

Maritime Labour Convention

Annual Report 2013

Isle of Man Government Department of Economic Development







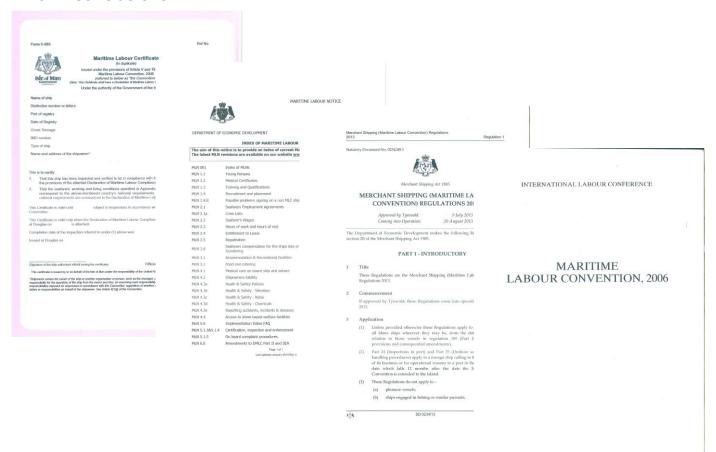
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Introduction

The Maritime Labour Convention 2006 (MLC) was extended to the Isle of Man on 7^{th} August 2013 and came into effect on 20^{th} August 2013 in line with the international coming into force date of the Convention. The aim of the MLC was to modernise labour standards for seafarers by prescribing –

- minimum requirements for seafarers to work on a ship including minimum age, training and qualifications, medical certificates and recruitment and placement;
- conditions of employment including wages, seafarers' employment agreements, hours of work and rest, entitlement to leave, repatriation, compensation for loss and foundering and manning levels;
- standards of accommodation, recreational facilities, food and catering; and
- levels of health protection including health and safety policies and programmes, shipowner's liability and medical care.

The Isle of Man Ship Registry (IOMSR) is responsible for inspections and issuing certification for Isle of Man registered ships trading commercially worldwide. Under the provisions of MLC 5.1.1/2 (General Principles) the Isle of Man Ship Registry is responsible for establishing:

"an effective system for the inspection and certification of maritime labour conditions, ...ensuring that the working and living conditions for seafarers on ships that fly its flag meet, and continue to meet, the standards in this Convention."

To achieve the required standards IOMSR worked tirelessly for many years to develop new legislation, update existing legislation and produce guidance for the benefit of seafarers, technical managers and crewing companies. MLC Standard A5.1.4/13 (Inspection and enforcement) requires:

"The competent authority of each Member shall maintain records of inspections of the conditions for seafarers on ships that fly its flag. It shall publish an annual report on inspection activities within a reasonable time, not exceeding six months, after the end of the year."

In fulfilling the Isle of Man Ship Registry's obligation under MLC A5.1.4/13 this report is the first annual report to be published annually. The report has been compiled taking into consideration the guidance contained in MLC B5.1.4/10. The statistics contained in this report are concerned only with vessels to which the MLC applies. The report covers the calendar year from 1^{st} January 2013 to 31^{st} December 2013.

The MLC replaced the existing inspections required by ILO178 (Inspection of Seafarers Working and Living Conditions) Regulations which has been in force since 2002. The report also replaces the Annual ILO178 Inspection Seafarer's Living and Working Conditions Report published by IOMSR.

1. Isle of Man MLC Regulations, Guidance and Amendments

The Maritime Labour Convention was implemented for Isle of Man ships by the Merchant Shipping (Maritime Labour Convention) Regulations 2013 (SD234/2013) on the 20th August 2013.

The Regulations follow the order and structure of the MLC. The Regulations apply to all Manx commercial ships trading internationally and foreign ships visiting Isle of Man ports with exception of pleasure vessels and fishing vessels. The Regulations also apply MLC5.2.1 (Inspections in port) and MLC5.2.2 (Onshore seafarer complaint handling procedures) which applies to foreign ships calling into a port in the Isle of Man in the normal course of their business or for operational reasons.

In addition to the requirements on shipowners, the Regulations apply MLC1.4 (Recruitment and placement for providers) to any private seafarer recruitment and placement service operating on the Isle of Man. Providers of recruitment and placement services must operate in accordance with the requirements the Regulations and are subject to inspection and certification for compliance.

Where the Regulations set out a standard to be achieved but no specific method of compliance is stated in the Regulations, guidance on how to achieve compliance with that standard can be found in the associated Maritime Labour Notice (MLN). If a standard is implemented in accordance with the provisions of the MLN, this is accepted as evidence of compliance with the regulation. Alternative methods of compliance to those set out in the MLN will be considered on a case by case basis by the Isle of Man Ship Registry.

Shipowners must ensure ships are constructed, equipped and operated in accordance with the requirements of the MLC Regulations and MLNs and that each seafarer enjoys all the rights conferred. The Isle of Man Regulation and MLN specific to each MLC Standard are stated on the ship's Isle of Man Declaration of Maritime Labour Compliance Part 1.

Other Isle of Man Regulations concerning MLC Requirements are listed as follows:-

- Medical Stores Regulations (SD735/01)
- Accident Reporting and Investigation (SD815/01)
- Manning And Training (SD723/96)
- Crew Accommodation (SI1978/795)
- Maintenance of Seamen's Dependants (SI1972/1635)
- Provisions and Water (GC34/90)
- Official Log Books (GC363/92)

Copies of the <u>Regulations</u> and <u>MLNs</u> are obtainable from the Isle of Man Ship Registry, Department of Economic Development, St Georges Court, Upper Church Street, Douglas, Isle of Man, IM1 1EX and can be accessed via the website - <u>www.iomshipregistry.com</u>.

Copies of the Maritime Labour Convention 2006 can be obtained from the International Labour Organisation - www.ilo.org/mlc.

Amendments to the MLC Regulations which came into effect in 2013 - Introduction of MLC Regulations - 20th August 2013.

Amendments to MLNs which came into effect in 2013 - Introduction of MLNs - 20th August 2013.

The latest MLNs as of January 2014 are listed below.

MLN Number	MLN Title	Date Last Amended	Latest Revision
MLN 001	Index of MLNs	Jan 14	Rev 4
MLN 1.1	Young Persons	Aug 12	Rev 1
MLN 1.2	Medical Certificates	Apr 13	Rev 2
MLN 1.3	Training and Qualifications	Apr 13	Rev 0
MLN 1.4	Recruitment and Placement	Aug 12	Rev 0
MLN 1.4.8	Possible problems signing on a non MLC ship	Aug 12	Rev 0
MLN 2.1	Seafarer's Employment Agreements	Apr 13	Rev 5
MLN 2.1a	Crew Lists	July 13	Rev 0
MLN 2.2	Seafarer's Wages	Feb 13	Rev 1
MLN 2.3	Hours of Work and Hours of Rest	Apr 13	Rev 3
MLN 2.4	Entitlement to Leave	Feb 13	Rev 2
MLN 2.5	Repatriation	Apr 13	Rev 1
MLN 2.6	Seafarer's Compensation for the Ship's Loss or	Oct 12	Rev 3
	Foundering		
MLN 3.1	Accommodation & Recreational facilities	Apr 13	Rev 2
MLN 3.2	Food and Catering	Feb 12	Rev 0
MLN 4.1	Medical Care on Board Ship and Ashore	Apr 13	Rev 2
MLN 4.2	Shipowners Liability	Nov 12	Rev 4
MLN 4.3a	Health & Safety Policies	Aug 12	Rev 0
MLN 4.3b	Health & Safety - Vibration	Aug 12	Rev 0
MLN 4.3c	Health & Safety - Noise	Sept 12	Rev 0
MLN 4.3d	Health & Safety - Chemicals	Sept 12	Rev 0
MLN 4.3e	Reporting Accidents, Incidents & Diseases	Oct 12	Rev 0
MLN 4.4	Access to Shore Based Welfare Facilities	Mar 12	Rev 0
MLN 5.0	Implementation Dates FAQ	Mar 13	Rev 0
MLN 5.1.3 & 5.1.4	Certification, Inspection and enforcement	Apr 13	Rev 1
MLN 5.1.5	On board Complaint Procedures	Apr 13	Rev 1
MLN 6.0	Amendments to DMLC Part II and SEA	Jan 14	Rev 0

2. Isle of Man System of Inspection

For Isle of Man registered ships to which the MLC applies, the Isle of Man Ship Registry is the "Competent Authority" as defined in Article II(a) of the MLC and is responsible for implementing the Isle of Man's obligations under the MLC. IOMSR is a Division of the Isle of Man Government Department of Economic Development.

In accordance with the MLC Regulations the following inspections are carried out:

- Inspections in order to certificate Isle of Man registered ships of 500 gross tonnage or over engaged in international voyages pursuant to the requirement of MLC 5.1.3/6.
- Inspections of vessels less than 500 gross tonnage operating commercially.
- Inspections in order to certificate recruitment and placement services based in the Isle of Man pursuant to the requirement of MLC A1.4/2.
- Inspections may also be carried out under the following circumstances:-
 - Isle of Man registered vessels worldwide to which the MLC applies where a complaint has been made.
 - Foreign Flag vessels to which the MLC applies in Isle of Man waters subject to a Port State Control (PSC) Inspection (MLC 5.2.1).
 - Foreign Flag vessels to which the MLC applies in Isle of Man waters where a complaint has been made (MLC 5.2.2).

The IOMSR endeavours to conduct all MLC inspections using exclusive IOMSR surveyors who fulfil the requirement of "inspector" as prescribed by MLC A5.1.4/7. Surveyors from the Ship Registry are empowered to conduct inspections at appropriate intervals and at any other time when given cause to do so. The surveyors have been trained to carry out MLC inspections in accordance with the requirements of MLC A5.1.4 and MLC B5.1.4.

In exceptional circumstances it is not always possible for IOMSR Surveyors to attend all the vessels. Where this occurs a Classification Society may be appointed as a Recognised Organisation (RO) as permitted by MLC 5.1.2/1 in order to carry out the MLC inspections on behalf of IOMSR. This is done on a case by case basis. Classification Societies which may be appointed are listed in Manx Shipping Notice 20.

Inspections are conducted for each registered ship to which MLC applies at intervals not exceeding 3 years. It is arranged that the surveyors complete the MLC Inspection at the same time as the other audits and inspections. Under this arrangement inspections under MLC take place at intervals of less than 3 years which ensures compliance with MLC A5.1.4/4 of the MLC.

IOMSR utilises a computerised reporting and filing system covering a range of ship certification and inspections which includes MLC inspections. This enhances the ability to plan forthcoming MLC inspections, analyse the findings, and monitor any deficiencies raised during inspections. The computerised reporting and filing system at IOMSR fulfils the requirement for maintaining records of inspections as required by MLC A5.1.4/13.

3. Ships and Premises Inspected

The following is an inspection record for Isle of Man registered ships, foreign flagged ships and recruitment & placement services inspected to which the MLC applies.

3.1 Isle of Man Registered Ships Inspected

Isle of Man Registered Ships	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	TOTAL
Total MLC Inspections	25	45	75	72	217
Ships with no MLC deficiencies	4	12	20	24	60
Ships with MLC deficiencies	21	33	55	48	157

For the ships identified where deficiencies requiring rectification action were raised, the deficiencies can be broken down as follows.

	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	TOTAL
1. Minimum Age	5	0	2	1	8
2. Medical Certificates	8	4	10	16	38
3. Qualification of Seafarers	0	1	4	14	19
4. Seafarer Employment Agreements	32	28	37	32	129
5. Use of any Licensed, Certified or Regulated Private Recruitment and Placement Service	10	11	9	5	35
6. Hours of Work and Rest	1	5	7	10	23
7. Manning Levels for the Ship	0	1	0	1	2
8. Accommodation	0	0	5	3	8
9. On-Board Recreational Facilities	0	1	4	0	5
10. Food and Catering	4	7	18	16	45
11. Health and Safety and Accident Prevention	18	21	23	23	85
12. On board Medical Care	2	1	2	2	7
13. On Board Complaint Procedures	7	2	12	3	24
14. Payment of Wages	0	0	2	0	2
TOTAL	87	82	135	126	430

Please note that on some ships more than one deficiency was issued to the same ship. All deficiencies were resolved to the satisfaction of IOMSR. Any deficiencies raised are entered into the computer system and monitored. Once the deficiencies have been rectified satisfactorily they are 'closed out' on the computer system.

The MLC is in the initial stage of being implemented across the Isle of Man fleet. The IOMSR accepts that the number of MLC deficiencies raised is unacceptably high however the MLC is still new to seafarers and shipping companies alike. The IOMSR anticipates the number of MLC deficiencies will significantly reduce over the next couple of years.

3.2 Foreign Flagged Vessels in Isle of Man Waters

Foreign Flag Ships Inspected in Isle of Man	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	TOTAL
Total ships inspected	-	-	-	-	-
Ships with no MLC deficiencies	-	-	-	-	-
Ships with MLC deficiencies	-	-	-	-	-

The above represents (Port State Control) PSC inspections of foreign flagged vessels in Isle of Man territory where MLC deficiencies may be raised as part of the inspection.

Note – Isle of Man MLC Inspections on foreign flagged vessels in Isle of Man waters will not come into effect until 7th August 2014 as per SD234/13 Reg3(2).

3.3 Isle of Man MLC Licensed Premises (Recruitment and Placement Services)

Isle of Man Premises	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	TOTAL
Total premises inspected	5	3	0	0	8
Premises with no deficiencies	5	3	0	0	8
Premises with deficiencies	0	0	0	0	0

A list of MLC1.4 approved private seafarer recruitment and placement services based on the Isle of Man is maintained on IOMSR Website.

Following an inspection of a ship or premises a report is made by the inspector including a list of any deficiencies to be rectified. A deficiency list stating what items are to be rectified is left with the ship's master or premises representative before the Inspector leaves the vessel or premises.

MLC reports issued to the ship's master are required to be displayed in a conspicuous place on board as per MLC A5.1.4/12.



4. Seafarers Subject to Isle of Man Legislation

All "seafarers" defined as per MLC Article II(f) sailing on Isle of Man registered vessels to which the MLC Regulations are applicable fall under the MLC Code requirements. Seafarers working on such vessels are required to be listed in the "List of Crew for IOM Registered vessels" as per MLN 2.1(A).

The following sections outline the various areas where MLC requirements have directly affected the seafarer and where deficiencies have been found during MLC inspections in these areas. A summary of deficiencies found in each area has been provided so that shipping companies and seafarers may benefit from the experience gained from the MLC inspections across the fleet.

4.1 Minimum Age (Young Persons)

The minimum age of a seafarer permitted to be employed on an Isle of Man registered ship is 16 years old however special provisions are in force for seafarers under the age of 18 years as stated in MLN1.1.

Deficiencies concerning minimum age in 2013 included:

• Inadequate company procedures stated

4.2 Seafarer Medical Certificates

All seafarers are required to hold a valid medical certificate as per the requirements of SD723/1996 Reg 66 and MLN1.2

Deficiencies concerning medical certificates in 2013 included:

- Unable to verify medical certificate in compliance with either MLC2006, STCW or ILO76 conventions
- Medical certificate had expired
- Seafarer not in possession of a valid medical certificate
- Medical certificate in Russian language only

4.3 Seafarer Qualifications

All officers and crew are required to be qualified in accordance with Isle of Man Merchant Shipping (Manning and Training) Regulations 1996 (SD723/1996) and carry their original qualification documents with them on board. All documents are subject to inspection at any time by relevant authorities.

Deficiencies concerning seafarer qualifications in 2013 included:

- A seafarer had lost their Isle of Man STCW endorsement
- CRA (STCW endorsement application) letter had expired
- Seafarer only in possession of copies of STCW certification
- Cook had no ship's cook qualification or food hygiene certificate
- Seafarer not in possession of STCW basic safety training course certification
- No ECDIS training certificates for navigation officers sailing on an ECDIS vessel

Ship's Officers are required to hold a valid STCW Certificate of Competency appropriate to their role on board. If the seafarer does not hold a United Kingdom Certificate of Competency then their national certificate of competency is required to be supplemented by an Isle of Man issued STCW endorsement.

Masters and Officers sailing on board Isle of Man registered ships that hold United Kingdom Certificates of Competency issued under the provisions of STCW¹ are examined and certificated by the United Kingdom Maritime and Coastguard Agency. IOMSR has no role or responsibilities concerning the United Kingdom's examination and certification process. Any statistics concerning seafarers in possession of a United Kingdom Certificate of Competency should be obtained directly from the United Kingdom Maritime and Coastguard Agency.

Isle of Man STCW Endorsements are issued pursuant to the requirements of SD723/1996 Reg 15(1) subject to the provisions of the STCW Convention Reg I/2 para 5.

Isle of Man STCW endorsements issued in 2013:

STCW ref	Capacity	Q1	Q2	Q3	Q4	Total
II / 2	Master	118	112	150	138	518
II / 2	Ch. Officer	92	88	116	97	393
II / 1	OOW Nav.	155	188	195	157	695
III / 2	Ch. Eng.	117	132	128	121	498
III / 2	2 nd Eng.	70	89	90	84	233
III / 1	OOW Eng.	115	162	145	115	537
	Total	667	771	824	712	2974

For a list of all the countries that are currently recognised by IOMSR for the issue of Isle of Man endorsements please refer to IOMSR website.

4.4 Seafarer Employment Agreements (SEAs)

All seafarers employed on Isle of Man registered ships are required to have a valid SEA as per the requirements of MLN 2.1.

Deficiencies concerning SEAs in 2013 included:

- SEAs found to have invalid signatories
- Documents referred to in the SEA were not provided on board
- SEA not provided to seafarer
- SEA missing required information
- The collective bargaining agreement associated with the SEA was not on board
- SEA not in English language

4.5 Seafarer's Wages

All seafarers are required to be paid in line with the terms of their SEAs at intervals not exceeding one month as per the requirements of MLN 2.2.

Deficiencies concerning seafarer's wages in 2013 included:

- Failure to pay seafarers at the prescribed monthly intervals
- Deductions made were missing on a seafarer's wage slip

¹ International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 as amended in 1995 and includes the Seafarer's Training Certification and Watchkeeping Code (STCW Code)

4.6 Seafarer Hours of Work and Rest

All seafarers sailing Isle of Man registered ships must comply with the minimum rest requirements as prescribed by IOMSR in MLN 2.3.

Deficiencies concerning seafarer's rest in 2013 included:

- Breach of minimum rest hours
- "Schedule of Working Arrangements" not posted
- Incorrect hours of rest criterion used for calculation
- Seafarers not recording their hours of rest

4.7 Seafarer Complaints

The following is a summary of seafarer complaints received at IOMSR in 2013.

Seafarer complaints received (serving on Isle of Man ships – MLC B5.1.5/2(g)):

• Wage dispute – commercial yacht – case ongoing

Seafarer complaints received (serving on foreign flag ships in Isle of Man waters – MLC 5.2.2):

none

Note – Seafarer complaint handling relating to MLC issues for seafarers on foreign flagged vessels in Isle of Man waters will not come into effect until 7th August 2014 as per SD234/13 Reg3(2).

5. <u>Violations of Legislation, Penalties Imposed and Cases of Ship</u> Detention

Port State Control (PSC) MLC deficiencies issued to Isle of Man ships by PSC Authorities representing countries worldwide are as follows:

	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	TOTAL
Total Inspections with MLC Detentions	0	0	0	0	0
*Total Inspections with MLC Deficiencies	7	18	6	13	44
**Inspections with no MLC Deficiencies	199	214	227	188	828
Total Inspections	206	232	233	201	872

Isle of Man PSC issued MLC deficiencies (foreign flag vessels in Isle of Man waters): none

Isle of Man PSC MLC detentions (foreign flag vessels in Isle of Man waters): none

^{*}Deficiencies include MLC deficiencies and deficiencies relating to ILO Convention 178 (Living and Working Conditions) during the transition phase from ILO178 Inspections to MLC Compliance Inspections in 2013.

^{**}Deficiencies may have been issued in relation to non-MLC issues but are not counted for the purposes of this report.

6. Reported Occupational Injuries and Diseases

All deaths and significant injuries to seafarers on board Isle of Man registered vessels are required to be reported to IOMSR as per the requirements of MS (Accident Reporting and Investigation) Regulations (SD815/01). Initial reports to IOMSR are to be made using form ARF1 available on the IOMSR website – see MLN4.3e and Manx Shipping Notice 003. All occupational diseases should be reported using form OD001 "Report of a Case of Occupational Disease" – see MLN 4.3e.

The tables below represent seafarer deaths and injuries on board Isle of Man registered vessels. The cases represent injuries and deaths from casualty and accident cases.

6.1 Total Number of Injuries and Deaths to Persons on Board per vessel Type

Type of Vessel	Deaths	Injuries
Passenger	0	2
Oil Tanker	1	7
Chemical Tanker	0	0
Gas Carrier	0	7
Bulk Carrier	0	6
Offshore/Standby	1	6
Other cargo Vessel	0	5
Commercial Yacht	0	3
Total	2	36

6.2 Total Injuries and Deaths to Persons on Board Reported

	Injury Accident	Injury Casualty	Death
Master	0	1	1
Ch. Off	3	0	0
OOW Nav	0	0	0
Ch. Engineer	2	1	0
2nd Engineer	0	0	0
OOW Engineer	1	0	0
Deck Rating	11	5	1
Engine Rating	3	2	0
Deck/Eng. Cadet	2	1	0
Cook/Steward	1	1	0
Passenger/Guest*	0	0	0
Visitor/Contractor*	2	0	0
Total	25	11	2

^{*}persons on board may not be an MLC defined "seafarer" but included for the purposes of overall statistics.

6.3 Occupational Diseases, Injuries and Deaths Reported

Injuries	Casualty	Accidents
Death	2	0
Fracture of skull, pelvis, spine, or a major bone in		
the arm or leg	2	0
Other fracture	2	6
Loss of hand or foot	1	0
Loss of fingers	1	0
Other eye injuries	0	1
Concussion	0	1
Burn or scald	1	1
Other strains or hernias	0	2
Dislocations	0	1
Crushing injuries	0	1
Major bruising	1	2
Puncture wound, cut or laceration	0	6
Torn cartilage / ligament / muscle	0	1
Near asphyxiation from oxygen depravation	1	0
Back injury	1	2
Other	1	1

(Please note that more than one injury may have occurred in the same case)

6.4 Activities Being Conducted Leading to an Injury or Death

	Injury Accident	Injury Casualty	Death
Access to the ship	1	0	0
Moving about the ship	6	1	1
Mooring or anchoring	6	2	0
Operating hatch covers	1	0	0
Lifting or carrying by hand	3	1	0
Lifting or carrying mechanically	0	0	1
Opening valves	1	0	0
Opening or lighting a boiler	1	0	0
Using portable tools	4	0	0
Overhauling or maintaining rotating equipment	1	2	0
Watch keeping duties	0	1	0
Launching or recovering survival craft	0	1	0
No activity being carried out	1	1	0
Total	25	9	2

(In some cases more than one seafarer was injured from the same activity)

6.5 Occurrence Leading to an Injury or Death

	Injury Accident	Injury Casualty	Death
Pressure vessel: explosion, collapse or bursting	1	0	0
Sudden uncontrolled release of any substance from a system or pressure vessel	1	0	0
Failure of any lifting device	0	1	0
Slips or falls (same level)	5	0	0
Slips of falls (different levels)	2	1	0
Involving mooring ropes or hawses	3	2	0
Exposure to hazardous or toxic substances	0	0	1
Man overboard	0	0	1
Moving about - no fall, no handling	3	0	0
Moving about - manual handling	3	1	0
Involving rescue boat/lifeboat/liferaft	0	1	0
Maintenance - Machinery	4	1	0
Maintenance - other	1	0	0
Illness	1	1	0
Cargo operations	1	0	0
Galley operations	0	1	0
Total	25	9	2

(In some cases more than one seafarer was injured in the same case)

For more information please refer to the "2013 Summary Report of Casualties, Accidents and Incidents on Isle of Man Registered Vessels" published on the IOMSR website.

Conclusions

In reviewing the application of the MLC and the conduct of inspections in 2013 a number of factors have emerged.

- ≥ 2013 was the first year the MLC has been implemented on Isle of Man registered vessels. As the MLC is new to seafarers and shipping companies the high number of deficiencies raised was expected as shipping companies develop their MLC procedures and the ships implement the procedures on board.
- The Isle of Man Ship Registry does not expect a high deficiency trend to continue in the future. It is anticipated the number of deficiencies will reduce significantly over the next few years as seafarers and companies become more familiar the MLC.
- MLC inspections will become an important part of the vessel's survey regime conducted by Isle of Man Ship Registry. The process of conducting MLC inspections at the same time as other audits and inspections will be continually reviewed by the Isle of Man Ship Registry to ensure continued effectiveness.

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