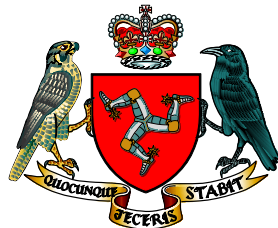


# Isle of Man Ship Registry

## Maritime Labour Convention Annual Report

2019

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 Ship Registry's Flag State 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 2019 to 31<sup>st</sup> December 2019.

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

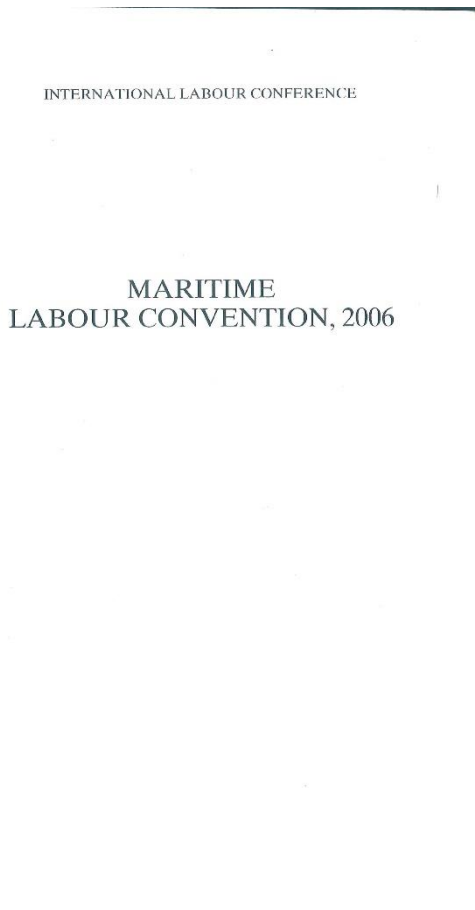
Fax +44 1624 688501

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

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

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Isle of Man Ship Registry Maritime Labour Notice		Isle of Man Ship Registry	
Index		MLN 001 (Rev. 12) Issued 27/03/19	
This Maritime Labour Notice (MLN) provides an index of the current MLNs. The latest MLNs are available on the Isle of Man Ship Registry's website: <a href="http://www.iomshipregistry.com">www.iomshipregistry.com</a>			
MLN 001	<a href="#">Index of MLNs</a>	Mar 19	Rev 11
MLN 1.1	<a href="#">Young Persons</a>	Aug 12	Rev 1
MLN 1.2	<a href="#">Medical Certificates</a>	Mar 19	Rev 3
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="#">SEAs &amp; Record of Sea Service</a>	Mar 19	Rev 6
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 5.1.385.1.4	<a href="#">Inspection, Certificate &amp; Definitions</a>	Nov 17	Rev 2
MLN 5.1.5	<a href="#">On board complaint procedure</a>	Jan 19	Rev 2
MLN 6.0	<a href="#">Amendments to DMLC 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 2019

SD2019/0100 - Merchant Shipping (Seamen's Documents) (Amendment) Order 2019

- This affects the Isle of Man Official Log Book and List of Crew.

SD2018/0324 - Merchant Shipping (Amendment) Regulations 2019

- This affects the record of sea service documentation.

## Amendments to MLNs which came into effect in 2019

The latest MLNs as of 1<sup>st</sup> January 2020 are listed below:

<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	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 &amp; 5.1.4</b>	Inspection, Certification, and Definitions	Nov 17	Rev 2
<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 Parts 1 and 2 for all types of ships as prescribed by MLC A5.1.3/10. The IOMSR also certifies non-cargo ships to which MLC applies. 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 are 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 Isle of Man or Classification Society MLC inspectors in 2018.

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 the inspections 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 – these are carried out 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 inspections for commercial ships and yachts in 2019 to which the MLC convention applies are summarised as follows:

<b>Type of inspection:</b>	<b>MLC</b>	<b>Flag GI</b>	<b>Total</b>
<b>Number of inspections:</b>	143	184	<b>327</b>

Of the MLC and Flag GI Inspections, MLC deficiencies raised can be summarised as follows;

0. MLC certification and documentation	8
1. Minimum Age	0
2. Medical Certificates	1
3. Qualification of Seafarers	11
4. Seafarer Employment Agreements	2
5. Use of any Licensed, Certified or Regulated Private Recruitment and Placement Service	7
6. Hours of Work and Rest	17
7. Manning Levels for the Ship	1
8. Accommodation	35
9. On Board Recreational Facilities	0
10. Food and Catering	9
11. Health and Safety and Accident Prevention	102
12. On Board Medical Care	14
13. On Board Complaint Procedures	2
14. Payment of Wages	2
15. Financial Security for Repatriation	0
16. Financial Security for Ship-owner's Liability	0
<b>Total MLC Deficiencies</b>	<b>211</b>

Any MLC deficiencies issued are to be rectified to the satisfaction of the attending inspector.

#### **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>
<b>Number of companies inspected</b>	4	3	1	3	<b>11</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 Isle of Man 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 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 2019 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 2019 included:

- seafarers not in possession of an original medical certificate (copy only).

##### **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 2019 included:

- seafarer only in possession of copies of STCW certification;
- person designated to give medical first aid not in possession of certification on board;
- seafarers not in possession of STCW basic safety training course certification;
- seafarers not in possession of IOM STCW endorsement;
- seafarers not in possession of dangerous cargo endorsement applicable to cargo carried.

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 the number of Isle of Man STCW endorsements issued in 2019.

<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	141	126	133	136	<b>536</b>
II / 2	Ch. Officer	88	70	76	59	<b>293</b>
II / 1	OOW Nav.	148	135	137	136	<b>556</b>
III / 2	Ch. Eng.	127	128	139	111	<b>505</b>
III / 2	2 <sup>nd</sup> Eng.	97	63	60	54	<b>274</b>
III / 1	OOW Eng.	113	138	121	128	<b>500</b>
III / 6	ETO	61	59	57	41	<b>218</b>
	<b>Total</b>	<b>775</b>	<b>719</b>	<b>723</b>	<b>665</b>	<b>2882</b>

<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).



For a list of all the countries that are currently recognised by IOMSR for the issuance 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 2019 included:

- SEA not signed;
- SEAs found to have incorrect signatories and company references;
- SEA details found completed with incorrect details;
- Collective Bargaining Agreement (CBA) expired;
- CBA not provided on board.

#### **4.5 Seafarer 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 2019 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 2019 included:

- breach of minimum rest hours;
- Schedule of Working arrangements not posted;
- incorrect entries recorded that do not correspond to the hours worked.

#### **4.7 Seafarer Complaints**

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

Deficiencies concerning the on-board complaints procedure in 2018 included:

- Complaint procedure unknown to some seafarers;
- Complaint procedure not provided to seafarers as per on-board procedures.

A seafarer also has the right to bring their complaint directly to IOMSR. All complaints received by IOMSR are treated in confidence.

In 2019 complaints warranting further action from seafarers serving on Isle of Man ships can be summarised as follows – MLC A5.1.5/2:

Type of ship	No. of ships received from	Related to DMLC Section					
		6	8	14	15	Other	Total
Comm. Yacht	3	1	1	2	1	0	5
<b>Total</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>5</b>

Complaints received from seafarers on foreign flag ships in Isle of Man waters – MLC 5.2.2:

- 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.

<b>Foreign Flag Ships Inspected in Isle of Man</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>
<b>Ships with MLC deficiencies</b>	-	-	-	-	<b>0</b>
<b>MLC detentions</b>	-	-	-	-	<b>0</b>

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

The table below shows Port State Control (PSC) inspections on Isle of man registered ships in foreign ports that resulted in MLC/ILO detentions or deficiencies (see applicable coding below) raised by PSC Authorities.

	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Total Ships Inspected:</b>	<b>923</b>	<b>844</b>	<b>891</b>	<b>874</b>	<b>790</b>
<b>Inspections with MLC Detentions:</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>1</b>
Tokyo MOU Region		2	1		
Black Sea MOU Region			1		
Paris MOU Region	2		1		1
<b>Inspections with MLC Deficiencies:</b>	<b>75</b>	<b>63</b>	<b>71</b>	<b>80</b>	<b>86</b>
Paris MOU Region	34	31	26	26	27
Tokyo MOU Region	18	19	32	29	33
United States Coast Guard	6	2	3		
Indian MOU Region	2	2		3	
Abuja MOU Region		1		2	4
Caribbean MOU Region	1				1
Latin America MOU Region	3	1	4	7	7
Black Sea MOU Region	5	3	6	7	8
Mediterranean MOU Region	5	3		3	
Riyadh MOU Region	1	1		3	6
Other					

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

The PSC coding used to record any MLC detentions and deficiencies are based on the following Paris MOU Codes<sup>3</sup>:

- 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

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

The following table shows 2019's PSC inspections of Isle of Man ships worldwide and deficiencies compared with the previous years. The items in brackets show typical deficiency items raised.

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

Year	2016	2017	2018	2019
<b>Number of Ships Inspected:</b>	<b>844</b>	<b>891</b>	<b>874</b>	<b>790</b>
<b>Inspections with no MLC Deficiencies or Detentions:</b>	<b>779</b>	<b>817</b>	<b>794</b>	<b>704</b>
<b>Inspections with MLC Detentions:</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>1</b>
<b>MLC Certification</b> (MLC certificate missing on board, MLC documents not posted)	1			
<b>3. Qualification of Seafarers</b> (A master's qualifications were found unsuitable for the ship size and trading area)				
<b>6. Hours of Work and Rest</b> Hours of rest infringements				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> (safety railing defective in vicinity of rescue boat)	1			
<b>14. Payment of Wages</b> (Found repeated cases of non-payment of wages)				
<b>Inspections with MLC Deficiencies:</b>	<b>63</b>	<b>71</b>	<b>80</b>	<b>86</b>
<b>Deficiencies raised:</b>	<b>80</b>	<b>85</b>	<b>116</b>	<b>126</b>
<b>MLC Certification</b> (MLC certificate found expired on board, MLC documents not posted)		5	5	1
<b>1. Minimum Age</b>				
<b>2. Medical Certificates</b> (expired)			1	
<b>3. Qualification of Seafarers</b> (Flag endorsement missing, STCW basic training certificates missing, only copies of certification, tanker endorsements missing, GMDSS licence expired, no ship's cook or food hygiene certificate)	8	6	15	
<b>4. Seafarer Employment Agreements</b> (incorrect ship-owner stated on SEA, expired SEAs)	10	3	5	6
<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, Master and crew not recording rest hours)	13	10	8	13
<b>7. Manning Levels for the Ship</b> (no cook provided on board as per manning document)				1
<b>8. Accommodation</b> (lighting, electrical devices, cleanliness, sanitary facilities, heating & ventilation)	4	10	3	9
<b>9. On Board Recreational Facilities</b> (prescribed mess and recreation rooms facilities missing)		1		
<b>10. Food and Catering</b> (quantity of food, galley facilities and cleanliness, food storage, food preparation, storage temperature, food condition, drinking water)	4		8	13
<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, insulation, engine room cleanliness, anchoring/mooring equipment)	36	45	66	74
<b>12. On Board Medical Care</b> (Med Oxygen found low, hospital, medical equipment, person in charge of medical care)		3	1	5
<b>13. On Board Complaint Procedures</b> (not located on board)	4	2	1	2
<b>14. Payment of Wages</b> (Unauthorised deductions, not paying overtime, Method of calculation)	1		3	2

## 6. Reported Occupational Injuries and Diseases

All deaths 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 tables in 6.1 to 6.5 below represent seafarer deaths 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 defined seafarers employed on MLC ships only and does not include passengers, guests, visitors or stevedores.**

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 deaths from natural causes or suicide.

	2019		2018	2017	2016
	No. of Seafarers	Rate per 100,000	Rate per 100,000	Rate per 100,000	Rate per 100,000
*MLC Fleet estimate	9225	-	-	-	-
Deaths	1	11	0	0	10
Serious injuries	13	141	134	121	139
Minor injuries	13	141	155	138	199

\* The MLC fleet estimate number of seafarers is based on a seafarer average per ship type per ship size. 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 Ship Registry’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:

**“2019 Summary Report of Casualties, Accidents and Incidents on Isle of Man Registered Ships”**

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

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

Individual by rank	Total	Minor Injury	Serious Injury	Death
Master	1		1	
Ch. Officer	0			
OOW Nav.	2		1	1
Ch. Engineer	3	1	2	
2nd Engineer	3	1	2	
OOW Engineer	3		3	
ETO / Electrician	0			
Deck Rating	12	9	3	
Engine Rating	0			
Deck/Eng. Cadet	1		1	
Cook/Steward	2	2		
Others	0			
<b>Seafarer Total</b>	<b>27</b>	<b>13</b>	<b>13</b>	<b>1</b>

Individual by injury	Total	Minor Injury	Serious Injury	Death
Death	1			1
Fracture of skull, pelvis, spine, or a major bone in the arm or leg	1		1	
Other fracture	1		1	
Burn or scald	4		4	
Dislocation	2		2	
Crushing injuries	2		2	
Major bruising	2	2		
Puncture wound, cut or laceration	11	11		
Near asphyxiation from oxygen deprivation	1		1	
Back injury	2		2	
<b>Seafarer Total</b>	<b>27</b>	<b>13</b>	<b>13</b>	<b>1</b>

Individual by age	Total	Minor Injury	Serious Injury	Death
16-19	0			
20-29	8	4	4	
30-39	4	2	1	1
40-49	7	4	3	
50-59	5	2	3	
60+	3	1	2	
<b>Seafarer Total</b>	<b>27</b>	<b>13</b>	<b>13</b>	<b>1</b>

## 6.2 Seafarer Injury or Death on Board per Ship Type

Type of Ship	Total	Minor Injury	Serious Injury	Death
Passenger Ship	1	1		
Oil Tanker	7	3	4	
Chemical Tanker	0			
Gas Carrier	4		4	
Bulk Carrier	2		2	
Offshore/Standby Vessel	2	1	1	
Other Cargo Ship	4	1	2	1
Commercial Yacht	7	7		
<b>Seafarer Total</b>	<b>27</b>	<b>13</b>	<b>13</b>	<b>1</b>

## 6.3 Seafarer Activities Being Conducted Leading to Injury or Death

Type of Activity	Total	Min. Inj.	Ser. Inj.	Death
Access to the ship	1			1
Leisure activity	1	1		
Moving about the ship	13	7	6	
Mooring or anchoring	2	1	1	
Painting, cleaning or de-rusting	1	1		
Opening valves	2		2	
Using sharp hand tools	1	1		
Using portable tools	1	1		
Watch keeping duties – Navigation	1		1	
Launching or recovering survival craft	1	1		
Maintenance - machinery	3		3	
<b>Seafarer Total</b>	<b>27</b>	<b>13</b>	<b>13</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 2019 a number of factors have emerged.

- Two amendments to MLC-related regulations and various amendments to Maritime Labour Notices were made in 2019. (Section 1)
- 327 inspections (143 MLC and 184 Flag GI) of Isle of Man registered ships were conducted worldwide by IOMSR or Classification society inspectors. (Section 3.1)
- 11 recruitment and placement companies were audited on the Isle of Man by Isle of Man surveyors in 2019. (section 3.2)
- The main source of on-board complaints referred to the Isle of Man Ship Registry by seafarers related to non-payment of wages (DMLC section 14). (Section 4.7)
- Of the inspections conducted by PSC 89% resulted in no MLC deficiencies. Of the ships issued with MLC-related deficiencies, 59% of deficiencies related to issues concerning health & safety and accident prevention. (Section 5.2)
- In 2019 there was 1 seafarer fatality, 13 seafarers with minor injuries and 13 seafarers with serious injuries reported to IOMSR. Moving about the ship lead to 48% of seafarer injury cases in 2019. (Section 6.3)
- No accidents were reported and no complaints were received from foreign flagged ships in Isle of Man territorial waters in 2019. (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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