



Maritime &
Coastguard
Agency

Consultation Report:
**CODE OF SAFE WORKING PRACTICES
FOR MERCHANT SEAFARERS 2024**

February 2024

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Section 1: Introduction

- 1.1 The Code Of Safe Working Practices For Merchant Seafarers (“The Code”) is an authoritative best practice manual on health and safety on board ships and is endorsed by the National Maritime Occupational Health and Safety Committee (NMOHSC). It is a statutory requirement for the current edition of the Code to be carried on board all UK ships, other than fishing vessels and pleasure craft. The Code explains with the regulatory framework for health and safety on board ship, safety management and statutory duties underlying the advice and gives practical information on safe working.
- 1.2 The Code has developed to become an internationally recognised maritime industry standard of best practice. The Code contains essential health and safety information and it must be made available to any seafarer on board the ship who requests it. Industry has indicated through stakeholder engagement that the manual requires more clarity in its language and, since its initial publication has become too lengthy to be easily used by its target audience (seafarers).
- 1.3 In response to this feedback, the Maritime and Coastguard Agency have redesigned and modernised the Code to improve its structure, ensure consistency and simplify its language. The use of recurring design features will enable quicker reference and generally aid understanding, making it clearer and easier to follow. A glossary has also been added.
- 1.4 In addition, there is a change in the physical format of the document from loose-leaf to bound. The intention is to improve the end-user experience, remove the yearly manual updating process and seek a more cost-effective sustainable solution, as well as making it easier for shipowners to ensure they are using the latest copy of the Code.
- 1.5 Throughout the review of the Code, industry has been central to decisions made. The process commenced with a survey carried out by the publisher, in April 2021. The results of this were assessed and led to the decision to proceed with the review project.
- 1.6 During 2022, industry focus groups were held, representing all user groups, to consider concepts of design and ways to improve and address the feedback received from the survey. Further engagement on the new designs was made with industry through holding a stakeholder engagement exercise, and stakeholders throughout industry as well as MCA officials, contributed to the redrafting of The Code. Finally, stakeholder views were again sought via the public consultation described in this report.
- 1.7 In the process of analysing the costs and benefits for a new code edition, three main options were considered;

Option 1 – do nothing, retaining the code as a printed, loose-leaf ring binder manual requiring the customers to use administrative resource to update, without improvements to the design. The code would be reviewed annually to check references and language clarity, as each chapter or topic is noted for review.

Option 2 –retain the code as a printed loose-leaf ring binder requiring the customers to use administrative resource to update. Redesigned within the parameters available for the loose-leaf format, with an improved structure, clearer language and accessibility

design with icons. This would continue to be updated annually or as frequently as the working group members consider necessary for health and safety reasons.

Option 3 – (preferred option) create a fully bound manual alongside the design improvements and updates outlined in option 1.

- 1.8 During the process of analysing costs and benefits, it was noted that inserting a yearly amendment to replace outdated content for options 1 & 2, took an average of one hour of administrative time per update, per code. Over the years and for the many copies held within some companies, this is a significant cost. In addition, having the latest and best guidance relies on ensuring all amendments are updated annually.
- 1.9 An environmental impact assessment was carried out by the publishers to analyse any potential impact of replacing a full manual each time it is updated, and it was considered low and within the publisher’s sustainability policies. It should also be noted that we have costed this option on the assumption that an updated manual will be published each year, however discretion will be used to ensure that amendments are only released when necessary.

1.10. **Consultation on the review of the Code**

- 1.10.1 The consultation sought to establish views on the new design and structure of the Code of safe working practices for merchant seafarers by outlining specific questions to ensure all aspects had been addressed and all parts of industry given full opportunity to comment. In total there were 12 responses. This (in addition to previous stakeholder engagement as detailed above) ensured a balanced review and true reflection of current industry concerns and working practices.
- 1.10.2 This report outlines the feedback received from the public consultation addressing the concerns raised but also to take the necessary steps to improve the safety of seafarers with regards to the use of COSWP on board ships.
- 1.10.3 We are grateful for all the comments received and we acknowledge the time and effort put into the information provided to us.

Section 2: Key Findings

2.1 Findings from the consultation

Analysis of the consultation responses outlined a number of key points:

- Views captured from a range of stakeholders within the maritime industry, all of whom agreed that the update to design and structure is necessary and welcome.
- The language and clarity of the document is an improvement due to the new formatting. Key highlighted areas and diagrams enhance the understanding of COSWP, making it more user friendly.

- The bound edition will be more sustainable and would have a better impact on the environment. Responses highlighted that a digital copy would be important for future editions.
- Some comments were made regarding specific content within certain chapters. These have been considered as very low risk to safety and will be presented to the working group for review in future editions.
- The consensus is that the new edition will be a positive step forward for COSWP future editions.

Section 3: Summary of Responses

3.1 A number of questions were asked as part of the consultation and the responses have been summarised in the following table, along with MCA comment.

3.2

Question Number	Public Consultation Questions	Summary of Responses	MCA Comment
1	What are your impressions of the new edition's design and structure?	<p>Overall positive feedback. The design and structure is good and pleasant to read with consistency across all pages and is a great improvement compared to previous editions. The refreshing look, better use of colour and layout makes it easier to understand.</p> <p>The use of tables, graphs and illustrations give the document a modern and interactive look and they are impressed with the design, it makes it easier to follow. Colour and layout also makes the document better to follow.</p> <p>References for further reading such as IMO guides, M-Notices etc add weight to guide.</p> <p>There is support for the new design as a means to modernise and enhance the accessibility and useability of the code.</p>	<p>The design and structure is an improvement on previous editions therefore the changes will be made for publication in Spring 2024.</p> <p>Recommendations regarding the symbols have been passed onto and actioned by the publisher.</p>

		Symbols used to identify different types of information in the Code were deemed as useful but possibly not distinctive enough.	
2	Do you feel that the new formatting has improved language and clarity? Please give examples if you think there are areas where this has not been successful.	<p>All agree that the new layout is a considerable improvement and has improved the language and clarity of the document.</p> <p>The use of colour coding and graphics makes the document easier to read, it is comprehensive and well laid out. Key highlighted points are another positive.</p>	We will continue with the proposed changes to COSWP as they improve the language and clarity of the document.
3	What is your impression of the phrasing in the 'active voice'? Does this help to distinguish reference material from practical guidance? Please give examples if you think there are areas where this has not been successful?	<p>The majority thought that use of the active voice has been good and largely successful.</p> <p>One noted that this is essential for readability and accessibility. The document is seen as a less formal document but is more advisory due to the better use of 'active' voice.</p> <p>Some responders did not understand what the term meant. They however had no negative comments regarding the language.</p> <p>Some suggested that active voice does not particularly matter to all who will be reading the COSWP document and that they will only be interested in obtaining specific requirements.</p>	The active voice is a sentence structure which is typically more clear and direct for providing instruction. Given overall positive comments this structure shall be used throughout (where appropriate)
4	Do you agree with the changes in costs for the new edition? If not please detail why that is the case?	<p>Most agree that a bound edition priced at £27.50 sounds very reasonable, especially given its size, complexity and importance. One comment indicated that the cost is under market.</p> <p>There were no objections to the new format. There is a suggestion that a digital copy be sent to all registered British seafarers.</p>	<p>New physical format to be used and priced as detailed in the consultation document.</p> <p>Will consider options for targeted information/pricing for specific sectors however important to note that COSWP is designed to be a generic document for all merchant seafarers.</p>

		<p>One suggests that different platforms like digital, physical etc be charged at different prices depending on the need of the vessel (reflecting comments previously picked up in stakeholder engagement).</p>	<p>Work is ongoing to provide an effective digital offering for the industry.</p>
5	<p>Do you agree with the environmental considerations for producing as a bound edition?</p>	<p>The majority agree that the bound edition will be better for the environment and will be good for sustainability.</p> <p>One responder would like to see the publisher make commitments on the type of paper used for printing and packaging for delivery to ensure recyclability and to encourage recycling of old editions.</p> <p>Everyone has acknowledged that a digital copy will be very important in the future.</p>	<p>New physical format to be used.</p> <p>The publisher already has a sustainability policy in place: A minimum of 75% recycled paper with the remaining paper from sustainable FSC sources; Only recycled packaging is used; and the paper required for print production is “carbon balanced”.</p> <p>Work is ongoing to provide an effective digital offering for the industry.</p>
6	<p>Do you think there is the right balance of diagrams and do they enhance understanding?</p>	<p>The majority have agreed that the use of diagrams enhance the understanding of the document and that they are well thought out and informative.</p> <p>The new version is seen as a great start. It is felt that the use of diagrams makes the publication more accessible to all levels of experience and understanding on board vessels.</p> <p>It is noted that some sections seem to be better balanced than others and that the text can be too dominant.</p> <p>Comments were made regarding the use of different symbols to highlight different parts of the code (e.g. key points, checklists etc) and these have been incorporated into the design.</p>	<p>COSWP is under constant review and may have more images and diagrams to support text in future editions, these will be agreed within the working group. Support from industry to provide suitable source images will be requested.</p> <p>Design related comments taken into consideration.</p> <p>A ‘how to use this book’ section of the Code was created for information purposes.</p>

7	Do you feel that the new COSWP edition better meets the needs of all users?	<p>The majority agree that the new edition meets the needs of all users. The format is a lot more user friendly and communicates key information to all individuals meeting the knowledge requirements.</p> <p>It is seen as a better version of previous editions.</p> <p>A suggestion that a water marked version to be used and issued to Seafarers free of charge as these are the real target audience.</p>	<p>A PDF version will be available on Gov.UK. Future editions may be in a different format but will not be used as an official document.</p> <p>The changes being made to format of the Code will better meet the needs of seafarers.</p>
Section 5.2	Do you have any additional comments to add to the response?	Additional comments made by respondents include various updates and recommendations for certain chapters especially but not exclusive to chapters 11, 15 and Annex 1.3.	The purpose for this consultation was for formatting and layout purposes. Comments regarding content changes have been recorded and will be reviewed for future editions using the regular content review process.

Section 4: MCA Response

- 4.1 The public consultation confirmed that the changes to format and structure of COSWP would benefit the industry, improving the language and clarity of the document.
- 4.2 In response to the public consultation, the MCA are working TSO to create a fully bound manual alongside the design improvements and updates outlined in the options above.
- 4.3 Publication is expected Spring 2024, at the price point detailed in the consultation.
- 4.4 The publishers have guaranteed that the new edition of COSWP will be printed on at least 75% recycled paper with the remaining percentage made from FSC approved sources.

Only recycled packaging will be used.

- 4.5 All comments made regarding content recommendations have been recorded and will be reviewed for future editions after consultation with the working group.

Section 5: Who Responded

- 5.1 The MCA would like to thank the following organisations and individuals for taking the time to comment on this consultation:

5.2

British Marine
Cargo and Marine Consultant
Health & Safety Executive – Product Safety & Market Surveillance Unit
Independent Master Mariner
Maritime Professional Council of the United Kingdom MPCUK
Senior Product Manager – Welding & Repair
Serco Northlink Ferries
Solent University
The Nautical Institute
The Workboat Association
UK Chamber of Shipping
United Kingdom Maritime Pilots' Association

(List does not reflect the number of responses received)