



Maritime &
Coastguard
Agency

Consultation Report:

**THE MERCHANT SHIPPING (POLAR
CODE) (SAFETY) REGULATIONS 2025**

July 2025

Contents

Section 1:	Introduction	1
Section 2:	Background	1
Section 3:	Proposed changes	2
Section 4:	Summary of comments received and MCA responses	7
Section 5:	Additional comments received and MCA responses	10
Section 6:	Further information	10
Section 7:	Next Steps	11

Section 1: Introduction

This public consultation sought views on the proposed Merchant Shipping (Polar Code) (Safety) Regulations 2025. The consultation was open for six weeks from 12 June 2025 and closed on 23 July 2025. The following organisations were specifically directed to the consultation.

- National Federation of Fishermen’s Organisations
- Scottish Fishermen’s Organisation
- Welsh Fishermen’s Association
- Northern Ireland Fish Producers’ Organisation
- UK Shipbuilders Trade Organisations
- Super Yacht Builders Association (SYBAss)
- UK Chamber of Shipping

Section 2: Background

2.1 The Polar Code¹, which was developed in the International Maritime organization (IMO), is mandatory under the SOLAS Convention² (Chapter XIV) and the International Convention for the Prevention of Pollution from Ships (MARPOL)³. It covers design, construction, equipment, vessel operation, training, search and rescue and environmental protection matters relevant to ships operating in the waters surrounding the two poles. In 2017 the Polar Code came into effect internationally (as a result of the insertion of Chapter XIV into the SOLAS Convention and amendments to MARPOL), providing a clear set of rules to protect not only ships and crews, but also indigenous communities, wildlife and marine ecosystems within the polar regions.

In line with the UK’s international obligations, the UK transposed the safety provisions of the Polar Code into domestic legislation by way of the Merchant Shipping (Polar Code) (Safety) Regulations 2021 (“the 2021 Regulations”), which came into force in early 2022. The environmental provisions were implemented separately in the legislation implementing MARPOL.

During the development of the Polar Code in the IMO, environmental representative organisations raised concerns about the significant number of smaller vessels operating in the polar regions with limited safety and environmental measures in place. Following the introduction of interim guidelines in 2021, the IMO’s Maritime Safety Committee (MSC) adopted mandatory provisions for these vessels in 2023.

The 2023 amendments to SOLAS Chapter XIV are contained in IMO Resolution MSC.532(107)⁴ and the 2023 amendments to the Polar Code are

¹ The International Code for Ships Operating in Polar Waters

² The International Convention for the Safety of Life at Sea, 1974

³ The International Convention for the Prevention of Pollution from Ships, 1974

⁴ [IMO Resolution MSC 532 \(107\)](#)

contained in IMO Resolution MSC.538(107)⁵. Both Resolutions were adopted on 9 June 2023 and will come into force on 1 January 2026. The amendments introduce bespoke requirements for fishing vessels $\geq 24\text{m}$, pleasure yachts ≥ 300 gross tonnage (GT) not engaged in trade and cargo ships of at least 300 but under 500GT, relating to safety of navigation and voyage planning on all voyages in polar waters. These requirements are contained in new regulations 9-1 and 11-1 in part 1-A of the Polar Code. Vessels constructed before 1 January 2026 do not need to comply with the new requirements until 1 January 2027. However, any vessels constructed on or after 1 January 2026 will need to comply with the new requirements as soon as they start to operate in polar waters.

In discharging the obligations under regulations 9-1 and 11-1, ships are required to take into account existing Polar Code requirements for the performance standards of ships' systems and equipment and operational assessment of the ship and its equipment. This obligation is interpreted as a requirement to comply so far as practicable with these additional existing requirements.

The UK is obliged to transpose the amendments to SOLAS Chapter XIV and the Polar Code into domestic law on 1 January 2026. The preferred approach is to revoke and replace the 2021 Regulations with a new statutory instrument (SI), which will incorporate all the provisions of the 2021 Regulations as well as bringing into scope fishing vessels $\geq 24\text{m}$, pleasure vessels $\geq 300\text{GT}$ and cargo ships of at least 300 but under 500GT. These Regulations ("the proposed Regulations") adopt this approach.

Section 3: Proposed Changes

3.1 The objective of the proposed Regulations is to improve the safety of vessels operating in the polar regions, as well as fulfilling the UK's international obligations as an IMO Member State and party to the SOLAS Convention by bringing UK legislation in line with SOLAS Chapter XIV (and the Polar Code). This will be done by transposing the amendments into domestic legislation and ensuring that the proposed Regulations come into force on the same date as the amendments come into force internationally (1st January 2026). The proposed Regulations aim to achieve the following policy objectives:

(a) To bring fishing vessels $\geq 24\text{m}$, pleasure vessels $\geq 300\text{GT}$ and cargo ships of at least 300 but under 500GT, into scope of UK legislation for vessels operating in polar waters. The proposed Regulations will ensure that these additional categories of ship are subject to bespoke requirements regarding safety of navigation and voyage planning, and will also require them to comply, so far as practicable, with existing Polar Code requirements for ship systems and equipment performance standards and operational assessment in part 1-A of the Polar Code (paragraphs 1.4 and 1.5).

⁵ [IMO Resolution MSC 538 \(107\)](#)

(b) To replace the 2021 Regulations with a new statutory instrument (SI) which will incorporate all the requirements of part 1-A of the Polar Code which apply to passenger ships and cargo ships of 500GT or more, operating in polar waters and which were implemented in the 2021 Regulations, as well as implementing the requirements for the additional categories of ship. As part of this transition, the survey and certification requirements in part 1-A will be inserted into the Merchant Shipping (Survey and Certification) Regulations 2015 (SI 2015/508) and the seafarer manning and training requirements in part 1-A will be inserted into the Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2022 (SI 2022/1342). The process of revoking and replacing rather than creating an adjunct SI comprising the amendments will reduce the regulatory burden and make it easier for industry to understand and comply with their regulatory obligations.

(c) To ensure that all convention references in the proposed Regulations are ambulatory in order that future amendments to these referenced latest provisions can automatically become part of UK law.

The proposed new requirements are:

3.2 Requirements for fishing vessels $\geq 24\text{m}$, pleasure vessels $\geq 300\text{GT}$ and cargo ships of at least 300 but under 500GT

The proposed Regulations will extend to UK fishing vessels $\geq 24\text{m}$, pleasure vessels $\geq 300\text{GT}$ and cargo ships of at least 300 but under 500GT, engaged on voyages in polar waters. The new categories of ship must take into account the requirements relating to performance standards and operational assessment in paragraphs 1.4 and 1.5 respectively of chapter 1 in part 1-A of the Polar Code, which the UK interprets as a requirement to comply with these requirements so far as practicable. New, bespoke, requirements relating to the safety of navigation and voyage planning are contained in new regulations 9-1 and 11-1 of the Polar Code respectively.

3.2.1 Performance standards (paragraph 1.4 of chapter 1 of the Polar Code)

All ships' systems and equipment required by the Polar Code and on board fishing vessels 24m or over in length overall, pleasure vessels of 300 gross tonnage or more not engaged in trade and cargo ships of at least 300GT but under 500GT, must take into account at least the same performance standards required by SOLAS, which the UK interprets as a requirement to comply so far as practicable.

- a) For ships operating in low air temperatures, a polar service temperature (PST) must be documented and be at least 10°C below the lowest Mean Daily Low Temperature (MDLT)⁶ for the intended area and season of operation. Systems and equipment required by the

⁶ Polar Code, Part I-A, Chapter 1, 1.2 Definitions, 1.2.9 - *Mean Daily Low Temperature* (MDLT) means the mean value of the daily low temperature for each day of the year over a minimum 10 year period. A data set acceptable to the Administration may be used if 10 years of data is not available.

proposed Regulations must be fully functional at the polar service temperature.

- b) For ships operating in low air temperature, survival systems and equipment must be fully operational at the polar service temperature during the maximum expected rescue time.

3.2.2 Operational assessment (paragraph 1.5 of chapter 1 of the Polar Code)

The Polar Code addresses hazards which may lead to elevated levels of risk due to the increased probability of occurrence. Fishing vessels of 24m or over in length overall, pleasure vessels of 300 gross tonnage or more not engaged in trade and cargo ships of at least 300GT but under 500GT are required to take into account the operational assessment requirements in paragraph 1.5 of chapter 1 of part 1-A of the Polar Code, which the UK interprets as a requirement to comply so far as practicable. In carrying out an operational assessment of the ship and its equipment, all of the following must be taken into consideration:

- a) **operation in low air temperature**
 - i. as it affects the working environment and human performance, maintenance and emergency preparedness tasks, material properties and equipment efficiency, survival time and performance of safety equipment and systems;
- b) **operation in ice**
 - i. experiencing topside icing, with potential reduction of stability and equipment functionality;
 - ii. potential for abandonment onto ice or land;
 - iii. as it may affect hull structure, stability characteristics, machinery systems, navigation, the outdoor working environment, maintenance and emergency preparedness tasks and malfunction of safety equipment and systems.
- c) **operation in high latitude**
 - i. extended periods of darkness or daylight as it may affect navigation and human performance;
 - ii. as it affects navigation systems, communication systems and the quality of ice imagery information;
 - iii. remoteness and possible lack of accurate and complete hydrographic data and information, reduced availability of navigational aids and seamarks with increased potential for groundings compounded by remoteness, limited readily deployable SAR facilities, delays in emergency response and limited communications capability, with the potential to affect incident response;
 - iv. potential lack of ship crew experience in polar operations, with potential for human error;
 - v. potential lack of suitable emergency response equipment, with the potential for limiting the effectiveness of mitigation measures;

- vi. rapidly changing and severe weather conditions, with the potential for escalation of incidents;
- vii. the environment with respect to sensitivity to harmful substances and other environmental impacts and its need for longer restoration.

d) Additional hazards, if identified.

The risk level within polar waters may differ depending on the geographical location, time of the year with respect to daylight, ice-coverage, etc:

- i. ice, as it may affect hull structure, stability characteristics, machinery systems, navigation, the outdoor working environment, maintenance and emergency preparedness tasks and malfunction of safety equipment and systems;
- ii. experiencing topside icing, with potential reduction of stability and equipment functionality;
- iii. low temperature, as it affects the working environment and human performance, maintenance and emergency preparedness tasks, material properties and equipment efficiency, survival time and performance of safety equipment and systems;
- iv. extended periods of darkness or daylight as it may affect navigation and human performance;
- v. high latitude, as it affects navigation systems, communication systems and the quality of ice imagery information;
- vi. remoteness and possible lack of accurate and complete hydrographic data and information, reduced availability of navigational aids and seamarks with increased potential for groundings compounded by remoteness, limited readily deployable SAR facilities, delays in emergency response and limited communications capability, with the potential to affect incident response;
- vii. potential lack of ship crew experience in polar operations, with potential for human error;
- viii. potential lack of suitable emergency response equipment, with the potential for limiting the effectiveness of mitigation measures;
- ix. rapidly changing and severe weather conditions, with the potential for escalation of incidents; and
- x. the environment with respect to sensitivity to harmful substances and other environmental impacts and its need for longer restoration.

The mitigating measures required to address the above specific hazards may vary within polar waters and may be different in Arctic and Antarctic waters.

3.3 Safety of navigation (Polar Code new chapter 9-1)

Fishing vessels of 24m or over in length overall, pleasure vessels of 300GT or more not engaged in trade and cargo ships of at least 300GT but under 500GT must:

- i. have the ability to receive up-to-date information including ice information for safe navigation;
- ii. have systems for providing reference headings and position fixing suitable for the intended areas;
- iii. have the ability to visually detect ice when operating in darkness;
- iv. comply with SOLAS regulation V/22.1.9.4⁷, irrespective of the date of construction and the size, and have a clear view astern;
- v. for ships operating in areas, and during periods, where ice accretion is likely to occur, means to prevent the accumulation of ice on antennas required for navigation and communication shall be provided;
- vi. for ice-strengthened ships:
 - a. ice-strengthened ships constructed on or after 1 January 2026, either two independent echo-sounding devices or one echo-sounding device with two separate independent transducers;
 - b. in category A and B ships, constructed on or after 1 January 2026, have enclosed bridge wings or they must be designed to protect navigational equipment and operating personnel;
 - c. where equipment required by SOLAS chapter V or this chapter have sensors that project below the hull, protect such sensors against ice;
- vii. ships of 500 gross tonnage and upwards, two non-magnetic means to determine and display their heading; both means to be independent and connected to the ship's main and emergency source of power;
- viii. ships proceeding to latitudes over 80 degrees be fitted with at least one GNSS compass or equivalent, which must be connected to the ship's main and emergency source of power;
- ix. ships, with the exception of those solely operating in areas with 24 hours daylight, be equipped with two means of illumination to aid visual detection of ice.

3.4 Voyage planning (Polar Code new chapter 11-1)

The proposed Regulations require fishing vessels of 24m or over in length overall, pleasure vessels of 300 gross tonnage or more not engaged in trade and cargo ships of at least 300GT but under 500GT to follow the procedures required by the safety management system on board. If no safety management system is implemented there must be a documented procedure for operation in polar waters. The safety management system or documented procedure must fulfil the voyage planning requirements detailed in paragraph 11-1.3 of part 1-A of the Polar Code.

The master must consider a route through polar waters, taking into account the following:

- i. the procedures required by the safety management system on board; if no safety management system is implemented there must be a documented procedure for operation in polar waters;

⁷ SOLAS V/22.1.9.4: Ships must meet the following requirements...."9 A clear view through at least two of the navigation bridge front windows and, depending on the bridge configuration, an additional number of clear-view windows shall be provided at all times, regardless of weather conditions."

- ii. any limitations of the hydrographic information and aids to navigation available;
- iii. current information on the extent and type of ice and icebergs in the vicinity of the intended route;
- iv. statistical information on ice and temperatures from former years;
- v. places of refuge;
- vi. current information and measures to be taken when marine mammals are encountered relating to known areas with densities of marine mammals, including seasonal migration areas;
- vii. current information on relevant ships' routing systems, speed recommendations and vessel traffic services relating to known areas with densities of marine mammals, including seasonal migration areas;
- viii. national and international designated protected areas along the route;
- ix. operation in areas remote from search and rescue (SAR) capabilities.

Section 4: Summary of Comments and MCA responses

4.1 Four responses were received to the consultation from industry stakeholders, trade bodies and individual operators.

A summary of the comments received, together with the responses provided by the Maritime and Coastguard Agency (MCA), is set out below.

Q1. Regarding the additional categories of ship being brought into scope by the proposed Regulations (fishing vessels $\geq 24\text{m}$, pleasure vessels $\geq 300\text{GT}$ and cargo ships of at least 300 but under 500GT), do you think the number of polar voyages by UK vessels will increase over the next 10 years and if so, why?

Two responses were received to this question. While one respondent felt that the number of voyages to polar regions would increase due to sea temperatures, currents, fish migration and tourism, another, a fishing industry body, believed that there would be no increase in Polar voyages due to international fishing restrictions in place, and the inability to obtain fishing licences in most foreign waters.

MCA response

The MCA, in line with the international community agrees it is likely that there will be an increase in polar marine traffic over the coming decades, mainly due to reducing sea ice making sea routes more accessible.

Q2. If you plan to operate a vessel within polar regions and to which the proposed Regulations will apply, would you choose to register under the UK flag? Please provide your reasons.

One response was received to this question. The respondent commented that fishing vessel owners are likely to register under a flag State that can assist them in securing legal fishing opportunities and licences in the area of intended operation.

MCA response

The MCA is grateful for these comments and has passed them to the Fishing Vessel team for further consideration.

- Q3. It is an analytical assumption that all UK vessels already operating in polar waters (passenger ships, and cargo ships $\geq 500\text{GT}$) comply with the 2021 Regulations. Do you have any evidence in support of, or with which to challenge this assumption?**

One response received to this question. The respondent commented that they were aware that almost all vessels operating in this area comply with the ISM Code, and, as such should have already considered the risks and hazards presented with operating in this region, as part of full compliance.

MCA response

The MCA welcomes the confirmation that the analytical assumptions made, are correct

- Q4. The requirements of SOLAS Chapter XIV and the Polar Code relating to safety of navigation and voyage planning are being extended to fishing vessels $\geq 24\text{m}$, pleasure yachts $\geq 300\text{GT}$ not engaged in trade and cargo ships of at least 300 but under 500GT. Do you know of any additional costs that these vessels would incur to be compliant with the proposed changes? If so, please provide evidence of this.**

One response was received to this question. One respondent commented that it is likely, as part of demonstrating compliance, that fishing vessels will have to implement a full safety management system (not currently required). Costs of such work can vary significantly but may range from £5k-10k per vessel, with ongoing costs. The other three respondents did not answer this question.

MCA response

The MCA notes the potential costs quoted by the respondent. However, a full safety management system, such as ISM, will not be required. What is necessary, is to have a 'system' in place to address the specific safety requirements of the Code. This can simply be a documented procedure for operation in polar waters, which must fulfil the voyage planning requirements detailed in paragraph 11-1.3 of part 1-A of the Polar Code.

Additionally, as the same respondent commented that they do not expect to see any increase in the number of UK registered fishing vessels undertaking polar voyages, this may negate any potential additional costs.

- Q5. Regarding fishing vessels $\geq 24\text{m}$, pleasure vessels $\geq 300\text{GT}$ and cargo ships of at least 300 but under 500GT, would it be economical or uneconomical to retrofit a vessel to be compliant with SOLAS Chapter XIV and the Polar Code requirements regarding safety of navigation and voyage planning? If not, please explain.**

Two responses were received to this question. One respondent commented that it was "economically possible but dependent on a vessel's existing

equipment”. The other mentioned that “if you want to ensure your ship can be fully engaged and marketable, then it would be beneficial”.

MCA response

The MCA welcomes the comment that it would be “*economically possible*” and beneficial to retrofit a vessel.

Q6. Do you foresee any unintended consequences of the proposed Regulations? Please explain.

Three respondents commented that they did not see that the proposed Regulations would produce any unintended consequences, whilst the other did not provide a response to this particular question.

MCA response

The MCA welcomes the comments received that no unintended consequences are foreseen in relation to the proposed Regulations.

Q7. Will the proposed offences and penalties provide an effective deterrent to non-compliance? If not, please explain.

Two responses were received to this question, both mentioning the high importance of protecting the environment and supporting the proposed offences and penalties. One respondent also asked that the level of fines be defined, as this may have increased impact.

MCA response

The MCA welcomes the comments received that the proposed penalties would act as an effective deterrent to non-compliance. Regulation 13(4)(b) of the proposed Regulations prescribes the maximum penalty (on indictment) for each potential offence under the Regulations:

“on conviction on indictment by imprisonment for a term not exceeding two years, or a fine, or both”.

This means that the fine can be unlimited and allows the court the discretion to decide on the amount, based on the seriousness of the offence.

Q8. Is the proposed guidance which accompanies the Regulations (MGN 637 (Amendment 1)), adequate? If not, please explain.

Three respondents commented that the guidance was clear and well written while the other did not respond to this particular question.

MCA response

The MCA welcomes the comment regarding Marine Guidance Note (MGN) 637 Amendment 1 and that the document clearly explains the vessel and seafarer requirements under the proposed Regulations.

Section 5: Additional comments and MCA responses

5.1 Summary of comments

One respondent commented that they believed the Basic and Advanced training requirements of the Polar Code were insufficient and suggested an alternative “Ice Navigator certificate” issued by the Nautical Institute (NI). Another said Canadian indigenous hunter & trapper associations are increasingly vocal about commercial shipping operating in the waters of their traditional hunting grounds:

“ I’m sure any concerns would be greatly mitigated if they knew there were Third Party NI trained neutral ice navigators on these ships. Having an experienced ice navigator familiar with conservation areas, restricted shipping zones and mitigation measures for marine mammals are just some of the value they add”.

MCA response

The UK’s training standards have been carefully mapped to the minimum requirements set out in the STCW Convention and Code⁸. These standards ensure that vessels operating in polar waters continue to meet international obligations for the safe operation of crew, tailored to vessel type and operational context. The UK’s approach has been developed collaboratively with a wide range of stakeholders, including vessel operators, seafarers, regulators, and training institutions. Courses are approved under the rigorous framework of **Annex D of MSN 1866**, ensuring alignment with both UK and STCW standards.

The Nautical Institute’s Ice Navigator qualification may be highly respected within the industry; however, it is not recognised as a mandatory international requirement under STCW or IMO instruments. Making it a compulsory requirement for UK seafarers would introduce significant additional costs and could place them at a disadvantage compared to their international counterparts. Furthermore, the course itself would require substantial review and validation before it could be considered for formal acceptance. The UK remains committed to maintaining high standards of safety and competence while ensuring fairness and proportionality in our regulatory approach.

Section 6: Further Information

6.1 Although the number of responses to this public consultation was somewhat disappointing, it was to be expected as this is a particularly niche area of regulation, and only a very small number of UK registered ships operate in the polar regions. A follow up communication was sent on 10th July 2025 requesting responses from the trade bodies detailed in section 1.

⁸ The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 and the Seafarers’ Training, Certification and Watchkeeping Code, which is made mandatory by the Convention.

The MCA has welcomed the comments that there are no unintended consequences of the proposed Regulations and that the associated guidance is “*well written*”.

The additional comments received regarding seafarer training and fishing vessels have been passed to the relevant teams within the MCA for further consideration and potential future discussion in the IMO.

Section 7: Next Steps

- 7.1 The MCA will proceed to make and lay the Merchant Shipping (Polar Code)(Safety) Regulations 2025, which will revoke and replace the Merchant Shipping (Polar Code) (Safety) Regulations 2021.
-