

# Isle of Man Ship Registry

## Maritime Labour Convention Annual Report

2020

Isle of Man Government  
Department for Enterprise



**Isle of Man  
Government**

*Reiltys Ellan Vannin*



## **Introduction**

The Maritime Labour Convention 2006 (MLC) was extended to the Isle of Man on 7<sup>th</sup> August 2013 and came into effect on 20<sup>th</sup> August 2013 in line with the international enforcement date of the Convention. Prior to MLC the Isle of Man Ship Registry (IOMSR) conducted Seafarer Living and Working Conditions inspections in accordance with the ILO178 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 IOMSR is responsible for ensuring that MLC inspections are conducted and MLC certification is issued to applicable ships on behalf of IOMSR for Isle of Man registered ships trading commercially worldwide. Under the provisions of MLC 5.1.1/2 (General Principles) the IOMSR 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's obligation under MLC A5.1.4/13 this report is published annually and 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 ships to which the MLC applies.

This report covers the calendar year from 1<sup>st</sup> January 2020 to 31<sup>st</sup> December 2020.

If you have any questions concerning the Isle of Man's implementation of MLC please contact us at either of the following:-

Isle of Man Ship Registry, Department for Enterprise,  
St George's Court, Upper Church Street, Douglas, IM1 1EX, Isle of Man, British Isles.

Tel +44 1624 688500

Fax +44 1624 688501

Email: [marine.mlc@gov.im](mailto:marine.mlc@gov.im)

**[www.iomshipregistry.com](http://www.iomshipregistry.com)**

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INTERNATIONAL LABOUR CONFERENCE

**MARITIME  
LABOUR CONVENTION, 2006**

Merchant Shipping (Maritime Labour Convention) Regulations 2013 Regulation 1

Statutory Document No. 0236/2013



Merchant Shipping Act 1985

**MERCHANT SHIPPING (MARITIME LABOUR CONVENTION) REGULATIONS 2013**

Approved by Tynwald: 9 July 2013  
Coming into Operation: 20 August 2013

The Department of Economic Development makes the following Regulations under section 2B of the Merchant Shipping Act 1985.

**PART 1 - INTRODUCTORY**

**1 Title**  
These Regulations are the Merchant Shipping (Maritime Labour Convention) Regulations 2013.

**2 Commencement**  
If approved by Tynwald, these Regulations come into operation on 20 August 2013.

**3 Application**

(1) Unless provided otherwise these Regulations apply to all seafarers and all Manx ships wherever they may be, from the dates prescribed in relation to those vessels in regulation 189 (Part 26 - Transitional provisions and consequential amendments).

(2) Part 24 (Inspections in port) and Part 25 (Onshore seafarer complaint handling procedures) apply to a foreign ship calling in the normal course of its business or for operational reasons to a port in the Island from the date which falls 12 months after the date the Maritime Labour Convention is extended to the Island.

(3) These Regulations do not apply to –

(a) pleasure vessels;

(b) ships engaged in fishing or similar pursuits;

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MARITIME LABOUR NOTICE

**MLN 001**  
(Rev 9)

DEPARTMENT OF ECONOMIC DEVELOPMENT

**INDEX OF MARITIME LABOUR NOTICES**

This is an index of current Maritime Labour Notices (MLNs). While this notice will be updated on a regular basis the latest MLNs will be available on our website and this will be the most up to date record.

Most Regulations and notices are available on the Isle of Man Government website: [www.isomshipregistry.com](http://www.isomshipregistry.com) or by contacting [marine.survey@goov.im](mailto:marine.survey@goov.im)

MLN 001	Index of MLNs	Nov 17	Rev 9
MLN 1.1	<a href="#">Young Persons</a>	Aug 12	Rev 1
MLN 1.2	<a href="#">Medical Certificates</a>	Apr 13	Rev 2
MLN 1.3	<a href="#">Training and Qualifications</a>	Jan 15	Rev 1
MLN 1.4	<a href="#">Recruitment and placement</a>	Aug 12	Rev 0
MLN 1.4.8	<a href="#">Possible problems signing on a non MLC ship</a>	Aug 12	Rev 0
MLN 2.1	<a href="#">Seafarers' Employment Agreements</a>	Apr 13	Rev 5
MLN 2.2	<a href="#">Seafarers' wages</a>	Feb 13	Rev 1
MLN 2.3	<a href="#">Hours of work and hours of rest</a>	Apr 13	Rev 3
MLN 2.4	<a href="#">Entitlement to leave</a>	Feb 13	Rev 2
MLN 2.5	<a href="#">Repatriation</a>	Apr 13	Rev 1
MLN 2.6	<a href="#">Seafarer compensation for the ship's loss or foundering</a>	Oct 12	Rev 3
MLN 3.1	<a href="#">Accommodation &amp; recreational facilities</a>	Apr 13	Rev 2
MLN 3.2	<a href="#">Food and catering</a>	Feb 12	Rev 0
MLN 4.1	<a href="#">Medical care on board ship and ashore</a>	Mar 15	Rev 3
MLN 4.2	<a href="#">Shipowner's liability</a>	Nov 12	Rev 4
MLN 4.3a	<a href="#">Health &amp; safety policies</a>	Aug 12	Rev 0
MLN 4.3b	<a href="#">Health &amp; safety - vibration</a>	Aug 12	Rev 0
MLN 4.3c	<a href="#">Health &amp; safety - noise</a>	Sept 12	Rev 0
MLN 4.3d	<a href="#">Health &amp; safety - chemicals</a>	Sept 12	Rev 0
MLN 4.3e	<a href="#">Reporting accidents, incidents &amp; diseases</a>	Oct 12	Rev 0
MLN 4.4	<a href="#">Access to shore based welfare facilities</a>	Mar 12	Rev 0
MLN 5.1.3&5.1.4	<a href="#">Certification, inspection and enforcement</a>	Nov 17	Rev 2
MLN 5.1.5	<a href="#">On board complaint procedure</a>	Apr 13	Rev 1
MLN 6.0	<a href="#">Amendments to D/HLC Part II and SEA</a>	Jan 14	Rev 0
MLN 7.0	<a href="#">MLC Amendments – Financial Security</a>	Dec 16	Rev 0

## **1. Isle of Man MLC Regulations, Guidance and Amendments**

The Maritime Labour Convention (MLC) was implemented for Isle of Man ships by the **Merchant Shipping (Maritime Labour Convention) Regulations 2013 (SD 234/2013)** on the 20<sup>th</sup> August 2013.

The Regulations follow the order and structure of the MLC and apply to all Manx commercial ships trading internationally. The Regulations also apply MLC 5.2.1 (Inspections in port) and MLC 5.2.2 (Onshore seafarer complaint handling procedures) to foreign ships calling into a port in the Isle of Man in the normal course of their business or for operational reasons. Isle of Man MLC inspections on foreign flagged ships in Isle of Man waters came into effect on 7th August 2014 as per SD 234/13 Regulation 3(2).

In addition to the requirements for shipowners, the Regulations apply MLC 1.4 (Recruitment and placement) to any private seafarer recruitment and placement service operating on the Isle of Man. These services must operate in accordance with the requirements of the Regulations and are subject to inspection and certification for compliance.

Where the Regulations set out a standard to be achieved with no specific method of compliance, guidance on how to achieve compliance 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 Regulations. 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 below:

- Medical Stores (SD2015/0055);
- Accident Reporting and Investigation (SD 815/01);
- Safety Official General Duties and Protective Equipment (SD816/01);
- Manning and STCW (SD 2014/0238);
- Crew Accommodation (SI 1978/795);
- Maintenance of Seamen's Dependants (SI 1972/1635);
- Provisions and Water (GC 34/90);
- Official Log Books and List of Crew (SD2015/0387).

Copies of the [Regulations](#) and [MLNs](#) are obtainable from:

- Isle of Man Ship Registry, Department for Enterprise, St George's Court, Upper Church Street, Douglas, Isle of Man, IM1 1EX, British Isles.
- Email - [marine.mlc@gov.im](mailto:marine.mlc@gov.im)
- [www.iomshipregistry.com](http://www.iomshipregistry.com).

Copies of the Maritime Labour Convention 2006 can be obtained from the International Labour Organisation - [www.ilo.org](http://www.ilo.org).

## Amendments to the MLC Regulations which came into effect in 2020

- none

## Amendments to MLNs which came into effect in 2020

The latest MLNs as of 31<sup>st</sup> December 2020 are listed below (amended in 2020):

<b>MLN Number</b>	<b>MLN Title</b>	<b>Date Last Amended</b>	<b>Latest Revision</b>
<b>MLN 001</b>	Index of MLNs	Mar 19	Rev 11
<b>MLN 1.1</b>	Young Persons	Aug 12	Rev 1
<b>MLN 1.2</b>	Medical Certificates	Mar 19	Rev 3
<b>MLN 1.3</b>	Training and Qualifications	Jan 15	Rev 1
<b>MLN 1.4</b>	Recruitment and Placement	Aug 12	Rev 0
<b>MLN 1.4.8</b>	Possible Problems Signing on a non MLC Ship	Aug 12	Rev 0
<b>MLN 2.1</b>	Seafarer's Employment Agreements & Record of Sea Service	Mar 19	Rev 6
<b>MLN 2.2</b>	Seafarer's Wages	Feb 13	Rev 1
<b>MLN 2.3</b>	Hours of Work and Hours of Rest	Apr 13	Rev 3
<b>MLN 2.4</b>	Entitlement to Leave	Feb 13	Rev 2
<b>MLN 2.5</b>	Repatriation	Apr 13	Rev 1
<b>MLN 2.6</b>	Seafarer's Compensation for the Ship's Loss or Foundering	Oct 12	Rev 3
<b>MLN 3.1</b>	Accommodation & Recreational facilities	Apr 13	Rev 2
<b>MLN 3.2</b>	Food and Catering	Feb 12	Rev 0
<b>MLN 4.1</b>	Medical Care on Board Ship and Ashore	Mar 15	Rev 3
<b>MLN 4.2</b>	Shipowner's Liability	Nov 12	Rev 4
<b>MLN 4.3a</b>	Health & Safety Policies	Aug 12	Rev 0
<b>MLN 4.3b</b>	Health & Safety - Vibration	Aug 12	Rev 0
<b>MLN 4.3c</b>	Health & Safety - Noise	Sept 12	Rev 0
<b>MLN 4.3d</b>	Health & Safety - Chemicals	Sept 12	Rev 0
<b>MLN 4.3e</b>	Reporting Accidents, Incidents & Diseases	Oct 12	Rev 0
<b>MLN 4.4</b>	Access to Shore Based Welfare Facilities	Mar 12	Rev 0
<b>MLN 5.1.3</b>	Certification, Inspection and Enforcement	May 20	Rev 3
<b>MLN 5.1.4</b>	Certification, Inspection and Enforcement	May 20	Rev 3
<b>MLN 5.1.5</b>	On board Complaint Procedures	Jan 19	Rev 2
<b>MLN 6.0</b>	Amendments to DMLC Part II and SEA	Jan 14	Rev 0
<b>MLN 7</b>	MLC Amendments – Financial Security	Dec 16	Rev 0

### MLNs withdrawn:

None.

## **2. Isle of Man System of Inspection**

For Isle of Man registered ships to which the Maritime Labour Convention 2006 (MLC) applies, the Isle of Man Ship Registry (IOMSR) 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. The IOMSR is a Division of the Isle of Man Government's Department for Enterprise.

The IOMSR issues and approves Declaration of Maritime Labour Compliance (DMLC) Parts 1 and 2 for all types of ships as prescribed by MLC A5.1.3/10. The IOMSR is responsible for ensuring MLC inspections for all ships are carried out at appropriate intervals not exceeding 3 years in compliance with MLC A5.1.4/4.

The IOMSR has also delegated specified Classification Societies<sup>1</sup> (MLC A5.1.2) to conduct MLC inspections on cargo ships and issue MLC Certification on behalf of IOMSR. Classification Societies may only issue an MLC certificate and not a Declaration of Maritime Labour Compliance Parts 1 and 2.

MLC inspections are conducted by trained IOMSR Surveyors or Classification Society MLC Inspectors who fulfil the requirement of "inspector" prescribed by MLC A5.1.4/7.

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

- Inspections in order to certificate Isle of Man registered ships of 500GT or over operating commercially engaged in international voyages pursuant to the requirement of MLC A5.1.3/6 and MLC A5.1.3/8.
- Inspections of ships less than 500GT operating commercially.
- Inspections in order to certificate recruitment and placement services based in the Isle of Man pursuant to the requirement of MLC 1.4/2.
- Inspections, by IOMSR surveyors only, may also be carried out at any time under the following circumstances:-
  - Isle of Man registered ships worldwide to which the MLC applies where a complaint has been made.
  - Foreign flag ships to which the MLC applies in Isle of Man waters subject to a Port State Control (PSC) inspection (MLC 5.2.1).
  - Foreign flag ships to which the MLC applies in Isle of Man waters where a complaint has been made (MLC 5.2.2).

In addition to MLC Inspections, Isle of Man surveyors also attend cargo ships at intervals not exceeding 3 years for a 'Flag State General Inspection'. Flag State General Inspections include MLC related items as part of the inspection.

The IOMSR and Classification Societies utilise computerised reporting and filing systems covering a range of ship certification and inspections which includes MLC inspections. This enhances the ability to plan forthcoming inspections, monitor any MLC deficiencies raised during inspections and record the final inspection reports. All MLC inspection reports issued by a Classification Society are sent to IOMSR and reviewed. The computerised reporting and filing system at IOMSR fulfils the requirement for maintaining records of inspections as required by MLC A5.1.4/13.

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<sup>1</sup> Recognised Organisations stated in Manx Shipping Notice 020.

### 3. Ships and Companies Inspected

The following is an inspection record for Isle of Man registered ships and recruitment & placement services to which the MLC applies attended by MLC inspectors in 2020.

Following an inspection of a ship or a company (for recruitment and placement services) a list of any deficiencies to be rectified is reported by the inspector. The deficiency list is left with the ship's master or company representative before the inspector leaves the ship or company. Rectification is to be completed within an agreed time limit.

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

#### 3.1 Isle of Man Registered Ships

**MLC Inspections** are required in accordance with MLC A5.1.3. MLC inspections are carried out by inspectors from either IOMSR or a Recognised Organisation (Classification Society).

**Flag State General Inspections** (Flag GI) of ships and yachts are carried out in addition to MLC inspections at intervals not exceeding 36 months by IOMSR surveyors and cover a variety of inspection items, including items covered under the MLC.

A record of MLC and Flag GI inspections for commercial ships and yachts in 2020 and any MLC related deficiencies raised is as follows:

Type of inspection:	MLC	Flag GI	Total
<b>Number of inspections:</b>	<b>113</b>	<b>101</b>	<b>214</b>
<b>Ships with no MLC deficiencies:</b>	<b>104</b>	<b>63</b>	<b>167</b>
<b>Ships with MLC deficiencies:</b>	<b>9</b>	<b>38</b>	<b>47</b>
<b>MLC Deficiencies raised:</b>	<b>11</b>	<b>43</b>	<b>54</b>
0. MLC certification and documentation		1	<b>1</b>
1. Minimum Age			
2. Medical Certificates		1	<b>1</b>
3. Qualification of Seafarers		5	<b>5</b>
4. Seafarer Employment Agreements		2	<b>2</b>
5. Use of any Licensed, Certified or Regulated Private Recruitment and Placement Service	1		<b>1</b>
6. Hours of Work and Rest		2	<b>2</b>
7. Manning Levels for the Ship			
8. Accommodation		7	<b>7</b>
9. On Board Recreational Facilities			
10. Food and Catering	4	2	<b>6</b>
11. Health and Safety and Accident Prevention	6	19	<b>25</b>
12. On Board Medical Care		4	<b>4</b>
13. On Board Complaint Procedures			
14. Payment of Wages			
15. Financial Security for Repatriation			
16. Financial Security for Ship-owner's Liability			

Please note that on some ships more than one deficiency may have been issued to the same ship. All deficiencies are to be rectified to the satisfaction of the attending inspector.

Note;

**Less than 500 GT MLC Ships** (issued with a DMLC Part 1 and DMLC Part 2 only)

**500 GT or over MLC Ships** (issued with an MLC certificate, DMLC Part 1 and DMLC Part 2)

### 3.2 Isle of Man MLC Licensed Companies (Recruitment and Placement Services)

<b>Isle of Man Companies</b>	<b>1<sup>st</sup> Qtr</b>	<b>2<sup>nd</sup> Qtr</b>	<b>3<sup>rd</sup> Qtr</b>	<b>4<sup>th</sup> Qtr</b>	<b>Total</b>
Companies with deficiencies	0	0	0	0	<b>0</b>
Companies with no deficiencies	3	0	6	1	<b>10</b>
<b>Total companies inspected</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>1</b>	<b>10</b>

As per MLN1.4 companies carrying out recruitment and placement services that are based on the Isle of Man are inspected annually for compliance in accordance with the IOMSR requirements. Upon successful completion of the inspection such companies are issued with a Certificate of Compliance.

#### 4. **Seafarers subject to Isle of Man Legislation**

All "seafarers", as defined under MLC Article II(f), sailing on Isle of Man registered ships to which the MLC Regulations are applicable fall under the MLC Code requirements. Seafarers working on such ships are required to be listed in the "List of Crew for IOM Registered Ships" as per Manx Shipping Notice 004.

The following sections outline the various areas where MLC requirements have directly affected the seafarer and where deficiencies have been found during **MLC inspections, Isle of Man General Inspections and Port State Control inspections** in these areas. A summary of deficiencies found in each area relating to seafarers is stated below so that shipping companies and seafarers may benefit from the experience gained from 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 seafarer minimum age in 2020 included:

- none

##### **4.2 Seafarer Medical Certificates**

All seafarers are required to hold a valid medical certificate as per the requirements of Isle of Man Merchant Shipping (Maritime Labour Convention) Regulations (SD 0234/2013) Regulation 8 and MLN1.2.

Deficiencies concerning seafarer medical certificates in 2020 included:

- Medical certificate found expired.

##### **4.3 Seafarer Qualifications**

All officers and crew are required to be qualified in accordance with Isle of Man Merchant Shipping (Manning and STCW<sup>2</sup>) Regulations 2014 (SD 2014/0238) and carry their original qualification documents with them on board. All documents are subject to inspection at any time by relevant authorities.

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.

Deficiencies concerning seafarer qualifications in 2020 included:

- Safety training certificate expired
- Flag state endorsement found not to correspond to newly issued Certificate of Competency
- No valid flag state endorsement for Certificate of competency on board

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<sup>2</sup> International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 as amended and includes the Seafarer's Training Certification and Watchkeeping Code (STCW Code).



Isle of Man STCW endorsements are issued pursuant to the requirements of SD 2014/0238 Reg. 17 subject to the provisions of the STCW Convention Reg. I/2 para 5.

The following table shows Isle of Man STCW endorsements issued in 2020.

<b>STCW ref</b>	<b>Capacity</b>	<b>Q1</b>	<b>Q2</b>	<b>Q3</b>	<b>Q4</b>	<b>Total</b>
II / 2	Master	125	89	163	144	<b>521</b>
II / 2	Ch. Officer	68	41	81	69	<b>259</b>
II / 1	OOW Nav.	131	78	153	133	<b>495</b>
III / 2	Ch. Eng.	131	75	136	140	<b>482</b>
III / 2	2 <sup>nd</sup> Eng.	68	29	69	64	<b>230</b>
III / 1	OOW Eng.	102	61	139	121	<b>423</b>
III / 6	ETO	57	20	60	49	<b>186</b>
	<b>Total</b>	<b>682</b>	<b>393</b>	<b>801</b>	<b>720</b>	<b>2596</b>

For a list of all the countries that are currently recognised by IOMSR for the issue of Isle of Man endorsements please refer to MSN 051 – Isle of Man Endorsement Application Process.

#### **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 MLC 2.1 and MLN 2.1.

Deficiencies concerning seafarer SEAs in 2020 included:

- SEA had expired;
- Seafarers working beyond SEA time limits and found working in excess of 14months on board;
- SEA found to be invalid for role performed on board;
- SEA not signed;
- Seafarers not repatriated in accordance with their SEA.

#### **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 MLC 2.2 and MLN 2.2.

Deficiencies concerning seafarer wages in 2020 included:

- None.

#### **4.6 Seafarer Hours of Work and Rest**

All seafarers must comply with the minimum rest requirements as per the requirements of MLC 2.3 and MLN 2.3.

Deficiencies concerning seafarer rest in 2020 included:

- Breach of minimum rest hours;
- Errors found in calculation of rest hours;
- Incorrect entries recorded that do not correspond to the hours worked.

#### **4.7 Seafarer Complaints**

All seafarers must be provided with information concerning the ship's on-board complaints procedure as prescribed by MLC A5.1.5/4.

Deficiencies concerning the on-board complaints procedure in 2020 included:

- none

In addition to the on-board compliant procedure a seafarer has the right to bring their complaint directly to IOMSR. **All complaints received by IOMSR are treated in confidence.**

A summary of complaints received in 2020 from seafarers serving on Isle of Man ships and investigated by IOMSR (MLC A5.1.5/2) is as follows;

Type of Ship	No. of Ships Received From	Related to DMLC Section									
		2	3	4	6	9	10	11	12	13	14
Commercial Yacht	8			2	1	1	1	2	1	1	5
Other cargo Ship	4	1	1	2							
<b>Total</b>	<b>12</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>5</b>

Complaints received from seafarers on foreign flag ships in Isle of Man waters – MLC A5.2.2:

- none.

## 5. Violations of Legislation, Penalties Imposed and Cases of Ship Detention

### 5.1 Foreign Flagged Ships Inspected in Isle of Man Ports

The below table represents Port State Control (PSC) inspections of foreign flagged ships in Isle of Man territorial waters. Please note where no MLC deficiencies have been raised deficiencies may have been raised in other areas.

Foreign Flag Ships Inspected in Isle of Man	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr	Total
<b>Ships with MLC deficiencies</b>	-	-	-	-	<b>0</b>
<b>MLC detentions</b>	-	-	-	-	<b>0</b>

Note – Attendance to foreign ships was restricted due to COVID19.

### 5.2 Isle of Man Ships Inspected in Foreign Ports

The following Port State Control (PSC) coding (based on the Paris MOU Codes<sup>3</sup>) is used to record MLC detentions and deficiencies related to MLC/ILO;

Certificates and Documentation (Ship) – 01139 and 01140

Certificates and Documentation (Seafarer documentation) – 012

Certificates and Documentation (documents) – 01306, 01307, 01308, 01329, 01330, 01331

Working and Living Conditions (living conditions) – 091

Working and Living Conditions (working conditions) – 092

MLC 2006 – 018

The table below shows PSC inspections on Isle of Man registered ships in foreign ports that resulted in MLC/ILO related detentions or deficiencies raised by PSC authorities.

	2017	2018	2019	2020
<b>Total Ships Inspected:</b>	<b>891</b>	<b>874</b>	<b>790</b>	<b>546</b>
<b>*Inspections with MLC Detentions:</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>3</b>
Tokyo MOU Region	1			1
Black Sea MOU Region	1			
Paris MOU Region	1		1	1
USCG				1
<b>*Inspections with MLC Deficiencies:</b>	<b>71</b>	<b>80</b>	<b>86</b>	<b>44</b>
Paris MOU Region	26	26	27	19
Tokyo MOU Region	32	29	33	11
United States Coast Guard	3			4
Indian MOU Region		3		
Abuja MOU Region		2	4	
Caribbean MOU Region			1	2
Latin America MOU Region	4	7	7	1
Black Sea MOU Region	6	7	8	6
Mediterranean MOU Region		3		1
Riyadh MOU Region		3	6	
Other				

\*Ships may have been detained or issued deficiencies relating to non-MLC matters but are not counted for the purposes of this report.

Please note that more than one MLC deficiency may have been issued to a ship during an inspection.

The following table shows 2020's PSC inspections of Isle of Man ships worldwide and deficiencies compared with the previous years. The items in brackets show types of deficiency items raised.

<sup>3</sup> <https://www.parismou.org/publications-category/pmou-deficiency-codes>

Year	2017	2018	2019	2020
<b>Number of Ships Inspected:</b>	<b>891</b>	<b>874</b>	<b>790</b>	<b>546</b>
<b>Inspections with no MLC Deficiencies or Detentions:</b>	<b>817</b>	<b>794</b>	<b>704</b>	<b>502</b>
<b>Inspections with MLC Detentions:</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>3</b>
<b>4. Seafarer Employment Agreements</b> Seafarers were discovered to be working on board longer than their SEA agreement and longer than 14months on board.				1
<b>6. Hours of Work and Rest</b> Hours of rest infringements, Seafarer hours of rest records do not reflect actual hours worked on board			1	1
<b>8. Accommodation</b> Stairway width, accommodation soil pipes leaking, external doors not closing properly.	3			
<b>11. Health and Safety and Accident Prevention</b> Found several electrical guards and covers missing from machinery on board.				1
<b>Inspections with MLC Deficiencies:</b>	<b>71</b>	<b>80</b>	<b>86</b>	<b>44</b>
<b>Deficiencies raised:</b>	<b>85</b>	<b>116</b>	<b>126</b>	<b>66</b>
<b>MLC Certification</b> (MLC documents not posted)	5	5	1	1
<b>1. Minimum Age</b>				
<b>2. Medical Certificates</b> (expired)		1		
<b>3. Qualification of Seafarers</b> (Flag endorsement missing/expired, STCW basic training certificates missing, only copies of certification, tanker endorsements missing, GMDSS licence expired, no ship's cook or food hygiene certificate)	6	15		4
<b>4. Seafarer Employment Agreements</b> (incorrect ship-owner stated on SEA, expired SEAs, missing SEAs, seafarers on board longer than SEA limit)	3	5	6	8
<b>5. Use of any Licensed, Certified or Regulated Private Recruitment and Placement Service</b>				
<b>6. Hours of Work and Rest</b> (schedule of working arrangements not posted or incorrect, breach of rest hours, rest periods not in compliance, Master and crew not recording rest hours)	10	8	13	5
<b>7. Manning Levels for the Ship</b>			1	
<b>8. Accommodation</b> (lighting, electrical devices, cleanliness, sanitary facilities, air conditioning defective, heating & ventilation inadequate)	10	3	9	2
<b>9. On Board Recreational Facilities</b> (DMLC part 2 prescribed mess and recreation rooms facilities missing)	1			
<b>10. Food and Catering</b> (galley facilities and cleanliness, food storage, food preparation, storage temperature, food condition/expired, insufficient provisions for voyage, food waste stored in food cold store with food, galley deck tiles broken, drinking water quality, FW sterilizer defective)		8	13	11
<b>11. Health and Safety and Accident Prevention</b> (safety committee meetings not recorded, working conditions relating to lighting, ventilation, access to the ship, gangway, slips, electrical, PPE, signs, machine part protection, pipe lagging, engine room cleanliness, anchoring/mooring equipment)	45	66	74	35
<b>12. On Board Medical Care</b> (hospital condition, medical equipment, person in charge of medical care)	3	1	5	
<b>13. On Board Complaint Procedures</b> (not located on board)	2	1	2	
<b>14. Payment of Wages</b> (Method of calculation)		3	2	

## 6. Reported Occupational Injuries and Diseases

All fatalities and significant injuries to seafarers on board Isle of Man registered ships are required to be reported to IOMSR as per the requirements of Merchant Shipping (Accident Reporting and Investigation) Regulations (SD 815/01).

Initial accident reports to IOMSR are to be made using form ARF1 available on the IOMSR website – see MLN 4.3e and Manx Shipping Notice 003 for more information.

All occupational diseases should be reported using form OD001 “Report of a Case of Occupational Disease” – see MLN 4.3e for more information.

The following tables represent seafarer fatalities and injuries on board Isle of Man registered ships. Only cases relating to occurrences involving shipboard operations are included in this report. **This report covers MLC ships and MLC defined seafarers only and does not include passengers, guests or visitors.**

In this report a “serious injury” is defined as an injury sustained by a person resulting in incapacitation where a person is unable to function normally for more than 72 hours commencing within seven days from when the injury was suffered. A “minor injury” is any lesser injury which is not a serious injury. This report does not include statistics relating to death from natural causes or by suicide.

	2020		2019	2018	2017	2016
	No. of Seafarers	*Rate	Rate	Rate	Rate	Rate
Fatalities	1	13	11	0	0	10
Serious injuries	10	125	163	134	121	139
Minor injuries	10	125	173	155	138	199

*Rate per 100,000*

\*To determine the rate the number of seafarers in the MLC fleet is estimated based on a seafarer average per ship type per ship size. The number of seafarers is based only on seafarers employed on board ships only and does not include seafarers at home on leave, passengers or guests.

In fulfilling the Isle of Man’s obligation under MLC standard A4.3.5(b) an Annual Summary Report of Casualties, Accidents and Incidents on Isle of Man Registered Ships is published on the IOMSR website.

For more information please refer to the following report published on the IOMSR website:

**“2020 Summary Report of Casualties, Accidents and Incidents on Isle of Man Registered Ships”**

<https://www.iomshipregistry.com/forms-reports/casualty-reports/>

## 6.1 Individual Seafarer Injuries by Rank, Injury and Age

MLC Seafarers by rank	Total	Minor Injury	Serious Injury	Fatality
Master	0			
Ch. Officer	0			
OOW Nav.	3	2	1	
Ch. Engineer	0			
2nd Engineer	1		1	
OOW Engineer	1			1
ETO / Electrician	0			
Deck Rating	8	5	3	
Engine Rating	3	1	2	
Deck/Eng. Cadet	2		2	
Cook/Steward	3	2	1	
Others	0			
<b>Seafarer Total</b>	<b>21</b>	<b>10</b>	<b>10</b>	<b>1</b>

MLC Seafarers by injury	Total	Minor Injury	Serious Injury	Fatality
Fatality	1			1
Fracture of skull, pelvis, spine, or a major bone in the arm or leg	4		4	
Other fracture	3	2	1	
Other strain or hernia	1		1	
Dislocation	1		1	
Crushing injuries	2		2	
Puncture wound, cut or laceration	4	3	1	
Chemical burn or poisoning	3	3		
Back injury	2	2		
<b>Seafarer Total</b>	<b>21</b>	<b>10</b>	<b>10</b>	<b>1</b>

MLC Seafarers by age	Total	Minor Injury	Serious Injury	Fatality
16-19	0			
20-29	9	3	5	1
30-39	3	2	1	
40-49	4	3	1	
50-59	5	2	3	
60+	0			
<b>Seafarer Total</b>	<b>21</b>	<b>10</b>	<b>10</b>	<b>1</b>

## 6.2 Individual Seafarer Injury or Fatalities on Board per Ship Type

MLC Seafarers per Ship Type	Total	Minor Injury	Serious Injury	Fatality
Passenger Ship	0			
Oil Tanker	0			
Chemical Tanker	0			
Gas Carrier	3		2	1
Bulk Carrier	3	2	1	
Offshore/Standby Vessel	6	5	1	
Other Cargo Ship	6		6	
Commercial Yacht	3	3		
<b>Seafarer Total</b>	<b>21</b>	<b>10</b>	<b>10</b>	<b>1</b>

## 6.3 Individual Seafarer Activities Being Conducted Leading to Injury or Fatalities

MLC Seafarers per Activity	Total	Min. Inj.	Ser. Inj.	Fatality
Lifting or carrying mechanically	1		1	
Lifting or carrying by hand	4	1	3	
Moving about the ship	4	2	2	
Mooring or anchoring	1		1	
Painting, cleaning or de-rusting	5	5		
Operating hatch covers	1		1	
Using fixed tools or machinery	1		1	
Using portable tools	1		1	
Overhauling or maintaining rotating equipment	1			1
Leisure activity	1	1		
Maintenance – other	1	1		
<b>Seafarer Total</b>	<b>21</b>	<b>10</b>	<b>10</b>	<b>1</b>

## 6.4 Occupational Diseases Reported per Seafarer

- None.

## 6.5 Injuries and Accidents Reported on Foreign Ships in Isle of Man Waters

- None.

## Conclusions

In reviewing the MLC inspections and accident reports received in 2020 a number of factors have emerged.

- No changes to MLC regulations were made and 2 Maritime Labour Notices were amended in 2020. (Section 1)
- 214 inspections (113 MLC and 101 Flag GI) of Isle of Man registered ships were conducted worldwide by IOMSR or Classification society inspectors. Of the deficiencies issued to ships the biggest source of MLC related deficiencies was Health, Safety and Accident Prevention accounting for 46% of all MLC related deficiencies raised. (Section 3.1)
- 10 recruitment and placement companies were audited on the Isle of Man by the Isle of Man Ship Registry in 2020, all with no deficiencies. (section 3.2)
- The biggest source of seafarer complaint referred to the Isle of Man Ship Registry related to wages (DMLC section 14). (Section 4.7)
- Of the inspections conducted by Port State Control authorities worldwide 91% resulted in no MLC related deficiencies or detentions. Of the deficiencies raised, 53% related to issues concerning health & safety and accident prevention. (Section 5.2)
- In 2020 there was 1 fatality, 10 serious injuries and 10 minor injuries relating to MLC seafarers reported to IOMSR. Painting, cleaning or de-rusting activities incurred the most injuries followed closely by moving about the ship and lifting/carrying by hand. (Section 6.3)
- No accidents were reported and no complaints were received from foreign flagged ships in Isle of Man territorial waters in 2020. (Section 4.7 and 6.5)

The process of conducting MLC inspections will be continually reviewed by the Isle of Man Ship Registry to ensure continued effectiveness.

*The Isle of Man Ship Registry welcomes any feedback concerning this report. If you have any comments or suggestions for future reports please email the Isle of Man Ship Registry at: [marine.mlc@gov.im](mailto:marine.mlc@gov.im)*



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