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## Summary of Articles

### [26-15-1. Systematising and Clarifying the UK' s MASS Regulatory Framework](#)

- The United Kingdom has organised and clarified existing guidance including MGN 702/705/664.
- This clarification addresses uncertainty among operators over the applicable regulatory route.
- It is intended to make existing arrangements easier to navigate ahead of the IMO non-mandatory MASS Code.

### [26-15-2. Strengthening Seafarer Protection in the United Kingdom](#)

- The United Kingdom has published MGN 706 (M) Amendment 1, which strengthens seafarer protection.
- It has also published MGN 475 (M) Amendment 2, requiring seafarers to be informed before employment of relevant financial protection arrangements.
- These measures can be viewed as strengthening the protection of seafarers' rights in both normal and crisis situations.

### [26-15-3. EU Measures against Irregular Migration](#)

- The EU' s new Pact on Migration and Asylum has entered into application.
- The European Commission has published an EU action plan targeting small-boat crossings on the Channel migratory route.
- A new draft return regulation has been approved, allowing detention for up to 24 months and the use of external "return hubs".

### [26-15-4. The UK Foresight Report and Maritime Logistics Risk](#)



- The UK government has published a foresight report on global supply-chain risk and resilience.
- The Suez Canal's surcharge increase illustrates one of the risks highlighted in the report.
- Proposals to levy transit charges in the Strait of Hormuz carry significant political and legal risk.

(End)

## Articles in Full

### [26-15-1. Systematising and Clarifying the UK's MASS Regulatory Framework](#)

On 19 June, the UK's Maritime and Coastguard Agency (MCA) updated its “Autonomy (MASS), UK Maritime Innovation Hub” page and consolidated the regulatory framework applicable to Maritime Autonomous Surface Ships (MASS) and remotely operated vessels. The significance of this measure lies not in the creation of new domestic regulation from scratch, but in the systematic organisation and clearer presentation of existing Marine Guidance Notes (MGN), principally MGN 702 (M), MGN 705 (M) and MGN 664 (M+F), according to vessel size and mode of operation. The suffix appended to each MGN indicates the categories of vessel covered: (M) denotes merchant vessels, while (M+F) denotes both merchant and fishing vessels.[\[1-1\]](#)

More specifically, MASS below 2.5 metres are covered by a general exemption under MGN 702, while Remotely Operated Unmanned Vessels (ROUVs) measuring 2.5 metres or more but less than 4.5 metres are covered by a general exemption under MGN 705. For small, low-risk vessels, these exemptions provide a proportionate regulatory route that, subject to certain conditions, does not require standard certification. Vessels measuring 4.5 metres or more but less than 24 metres are expected to proceed either through individual assessment as innovative-technology vessels under MGN 664 or through certification routes such as Workboat Code Edition 3. Vessels of 24 metres and above are required to meet more comprehensive statutory certification, classification and applicable international convention requirements.[\[1-2\]](#)

There was a clear operational need for this clarification. MASS and remotely operated vessels are increasingly being trialled and deployed in survey, port surveillance, research and security work, whereas conventional vessel regulation presumes a master and crew on board. As a result, operators—particularly those using small uncrewed or remotely operated vessels—had found it difficult to determine which rules, exemptions and certification procedures applied.

This update is also best understood as a step taken with close regard to the adoption and application into force of the IMO non-mandatory MASS Code. The Code was adopted at MSC 111 in May 2026 and is scheduled to apply from 1 July 2026. The United Kingdom therefore needs to set out how it will handle the testing, deployment and certification of MASS domestically in the light of that Code. Accordingly, this measure should be assessed not as the creation of a new regime following the Code's application, but as an enhancement of the guidance function that connects existing arrangements to domestic practice and helps operators identify the applicable route. A structure that offers a simple entry point for small vessels, while requiring individual assessment and formal certification as vessels become larger and higher-risk, reconciles the promotion of trials and deployment with clearer safety verification.[\[1-3\]](#)

## 26-15-2. Strengthening Seafarer Protection in the United Kingdom

On 17 June, the UK's Maritime and Coastguard Agency (MCA) published MGN 706 (M) Amendment 1, concerning the implementation of the 2022 amendments to the Maritime Labour Convention, 2006 (MLC 2006). In this context, "MGN" denotes a Marine Guidance Note, "(M)" indicates that it is addressed to merchant shipping, and "Amendment 1" denotes the first revised edition. The MLC 2006 is an international convention adopted by the International Labour Organization (ILO) governing the working and living conditions of seafarers; as a State party, the United Kingdom is required to give effect to amendments adopted by the ILO in its domestic framework and in the conduct of its maritime administration. Accordingly, this MGN is best understood not as a new UK-specific standard, but as practical guidance for applying the 2022 MLC amendments to UK shipowners, ships, seafarers, and recruitment and placement services.

The 2022 MLC amendments are intended to improve seafarers' working and living conditions in the light of problems that came to the fore during the COVID-19 period, such as stalled crew changes, prolonged service on board, isolation and delayed repatriation. Their scope extends to seafarer recruitment and placement, repatriation, social connectivity on board, food and drinking water, medical care, and occupational safety and health on board. Particular emphasis is placed on ensuring that seafarers can keep in contact with their families and others while on board; on the free provision of adequate food and drinking water; and on the prompt disembarkation of seafarers requiring emergency medical care, together with assured access to shore-based medical treatment.[\[2-1\]](#)

Also published on the same day, MGN 475 (M) Amendment 2 sets out MLC 2006-based requirements governing seafarer recruitment and placement services. That notice requires seafarers to be informed, before employment or during the contracting process, of the financial protection arrangements available should a recruitment and placement service or a shipowner fail to perform its obligations. This is intended to ensure that seafarers can understand in advance their rights and means of redress should they face matters such as unpaid wages, failure to honour employment obligations or delayed repatriation.[\[2-2\]](#) [\[2-3\]](#)

These notices do not directly address security-related incidents such as the seizure of vessels or the detention of seafarers in the Strait of Hormuz and comparable areas. They nonetheless strengthen basic protections—repatriation, medical care, communication, compensation and explanation of rights—for cases in which seafarers, owing to unforeseen circumstances, are unable to disembark and return home as planned, are required to remain on board for extended periods, or suffer contractual disadvantage. For this reason, while they cannot be described as measures prompted by the situation in the Strait of Hormuz, they may be regarded as institutional safeguards capable of responding indirectly to contingencies, including the detention of seafarers.

Taken together, the MCA notices constitute concrete steps to implement the 2022 MLC amendments in the United Kingdom, and form part of a wider effort to strengthen the protection of seafarers' rights in both normal and crisis situations.

## 26-15-3. EU Measures against Irregular Migration

In mid-June, a series of developments took place within the EU concerning measures to address irregular migration and to improve the effectiveness of the return system. The immediate background was the entry into application, on 12 June, of the EU's new Pact on Migration and Asylum. The Pact is a comprehensive framework that brings together entry screening at the external borders, asylum procedures, responsibility-sharing among Member States, crisis response and return procedures, and it moves the EU's migration and asylum policy into a new phase. The European Commission presents the Pact as the foundation of a common EU migration-management system.[\[3-1\]](#)

Building on this institutional reform, the European Commission published an EU action plan on the "Channel migratory route" on 16 June. The plan addresses the dangerous small-boat crossings from northern France and elsewhere towards the United Kingdom, and is notable for treating the Channel issue not merely as a matter for France and other coastal states, but as a migration-management challenge for the EU as a whole. In concrete terms, it combines the detection of smuggling networks, action against the supply chains for small boats, engines and related equipment, coastal surveillance and border management, support from Frontex and Europol, cooperation with countries of origin and transit, and information-sharing and operational cooperation with the United Kingdom. The aim is to deter dangerous small-boat crossings and dismantle smuggling networks. This may be described as a "whole-of-route" approach that seeks to manage smuggling organisations, migration routes, border management and return cooperation in an integrated manner, rather than confining itself to preventing departures at sea.[\[3-2\]](#)

The return system is also under review. On 11 June, the Council of the European Union updated the provisional agreement text on the draft legislation concerning the return of third-country nationals with no legal right to stay, and on 17 June the European Parliament approved the draft regulation. The draft incorporates mechanisms designed to make returns more effective. First, persons who have been ordered to leave are placed under an obligation to cooperate with the authorities in advancing their own return procedures. Second, where a person fails to cooperate, presents a risk of absconding, or poses a security risk, that person may be detained after individual assessment and by order of an administrative or judicial authority. Third, the maximum detention period is set at up to 24 months, with a further extension of up to six months in total possible where circumstances change. Fourth, recourse to "return hubs" established in third countries is permitted. Return hubs are a mechanism for transferring persons who have no right to remain within the EU to a third country that has agreed to receive them, in order to advance their eventual return or transfer to another third country. They are confined to cases based on an agreement with a third country that respects human rights, international law and the principle of non-refoulement.[\[3-3\]](#)

Taken as a whole, these developments are not confined to piecemeal measures against the Channel small-boat problem. With the Pact on Migration and Asylum entering into application, the EU is seeking to link entry management, asylum examination, anti-smuggling



measures and return, and thereby to improve the effectiveness of the migration-management system as a whole.

## 26-15-4. The UK Foresight Report and Maritime Logistics Risk

On 15 June 2026, the Government Office for Science published “Global Supply Chains: A Foresight report on risk and resilience”, a foresight report analysing, with a horizon extending to around 2040, the vulnerability of the international supply chains that underpin the United Kingdom’s economy and security, together with the direction of efforts to strengthen their resilience.[\[4-1\]](#)

The report frames supply chains not merely as a matter of corporate procurement and logistics, but as an issue of national economic security. It also conceives of them not as a linear “chain”, but as a complex, interconnected “network”. On this view, where dependence becomes concentrated on particular supplier countries, firms, ports or maritime chokepoints, any disruption at such a point is liable to propagate widely.

In the maritime domain, the Suez Canal, the Strait of Hormuz, the Strait of Malacca and the Panama Canal are identified as key risk points, with fee increases cited—alongside conflict and climate change—as potential triggers. The report’s aim is not to introduce new regulation, but to foster a shared awareness of risk across government, industry and academia and to demonstrate the need to manage the risks of concentration, dependence and disruption in supply chains at the national level.[\[4-2\]](#)

Against this backdrop, the Suez Canal Authority’s announcement that it will raise various surcharges from 15 July illustrates the type of risk highlighted in the report. Suez is an artificial canal, and the move appears intended to recover and maximise the revenue lost as conditions in the Red Sea deteriorated and to capture value as traffic returns. As a charge for the use of toll-based infrastructure, it is commercially understandable.[\[4-3\]](#)

The Strait of Hormuz, by contrast, requires a different analysis. According to press reports, Iran has indicated that it would permit transit under conditions laid down by Iran and Oman, and that those conditions would include a transit charge. Hormuz, however, is a natural strait in which the right of transit passage is recognised under international law. As a general rule, no charge may be levied on transit as such; charges may only be imposed as remuneration for specific services actually rendered, such as light dues, pilotage and rescue.[\[4-4a\]](#) [\[4-4b\]](#)

The examples of charges in natural straits, such as the Bosphorus and Dardanelles under the 1936 Montreux Convention and the Øresund prior to its abolition in 1857, are each special, historically specific arrangements that cannot simply be applied to Hormuz. [\[4-5\]](#)

In conclusion, the revision of Suez’s charges does not legally justify the levying of transit charges at Hormuz. There remains scope, however, for the argument to be used politically as a rationale for turning strategic chokepoints into revenue sources. The risk that such monetisation spreads under conditions of tension reflects the very network vulnerability against which the report warned.[\[4-6\]](#) [\[4-7\]](#)



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欧州海上安全レポート  
European Maritime Safety Report

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