

Isle of Man Ship Registry Maritime Labour Notice



Amendments to DMLC Part II and SEAs

Ref. MLN 6.0 (Rev 1.)
Issued 30/06/2025

1. Introduction

The Ship Registry has delegated Maritime Labour inspection and certification for cargo ships, and retained inspection and certification for commercial yachts and passenger ships. Irrespective of whether the inspection and certification has been delegated or retained, approval and insurance for the DMLC, as well as approval of the Seafarer's Employment Agreement (SEA) is undertaken by the Ship Registry.

In all cases, these will be required to be approved by the Ship Registry prior to a vessel's initial maritime labour inspection. If a shipowner subsequently wishes to amend either document, the processes in this MLN should be followed.

2. DMLC Part II Amendments

The DMLC Part II is a working document and is liable to changes and amendments as a result of inspections, internal reviews or amendments to the Convention that need to be reflected in the Part II. However, the Part II can be a fairly substantial document and in many cases can cover a number of ships therefore any amendments can be a significant administrative task.

2.1 Minor Amendments

It is the policy of the Ship Registry that minor amendments can be initially recorded on an amendment/revision sheet that should be kept onboard with the current Part II so that any changes can be easily followed. Minor amendments are considered to be items such as changes to document numbers/versions, changes to procedures that are referenced in the Part II or correction of typographical or grammatical errors.

When the shipowner deems that there are sufficient minor amendments to warrant the re-issue of the DMLC Part II they may then submit these changes to the Isle of Man Ship Registry and a new Part I & II will be issued.

2.2. Significant Amendments

Any significant amendments should be submitted to the Ship Registry for review as soon as practicable. Significant amendments are considered to be any change which affects the seafarer's rights under the Convention, changes to working practices, new policies relating to new Convention requirements or any other significant revision to an approved section.

2.3 Reissue Procedure

When the Shipowner is satisfied that the DMLC Part II needs to be reissued, they should email marine.mlc@gov.im with a copy of the new DMLC Part II. If possible any changes



from the existing approved DMLC Part II should be shown, either highlighted or in tracked changes in Microsoft Word. The Shipowner is requested to confirm to which vessels the new DMLC Part II should apply.

The Ship Registry will review the Part II and if approved will issue a new DMLC Parts I & II to the relevant vessels. Although the Part I may not have any updates, this is done to keep the dates of Parts I & II aligned. Assuming that the new DMLC Part II replaces an already fully signed Part II, the new Part II will be issued signed by the Ship Registry in the final section.

The only instance where the Part II will be issued unsigned for signature by an RO will be where the Part II is issued prior to the RO undertaking an initial MLC inspection.

The Shipowner will then need to counter-sign the Part II, dating their signature as the same date it was signed by the Ship Registry (or if issued for an initial inspection, to be signed before or the same date as the RO signs), and then request a new Maritime Labour Certificate from either their RO (for cargo ships) or the Ship Registry (for commercial yachts of 500gt and over and passenger ships) in order to ensure that the correct DMLC is referenced.

The Shipowner should then ensure that the latest version Maritime Labour Certificate, DMLC Part I and fully signed Part II are forwarded to the vessel, and that superseded documents are removed.

Please note that additional transitional arrangements were put in place for the 2022 amendments to MLC which are explained in [TAN 007-24](#).

3. Seafarers Employment Agreement (SEA)

Similarly there will be amendments made to an SEA that has previously been reviewed and accepted by the Isle of Man Ship Registry. It is not a requirement to have minor amendments reviewed, such as increases in wages/leave/indemnity cover or similar. Only amendments that either negatively affect the seafarer's rights or are a reduction in previously reviewed conditions are required to be submitted for review. This can be done by emailing marine.mlc@gov.im

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.

