

Isle of Man Ship Registry Technical Advisory Notice



Guidance for Isle of Man-Registered Vessels Operating in the Middle East

Ref. 002-26
Issued: 13/03/26

1. Background

The evolving security situation in parts of the Middle East continues to create uncertainty for vessels operating in or transiting through the region. The Isle of Man Ship Registry remains committed to safeguarding the rights and welfare of seafarers serving on Isle of Man-registered ships. This includes the protections afforded under the [Merchant Shipping \(Maritime Labour Convention\) Regulations 2013](#) and other applicable Manx legislation.

These Regulations establish enforceable requirements relating to employment conditions, repatriation, welfare, and the safety of seafarers, all of which remain fully applicable during periods of conflict or instability. Operators are strongly encouraged to monitor developments in the region, undertake appropriate risk assessments, and ensure that effective support is provided to any seafarers who may be affected.

2. Purpose

This Notice provides guidance to Isle of Man shipowners, managers, and seafarers who may be affected by the ongoing conflict in the Middle East. The Isle of Man Ship Registry is issuing this Notice to set out key considerations relating to seafarer welfare, repatriation, and operational risk for Isle of Man-registered vessels.

3. Key Considerations for Shipowners and Operators

3.1 Welfare and Rights of Seafarers

Owners and operators should ensure:

- Seafarers' employment rights and protections remain fully upheld;
- Welfare-related concerns arising from the conflict are proactively managed;
- Seafarers have access to communication channels to raise concerns confidentially;
- Support is provided for those experiencing stress or anxiety due to the conflict.

This includes ensuring full compliance with the requirements of MLC 2006 as implemented through the Merchant Shipping (Maritime Labour Convention) Regulations 2013, and other applicable Isle of Man legislation.

3.2 Repatriation

Under Isle of Man legislation, seafarers retain the right to repatriation in a range of circumstances, including when their employment agreement expires or is terminated, or when their vessel is bound for a war zone to which the seafarer does not consent to go.

For purposes of Isle of Man legislation, war zones are as defined by either the United Kingdom Warlike Operations Committee or the Seafarer's SEA. As at the date of this notice, the Strait of Hormuz, Gulf of Oman and Persian Gulf have been designated as war-like operation areas,



meaning that a seafarer onboard a vessel destined for these areas should be offered repatriation, should they wish, at no penalty.

Further detail on repatriation rights and shipowner responsibilities is set out in [MLN 2.5](#).

Owners and operators must comply with these statutory requirements and must not penalise any seafarer who declines to sail into war-like areas.

3.3 Extension of Seafarer Employment Agreements (SEAs)

Due to the current security situation in the Middle East, some seafarers may be unable to travel home at the end of their contract or may request to remain onboard beyond the expiry of their Seafarer Employment Agreement (SEA). The Isle of Man Ship Registry permits SEAs to be extended up to a maximum of 12 months minus the seafarer's annual leave entitlement, without requiring notification to the Registry, provided that:

- The extension is mutually agreed between the shipowner, the seafarer, and any relevant seafarers' organisations (where applicable);
- The extension is documented by a new SEA or an addendum, signed by both parties;
- The total service period does not exceed 12 months minus annual leave entitlement (or an alternative limit permitted under an applicable CBA.)

A seafarer's entitlement to repatriation does not lapse when an SEA is extended. In recognition of the exceptional circumstances, the Ship Registry may also consider requests for extension to an SEA beyond the maximum service period on a case-by-case basis. Where appropriate, the Registry will confirm via email that it has no objection to the extension. Requests should be sent to marine.survey@gov.im with the following details:

- Seafarer's start date;
- SEA expiry date;
- Rank;
- Vessel name;
- Nationality;
- Written confirmation from the seafarer requesting the extension;
- Reason for extension.

The Registry also recognises that some seafarers may request early termination of their SEA on compassionate grounds. Under the MLC, early termination may occur without penalty, and shipowners are encouraged to support such requests where possible.

Shipowners should also consider the fatigue risks associated with prolonged service and ensure that appropriate mitigations are implemented, including additional rest opportunities, adjusted work/rest schedules, or fatigue-specific risk assessments.

3.4 Risk Assessment and Voyage Planning

Operators should ensure that voyage planning accounts for:

- Updated security advice for the region;
- Current maritime threat assessments;
- Guidance issued by naval forces, government bodies, and industry security groups;
- The mental and physical wellbeing of crew.

In addition to the above, operators should be aware that the ongoing Middle East conflict has led to significant disruption to major commercial shipping routes, including:



- Strait of Hormuz
- Red Sea / Suez Canal
- Bab el-Mandeb Strait

These widespread route changes continue to cause significant delays across the shipping sector. Operators should ensure these factors are fully considered in voyage planning and commercial arrangements.

In preparing voyage plans, operators should remain alert to government-issued maritime security guidance, including any updates or advisories regarding higher-risk regions. While specific security level designations are not detailed here, operators must ensure that their ship security measures reflect the most current information available from competent authorities.

Operators should note that missile and drone attacks on commercial vessels have resumed in the Red Sea as of early March 2026, contributing to simultaneous disruption across multiple critical maritime corridors. These renewed hostilities have affected the Red Sea, Bab el-Mandeb, and the Strait of Hormuz at the same time, significantly increasing operational risk and limiting safe routing options for international shipping.

3.5 Support for Affected Seafarers

Seafarers affected by the conflict should be provided with clear, timely information on:

- Their rights regarding employment, repatriation, and safety;
- How to obtain assistance from the shipowner or welfare organisations;
- How to raise concerns or report difficulties.

The Isle of Man Ship Registry remains available to provide advice or support to shipowners and seafarers who require clarification on their rights or obligations.

Seafarers should also be reminded that the Isle of Man Ship Registry provides the Crew Matters App, offering access to wellbeing resources, mental-health support, financial guidance, and confidential helplines. The app can be used at any time to obtain assistance, information, or support while serving in high-risk or disrupted regions.

The Crew Matters App can be downloaded via Google Play Store [Here](#)

3.6 Dissemination of Information

Shipowners and industry partners are requested to:

- Circulate this guidance widely among seafarers, crew agencies, and operational departments;
- Publish or share the information through internal communication channels;
- Ensure all seafarers joining vessels are aware of current operational risks in the region.

Wider dissemination will help ensure that those affected can access up-to-date information, support, and protection.

4. Guidance for British Nationals

- 5.** All British seafarers in Bahrain, Israel, Kuwait, Palestine, Qatar and United Arab Emirates are encouraged to register with FCDO. You will then receive direct updates from FCDO.

Further Information

This guidance will remain under review. Updates may be issued as the situation in the Middle East develops or as new government or international guidance becomes available.



For guidance specific to Isle of Man-registered vessels, or if you require further support, please contact:

marine.survey@gov.im

Telephone: +44 (0)1624 688500

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

