

Strengthening Seafarer Protections

**TUC response to Department for Transport
consultation
July 2026**

Introduction

The TUC is the voice of Britain at work. We represent over 5 million working people in 47 unions across the economy. We support unions to grow and thrive, and we stand up for everyone who works for a living. We campaign for more and better jobs and a better working life for everyone.

The lack of employment protection for seafarers was demonstrated in March 2022 when P&O Ferries sacked 786 workers without notice by video call. Since then, RMT and Nautilus, supported by the TUC, have worked together to make the case for strengthening the employment rights of those who work at sea. We welcomed the Labour Party's commitment, in opposition, to create a mandatory Seafarers' Charter and the steps taken since the general election to put this into practice by taking powers in the Employment Rights Act to strengthen the rights of seafarers. We welcome this opportunity to respond to the government's consultation on Strengthening seafarer protections. We would also like to state our support for the submissions of our affiliates representing seafarers, Nautilus and RMT.

Question: Do you agree or disagree that the safe working and remuneration declarations should apply to all sea services between the UK and France and the UK and Channel Islands that visit a UK port at least 120 times a year?

Yes, we agree that safe working and remuneration declarations should apply to all sea services between the UK and France and the UK and the Channel Islands that visit a UK port at least 120 times a year.

However, this must be a first step towards requiring safe working and remuneration declarations on all sea services that call at a UK port above a minimum frequency threshold. We welcome the government's ambition to negotiate agreements with other countries on minimum wages and working conditions for seafarers on additional routes to and from the UK. We urge the government seek discussions with other governments as a matter of urgency priority, with particular priority given to routes to and from Ireland, Belgium and the Netherlands.

We believe there is a strong case for lowering the threshold of 120 calls at a UK port per year. We recognise that this would require amendments to the Seafarers' Wages Act which are outside the scope of the current consultation, but would welcome a commitment from government to review the threshold.

Question: Do you agree with the use of the remuneration regulations to require payment of the equivalent of the National Minimum Wage for the entirety of routes from the UK to France and the Channel Islands?

Yes, we support the proposal that UK minimum wage requirements will apply for the entirety of the route. This will lie alongside existing requirements to pay the French

minimum wage for the entirety of the route, meaning that seafarers must be paid whichever is the highest of the two minimum wages at any time. It is important that this is made absolutely clear to both employers and workers.

Question: Are there other types of remuneration that these powers should be used to regulate?

In addition to basic or regular pay, the regulations should cover holiday pay, sick pay and pensions.

Holiday pay is essential if workers are to be able to realise their basic right to take a holiday and have a period of time away from work. Sick pay is essential to enable workers to take time off when they are sick, which is vital to facilitate faster recovery, prevent illnesses from becoming more serious and to protect other seafarers from being infected. Adequate pensions are essential to enable seafarers to retire from a life at sea to live in dignity and security. All these should be included in mandatory standards.

Question: Are there any changes from the existing Seafarers' Wages Regulations relating to the calculation on NMW that should be applied to the remuneration regulations?

Operators should be required to include in seafarers' contracts both their hourly rate of pay and the number of hours they are expected to work, including overtime. The formulae used by the employer to calculate the overall hourly rate (which will usually include both basic pay and overtime rates) should also be included. This should be a condition of the Remuneration declaration.

Question: Do you agree with a maximum period of service aboard of no more than 14 days, followed by an equal period of leave?

Yes, we agree with a maximum period of service aboard of 14 days, followed by an equal period of leave. This will represent an important improvement in requirements relating to rest for seafarers on the covered routes.

However, we are concerned that this will leave rest requirements on domestic ferry routes weaker than those for international routes and operators of domestic only routes will still be able to roster seafarers to work tours longer than 14 days. This will create a two-tier workforce, where conditions on ships between Scotland and Northern Ireland, for example, are inferior to the mandatory conditions in place between England and France. This is not acceptable and we urge the government to commit to securing the same roster and other conditions on domestic ferry routes as are being put into place for the routes to France and the Channel Islands.

Question: Do you agree that those in training should have a maximum period of service aboard of no more than 21 days, with an equal period of leave?

Yes, we agree that for those in training the maximum period of service should be 21 days, followed by 21 days of leave.

For existing staff, the training and time required to complete re-validation of mandatory seafarer certification (eg ENG1 medical, valid for two years and STCW certification, valid for 5 years) should be taken during rostered periods of work wherever possible and not during rest periods. If taken in rest periods, the principle of compensatory rest must apply.

Question: Do you think it would be beneficial to require fatigue management plans?

Yes, we believe it is vital to require operators to produce fatigue management plans. Operators should take responsibility for managing the fatigue of staff properly; the safety of both the ship's crew and the public depend on it. The production of fatigue management plans should be required as part of the safe working declaration.

Requiring Fatigue Management Plans would bring the ferries sector into line with the wider transport industry, from HGV drivers to mandatory Fatigue Risk Management Systems in the railway industry.

Question: What, if any, elements of fatigue management plans should be required?

Fatigue management plans should be subject to discussion and agreement with trade unions representing seafarers.

Questions: Declarations, surcharges and refusal of access

Do you agree that the timescales for providing safe working and remuneration declarations should be the same as those for the existing equivalence declarations?

Yes.

Do you agree that the same relevant year should apply for safe working and remuneration declarations as for equivalence declarations?

Yes.

Do you agree with the proposed surcharge tariff for

A) remuneration declarations

Yes.

B) Safe working declarations

Yes.

Do you agree with the timescales for communicating refusal of access?

Yes.