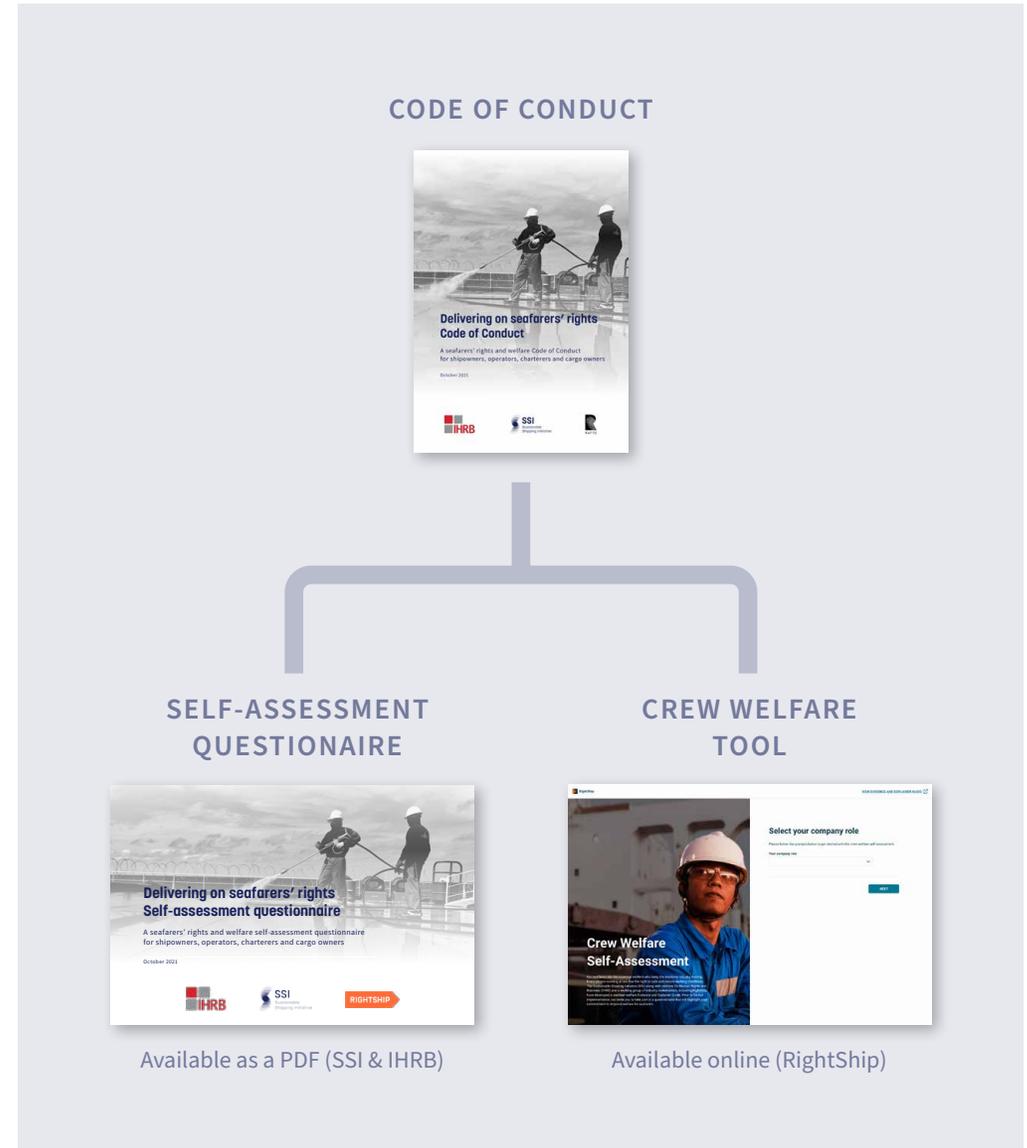
MSC and the leading Australian supermarket and retailer Coles Group (Coles) have included specific clauses in their commercial contract related to the wellbeing of

seafarers with a focus on human rights and modern slavery risks arising from the pandemic. In addition to this, 2021 saw MSC and Coles embark on a pilot project to track how vessels used to transport Coles' shipments are implementing human rights-related contractual compliance requirements. This is the first agreement of its kind between MSC and a customer. Out of more than 200 vessels used for Coles' shipments across different international trade lines in the contract period, MSC tracked and reported on 842 seafarers on board of the agreed monitored vessels. Initial results revealed that COVID-19 related challenges remain. In some instances, seafarers' shore leave was not possible due to different ports' COVID-19 restrictions, resulting in two seafarers having to stay on board longer than 11 months. This situation was directly proactively handled by MSC by requesting ad hoc flag states' permission. The partnership between MSC and Coles on this pilot project has highlighted the value of building strong relationships between suppliers and customers to unlock opportunities for leadership and collaboration.

A look at the data

The Code of Conduct is supplemented by a practical self-assessment questionnaire, developed in collaboration with RightShip. This tool, which is available as a PDF on the SSI and IHRB websites as well as through the RightShip Crew Welfare Tool, provides guidance on how to adopt the commitments outlined in the Code of Conduct, as well as a way to track progress year on year.

Below, we are happy to share snapshots and reflections of the data one year after its launch, celebrating those who have taken steps to self-assess as well as highlighting areas for further work and progress.



Data from the RightShip Crew Welfare Tool

AUTHOR: Steen Lund, CEO, RightShip

RIGHTSHIP

The Crew Welfare Self-Assessment Tool was designed to sit alongside the Delivering on seafarers' rights Code of Conduct. It supports shipowners, managers and operators to understand their responsibilities, while assessing current operations and ways of working. Those completing the assessment are shown areas for improvement and can track progress to new and higher norms over time.

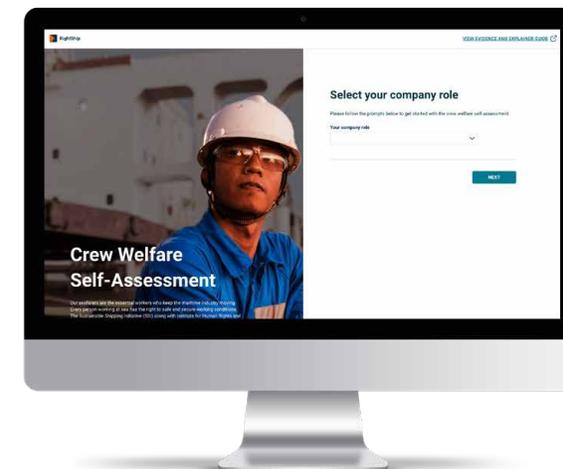
Launched in October 2021, uptake was rapid, with 122 companies, or 3,564 vessels, signing up in the first few months.

From January 2022, changes were made by RightShip to the way the assessment tool should be used. The addition of various documentation verification requirements and justification comment sections strengthened the validity of the self-assessment by allowing for independent verification of the claim attainment level.

As of 5 October 2022, the self-assessment has been completed by 181 DOC companies, covering over 5,632 vessels, and RightShip continues to work with those organisations part-way through the assessment to encourage them to finish.

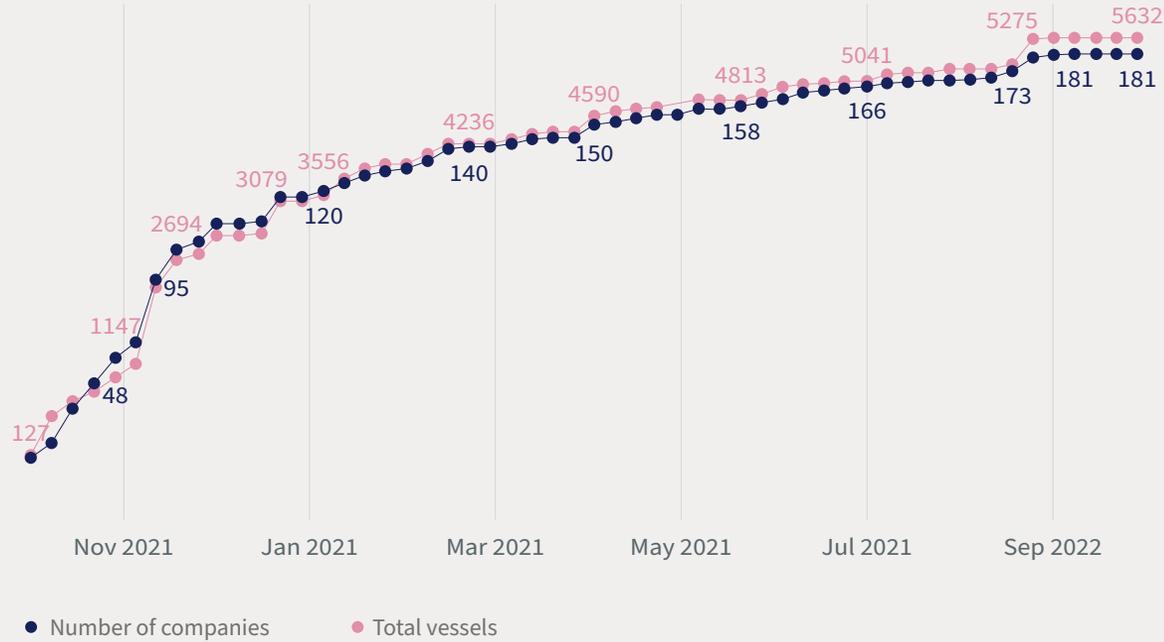
In a sector facing accusations of neglect and indifference, and potential crew shortfalls running into tens of thousands, concrete action on crew welfare is urgently needed. Those completing the self-assessment are showing their commitment beyond compliance conditions, for the seafarers who call their vessels home.

As pressure builds from consumers keen for global organisations to do the right thing, we hope that the Crew Welfare Self-Assessment Tool will develop further, and the potential exists to add verification during a vessel inspection, lifting standards and supporting the maritime industry with a zero-harm vision.



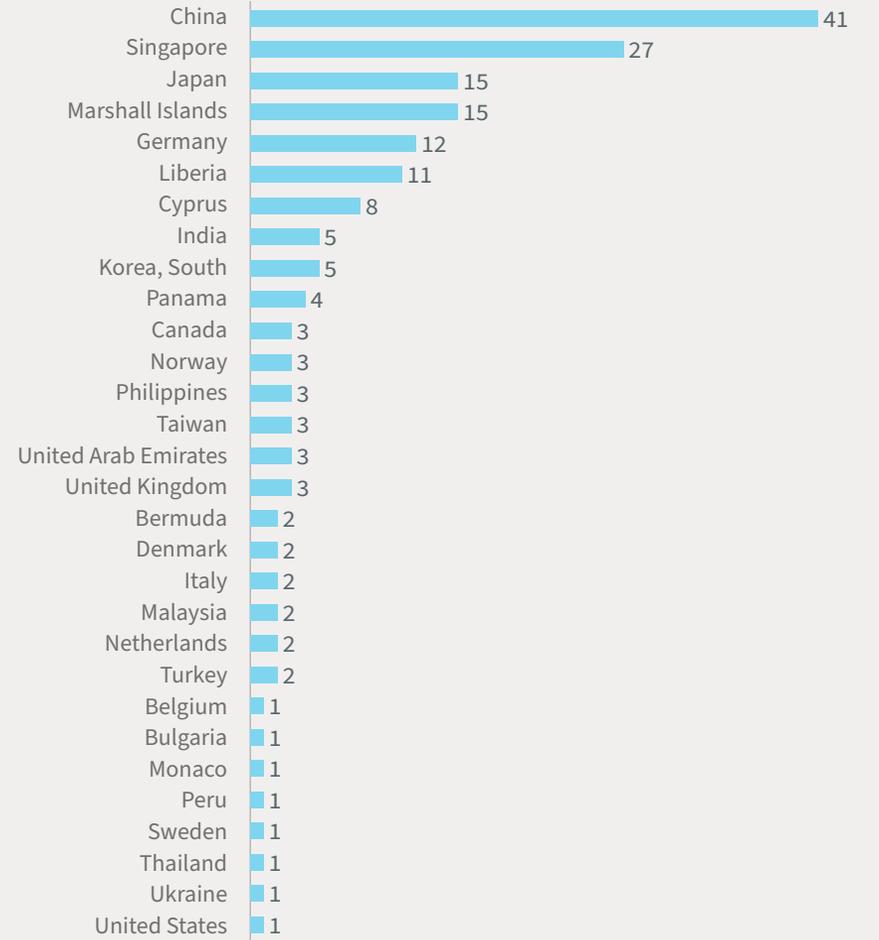
“ Those completing the self-assessment are showing their commitment beyond compliance conditions. ”

Total completed and acceptable submissions by month



Companies by country of registration

Number of DOC companies



188

Total forms

181

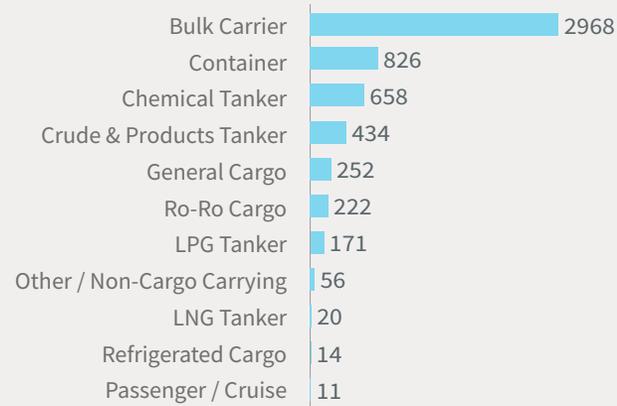
Number of DOC companies

5632

Number of vessels

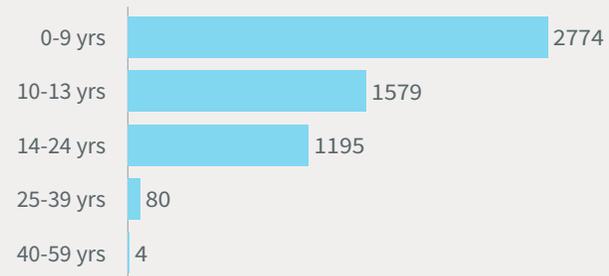
Vessel breakdown by type

Number of vessels (in trading or repair)



Vessel breakdown by age group

Number of vessels (in trading or repair)



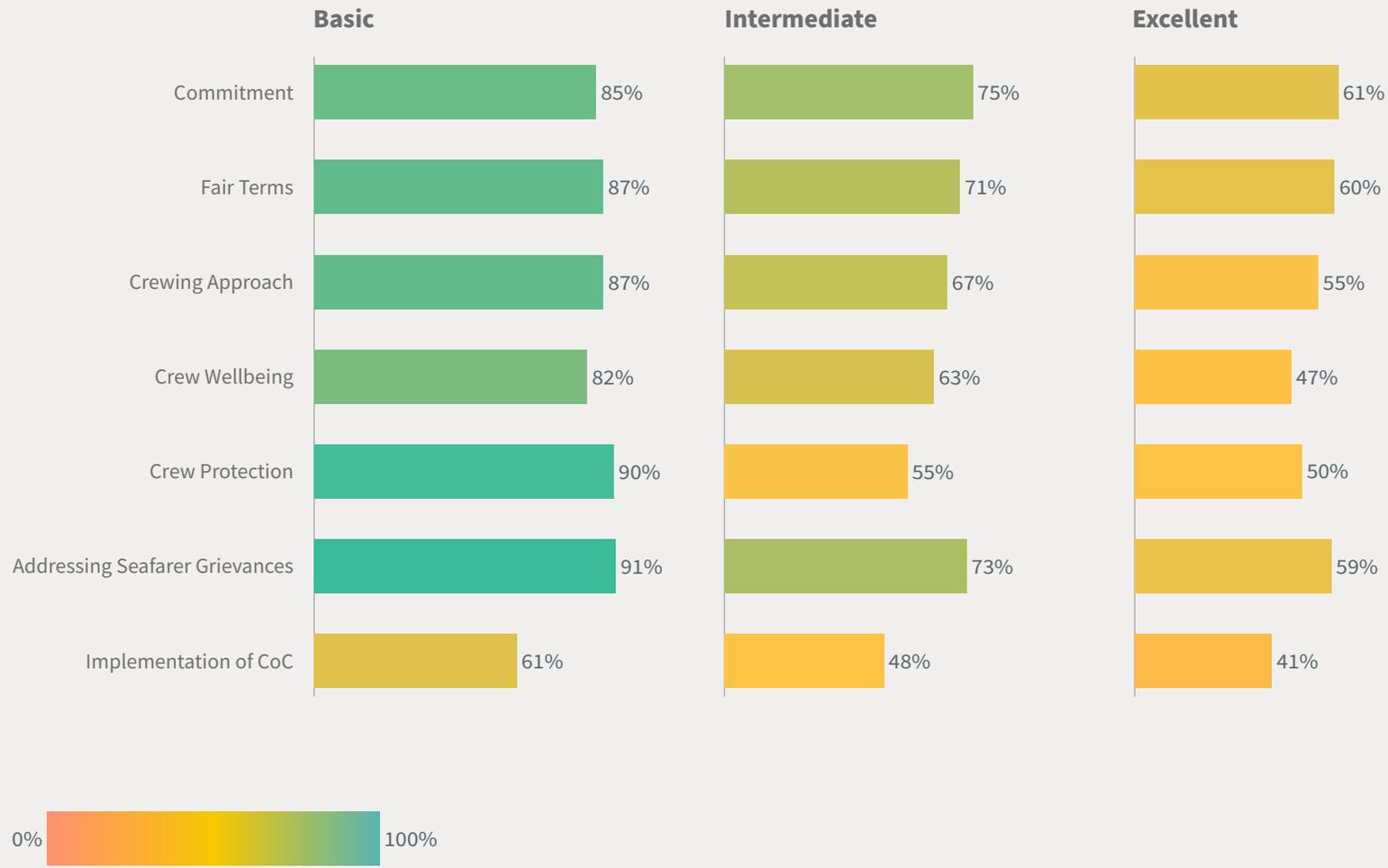
Percentage of Yes answers for Yes/No questions

MAIN SECTION	QUESTION (SUMMARY)	% OF ANSWERS WITH YES
Commitment	1.1 Has Written Commitment	98%
	1.2 Has Management System	99%
	1.8 Has Not Circumvent Rules	96%
Fair Terms	2.1 Has Forced Labour Prohibited	98%
	2.2 Has Verification No Fraud	96%
	2.3 Has Other Costs Prohibited	99%
	2.5 Has All Destination Paid	99%
	2.7 Join Workers Union	86%
Crewing Approach	3.4 Has No Operation Short Handed	93%
Crew Protection	5.1 Has Security Management System	97%
	5.3 Has Armed Private Security	92%
	5.4 Has Rights Protected	95%
	5.5 Has MLC Compliance	99%
	Addressing Seafarer Grievances	6.3 Has Protection Against Retaliation
Implementation of CoC	7.1 Has Access To Information	89%
	7.2 Has Code Of Conduct Communicated	83%
	7.3 Has Yearly Self-certification	71%
	7.4 Has Demonstrated Compliance	79%
	7.5 Has Easy Access For Audits	85%
	7.7 Has Best Practices Shared	78%

● 90 – 100% ● 80 – 90% ● 70 – 80%

See [Appendix](#) for table containing full question text

Percentage of boxes ticked by level and section



THREE DIFFERING LEVELS OF ACHIEVEMENT:

Basic

requires fulfilling all requirements at the basic level.

Intermediate

requires fulfilling all requirements at the basic and intermediate levels.

Excellent

requires fulfilling all requirements at all three levels.

Overall average percentage across all levels and sections

55%

What does the data tell us?

AUTHOR: Andrew Stephens, Executive Director, Sustainable Shipping Initiative



Following the launch of the Code of Conduct and self-assessment questionnaire in October 2021, we saw a promising initial uptake of the Code, with companies quickly submitting self-assessments via the RightShip Crew Welfare Tool. Although the curve has tapered out now, the number of shipowners, operators and managers, as well as the number of vessels covered, continues to grow.

As of 5 October 2022, submissions cover just under 10% of the ocean-going fleet capacity.



A FEW NOTABLE TRENDS IN THE SUBMISSIONS TELL US MORE ABOUT THE CURRENT COVERAGE:

- Bulk carriers make up over 50% of vessels covered, with the second largest group, containers, only making up about 14%.
- Similarly, just under 50% of vessels covered are 0-9 years old, and 77% of vessels are under 14 years old.
- Shipowners, managers and operators who have used the Crew Welfare Tool are predominantly from Asian countries, with a majority of companies using the tool from China (23%), Singapore (15%), Japan (8%), followed by the Marshall Islands (8%).
- When looking at number of vessels, China (28%) and Singapore (18%) remain the top two, followed by Germany (8%) and Japan (7%).
- The average fleet size per company is +/- 30 vessels.

This reflects the reach of the Crew Welfare Tool thus far, which has been impactful, though narrow in scope. We can thus identify key areas for further action and promotion for the Code of Conduct and self-assessment.

Across 42 questions on sections 1-7 (those targeted at shipowners, operators and managers which are covered in the RightShip Crew Welfare Tool), a total of twenty were simple yes or no questions. On average, 91% of these were answered positively. However, we see a range of percentages across these twenty questions, with 97% answering positively to a clear compliance-based clause, e.g. 5.1. which reads “[The shipowner/operator] has a security management system to protect seafarers from piracy and other criminal activity. The system provides appropriate preparatory training for seafarers and for armed security personnel, and it includes anti-piracy non-lethal weapons.” Conversely, only 86% responded positively to clause 2.7, “Under contract agreement, all seafarers are free to join a workers’ union of their choice.”

Questions in section 7, which dealt with the implementation of the Code of Conduct, achieved lower positive levels. However, positive answers in this section could be expected to grow as companies have more time to implement the Code.

Credibility remains a concern as self-assessments are not vetted and not mandated to be made public. We hope that as companies embed the Code of Conduct into their internal processes and reporting cycles, we will begin to see more verification and transparency around actions taken to implement these tools, leading to measurable and consistent improvements on conditions impacting seafarers.

The final chart addresses the set of questions with three differing levels of achievement: basic, intermediate (which requires fulfilling all requirements at the basic and intermediate levels), and excellent (which requires fulfilling requirements at all three levels).

The responses highlight areas for improvement and prioritisation. For example, section four (Crew wellbeing, which deals with physical and mental wellbeing for seafarers) had some of the lowest consistent rating in terms of percentage meeting the basic level (**82%**), intermediate level (**63%**), and excellent level (**47%**).

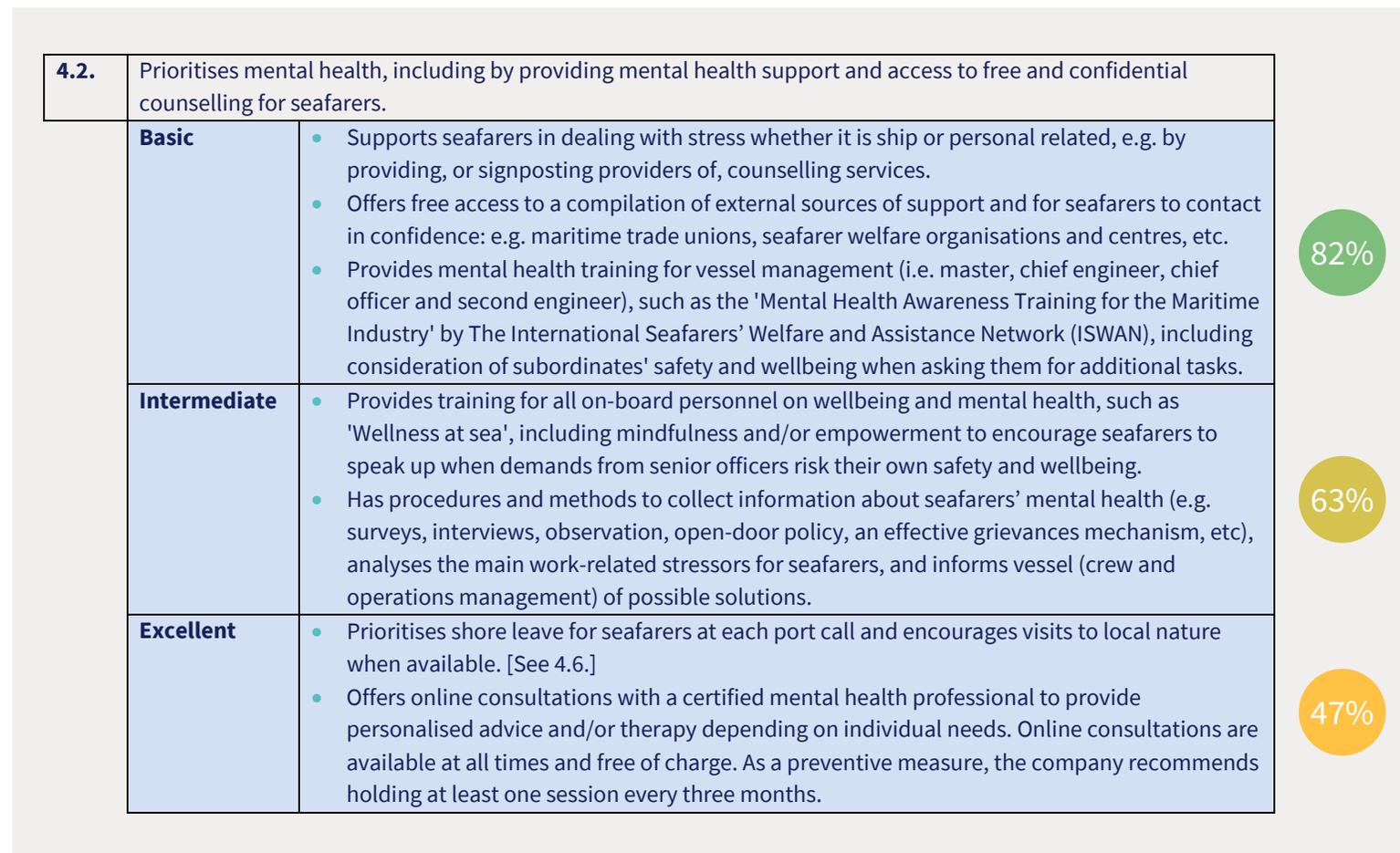


FIGURE 1: Question 4.2 from the self-assessment questionnaire, and percentage of scores achieved for each level

By contrast, sections one and two (Commitments and Fair terms of employment) achieved high overall scores, with over **85%** meeting the basic level, over **71%** the intermediate, and over **60%** the excellent.

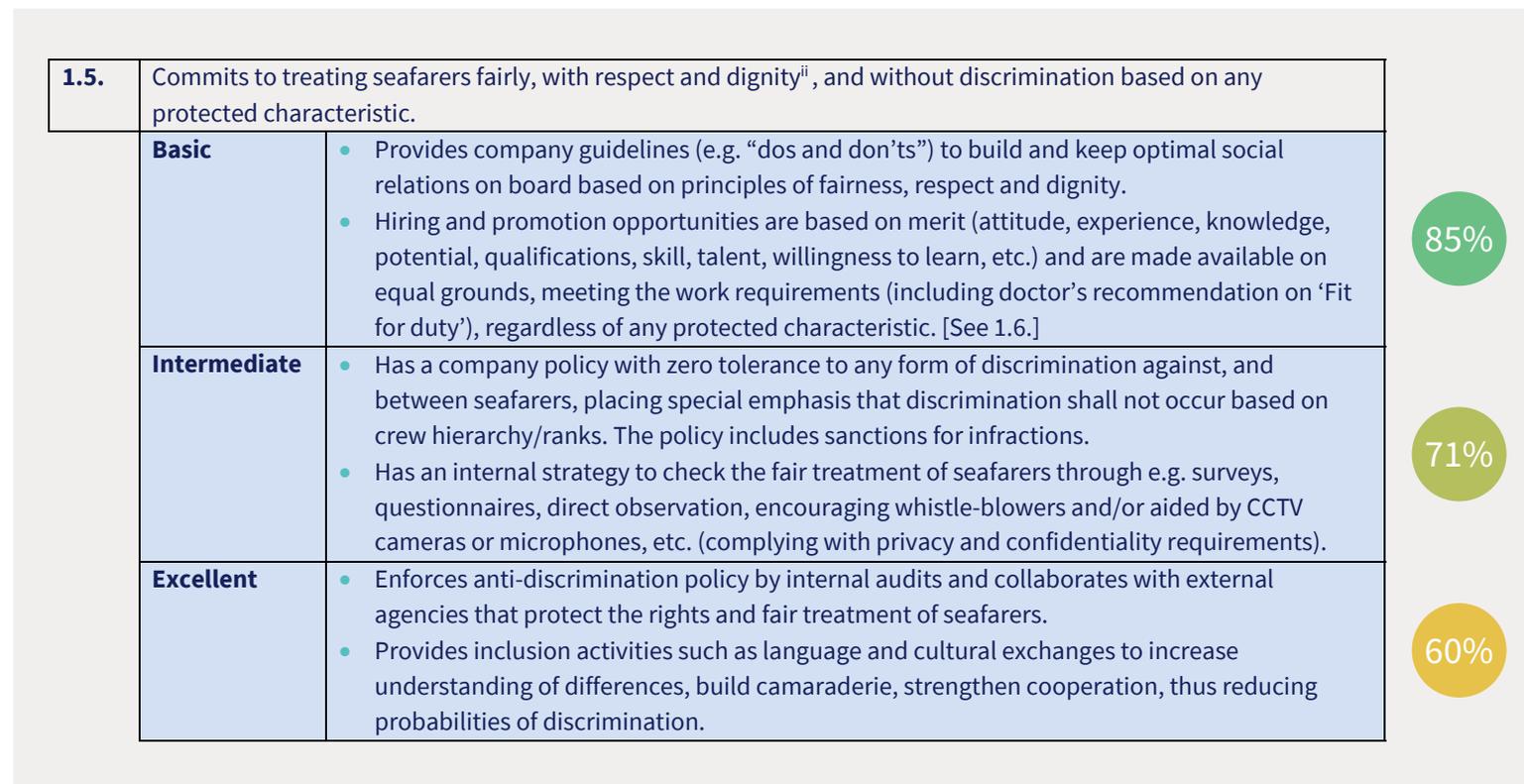


FIGURE 2: Question 1.5 from the self-assessment questionnaire, and percentage of scores achieved for each level

“ The results present a sober reflection of the current situation. ”

IN CONCLUSION

These responses are far from perfect, but they are not intended to be. Instead, they present a sober reflection of the current situation and emphasise the need to continue making improvements and tracking progress. There is much to do by all stakeholders involved, from sharing best practice with one another, to ensuring that their seafarers are aware of their rights, as well as any resources and grievance mechanisms available to them.

Call to action

AUTHOR: Olivia Swift, Senior Programme Manager, Lloyd's Register Foundation



As any trade unionist will tell you, securing the rights of workers is a work in progress, and given its complexities, this is certainly the case for the global maritime industry. 'Progress' is the keyword: for shipping to be safe and sustainable, especially as it faces the twinned, mighty challenges of digitising and decarbonising, its seafarers need to be safe and secure, with decent work and living conditions, fair employment terms, wages and social protection. In the 21st century, it should not need to be a big ask, yet unpacking and addressing the constituent parts of that list can seem daunting.

The Code of Conduct provides comprehensive and practical guidance for shipowners and charterers to take stock of their performance supporting seafarers' rights. In the process, they can access guidance about what to do under each clause. When topics such as 'wellbeing' are so diverse, this broken-down, practical support is invaluable. Catering for

the perspectives of both owners and charterers is important, as both have a role to play and need to work together in support of seafarers, on whom both rely.

The first year of the Code of Conduct has been beneficial in establishing the basic knowledge and a baseline for shipowners and charterers to track progress against. But we can't stop there.

We have a shared responsibility to ensure that seafarers benefit from the Code of Conduct. Sharing lessons learned and reflecting on what has worked and what hasn't will benefit all using the Code and self-assessment. Sharing how timely, cost-efficient and effective changes can be rolled out beyond immediate users will grow the benefits of these tools and contribute to an industry where seafarers' rights are respected for a safe and sustainable maritime future.



SHOWING SUPPORT

The Lloyd's Register Foundation is keen to continue its work with the industry towards a safer maritime sector, and is proud to have supported SSI and IHRB with its anniversary roundtable event in October 2022.

Appendix

Percentage of Yes answers for Yes/No questions (Full questions shown)

MAIN SECTION	QUESTION (FULL)	% YES
Commitment	1.1 Has a written commitment to valuing seafarers, including by respecting their human rights, and to complying with the MLC which reinforces seafarers' human rights.	● 98%
	1.2 Has a management system, supported by appropriate staffing and procedures, to manage compliance with the MLC, other relevant health and safety requirements and this Code of Conduct.	● 99%
	1.8 Avoids seeking further exemptions over and above those already provided for in the statutory or regulatory framework related to human rights, including labour rights, environmental, health, safety or security, recognising that these rules are in place to protect seafarers, the public, the marine environment and the industry.	● 96%
Fair Terms	2.1 Prohibits forced labour, including through practices that can lead to forced labour situations, such as through debt bondage due to the payment of recruitment fees and related recruitment costs, by verifying that seafarers have not paid fees or other charges for recruitment or placement to a seafarer recruitment and placement service and includes this requirement in the shipowner's contracts with seafarer recruitment and placement service.	● 98%
	2.2 Verifies that seafarers have not been subject to fraud, substitution of contracts, or retention of passports.	● 96%
	2.3 Verifies that seafarers are not charged other costs that are prohibited by the MLC such as repatriation costs.	● 99%
	2.5 Pays seafarers from the time and destination of departure to join the ship to the time of return to the destination selected for repatriation.	● 99%
	2.7 Under contract agreements, all seafarers are free to join a workers' union of their choice.	● 86%
Crewing Approach	3.4 Does not operate short-handed (except in exceptional emergencies for the shortest time possible).	● 93%
Crew Protection	5.1 Has a security management system to protect seafarers from piracy and other criminal activity. The system provides appropriate preparatory training for seafarers and for armed security personnel, and it includes anti-piracy non-lethal weapons.	● 97%
	5.3 Ensures any armed private security providers on board have received training on the rules on the use of force and on respecting the human rights of those affected by security operations, including seafarers.	● 92%
	5.4 Commits to protecting the rights of their crews during any criminal investigations following accidents, including the seafarers' rights to avoid self-incrimination, to fair treatment, and to payment of wages, subsistence, accommodation and medical care.	● 95%
	5.5 Ensures that seafarers are not abandoned and complies with the MLC requirements on abandonment, including maintaining continuous financial security to cover abandonment of seafarers, and cooperates to resolve any relevant claims concerning abandonment.	● 99%
Addressing Seafarer Grievances	6.3 Ensures there is protection against retaliation, including no blacklisting by the shipowner, vessel operator or the seafarer recruitment and placement service for raising grievances.	● 97%
Implementation of CoC	7.1 Acknowledges that the charterer/cargo owner counterparty requires access to information about conditions for seafarers on its ships, subject to data privacy and confidentiality as relevant, to address the issues covered in this Code of Conduct.	● 89%
	7.2 Communicates the requirements of this Code of Conduct to its workers, and to any other entity responsible for the operation of its ships and recruitment and placement of seafarers, and ensures that it has the legal mechanisms to require compliance by them with this Code of Conduct.	● 83%
	7.3 Conducts an annual self-assessment against the requirements of this Code of Conduct	● 71%
	7.4 Maintains relevant documentation required to demonstrate compliance with this Code of Conduct and required laws and agrees to make such documentation available to the charterer/cargo owner counterparty and its designated auditor evidence of compliance if requested.	● 79%
	7.5 Facilitates access to its ships to conduct audits in line with this Code of Conduct if requested.	● 85%
	7.7 Agrees to share with the charter party, and across their value chain, cases of best practice and solutions derived from this Code of Conduct, for learning, knowledge exchange and continuous improvement in the industry.	● 78%

● 90 – 100% ● 80 – 90% ● 70 – 80%

[Back to relevant page](#)

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Thank you to those who provided insights, reflections and content for this report:

Coles Group
Lloyd's Register Group
MSC Mediterranean Shipping Company
Nautilus International
RightShip
Swire Shipping
The International Transport Workers Federation
The Mission to Seafarers

Partners and collaborators

Rafto Foundation for Human Rights
RightShip
The Mission to Seafarers

Delivering on seafarers' rights Working Group

Forum for the Future
Louis Dreyfus Company
Oldendorff Carriers
RightShip
South32
Standard Chartered Bank
Swire Shipping
Wilhelmsen Ship Management

Funders

This progress report and additional work in this area have been made possible by funding from the Lloyd's Register Foundation and the Swiss Federal Department of Foreign Affairs. We thank them for their continued support of this work.

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