



Maritime &  
Coastguard  
Agency

## MARINE GUIDANCE NOTE

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# MGN **XXX** (M)

# Application of the Industrial Personnel Code and the Special Purpose Ships Code

**Notice to all Shipowners, Masters, Managers, Crew, Charterers, Shipbuilders, Project Managers, Employers, Surveyors, Recognised Organisations, Contractors and other providers of shipboard personnel**

This Marine Guidance Note should be read in conjunction with the Merchant Shipping (Safety Measures for Ships Carrying Industrial Personnel and Special Personnel) Regulations 2025.

This Marine Guidance Note replaces MGN 674 (M) (Application of the Special Purpose Ships Code).

## Summary

This Marine Guidance Note provides advice concerning new requirements for the carriage of industrial personnel and special personnel in the Merchant Shipping (Safety Measures for Ships Carrying Industrial Personnel and Special Personnel) Regulations 2025 (“the 2025 Regulations”).

## 1. Introduction

1.1 **Industrial personnel** are persons who are transported or accommodated on board a cargo ship or high speed cargo craft for the purposes of offshore industrial activities performed on board other ships and/or on offshore facilities. As such, they cannot be treated as either passengers or crew (and also not as special personnel). Safety measures for industrial personnel are contained in Chapter XV in the Annex to the International Convention for the Safety of Life at Sea, 1974 (“**the SOLAS Convention**”) (safety measures for ships carrying industrial personnel), which came into force on 1 July 2024

(IMO Resolution MSC.521(106)<sup>1</sup>). Chapter XV incorporates, and makes mandatory, the technical requirements for the carriage and accommodation of industrial personnel on cargo ships and high speed cargo craft which are contained in the International Code of Safety for Ships Carrying Industrial Personnel (“**the IP Code**”) (IMO Resolution MSC.527(106))<sup>2</sup>. The 2025 Regulations implement these international requirements into United Kingdom law.

1.2 **Special personnel** are persons who are carried on board a ship in connection with the special purpose of that ship or because of special work being carried out on board the ship, and who are not passengers, members of the crew of the ship or industrial personnel. The Code of Safety for Special Purpose Ships (“**the SPS Code**”) contains safety measures for special personnel and exists in two versions: **the SPS Code 1983** (IMO Resolution A.534(13) as amended), and **the SPS Code 2008** (IMO Resolution MSC.266(84) as amended). The SPS Code 1983 applies to ships constructed before 1 July 2009 and the SPS Code 2008 applies to ships constructed on or after 1 July 2009 and also to vessels not previously certificated as “**Special Purpose Ships**” (ships which carry special personnel). The MCA’s policy on the application of the SPS Codes was previously contained in MGN 674(M) and took into consideration the carriage of industrial personnel in the application of the SPS Codes. Although not mandatory in international law, the SPS Codes are widely relied on, and the 2025 Regulations make both the SPS Code 1983 and the SPS Code 2008 mandatory in United Kingdom law.

1.3 The SOLAS Convention, as implemented in UK merchant shipping legislation, allows a cargo ship to carry up to 12 passengers in addition to the crew. The Convention recognises that a passenger is “*every person other than the master and members of the crew or other persons employed or engaged in any capacity on board a ship on the business of that ship (or a child under one year of age).*” A ship carrying more than 12 passengers is, by definition, a passenger ship and is subject to enhanced constructional and operational requirements to ensure the safety of the passengers on board.

1.4 The IP Code and the SPS Codes apply to cargo ships and high-speed cargo craft (i.e. not passenger ships or passenger craft) for which only cargo ship certificates, or the corresponding high speed craft certificate, should be issued. However, because of various enhancements in terms of the construction and equipment applicable to the ship, and to the safety and training standards for the industrial personnel or special personnel on board, such ships are permitted to carry more than 12 non-crew (taken as an aggregate of passengers, industrial personnel and special personnel).

1.5 Both the IP Code and SPS Codes provide suitable safety standards for ships operating in the offshore sector (i.e. the oil and gas, and windfarm industries). However, it is recognised that the SPS Code can be applied to ships operating in other fields, such as research and cable laying vessels. The IP Code is a mandatory IMO instrument which the United Kingdom is required to implement as a party to the SOLAS Convention. The SPS Codes, however, are non-mandatory instruments which States may opt to apply on a mandatory basis. In view of the synergies between the application of the IP Code and the SPS Codes, UK policy is to implement all the Codes in one mandatory instrument.

1.3 Further, whilst both the IP Code and SPS Codes are intended for application to ships of 500GT or more and undertaking international voyages, IMO Member States are

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<sup>1</sup>[https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MSCResolutions/MSC.521\(106\).pdf](https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MSCResolutions/MSC.521(106).pdf)

<sup>2</sup>[https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MSCResolutions/MSC.527\(106\).pdf](https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MSCResolutions/MSC.527(106).pdf)

encouraged to apply the Codes to ships <500GT and also to ships undertaking non-international voyages. Therefore, the 2025 Regulations apply to such ships. UK requirements are already in place for high-speed cargo craft which are <500GT<sup>3</sup> operating on non-international voyages. The 2025 Regulations ensure operators have the flexibility to comply with either: the Merchant Shipping (High Speed Offshore Service Craft) Regulations 2022 (SI 2022/41), which incorporate the High Speed Offshore Service Craft Code, which is a comprehensive code for high speed cargo craft under 500 gross tonnage, **or** with the IP Code (as implemented by the 2025 Regulations) **and** the High Speed Craft Code 2000 (as implemented by the Merchant Shipping (High Speed Craft) Regulations 2022 (SI 2022/1219) (“the High Speed Craft Regulations 2022”).

1.4 Note also that the Workboat Code (Edition 3)<sup>4</sup> applies to the safe carriage of industrial personnel on vessels subject to the Code, up to a maximum of 12 passengers and industrial personnel in aggregate. Therefore, for vessels which are **not** subject to the Workboat Code (those under 24 metres in length) and intending to carry more than 12 passengers and industrial personnel in aggregate, the requirements in the Merchant Shipping (Safety Measures for Ships Carrying Industrial Personnel and Special Personnel) Regulations 2025, as set out in this MGN, will apply instead.

1.8 When industrial personnel are transported on vessels which are certificated in accordance with the Workboat Code, it is strongly recommended that the industrial personnel requirements set out in the IP Code (Part III/1) are complied with, when they are on board for the purposes of “*offshore industrial activities*” (see paragraph 2.4 below).

1.9 In accordance with Article 1 of the Protocol of 1988 to the SOLAS Convention (general obligations), “*no more favourable treatment*” should be given to either UK or non-UK ships operating in UK waters. As such, the requirements of the 2025 Regulations apply equally to all ships carrying industrial personnel and special personnel whilst the ship is operating in UK waters.

## **2. The International Code of Safety for Ships Carrying Industrial Personnel (IP Code)**

### **Introduction**

2.1 The IP Code provides for the safe carriage of industrial personnel on ships and their safety during personnel transfer operations by considering the risks which are not adequately mitigated by the applicable safety standards in the SOLAS Convention. It is closely based on the SPS Code 2008, but with some adaptations and provisions for the training of industrial personnel, arrangements for the safe transfer of personnel and the carriage of dangerous goods while industrial personnel are on board.

2.2 The IP Code provides a goal-based standard, in which goals and functional requirements are achieved through the application of specific regulations. The Code supplements the cargo ship requirements in the SOLAS Convention, i.e. in relation to cargo ships which are certified under SOLAS Chapter I, as the minimum standard. Likewise, for high-speed vessels, the starting point is compliance with SOLAS Chapter X and the High-

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<sup>3</sup> SI 2022/0041 – The Merchant Shipping (High Speed Offshore Service Craft) Regulations 2022

<sup>4</sup> SI 2023/1216 – The Merchant Shipping (Small Workboats and Pilot Boats) Regulations 2023

Speed Craft Code as the minimum standard, which is then enhanced by the additional requirements of the IP Code.

2.3 Industrial personnel means “*all persons transported or accommodated on board for the purpose of offshore industrial activities performed on board other ships and/or offshore facilities*”. Thus, the emphasis is on work performed away from the ship which is providing the transport or accommodation for the industrial personnel.

2.4 In this respect, “*offshore industrial activities*” means “*the construction, maintenance, decommissioning, operation or servicing of offshore facilities related, but not limited, to exploration and exploitation of resources by the renewable or hydrocarbon energy sectors, aquaculture, ocean mining or similar activities.*” Thus, these activities can include activities associated with both the oil and gas, and wind farm sectors.

2.5 Note that “offshore industrial activities” does not include within its scope, vessels which are engaged in the construction, maintenance and servicing of facilities located on offshore islands or other remote locations. Such ships would need to comply with passenger ship requirements.

### **Application of the IP Code in the United Kingdom (regulations 9 and 10 of the 2025 Regulations)**

2.6 The IP Code applies to cargo ships and high-speed cargo craft of **500GT and above** constructed on or after 1 July 2024, but the 2025 Regulations **extend** the application of the Code to all cargo ships **under 500GT** on both international and non-international voyages, subject to carrying an aggregate of more than 12 industrial personnel, special personnel and passengers. For high-speed cargo craft, the 2025 Regulations provide the option to either comply with the Merchant Shipping (High Speed Offshore Service Craft) Regulations 2022 (SI 2022/41) (for those vessels under 500GT), or the IP Code as it applies to high-speed craft (as implemented under the 2025 Regulations) **and** the Merchant Shipping (High Speed Craft) Regulations 2022.

2.7 Noting that cargo ships are already entitled to carry up to 12 passengers, the parameter of “*more than 12*” includes the aggregate number of industrial personnel, special personnel and passengers carried on board. Thus, a ship carrying a minimum of one industrial personnel, plus an aggregate of special personnel and/or passengers which in total exceeds 12, will result in the ship coming within the scope of the IP Code. The number of passengers being carried must not exceed 12, otherwise passenger ship requirements will apply. Industrial personnel are not considered to be passengers (see SOLAS XV/3.2 and the definitions of “industrial personnel” and “passenger” in regulation 3 of the 2025 Regulations) and are designated as a separate category of person on board. If a cargo ship never carries more than 12 industrial personnel, it is strongly recommended that the ship still complies with the IP Code requirements concerning industrial personnel and safe transfer arrangements (see regulations in Part III/1 and 2 respectively).

2.8 The IP Code recognises that special personnel may be carried at the same time as industrial personnel (SOLAS Chapter XV/3.2, or 3.3 if applicable). This does not change the position in relation to the application of the IP Code as the carriage of any industrial personnel at all triggers the higher standard of the IP Code. However, a ship that is certified in accordance with the IP Code which carries only special personnel and no industrial personnel on a single exceptional voyage, may not also need certification as a Special Purpose Ship as well. This equivalence arrangement is subject to approval by the MCA.

### **Safe Transfer Arrangements**

2.9 The master has ultimate responsibility for all persons on board and therefore has the authority to halt the transfer of persons at any time if it is considered that the safety of the vessel or persons on board may be compromised.

2.10 Regulation III/2 of the IP Code contains the requirements for the safe transfer of industrial personnel where the safe transfer arrangement is provided by the IP Code vessel. The safe transfer arrangement must be:

- .1 designed, constructed and maintained to withstand the loads the ship is subjected to;
- .2 designed and engineered to fail to a safe condition in the event of a loss or reduction in associated functionality; and
- .3 capable of safely returning persons in transfer to a safe location after loss of power (see paragraph 2.2.2 in Part II of the IP Code – functional requirements).

2.11 When the safe transfer arrangement is provided by the offshore structure, the following matters, in particular, should be taken into account:

- .1 clear lines of communication to be maintained at all times between the supervising responsible officer on the offshore installation and the navigating bridge of the vessel during transfer operations;
- .2 onboard procedures during personnel transfers should only be undertaken by properly trained personnel;
- .3 there should be a safe and unobstructed route for industrial personnel on the vessel in accordance with Regulation III/2.1.6 of the IP Code during transit to and from the safe transfer arrangement;
- .4 the deck area for personnel transfer should be designed and free from obstructions in accordance with Regulation III/2.1.8 of the IP Code; and,
- .5 a job safety analysis should be carried out in accordance with Regulation III/2.1.9 of the IP Code.

2.12 The following guidance regarding the safe transfer of industrial personnel, or approved alternative, must also be taken into account: **IMCA M202 – Guidance on the Transfer of Personnel to and from Offshore Vessels and Structures<sup>5</sup>** as amended, and **MCA Code of Safe Working Practices for Merchant Seafarers, chapters 31 and 32<sup>6</sup>** as amended, (see Regulation III/2.1.10 of the IP Code).

### **Certification of Safe Transfer Arrangements**

2.13 Safe transfer arrangements must comply with the requirements contained in Regulation II/2.2.2.2 of the IP Code (see Regulation III/2.2.2).

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<sup>5</sup> <https://www.imca-int.com/product/guidance-on-the-transfer-of-personnel-to-and-from-offshore-vessels-and-structures/>

<sup>6</sup> <https://www.gov.uk/government/publications/code-of-safe-working-practices-for-merchant-seafarers-coswp-amendment-7-2022>

2.14 The safe transfer arrangements must comply with the rules of a classification society recognised as a Recognised Organisation by the United Kingdom, including the provision of a type approval certificate.

### **Vessels <500GT and which undertake either international or non-international voyages**

2.15 UK policy is to apply SOLAS Chapter XV and the IP Code to vessels <500GT, whether operating on international or non-international voyages, with the exception of high-speed craft operating on non-international voyages. This latter category of vessel may comply with either (a) the Merchant Shipping (High Speed Offshore Service Craft) Regulations 2022 (SI 2022/41) (“**the HSOSC Regulations**”) or (b) the IP Code **and** the High Speed Craft Code 2000, as implemented in, respectively, the 2025 Regulations and the High Speed Craft Regulations 2022. All other vessels must comply with the 2025 Regulations, which incorporate the requirements of the IP Code.

2.16 Vessels of less than 500GT may apply for exemptions from requirements of the IP Code. Applications will be considered on a case-by-case basis: see **MSF1261**, available on Gov.UK: [Apply for equivalence, exemption or alternative design and arrangement from statutory requirements - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/apply-for-equivalence-exemption-or-alternative-design-and-arrangement-from-statutory-requirements) The justification and any alternative compliance proposed must be indicated in the application for any exemption (or equivalence, if relevant).

## **3. The Code of Safety for Special Purpose Ships (SPS Code)**

### **Introduction**

3.1 The SPS Codes provide a standard for cargo ships of 500GT and above which carry an aggregate of more than 12 special personnel and passengers. However, IMO Member States are also encouraged to extend the application of the SPS Codes to vessels under 500GT. As such, the 2025 Regulations apply the SPS Codes to all Special Purpose Ships of all sizes and engaged on either international or non-international voyages. Special personnel are persons that are specifically needed for the particular operational purpose of the ship and are carried **in addition to the crew**. Because special personnel are on board in connection with the operational purpose of the ship, they work largely on board the ship, often in close association with the crew. This is in contrast to industrial personnel whose work takes place off the ship that transported them.

3.2 The types of activities undertaken by special personnel in accordance with the SPS Code include the following:

- .1 Scientists or technicians engaged in research, hydrographic or oceanographic surveys, or expeditions;
- .2 personnel engaged in training and practical marine experience to develop seafaring skills suitable for a professional career at sea;
- .3 personnel who process the catch of fish, whales or other living resources of the sea on factory ships not engaged in catching;
- .4 salvage personnel on salvage ships, cable-laying personnel on cable-laying ships, seismic personnel on seismic survey ships, diving personnel on diving support

ships, pipe-laying personnel on pipe layers and crane operating personnel on floating cranes; and remotely operated vehicle technicians; and

.5 technicians that work on wind and tidal turbines (industrial personnel), or other emerging energy technologies.

3.3 As such, the SPS Codes can be applied to ships undertaking a wider variety of roles, beyond just providing support to the offshore sector.

3.4 Special personnel cannot be regarded as part of the crew. The SPS Codes define the crew as “*all persons carried on board the ship to provide navigation and maintenance of the ship, its machinery, systems and arrangements essential for propulsion and safe navigation or to provide services for other persons on board*”. Special personnel can be designated as passengers, so long as there are no more than 12 on board. If the number is higher than 12, the additional persons are classified as special personnel and the SPS Code applies. If any of this number comprises industrial personnel, the IP Code applies.

3.5 Further, it should be noted that “*seafarer*” means any person, including the master, who is employed or engaged or works in any capacity on board the ship and whose normal place of work is on that ship. “*Seafarer*” does not apply to those persons whose work is not part of the routine business of the ship and whose primary place of work is ashore, for example, marine professionals such as harbour pilots, inspectors or superintendents, research scientists, divers, and specialist offshore technicians. However, it is to be noted that it is not the matter of the role that is the deciding factor; it is whether the normal place of work is on board a ship or not. See also paragraph 5.10 below.

### **Application of the SPS Codes in the United Kingdom (regulations 11 and 12 of the 2025 Regulations)**

3.6 Ships carrying more than 12 special personnel and passengers (subject to a maximum of 12) in aggregate should:

.1 if constructed on or after 1 July 2009, comply with the 2008 SPS Code;

.2 if constructed before 1 July 2009, may comply with the SPS Code 2008 OR the SPS Code 1983, but this is subject to paragraph 3.7 below (see also Section 4 below).

3.7 Ships (irrespective of the date of construction), which were not certified in accordance with the SPS Code 1983 before entry into force of the 2025 Regulations must comply with the SPS Code 2008. When carrying industrial personnel (of any number) the ship must comply with the IP Code (Part 2 of the 2025 Regulations).

### **Vessels <500GT and which undertake either international or non-international voyages**

3.8 UK policy is to apply the SPS Codes to vessels <500GT, whether operating international or non-international voyages. Such vessels must therefore comply with the 2025 Regulations, which incorporates the requirements of the SPS Code.

3.9 The 2025 Regulations contain provision to grant an exemption from the requirements of the SPS Code 1983 and SPS Code 2008 for exceptional single voyages and also, in the case of the 1983 Code, for SPS ships on near-coastal voyages. The Regulations also implement the provision in the Codes for equivalences. Applications for exemptions and equivalences will be considered by the UK on a case-by-case basis. The application form for

exemptions and equivalences (MSF1261) is available on Gov.UK: [Apply for equivalence, exemption or alternative design and arrangement from statutory requirements - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/apply-for-equivalence-exemption-or-alternative-design-and-arrangement-from-statutory-requirements). In this respect, compliance with the **Code for the Construction and Equipment of Mobile Offshore Drilling Units 2009 (MODU Code)** would be considered an equivalent standard to the SPS Code 2008 for vessels for which the MODU Code is suitable (vessels involved in offshore drilling).

## 4. Grandfathering arrangements for ships already operating in accordance with MGN 674(M)

### Industrial personnel

4.1 For cargo ships and relevant high speed cargo craft constructed before 1 July 2024 which were authorised **before 1 July 2024** to carry more than 12 industrial personnel by their flag Administration in accordance with the *Interim recommendations on the safe carriage of more than 12 industrial personnel on board vessels engaged on international voyages* (IMO Resolution MSC.418(97) (“the Interim Recommendations”), there is a grace period, at the end of which they must comply with particular provisions of the IP Code (SOLAS XV/3.2 and 3.3).

4.2 Where there has been such authorisation, cargo ships which were constructed before 1 July 2024 **must comply** with regulations III/1 (training and instruction of industrial personnel), III/2 (except paragraph 2.1.7) (safe transfer), IV/7 (life-saving appliances and arrangements) and IV/8 (carriage of dangerous goods where IP are on board) **by the first intermediate or renewal survey**, whichever occurs first, after 1 July 2024.

4.3 Again, where there has been such authorisation, high speed cargo craft, other than those under 500GT operating non-international voyages and certified under the HSOSC Regulations, constructed before 1 July 2024, **must comply** with regulations III/1 (training and instruction of industrial personnel), III/2 (except paragraph 2.1.7) (safe transfer), V/7 (life-saving appliances and arrangements) and V/8 (carriage of dangerous goods where IP are on board) **by the third periodical or first renewal survey**, whichever occurs first, after 1 July 2024.

4.4 By virtue of SOLAS Chapter XV/3.2 and 3.3 (implemented by regulation 10 of the 2025 Regulations), the Interim Recommendations are the required basis for an Administration’s authorisation for the carriage of more than 12 industrial personnel. For the authorisation to be effective for the purposes of XV/3.2 and 3.3, relevant ships must have met the requirements of the Interim Recommendations, including paragraph 6, which provides that the standard for the ship carrying industrial personnel is either the SPS Code 2008 or a standard providing an equivalent level of safety, taking into account the number of persons on board.

4.5 In the UK, MGN 674(M) set out the requirements for Special Purpose Ships already operating in the offshore sector and carrying industrial personnel. MGN 674(M) also set out the applicable UK requirements in response to the Interim Recommendations in Resolution MSC.418(97) and provided a general authorisation for UK cargo ships and non-UK cargo ships operating within the UK/UK Exclusive Economic Zone (EEZ) where there was compliance with the SPS Code 2008 (which has generally been evidenced by a Statement of Compliance). This means that these cargo ships may take advantage of the grandfather rights in Chapter XV and comply only with the provisions of the IP Code indicated above (in paragraph 4.2) and by the date of the next relevant survey after 1 July 2024, although they may of course choose to comply with the whole of the IP Code immediately (i.e. as soon as the 2025 Regulations come into force). In either case, the ship will be issued with an



Industrial Personnel Safety Certificate under the Merchant Shipping (Survey and Certification) Regulations 2015 (SI 2015/508).

4.6 High speed cargo craft which were authorised in accordance with the Interim Recommendations by a flag Administration prior to 1 July 2024 must comply with the provisions of the IP Code indicated in paragraph 4.3 as applicable to vessels <500GT, or with the whole of the IP Code. However, it is recognised that the SPS Code 2008 provides a construction standard applicable to conventional vessels (i.e. not high speed by definition), and therefore it is not expected that there are any such high speed Special Purpose Ships which will come within the scope of this authorisation.

4.7 Both cargo ships and high speed cargo craft (if relevant) which were authorised to carry more than 12 industrial personnel in accordance with the Interim Recommendations, must continue to comply with the requirements of the SPS Code 2008 or alternative equivalent standard agreed by MCA (paragraph 6 of the Interim Recommendations) as these requirements are not replaced by other provisions in the IP Code; the training and safe transfer recommendations **are** replaced by alternative provision in the IP Code.

4.8 An authorisation to carry more than 12 industrial personnel issued by an Administration before 1 July 2024 will be time-limited in the extent of their application, following which such ships will need to comply with regulations III/1, III/2 (except paragraph 2.1.7), IV/7 and IV/8 of the IP Code in order to continue operating (SOLAS XV/3.2 and 3.3). For **cargo ships**, such authorisations cease to apply from the **first intermediate or renewal survey**, whichever occurs first after 1 July 2024. For high speed cargo craft, compliance is required by the **third periodical or first renewal survey**, whichever occurs first, after 1 July 2024. Thus, there will be a short timeframe in which such authorisations will continue to apply before certification is required.

4.9 MCA has issued authorisations in accordance with SOLAS XV/3.2 and 3.3 to relevant UK-flagged vessels. Further information regarding this can be found in MIN 708(M). For non-UK flagged vessels which may be subject to port State control inspections in UK ports, the MCA would expect to see a document which includes a statement that the authorisation is issued in accordance with SOLAS XV/3.2 or 3.3, confirms compliance with the Interim Recommendations and provides information to identify the ship (name, IMO number etc), keel laying or major conversion date, and number of persons (the aggregate of industrial personnel, special personnel and passengers) the vessel is certified to carry. The statement should also state when the authorisation will cease to apply.

### **Special Purpose Ships**

4.10 Special Purpose Ships constructed before 1 July 2009 and which complied with the **SPS Code 1983** prior to 1 July 2024, can continue to comply with the SPS Code 1983 for the purpose of carrying **special personnel only**. Such ships must not carry industrial personnel. United Kingdom ships will be issued with a Special Purpose Ship Safety Certificate under the Merchant Shipping (Survey and Certification) Regulations 2015 (which are amended by the 2025 Regulations), which will note the level of compliance.

## **5. IP and SPS Code compliance with medical fitness, safety training, safety management, certification requirements and safe manning**

5.1 The IP Code (Part III/1) sets out the standards which industrial personnel must meet before they can board a ship to which the IP Code applies, as follows:

- .1 must be at least 16 years of age;
- .2 must be medically fit;
- .3 must be able to communicate with the ship's crew;
- .4 must have received appropriate safety training covering personal survival, fire safety, and personal safety and social responsibility;
- .5 must have received onboard ship-specific safety familiarisation; and
- .6 must have received onboard familiarisation with the ship's transfer arrangements and equipment.

5.2 The SPS Code assumes that special personnel will be able-bodied with a fair knowledge of the layout of the ship and will have received some training in safety procedures and the handling of the ship's safety equipment before leaving port, which the owner and master are responsible for arranging. Because the SPS Code does not provide specific requirements, appropriate training requirements are contained in regulation 12 of the 2025 Regulations. The MCA would expect the detail to be outlined in the vessel's Safety Management System. Industrial personnel and special personnel are not considered to be part of the crew for the purposes of training, medical fitness and certification, and the standards in this MGN should be applied to any personnel who have no specific safety duties allocated on a ship's Muster List. In addition to paragraphs 5.5 and 5.6 below, industrial personnel and special personnel are required to have basic safety training and security training in accordance with STCW Chapter VI and be medically certified as for the ship's crew.

### **Medical Fitness**

5.3 Industrial personnel and special personnel should be able to demonstrate their medical fitness with either:

- (a) an MLC compliant medical certificate<sup>7</sup> (e.g. ENG1);
- (b) for non-international voyages up to 60 miles from shore, an ML5 certificate is deemed to be acceptable (see MGN 640 for further information).
- (c) a recognised equivalent medical fitness certificate specified in MSN 1815, as amended;
- (d) subject to a risk assessment by the employer, another certificate of medical fitness appropriate to the duties and geographic location of the worker will be accepted; or
- (e) either of the following options:
  - .1 Offshore Energies UK (OEUK) offshore medical (for offshore workers); or

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<sup>7</sup> See the Merchant Shipping (Maritime Labour Convention) (Medical Certification) Regulations 2010

- .2 medicals carried out in accordance with “The Renewable UK” Medical Fitness to Work Guidelines for near offshore projects (for wind farm workers).

5.4 With respect to .1 and .2 above, these standards are only acceptable for ships operating on domestic voyages. For ships operating internationally whilst carrying special personnel or industrial personnel, such personnel must obtain an ENG1.

### **Safety training**

5.5 All industrial personnel and special personnel should be able to demonstrate safety training and abilities as follows:

- .1 ship familiarisation training defined in MGN 120(M);
- .2 ability to communicate in the working language of the ship; and
- .3 completion of basic safety training in personal survival techniques, fire safety and personal safety and social responsibilities as set out in one of the following courses:
  - .1 Table A-VI/1-1 of the STCW Code; or
  - .2 the Global Wind Organization (GWO), Offshore Petroleum Industry Training Organisation (OPITO) approved Basic Offshore Safety Induction and Emergency Training (BOSIET); or
  - .3 courses developed for the industry that are of at least equal standard to the above, which the company has assessed and are acceptable for the purposes of the operations and occupational risks to which it is anticipated the industrial personnel or special personnel will be exposed. Such courses must adequately address the elements set out in Part III/1 of the IP Code.

5.6 Industrial personnel and special personnel who have been designated safety or pollution prevention duties in the operation of the ship must, before being assigned to duties in accordance with the muster list, receive:

- .1 basic training as set out in Chapter VI/1 of the STCW Code and be required to provide evidence of having completed the training at the required standard of competence to undertake the tasks, duties and responsibilities listed in column 1 of tables A-VI/1-1, A-VI/1-2, A-VI/1-3 and A-VI/1-4 of the Code.
- .2 training as set out in Section A-VI/2, A-VI/3 and/or A-VI/4 of the STCW Code, based on their roles and responsibilities on the muster list.

### **Safety Management**

5.7 Procedures should be established to ensure proper familiarisation training for all new personnel, in accordance with the ship’s safety management system. For all personnel, instructions which are essential to be provided prior to sailing should be identified and documented. The company must be able to show evidence of training certification which complies with Part III/1.3 of the IP Code.

## **Occupational health, safety and welfare**

5.8 Merchant shipping legislation covering living and working conditions protects seafarers. Whether industrial personnel and special personnel on board IP or SPS certificated ships (or ships accepted as equivalent), are “seafarers” for the purposes of the Maritime Labour Convention should be considered against the criteria in MGN 471(M) – *Maritime Labour Convention 2006: Definitions*.

5.9 The occupational health and safety requirements that are applicable to employers, workers and others on board the ship are those in the Merchant Shipping and Fishing Vessels (Health and Safety at Work) Regulations 1997 (see MGN 636 (M+F) as amended, and MGN 492 (M)), whether such persons are considered seafarers or non-seafarers.

5.10 It is recommended that the ship should also carry a statement from the MCA to support the industrial personnel and special personnel on board who are not defined as seafarers under the Maritime Labour Convention (MLC). Owners should apply through their local Marine Office/Customer Service Manager. These will be issued by MCA Headquarters, Maritime Security & MLC Branch in Technical Services (Operations). Further guidance on the interpretation of “seafarers” for MLC purposes can be found in MGN 471(M).

5.11 For foreign flagged vessels operating in the UK EEZ, MCA would expect an equivalent statement to paragraph 5.10 from the ship’s flag administration.

## **Safe Manning**

5.12 It is the responsibility of the owner or operator to ensure that the ship is adequately manned, taking into account the number of persons on board and the area of operation. Ships undergoing relocation voyages when they may not be carrying industrial personnel or special personnel may need fewer crew to deal with any emergency.

5.13 The need to handle large numbers of industrial personnel who may be unfamiliar with the marine environment must be taken into account in determining manning levels. Personnel must be appropriately trained: the owner must ensure that evidence of the training is available and the master must ensure that this has been provided before personnel go on board. Owners and operators must give attention to the requirements for minimum numbers of trained crew to take charge of survival craft and to deal with any emergencies.

5.14 Owners and operators must ensure that the masters, officers, ratings and other personnel have completed the training required by the Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2022 Regulations (SI 2022/1342), specified in Merchant Shipping Notice (MSN) 1866 Amendment 1:

<https://www.gov.uk/government/publications/msn-1866-m-amendment-1-training-requirements-for-seafarers-on-tankers-igf-code-ships-ships-that-operate-in-polar-waters-and-passenger-ships>

5.15 Further information on safe manning can also be found in MSN 1868 Amendment 1.

## More information

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