Delivering on Seafarers’ Rights

2026 Progress Report

FIVE YEARS INTO THE CODE OF CONDUCT: WHAT'S CHANGED FOR SEAFARERS?

The Unsung Core
BARRENT SEA · PHOTO: IAN SUPAPO · ITF SEAFARERS’ TRUST ‘LIFE AT SEA’

CONTENTS

IN THIS REPORT

Hang In There
Location: North Pacific Ocean
Photographer: Edmar Rosales Ogao-ogao

Executive Summary

Five years ago, the [Delivering on Seafarers' Rights Code of Conduct] set out what responsible practice on seafarers' rights and welfare should look like across the shipping value chain. Five years of implementation, along with data from the accompanying Crew Welfare Self-Assessment, now provide substantial evidence of progress, and a much clearer picture of what needs to happen next.

Since 2021, more than 1,000 companies have participated in the Crew Welfare Self-Assessment (CWSA), covering more than 13,000 vessels and roughly 300,000 seafarers, and we have reported on progress every year. We are hugely pleased that participation has expanded beyond the largest operators, and repeat assessments show that for many companies, welfare is becoming an ongoing management priority. Among companies participating in the CWSA, many of the foundations of responsible employment are now strongly established, with high levels of attainment across most areas of the Code of Conduct and measurable progress in areas including connectivity, mental-health training and inclusion.

This shows that stronger approaches to seafarer welfare can be implemented across large and diverse fleets,and increasingly by smaller operators too.

Alongside this, new evidence provides a separate perspective on the conditions that matter to people at sea.Findings from two surveys commissioned exclusively for this report (see 'About this report') underline thecontinuing importance of fundamentals including adequate crewing and rest, fair treatment, confidence ingrievance processes and support when things go wrong.

49% of surveyed seafarers said there had been enough crew onboard during their most recent contract to work safely without excessive fatigue or breaches of agreed hours of work and rest.	59% said they would feel safe raising a serious concern without fear of consequences.	50% were confident their employer would support them and their family if something seriously went wrong.

Taken together, these evidence bases point to the next phase of the work. The priority is to build on theprogress already being demonstrated by those leading the field, help more owners and operators put the Codeof Conduct into practice and make good welfare increasingly achievable across the global fleet.

Charterers and cargo owners have an important role to play, as do insurers, investors and flag states. They cando more than set expectations or screen suppliers: they can support improvement through terms and clauses,agreed improvement plans, practical collaboration and longer-term commercial relationships, while recognisingowners and operators that demonstrate strong and improving performance. Importantly, flag states need toimplement stronger, more effective control.

The first five years have established the direction anddemonstrated what is possible. The opportunity for the next five isto make better welfare more widely and consistently deliveredacross global shipping.

About This Report

This report is structured to mirror the Code of Conduct, and brings together several sources of evidence, two ofwhich were commissioned expressly for this report:

COMPANY DATA

CWSA data

RightShip's Crew Welfare Self-Assessment (CWSA) Tool: 2,069 submissions from 1,072 unique DOC companies between 2021 and 2026.

SEAFARER SURVEY

TURTLE data

A 2026 TURTLE survey of 892 seafarers, commissioned for this report.

SEAFARER WORKSHOPS

MtS Workshop data

Discussions and workshops with seafarers through the Mission to Seafarers in the Philippines.

The report also draws selectively on Marine Benefits' Re:fresh Global 2024 study, an anonymous survey of 36,446 seafarers across 52 companies.

These evidence bases are separate. The employers of those in the TURTLE survey and the workshop participants are not identified and cannot be matched to companies participating in CWSA. The report therefore does not use seafarer responses to validate or contradict individual company self-assessments. Nor should either dataset be treated as representative of the entire global shipping industry.

Instead, the sources are used alongside one another to understand developing company practice, seafarer priorities and areas where further industry action may be valuable.

Acknowledgments

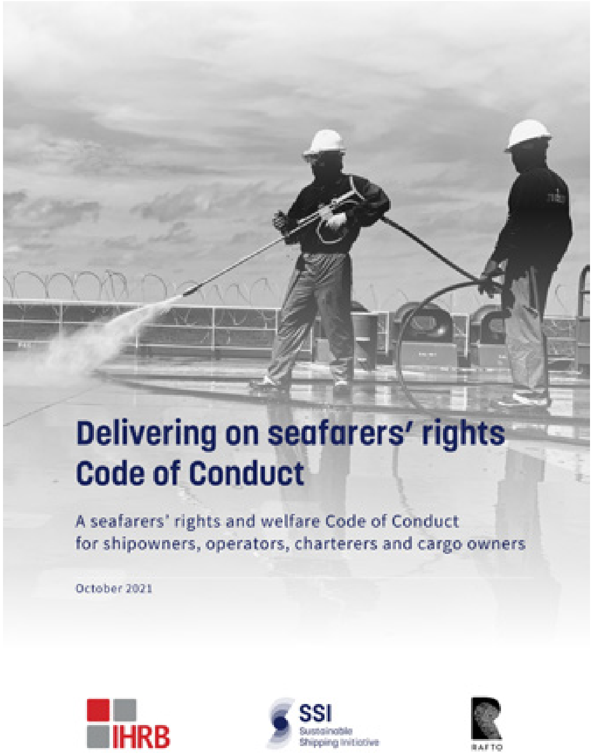
This report is a collaborative effort by the Institute for Human Rights and Business (IHRB), The Mission to Seafarers, Rafto Foundation for Human Rights, RightShip, Sustainable Shipping Initiative (SSI) and TURTLE. With thanks to Marine Benefits for their contribution.

It builds on the Delivering on Seafarers' Rights Code of Conduct and brings together industry data, direct seafarer insight and the experience of organisations working across seafarer rights and welfare. We are grateful to the organisations that provided data and evidence for this report, including The Mission to Seafarers and Marine Benefits, and to the companies and industry stakeholders who shared their experience and perspectives. IHRB are grateful to our ongoing funders, including ITF Seafarers' Trust, The Seafarers' Charity, TK Foundation, and the Swiss Federal Department of Foreign Affairs

We would like to acknowledge the ITF Seafarers' Trust 'Life at Sea' project and thank them for providing access to the photographs in this report. All images were taken by seafarers themselves, who are compensated for the use of their work. Above all, we thank the seafarers who took part in the survey and workshops and shared their experiences with us. Their contribution is central to this report and to the question it asks: how do we make good welfare achievable and consistently delivered across the entire industry?

The Code of Conduct

The Delivering on Seafarers' Rights Code of Conduct was published in October 2021 by IHRB, the Sustainable Shipping Initiative and the Rafto Foundation.



The Code of Conduct is used by shipowners and ship operators to understand the extent to which current operations meet their seafarers' rights and welfare responsibilities, and by charterers and cargo owners to strengthen due diligence that in turn informs chartering-related decision-making. It is supplemented by a practical self-assessment questionnaire that provides guidance on how to adopt the commitments outlined in the Code of Conduct and track progress. Both documents are available to download, and the now updated self-assessment is available electronically via RightShip's Crew Welfare Self-Assessment Tool.

This Code of Conduct seeks to reinforce compliance with the Maritime Labour Convention (MLC) and other relevant maritime conventions. However, it goes beyond MLC by focusing on valuing seafarers and the full spectrum of their human rights.

It addresses systemic risks and impacts experienced by seafarers through: (i) emphasising rights in the MLC, including on hours of rest, recruitment fees and grievance access, that are not being adequately enforced in practice; and (ii) setting expectations in areas where MLC, even as strengthened by its 2022 amendments, does not yet reach, including mental health, psychological safety, inclusion and the welfare infrastructure that enables seafarers to live and work well.

Five years on, the MLC has evolved in many of the same areas, with stronger requirements on connectivity, repatriation and abandonment, shore leave, and violence and harassment. The direction of travel reinforces the trajectory set by the Code of Conduct: from minimum compliance as the baseline, towards a fuller understanding of what seafarers need to live and work well.[1]

The five-year milestone provides an opportunity to look at where practice has moved, where stronger approaches are becoming established, and where further progress is needed.

[1] The MLC requires 'continuous improvement' and was conceived to support the journey to decent work as defined by the ILO.

The 8 Chapters of the Code

#	Section	What it requires	What this means in practice
1	Shipowner / ship operator commitments 1.1–1.8	Written commitment to seafarers' human rights and MLC compliance; a properly staffed management system; regular rights training; an inclusive culture; fair treatment and equal opportunity; workplaces free from discrimination, harassment, violence and retaliation; no further exemptions from protective rules.	Seafarers: know your rights; be treated fairly, with respect and dignity; work free from discrimination, harassment, violence and retaliation. Companies: resource the management system, train crew and staff, promote inclusion and equal opportunity, and apply protective rules consistently.
2	Fair terms of employment 2.1–2.7	No forced labour, recruitment fees or related costs; no contract substitution, fraud or passport retention; no prohibited charges; correct and timely pay; pay from departure to join the ship through repatriation; continuity of specified insurance while ashore for returning seafarers; freedom to join a workers' union of their choice.	Seafarers: no recruitment fees or prohibited costs; no passport retention or contract substitution; correct, full and timely pay; specified insurance protection between contracts; freedom to join a union. Companies: verify recruitment and payment practices, including through recruitment and placement services.
3	Crewing approach 3.1–3.6	A crewing strategy monitored for its impact on wellbeing and retention; balance between onboard and onshore time; contracts no longer than 11 months; crewing above the legal minimum where realistic workload requires it; no short-handed operation except exceptional emergencies for the shortest possible time; consideration of peak workloads, fatigue and emergency resilience.	Seafarers: crewing should reflect the work required, not only the legal minimum; contracts and rotations should support wellbeing; short-handed operation should be exceptional and temporary. Companies: assess workload, peak periods and fatigue when setting crewing levels and maintain sufficient resilience for emergencies.
4	Crew wellbeing 4.1–4.6	A physical and mental wellbeing plan or programme, with a trained wellbeing officer and budget; mental-health support and free confidential counselling; seafarer assistance programmes; recreation and social interaction; free internet for private personal use, limited only for justified safety, security and responsible-use reasons; fresh, healthy, quality food and water; shore leave subject to operational and port-state restrictions.	Seafarers: confidential mental-health support; recreation and social connection; free personal internet; sufficient, varied food and water that considers religious, medical and cultural requirements; shore leave where permitted. Companies: fund and resource wellbeing, rather than relying on policy alone.
5	Crew protection 5.1–5.5	Security management against piracy and other criminal activity; preparatory training and appropriate security arrangements; communication and psycho-social support for crew and families after an emergency or threat; human-rights training for armed private security; protection of seafarers' rights during criminal investigations following accidents; continuous financial security against abandonment.	Seafarers: security protection and support following emergencies; fair treatment during relevant criminal investigations, including protection against self-incrimination and continued wages, subsistence, accommodation and medical care; financial protection against abandonment. Companies: maintain effective security systems, provide post-incident support, protect rights during investigations and maintain continuous abandonment cover.
6	Addressing seafarer grievances 6.1–6.4	A culture that supports raising concerns; multiple accessible grievance routes, including anonymous whistleblowing; fair, informed and respectful processes protecting privacy and confidentiality; protection against retaliation and blacklisting; records of concerns used for continuous improvement.	Seafarers: accessible ways to raise concerns, including anonymously, with confidentiality and protection from retaliation or blacklisting. Companies: provide multiple trusted channels, protect those who speak up and learn systematically from grievances.
7	Implementation of the Code 7.1–7.7	Access to relevant information for charterer/cargo-owner counterparties; communication of Code requirements to workers and relevant third parties, backed by legal mechanisms; annual self-assessment; documentation demonstrating compliance; audit access where requested; agreed corrective action where gaps are identified; sharing of best practice and solutions.	Seafarers: commitments should be assessed and evidenced, not simply stated. Companies: assess annually, retain evidence, enable appropriate scrutiny, correct shortcomings and share learning.
8	Charterer and cargo owner requirements 8.1–8.10	Targets so that a majority of chartered ships meet the Code by the end of Year 3; annual targets to incorporate the Code into charterparties; use the Code and self-assessment in due diligence and chartering decisions; refrain from "no crew change" clauses except for exceptional and justified legal restrictions; support crew changes; collaborate with owners on implementation and repeated complaints; use leverage to strengthen seafarers' rights; publish annual progress.	Seafarers: chartering arrangements should support, rather than obstruct, their rights and crew changes. Charterers/cargo owners: use due diligence and chartering decisions to shift business towards operators meeting the Code, work constructively with owners to improve performance, and report publicly on progress.

What the Crew Welfare Self-Assessment Data Shows Us

Five years of CWSA data now provide a substantial body of evidence about how crew welfare practice is developing among participating companies. Since 2021, over 1,000 companies have participated in the CWSA, covering more than 13,000 vessels and 300,000 seafarers.

The CWSA does not represent the whole industry. It reflects companies that have chosen to assess and disclose their approach to crew welfare. But its scale, longitudinal data and growing repeat participation provide an important view of where practice is changing, where stronger approaches are becoming established, and where further progress is needed.

Engagement is broadening

CWSA initially attracted larger operators, with an average fleet size of 33 vessels. More recently, companies joining have had average fleets of 6–7 vessels.

Companies are also repeating their assessments year on year. In 2026, 57% of participating companies had submitted previously, compared with 35% in 2023. Of the 685 companies with an active submission in August 2026, 409 had submitted more than once and 115 had submitted four or more times.

Many of the fundamentals are well established

Across CWSA participants, high levels of attainment are reported across most areas of the Code of Conduct. Overall attainment is above 88% in six of the seven chapters covering owners and operators, including fair terms of employment (90%), crew protection (92%), addressing grievances (92%) and implementation of the Code of Conduct (90%). That also means 10–12% of participating companies are not yet meeting commitments in each chapter including some of the most fundamental areas of the Code.

Progress is visible, but there is more to do

The CWSA data provides good grounds for optimism. It shows companies returning to assess their performance, participation extending to smaller fleets, and measurable improvements in areas such as connectivity and mental-health training.

The value of this evidence is not that it shows the job is done. It demonstrates that progress is possible and increasingly established across a significant group of companies. Five years of reporting also give a much clearer picture of what stronger practice looks like, where change is happening and where further attention is needed.

5 years of CWSA

1,072
Companies have participated

13,659
Vessels covered

2,069
Valid submissions

685
Companies held an active submission in August 2026

57%
Percentage of 2026 participants who had previously participated

300,000
Approx number of seafarers covered

Progress Against the Code of Conduct

Better than Yesterday ☑️💯
Location: Argentina
Photographer: Jan Mon

Chapter 1

Commitments and Inclusive Workforce

Many seafarers already carry the feeling that they can easily be replaced. Every seafarer wants to feel valued, respected, and recognized as more than just another contract. When companies invest in their people and make them feel that they matter, it creates a stronger sense of value and belonging among seafarers.

Seafarer - The Mission to Seafarers workshop, 2026

What the Code of Conduct asks: Shipowners commit, in writing, to valuing seafarers' rights and building an inclusive, non-discriminatory workplace with equal opportunity for all.

What the research shows: Among CWSA participants, many of the foundations in this chapter are strongly established, with overall attainment of 88%.

There has also been measurable progress on inclusion: 98% of participating companies now report having a comprehensive DEI policy, up from 92% in 2024, while pre-joining DEI briefings for seafarers have increased from 85% to 95%.

The TURTLE data reinforces the importance of continuing to focus on how rights, respect and inclusion are understood by seafarers.

Get started today: Start with rights awareness. MACN, ITF, ISWAN all have practical resources to help companies and crews understand what seafarers' rights look like in practice.

Northern Lights
· LATVIA, RIGA · PHOTO: JODEL S. MENDOZA
Heavenly display onboard

Chapter 2

Fair Terms of Employment

Delayed salary, or salary that is always delayed, one to two months before it arrives.

Seafarer - The Mission to Seafarers workshop, 2026

What the Code of Conduct asks: Seafarers are paid in full, correctly and on time, free from recruitment fees, contract fraud, or prohibited charges, and are free to join a union of their choice.

What the research shows: Fair terms of employment is one of the strongest-performing areas among CWSA participants, with overall attainment of 90%. Some of the most fundamental protections are now reported almost universally: all CWSA 2.0 participants report monthly payment of wages, providing seafarers with copies of their employment agreements and ensuring prohibited charges are not passed on to seafarers.

Fair and predictable employment also emerged strongly in the seafarer research. TURTLE data shows three quarters (76%) said their wages were always paid correctly, in full and on time, although delayed pay and employment terms remain a concern for almost a quarter of respondents.

> ***"Fair terms of employment must be set out in the Seafarers Employment Agreement in compliance with the MLC. The agreement must incorporate the terms of any applicable collective bargaining agreement (CBA). Obviously, from a union perspective we believe CBAs are fundamental to the delivery of a fair employment relationship."***
>
> MARK DICKINSON · SENIOR ADVISOR, NAUTILUS INTERNATIONAL

Get started today: Trace your recruitment chain. The Responsible Maritime Recruitment toolkit provides a five-phase process for identifying and eliminating fees. Collective bargaining agreements are one of the most effective tools for ensuring fair terms reach every vessel.

IN FOCUS

RECRUITMENT FEES

What Every Operator Needs to Know

Code of Conduct, clauses 2.1, 2.2

What are they:

Illegal fees charged to seafarers, directly or through a crewing agency, to secure a job onboard. Prohibited under MLC 2006, with no exceptions beyond the cost of a statutory medical certificate, seafarer's book, or passport.

How widespread:

31% of seafarers have been asked to pay one. 74% of those asked went on to pay it. Most demands come from crewing agents (62%), not shipping companies directly (12%), which is why company policy alone rarely closes the gap, the exposure sits further down the supply chain. Lower-ranked seafarers are the least able to refuse: just 20% of ratings said no, against 29% of officers. (IHRB and TURTLE, 2024: 2,627 seafarers surveyed)

Why it matters beyond the fee itself:

Some seafarers are charged over $10,000 for a single job. 73% report a direct mental health impact from fee demands, financial stress, depression, anxiety, sleep disturbance. 80% never report it, mostly because they don't know where to, or don't believe it will help.

There is a risk that those willing to pay the most might be employed through agents over those who are most skilled, implying a safety risk.

How to avoid it:

IHRB and TURTLE's Responsible Maritime Recruitment toolkit sets out a five-phase approach, from internal baseline checks and budget transparency, through crewing agency due diligence, to a structured escalation protocol when a violation is found.

Companies can also make a public no-fee declaration and join IHRB-convened Action Group on Seafarer Recruitment Fees.

Chapter 3

Crewing Approach

> **On the paperwork, your rest hours are complete. But in reality, you are beaten down by work.**
>
> Seafarer - The Mission to Seafarers workshop, 2026

What the Code of Conduct asks: Crewing levels go beyond the legal minimum (the Minimum Safe Manning Certificate requirement under SOLAS), reflect real workload, and avoid short-handed operation, with contracts and hours of work and rest actively managed, not just recorded.

What the research shows: Crewing is another area of high attainment among CWSA participants, at 88%. Appropriate crewing levels and processes for managing work and rest hours are very widely reported. The Code of Conduct goes further than minimum crewing requirements, asking companies to consider actual workload, fatigue risk and adequate rest, and the demands of individual vessel operations.

Crewing levels and fatigue emerged as a significant concern in the TURTLE data. Only 49% said there had been enough crew onboard during their most recent contract to work safely without excessive fatigue or breaches of agreed adequate rest hours. Discussions with seafarers in the MtS workshops also repeatedly highlighted workload, watch patterns and the difference between recorded and actual rest.

Research by the World Maritime University points to systemic problems with existing regulatory requirements on hours of work and rest, suggesting the gap between recorded compliance and seafarers' lived experience is not incidental but structural.

Get started today: Work with your partners on crewing resource plans around actual voyage demands and fatigue risk, not the minimum safe manning level.

IN FOCUS

Fatigue

Code of Conduct, clauses 3.3, 3.4

What it is	The Code of Conduct asks companies to set crewing levels that reflect realworkload and fatigue risk, with rest hours that reflect what happens ratherthan what is recorded.
What good looks like	The leading operators review crewing levels against actual voyagedemands, give masters the authority to report real rest hours withoutcommercial pressure, and treat fatigue risk as an operational variablerather than a compliance box.
The wider picture	**49%** enough crew **32%** no **19%** sometimes 49% of surveyed seafarers said there had been enough crew onboard towork safely without excessive fatigue; 32% said no and 19% saidsometimes. In the separate CWSA population, appropriate manning andwork/rest-hour records are reported at 100%.
What seafarers say	*"On the paperwork, your rest hours are complete. But in reality, you are beaten down by work." "If you total the overtime, it can reach more than 200 hours, but only around 120 hours are recognised by the principal. The rest of your overtime is just thank you hours."* (Mission to Seafarers workshop, 2026)
Why it matters	Fatigue is consistently identified as a contributing factor in maritime incidents. When records do not reflect reality, the safety case for compliance is undermined.
What needs to change	Masters need to report real rest hours without fear of commercial pressure. The industry needs vessel-level indicators that distinguish genuine from recorded compliance. Charterers have a direct role: crewing adequacy should feature in vessel selection and charterparty terms, making the commercial case for proper manning as visible as the cost case against it.

Chapter 4

Crew Wellbeing

> **First, I want financial security, which means my salary should be paid on time and I need confidence that the company will stand by its crew during difficult situations such as geopolitical conflicts, pandemic, and other emergencies.**
>
> **Seafarer - The Mission to Seafarers workshop, 2026**

What the Code of Conduct asks: A named wellbeing officer, mental health support, free internet, good food, and shore leave.

What the research shows: Crew wellbeing remains the area with most room for improvement among CWSA participants, with overall attainment of 76%, but there are clear areas of progress. Mental-health training has increased significantly, and fewer companies are charging seafarers for connectivity, while provision of catering, mess and recreational facilities is very widely reported.

Connectivity
Connectivity is one of the clearest examples of change over a relatively short period.

In 2024, 18.4% of participating companies reported charging seafarers for internet access. By 2026, this had fallen to 8.5%. This improvement has taken place alongside the strengthening of MLC requirements on social connectivity. Some 72% of participating companies report applying data limits, with monthly allowances ranging from 300MB to 50GB.

The direction of travel is clear, but significant variation remains. Whether internet is available is only part of the question. Cost, data allowance and the quality of access determine whether seafarers can use it to maintain regular contact with home.

Mental Health Support and Training
There has been a clear increase in mental health training. The proportion of participating companies providing seminars and in-person training rose from 64% in 2024 to 76% in 2026.

Progress is not consistent across every form of support. Over the same period, proactive post-trauma counselling fell from 83% to 73%, family mental-health support from 71% to 61%, and post-incident psychological fitness assessments from 84% to 72%.

The picture is therefore mixed. Mental health has greater visibility within participating companies but maintaining support following an incident and extending it to seafarers' families remain areas for attention.

TURTLE data finds 56% said they had access to free mental health support or confidential counselling and would feel safe using it. However, a further 17% said support was available, but they would not feel safe using it, while 27% said they had no access. [2]

Psychological Safety

Having support available is only part of the picture. Having the confidence that speaking up, asking for help or admitting difficulty will not be held against you determines whether seafarers can access support that exists. TURTLE data finds that 17% of seafarers said mental health support was available but they would not feel safe using it. The MtS workshops reinforced this: seafarers described environments were showing vulnerability, particularly among ratings, carried real professional risk. The gap between what companies provide and what seafarers feel able to use is one of the harder things to measure and one of the most important things to close.

Marine Benefits' Re:fresh 2024 study found relatively high overall psychological safety, trust and inclusion across its sample, while also reporting bullying, discrimination and sexual harassment among a minority of respondents. Preliminary results from the Marine Benefits 2026 report indicate that experiences of sexual harassment have improved since 2024, while psychological safety has also shown a slight improvement.

> **During my cadetship, I reached a point where I could no longer feel pain, happiness or sadness. I just felt blank. At the same time, I would hear comments like "You don't know anything" and those kinds of experiences can become traumatic.**
>
> **Seafarer - The Mission to Seafarers workshop, 2026**

Food and Facilities

CWSA participants report very high levels of provision for catering and mess facilities, and MLC 2006 requires ships' cooks to be trained and certified. But provision is not the same as quality. Seafarers in the MtS workshops were consistent that food is one of the most tangible daily markers of whether a company genuinely values its crew, and that quality, portion adequacy and cultural appropriateness vary considerably. For crew who may be away from home for months at a time, a galley that reflects their diet and culture is not a minor comfort.

Get started today: Investigate the root causes of mental health stress in your organisation. The Mission to Seafarers' WeCare programme offers practical support for companies and seafarers working to improve wellbeing onboard.

[2] Now strengthened in MLC 2022 amendments (in force December 2024): https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:51::::51:P51_CONTENT_REPOSITORY_ID:4287245

Chapter 5

Crew Protection

What the Code of Conduct asks: Security planning, protection during investigations, and continuous financial cover against abandonment.

What the research shows: Crew protection is the strongest-performing area among CWSA participants, with overall attainment of 92%. Financial security and anti-abandonment protections are particularly well established, alongside high levels of reported practice on security planning and support following serious incidents.

For seafarers, confidence that support will be there when it is needed remains important. TURTLE data finds only half of those surveyed were confident their employer would support them and their family if something seriously went wrong onboard; 27% were unsure and 23% were not confident.

In 2025, seafarer abandonment reached record levels. ITF data[3] shows 6,223 seafarers abandoned across 410 ships, a 31% increase in 2024 and the sixth consecutive year in which the number of vessels on which abandonments occurred broke records. Seafarers were collectively owed $25.8 million in unpaid wages as a result. In 185 of those cases, ships did not hold the mandatory financial security required under the MLC. That is precisely the protection this chapter asks companies to put beyond doubt.

On security, IMO's piracy reporting[4] recorded a 17% increase in global piracy and armed robbery incidents in 2025. In the Strait of Hormuz and the wider Middle East, IMO recorded 65 confirmed incidents and 17 seafarer fatalities as of August 2026, with ongoing attacks affecting vessels transiting the Red Sea and Gulf of Oman.

On criminalisation, growing numbers of masters and crew are being detained, investigated or prosecuted despite acting in good faith, with seafarers facing arbitrary detention, prolonged imprisonment in foreign jurisdictions, and lengthy separation from their families while authorities investigate alleged crimes. The IMO Legal Committee, meeting in April 2026, backed wider implementation of the 2024 IMO/ILO Guidelines on the fair treatment of detained seafarers, recognition that the protections are not yet consistently applied in practice.

Get started today: Check that your anti-abandonment cover is operational and tested, not just documented. Review the 2024 IMO/ILO Guidelines on the fair treatment of detained seafarers against your current procedures. Companies with commercial leverage can use it to advocate with flag states on abandonment.

[3] Seafarer abandonment crisis: thousands left behind in shipping's worst year on record: https://www.itfseafarers.org/en/news/seafarer-abandonment-crisis-thousands-left-behind-shippings-worst-year-record
[4] International Maritime Organization (IMO), "Piracy Reports.": https://www.imo.org/en/ourwork/security/pages/piracy-reports-default.aspx

Chapter 6

Addressing Grievances

In the grievance system, you have to write your name, the name of the person you're reporting, and then it is discussed between you, the person you reported, and the master. That makes you lose confidence because you might be targeted afterward. When I spoke up before, I ended up being blacklisted by the captain.

Seafarer - The Mission to Seafarers workshop, 2026

What the Code of Conduct asks: Accessible, anonymous routes to raise a concern, free from retaliation or blacklisting.

What the research shows: Grievance mechanisms are strongly established among CWSA participants, with overall attainment of 92%. Core grievance procedures are very widely reported, including mechanisms for raising concerns and protections against retaliation.

Feeling able to use those mechanisms safely is a significant concern for seafarers. In the TURTLE data, 25% were unsure they would feel safe raising a serious concern without fear of consequences and 16% said they would not.

The MtS workshop discussions highlighted concerns about confidentiality, retaliation and the vulnerability of ratings where reporting could affect future employment.

The existence of a grievance mechanism is not the same as confidence in using it. A well-functioning reporting culture produces more complaints, not fewer, because people trust that raising a concern will lead to action rather than consequences. Ratings are particularly exposed: they have fewer employment options and less leverage to absorb the risk of speaking up.

In most situations on board, speaking up will not help you, especially if you are at the bottom of the hierarchy. A captain can change the narrative, and many seafarers hesitate to speak up because they do not know what it will mean for their next employment.

Seafarer - The Mission to Seafarers workshop, 2026

Get started today: Check your grievance reporting rates. Low numbers are more likely to reflect fear than a problem-free fleet. ISWAN and IHRB work with companies on building mechanisms that seafarers trust and use.

IN FOCUS

Psychological Safety

Code of Conduct, clauses 6.2, 6.3

What it is

Whether a seafarer can raise a concern or admit difficulty without fear it will cost them their job, their next contract or their standing on board. It determines whether any other welfare provision — mental health support, grievance mechanisms, welfare officers — can be used.

What good looks like

The strongest performers test whether their grievance procedures work, tracking reporting rates, investigating when they are low, and ensuring routes are independent of the onboard hierarchy. Some have introduced confidential third-party channels, so ratings have somewhere to go that does not pass through the people they may need to report.

The wider picture

59% would feel safe **16%** would not **25%** unsure

59% of surveyed seafarers said they would feel safe raising a serious concern; 16% said they would not, and 25% were unsure. The Mission to Seafarers participants consistently raised concerns about retaliation and the influence of the onboard hierarchy on reporting.

What seafarers say

"In the grievance system, you have to write your name, the name of the person you're reporting, and then it is discussed between you, the person you reported, and the master. That makes you lose confidence because you might be targeted afterwards. When I spoke up before, I ended up being blacklisted by the captain." (The Mission to Seafarers workshop, 2026)

Why it matters

The existence of a grievance mechanism is not the same as confidence in using it. A well-functioning reporting culture produces more complaints, not fewer. Ratings are particularly exposed: they have fewer employment options and less leverage to absorb the risk of speaking up.

What needs to change

Reporting routes need to be genuinely independent of the onboard hierarchy. Non-retaliation policies need to be actively enforced. Companies need to track whether mechanisms are being used and investigate when they are not, because low reporting rates are more likely to reflect fear than a problem-free fleet.

Chapter 7

Implementation of the Code of Conduct

What the Code of Conduct asks: Annual self-assessment, documentation, audit access, and shared learning across the industry.

What the research shows: In 2026, 99% of participating companies committed to refreshing their assessment annually and 94% to providing evidence for verification. For many, the self-assessment has become part of an ongoing management tool rather than a one-off exercise.

Since 2024, companies have become more willing to share their self-assessment with charterers and cargo owners, up from 78% to 84%, and less willing to open their practice to independent scrutiny. Sharing best practice with the wider industry fell from 94% to 87%. Disclosing action plans for identified gaps fell from 93% to 85%. Permitting third-party access for vessel audits fell from 91% to 84%. Transparency is increasingly flowing upward through the commercial chain, where it may improve a company's competitive position, and less freely outward to the industry, where it would raise standards.

Get started today: Share your self-assessment and improvement plans beyond your immediate commercial relationships.

PILOT LADDER CHANGING
Location: AT SEA
Photographer: GAGAN CHOPRA

Chapter 8

Charterer and Cargo Owner Requirements

What the Code of Conduct asks: Charterers and cargo owners use their commercial influence to support better seafarer welfare, progressively shifting business towards Code-compliant operators, incorporating the Code of Conduct into chartering decisions and agreements, protecting crew change and reporting publicly on progress.

Chapters 1-7 focus on shipowners and operators. This chapter recognises that they do not operate in isolation. The terms on which vessels are chartered, the expectations placed on owners and the nature of longer-term commercial relationships can all influence the conditions in which seafarer welfare improvements are made.

> ***"Safety is non-negotiable, and seafarer welfare is fundamental to safer, more reliable shipping operations. As a major charterer, Rio Tinto recognises the important role cargo owners play in supporting higher welfare standards across the maritime value chain. Through our Designated Owners & Operators (DOO) program, we work with shipowners and managers on practical improvements that help crews stay well rested, connected, supported and empowered to speak up. By uplifting crew welfare standards, we strengthen safety, resilience and ultimately operational performance across the fleet."***
>
> MENAND KARSEN, GENERAL MANAGER, MARINE, RIO TINTO

There are already examples of this broader role in practice. Rio Tinto's Master Coach Programme places experienced former ship masters onboard vessels for 8–14 days, working with crews to identify and address unsafe practices through coaching rather than audit. It is a practical example of a charterer using its position not only to set expectations, but to help build the capability to meet them.

The Role of Flag States

The MLC has been ratified by 112 countries representing more than 96% of world gross tonnage. The MLC recalls Article 94 of UNCLOS, which establishes duties and obligations of a flag state regarding labour conditions, crewing, and social matters on ships that fly its flag. Title 5.1 of the MLC specifically addresses flag states. The baseline, certification, inspection, complaint handling, is a legal floor nearly every flag has signed up to. MLC ratification confirms a legal commitment. It says nothing about whether inspection is real or complaints get resolved. In practice, this means some flags treat MLC as a ceiling, doing only what the Convention requires, while others treat it as a floor, holding themselves to higher, more ambitious welfare standards on top of it.

A so-called ‘flag of convenience’ (FOC) or ‘open registry’ is one with no genuine link between the ship's flag and its ownership, historically adopted to cut cost: lower registration fees, lighter tax, fewer labour and crewing constraints than a national flag would impose. Panama, Liberia, and the Marshall Islands are the largest by tonnage. The term carries a reputation for weak enforcement, but it isn't uniform, some open registries now rank among the better-performing flags on independent assurance measures; others visibly don't.

A well-regulated flag doesn't guarantee good treatment of crew. A weaker flag doesn't mean every operator under it treats crew badly. Both need checking independently. The important point is that all flag states implement their laws effectively on vessels sailing under their flag, and that they operate in accordance with Article 91 and 94 of UNCLOS.

What Flag States Must Do

Enforce the MLC. Flag states need to be equipped to impose real penalties when a ship doesn't comply with MLC and/or national legislation, and not just at the point of registration. (And legislation needs to champion crew welfare.)

Address the things MLC doesn't fully cover. Targeted action on seafarers' mental health, access to communication/internet on board, and other elements of welfare outlined in the Code of Conduct that go beyond the MLC minimum, would improve seafarer welfare ahead of MLC updates.

Address abandonment. Although abandonment affects a relatively small proportion of seafarers, its impact - crews left in port without fuel, food, water or pay for months - is one of the worst FOC-linked problems. Flag states can and should require shipowners to carry financial security (insurance/bonds) for wages and repatriation and can move quickly to help repatriate crew and recover unpaid wages when a shipowner defaults.

Cooperate with port state control and unions. Since flag-state inspection alone is uneven, the system leans heavily on port states (inspections when ships call at their ports) and union federation the ITF, which places inspectors globally and has a hotline for seafarers on FOC vessels. Sharing data with port states, blacklists (or delists) persistently non-compliant owners, helps to expose bad operators and thereby protect seafarers, and promote good operators.

Industry View

Diana Shipping Services

DIANA SHIPPING SERVICES

AUTHOR: Georgios Tsoukatos, DPA-HSQ/Vetting Manager, Diana Shipping Services

The Code of Conduct and CWSA have strengthened our approach to crew welfare by making it an integral part of our overall safety and management culture. They have encouraged us to adopt a more structured and proactive approach to understanding and addressing the needs of our seafarers. We place particular emphasis on open communication, respectful treatment, access to appropriate support services, and providing an onboard environment in which crew members feel comfortable raising concerns. We continuously review feedback from our vessels and seafarers and use this information to identify areas for improvement. We consider crew welfare to be closely connected with our safety culture, operational performance and the long-term engagement and retention of our seafarers.

As part of our continuous crew welfare improvement, we have strengthened several areas of support available to our seafarers. One important improvement has been the enhancement of Internet facilities and onboard access. Reliable communication with family and friends is an important factor in maintaining seafarers' well-being, particularly during extended periods away from home. We have also introduced access to professional psychological support for our seafarers, providing them with an additional confidential channel to seek assistance when facing personal, emotional or work-related challenges.

In addition, we have established 24-hour medical support through a private medical service provider, ensuring that our crew can obtain professional medical advice and assistance whenever required, including outside normal working hours. This service provides an important additional benefit not only to the seafarer requiring medical assistance, but also to the Master. In the event of a challenging medical situation on board, having immediate access to professional medical advice provides the Master with valuable support in assessing the situation and determining the appropriate course of action.

This can significantly reduce the stress associated with managing such situations, particularly considering the extensive responsibilities already entrusted to the Master.

Furthermore, we have introduced a monthly welfare budget for each vessel, allowing the Master, in consultation with the crew, to make purchases that respond to their actual needs and preferences and improve the quality of their leisure time on board.

Depending on the crew's preferences, this may include items such as books, electronic games, or other recreational activities. In parallel, we have established a company-wide list of recreational and welfare facilities that we consider to be part of the minimum welfare provisions offered to our seafarers. These include gym equipment, karaoke facilities and PlayStation consoles. When any of these facilities becomes damaged or requires maintenance, the Master can notify office, and the necessary action is taken to repair or replace the equipment as appropriate. Through this approach, we aim to ensure that every seafarer, regardless of the vessel to which they are assigned, can expect a consistent minimum level of welfare and recreational facilities provided by the company.

At the same time, the monthly welfare budget gives each crew the flexibility to further enhance their onboard leisure experience according to their specific needs and preferences.

These initiatives have strengthened the support available to our seafarers and have created a more structured and participative approach to crew welfare, where the crew's own feedback and preferences play an important role in determining further improvements.

From our experience, a strong focus on crew welfare has a direct and positive impact on both seafarers and vessel safety. Seafaring involves long periods away from home, demanding working conditions and significant levels of responsibility. Providing an environment where seafarers feel supported, respected and valued contributes to better morale, motivation and engagement. It also encourages more open communication and makes crew members more willing to raise concerns, seek assistance and share ideas for improvement. We believe that welfare should therefore be viewed as an investment in human performance.

When seafarers are mentally and physically supported and have adequate opportunities to rest, communicate and enjoy their free time, they are better positioned to maintain concentration, make sound decisions and work effectively as a team.

A strong welfare culture also supports the Master and senior officers by reducing some of the pressures associated with managing challenging situations on board and by providing additional support when required.

This is particularly important given the wide range of responsibilities and decisions they are expected to manage. At the same time, we believe that any initiative aimed at improving the living and working environment of seafarers needs to be supported by continuous and targeted development of their safety knowledge and competencies.

Welfare and safety training should evolve together, addressing the actual risks, challenges and lessons identified from vessel operations. This continuous link between improved living conditions, professional development and safety awareness is essential for maintaining a strong safety culture over the long term. Only through this balanced and continuous approach can the relationship between crew welfare, competence and safety be sustained, allowing all parties involved — seafarers and the company — to feel the positive impact and realise the full benefits of the overall crew welfare journey.


Pargoy on board
Location: Brazil
Photographer: Dwi kartini

A Call to Action

Five years of evidence shows what is possible when the Code of Conduct is taken seriously. The foundations are established among the leading group. The opportunity for the next five years is to make that the norm across the whole industry: stronger practice easier to adopt, progress more visible, and the gap between the best and the rest finally closing.

Owners and operators:

Build on what leading companies have demonstrated is achievable. Use the Code of Conduct to strengthen employment and welfare practices across fleets, with particular attention to the fundamentals highlighted by seafarers: adequate crewing and rest, fair and predictable employment, trusted grievance mechanisms, connectivity and support when things go wrong. Use the CWSA as an ongoing tool for improvement and be prepared to evidence progress.

Charterers and cargo owners:

Use commercial relationships to reward good employment and welfare and enable improvement. Make welfare a meaningful part of due diligence, vessel selection and longer-term supplier relationships. Use charterparty terms and clauses to protect crew welfare, agree improvement plans where gaps are identified, and work with owners to address them rather than relying on exclusion alone. Make continuous improvement and stronger performance relevant in commercial decision-making.

Insurers:

Use employment and welfare insight as part of prevention, not only as evidence after harm occurs. Bring together claims, medical, inspection and welfare data to better understand where crew conditions contribute to human and operational risk. Use that insight in loss prevention and engagement with assureds, support practical improvements where risks are identified, and help build the evidence base for which welfare interventions reduce harm.

Flag states:

Enforce your obligations upon ship owners and strengthen the focus on whether minimum requirements are delivering safe conditions in practice. Scrutinise whether crewing reflects actual operational demand and whether recorded work and rest hours are credible. Use oversight and inspection to identify persistent welfare risks and support operators to address underlying causes rather than treating individual non-conformities in isolation.

Financiers and investors:

Make welfare performance visible in capital decisions, incorporate credible welfare information into due diligence and engagement, recognise operators demonstrating stronger practice and improvement, and use financing relationships to support investment in better working and living conditions.

Regulators and industry bodies:

Keep raising the baseline as evidence develops. Build on the direction already established through the MLC and other frameworks, strengthen implementation of existing protections, and address emerging evidence on fatigue, psychological safety and other areas where minimum compliance may not be sufficient. Work towards greater consistency in how welfare performance and outcomes are understood and evidenced across the industry.

Supporting organisations:

Stronger and sustained efforts to collaborate and work together to advance decent work and continuous improvement in the employment and welfare of seafarers.

Getting Started with the Code of Conduct

01

Establish your baseline

Complete the self-assessment and identify what you cannot yet evidence.

02

Assign responsibility

Name one person accountable for seafarer welfare and give them the mandate to act.

03

Examine recruitment first

Review every agent and placement service, including those used by third-party managers.

04

Test whether crew can speak up

Look at grievance use and check that concerns can be raised safely and independently.

05

Compare policy with practice onboard

Check contracts, crewing, connectivity, food and shore leave against what happens.

06

Prioritise and improve

Choose the most important gaps, set dates to address them and reassess annually.

Where Responsibility Lies

Level	Who	Role	What Good Looks Like
Industry	IMO, ILO, flag and port states	Set the baseline	Clear regulation, oversight and enforcement
Company	Shipowners, operators, managers	Put it into practice	Fair terms, safe crewing, welfare systems and effective grievance mechanisms
Commercia l partners	Charterers, cargo owners, financiers, insurers	Reward and enable better practice	Welfare informs decisions, terms support delivery, and improvement is recognised
Vessel	Masters, officers, onboard management	Make it real onboard	Safe workloads, rest, wellbeing and protections work in practice
Seafarer	Seafarers and crew	Experience and speak up	Rights are understood, concerns can be raised safely and people are treated fairly