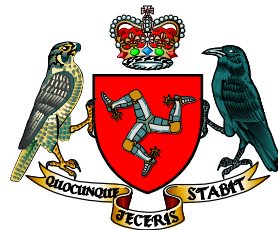


# Isle of Man Ship Registry

## Maritime Labour Convention Annual Report

2025

Isle of Man Government  
Department for Enterprise



**Isle of Man  
Government**

*Reiltys Ellan Vannin*



## **Executive Summary**

- The IOM MLC regulations were updated in January 2025 to include the 2016, 2018 and 2022 MLC Amendments, 2 Maritime Labour Notices were amended
- IOMSR or Classification Society inspectors conducted 224 inspections (111 MLC and 113 Flag GI) of Isle of Man registered ships in 2025. The biggest source of MLC related deficiencies was Health & Safety and Accident Prevention, accounting for ≈30% of all MLC related deficiencies raised.
- The Isle of Man Ship Registry audited 10 recruitment and placement companies on the Isle of Man in 2025, no deficiencies were identified
- The biggest source of seafarer complaints referred to the Isle of Man Ship Registry in 2025 related to Payment of Seafarers Wages (DMLC section 14)
- 12% of Port State Control Inspections raised a deficiency relating to MLC on board IOMSR vessels. The greatest source of which were Health Protection, Medical Care, Welfare & Social Security Protection
- In 2025, there was 1 fatality, 8 serious injuries and 22 minor injuries relating to MLC seafarers reported to IOMSR. Most injuries occurred during mooring and anchoring operations.
- There were approximately 7200 MLC Seafarers serving on-board IOM Flagged Vessels in 2025, the rate of injury per 100,000 seafarers has remained static compared against previous years.
- No accidents were reported and no complaints were received from foreign-flagged ships in Isle of Man territorial waters in 2024

This report covers the calendar year from 1<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025

If you have any questions concerning the Isle of Man's implementation of MLC or feedback surrounding this report, please contact us at any of the following or the address given below:-

Tel +44 1624 688500  
Fax +44 1624 688501  
Email: [marine.mlc@gov.im](mailto:marine.mlc@gov.im)

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Isle of Man Ship Registry, Department for Enterprise, St George's Court,  
Upper Church St, Douglas, Isle of Man, IM1 1EX, British Isles  
[www.iomshipregistry.com](http://www.iomshipregistry.com)

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## **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. The Isle of Man Ship Registry will consider alternative methods of compliance to those set out in the MLN on a case-by-case basis.

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 Dependents \(SI 1972/1635\)](#);
- [Provisions and Water \(GC 34/90\)](#);
- [Official Log Books and List of Crew \(SD2015/0387\)](#).

### **Amendments to the Isle of Man MLC Regulations that came into effect in 2025**

- Merchant Shipping (Maritime Labour Convention) (Amendment) Regulations 2025 – Updated the Isle of Man MLC Regulations to include the 2016, 2018 & 2022 Amendments to MLC

## Amendments to MLNs that came into effect in 2025

The latest MLNs as of 31<sup>st</sup> December 2025 are listed below (2 amended in 2025):

MLN Number	MLN Title	Date Last Amended	Latest Revision
MLN 001	<a href="#">Index of MLNs</a>	Dec 24	Rev 22
MLN 1.1	<a href="#">Young Persons</a>	Jun 22	Rev 2
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>	Jun 25	Rev 8
MLN 2.2	<a href="#">Seafarers' wages</a>	Dec 24	Rev 2
MLN 2.3	<a href="#">Hours of work and hours of rest</a>	Jun 22	Rev 4
MLN 2.4	<a href="#">Entitlement to leave</a>	Feb 13	Rev 2
MLN 2.5	<a href="#">Repatriation</a>	Dec 24	Rev 3
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>	Dec 24	Rev 3
MLN 3.2	<a href="#">Food and catering</a>	Dec 24	Rev 1
MLN 4.1	<a href="#">Medical Care Onboard Ship and Shore</a>	Sep 22	Rev 7
MLN 4.2	<a href="#">Shipowner's liability</a>	Dec 24	Rev 5
MLN 4.3a	<a href="#">Health &amp; safety policies and programmes</a>	Dec 24	Rev 2
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 5.1.3/4	<a href="#">Inspection, Certificate &amp; Definitions</a>	May 20	Rev 3
MLN 5.1.5	<a href="#">On board complaint procedure</a>	Feb 22	Rev 3
MLN 6.0	<a href="#">Amendments to DMLC Part II and SEA</a>	Jun 25	Rev 0
MLN 7.0	<a href="#">MLC Amendments – Financial Security</a>	Dec 24	Rev 1

### 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 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 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

#### 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). Note that in the case of vessels where an MLC Inspection has been undertaken by the RO that any deficiencies found are recorded separately to the main IOM database and so statistics relating to deficiencies consider IOMSR surveyor deficiencies only.

**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 2025 is as follows:

Type of inspection:	MLC	Flag GI	Total
Number of inspections:	115 RO	115	248 (133 IOM)
	18 IOM		
Ships with no MLC deficiencies:	12	64	76
Ships with MLC deficiencies:	6	51	57

Please note, on some ships more than one deficiency may have been issued to the same ship.

#### 3.2 Isle MLC Deficiencies Raised

MLC deficiencies raised on board Manx flagged vessels during MLC Surveys and General Inspections is outlined below. It should be noted that references to pleasure yacht reference PYCR yachts that are currently operating in 'pleasure' mode but retain commercial compliance.

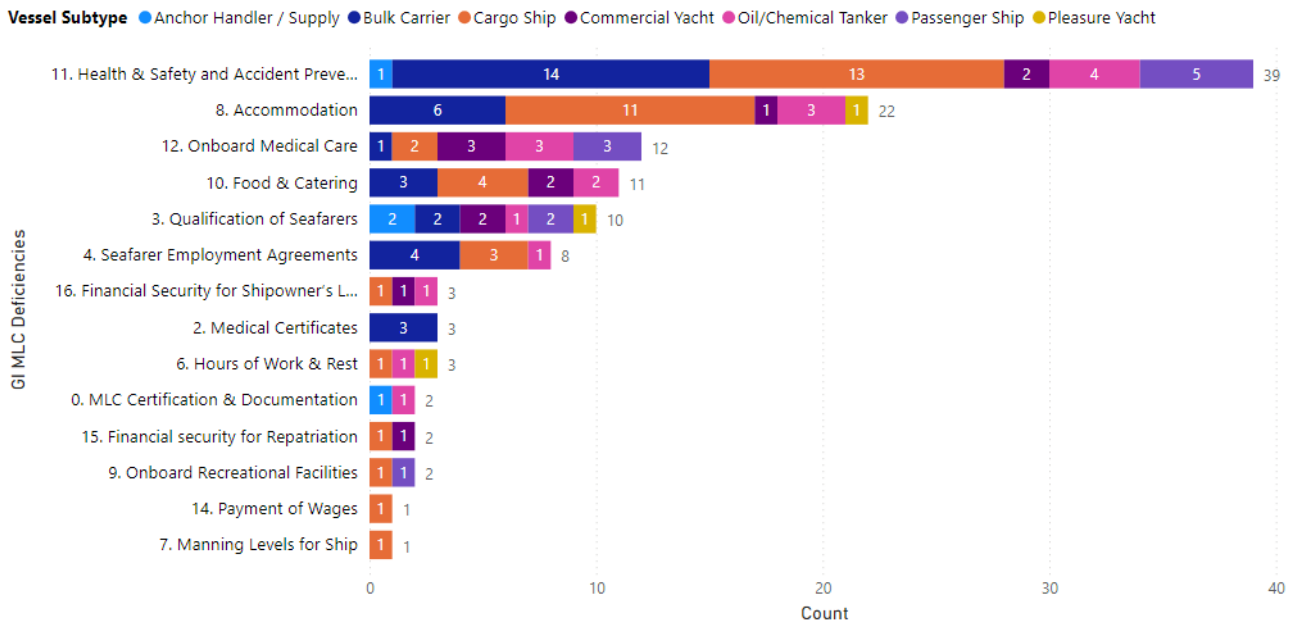


Figure 1 - 2025 MLC Deficiencies raised by IOM General Inspections

**Vessel Subtype** ● Anchor Handler / Supply ● Bulk Carrier ● Cargo Ship ● Commercial Yacht ● Pleasure Yacht

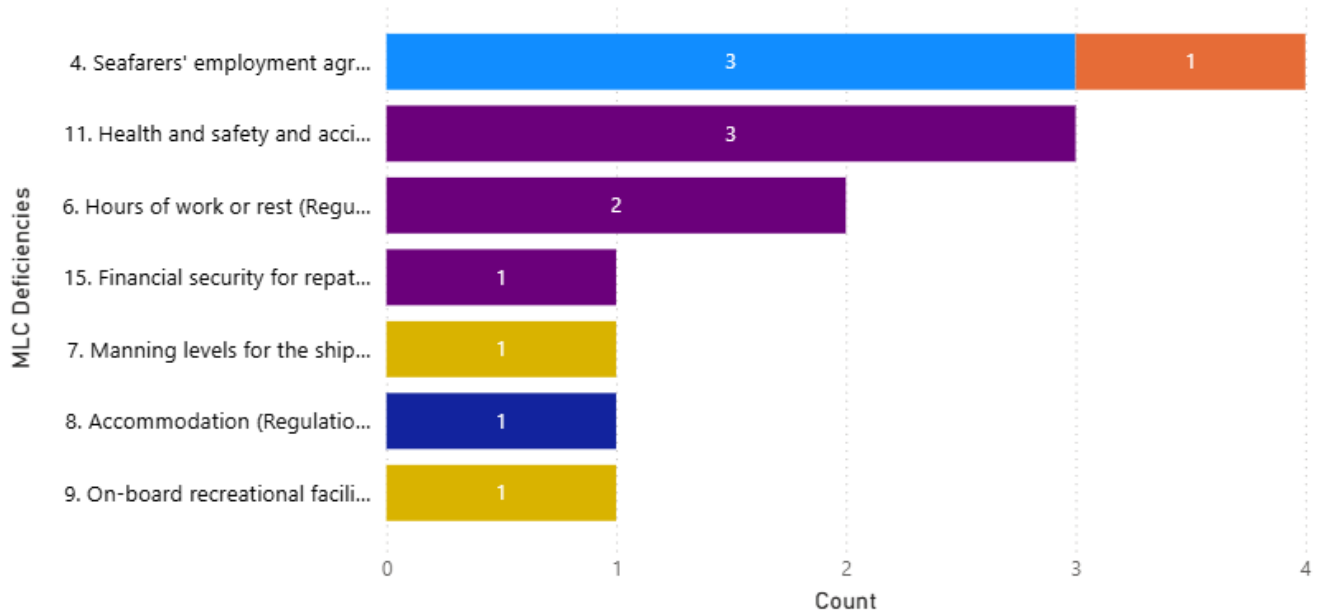


Figure 2 - MLC Deficiencies raised by MLC Surveys

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

Isle of Man Companies	Q1	Q2	Q3	Q4	Total
Companies with deficiencies	0	0	0	0	0
Companies with no deficiencies	5	4	0	1	10

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

A selection of the deficiencies found in MLC areas relating to seafarers in 2025 are provided in the table below:

MLC Area	Deficiency	Comment
2. Medical Certificates	Medical Certificate	The medical certificate for 2/E does not contain the minimum information required by STCW A-I/9-7.
3. Qualification of Seafarers	Evidence of basic training	Chief Engineer original certificates not onboard - certificates to be sent from home.
	Training & Qualification - Personal Safety Training	Not all deck offers were furnished with generic ECDIS training certificates, or confirmation the required training was completed.
4. Seafarer Employment Agreements	Seafarer Employment Agreement SEA	The C/O employment contract was issued and signed by a non-approved recruitment agency. The crewing agency was contacted, and the SEA corrected with the agency signing on behalf of the approved crewing agency with whom they have a service agreement with
	Seafarer Employment Agreement SEA	The SEA for the newly joined 3/E, and Oiler joined in Jul 2025 were not signed by the employees.
6. Hours of Work & Rest	Schedule for watchkeeping personnel - Schedule for service at sea and service in port	A table of working arrangements was unavailable.

8. Accommodation	Furnishings	The crew recreation sofa was found with 5-20cm tears/worn off covering in a band over the majority of the sofa seating length.
8. Accommodation	Heating, Air Conditioning and Ventilation	Air conditioning not working throughout accommodation.
8. Accommodation	Other - (Accommodation, recreational facilities.....)	The ship is equipped with a gym, however, no safety instructions on the proper use of gym equipment posted. The ship to provide safety instructions for the crew on proper use of the equipment.
8. Accommodation	Water, pipes and tanks	No capability on board to test freshwater chlorine levels
10. Food & Catering	Cold Room, Cold Room Cleanliness, Cold Room Temperature	Mouldy food (green chilies, green peppers, parmesan cheese & generic cheese) found in vegetable room.
10. Food & Catering	Food segregation	Raw, open, and undated meat found on top of and adjacent to cooked meat in meat freezer. Dirty and broken knife also found in freezer.
11. Health & Safety and Accident Prevention	Cleanliness	Galley floor found to be very dirty under cabinets. Large bowl of cooking oil (used) also found on floor.
11. Health & Safety and Accident Prevention	Guards/fencing around dangerous machinery parts	A meat slicer was found in the ship's lobby without visible safety warnings, posing a potential safety hazard.
11. Health & Safety and Accident Prevention	On board program for the prevention of occupational injuries and diseases	MSDS for paints and chemicals to be available locally in paint store.
11. Health & Safety and Accident Prevention	Other (working spaces ILO)	Floor plates in way of ballast water management system not fully supported and 'springy'. Floor plates supporting structure to be improved.
11. Health & Safety and Accident Prevention	Personal equipment	A number of officers and crew were not wearing hard hats and/or safety shoes whilst on duty.
12. Onboard Medical Care	Medical equipment, medical chest and medical guide	Category B medical stores to be replenished
12. Onboard Medical Care	Medical equipment, medical chest and medical guide	Eye wash bottle in the engine room workshop found open despite one use only.
12. Onboard Medical Care	Medical equipment, medical chest and medical guide	No evidence of annual medical oxygen cylinder inspection and no evidence of a recharge within the last 3 years (while the cylinder is only required to be hydrotested 5 yearly, medical oxygen has a 3 year shelf life and must be refilled at not more than 3 years).
12. Onboard Medical Care	Medical equipment, medical chest and medical guide	Presently there are required medications onboard which have expired and need replacement.
14. Payment of Wages	Non-payment of wages	Chief Officer since expiry of SEA and no new agreement being sent by crewing agent is having check and chase up salary payments that are not being made.

#### 4.1 IOM STCW Endorsements

The following table shows Isle of Man STCW endorsements issued in 2025.

STCW ref	Capacity	Q1	Q2	Q3	Q4	Total
II / 2	Master	170	153	164	194	<b>681</b>
II / 2	Ch. Officer	67	64	102	96	<b>329</b>
II / 1	OOW Nav.	121	127	137	163	<b>548</b>
III / 2	Ch. Eng.	142	139	151	174	<b>606</b>
III / 2	2 <sup>nd</sup> Eng.	68	53	64	73	<b>258</b>
III / 1	OOW Eng.	129	114	135	108	<b>486</b>
III / 6	ETO	41	67	85	110	<b>303</b>
	<b>Total</b>	<b>738</b>	<b>717</b>	<b>838</b>	<b>918</b>	<b>3211</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](#).

#### 4.2 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.

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 2025 from seafarers serving on Isle of Man ships and investigated by IOMSR (MLC A5.1.5/2) is as follows:

Type of Ship	Related to DMLC Section									
	2	3	4	6	9	10	11	12	13	14
Commercial Yacht			1							4
Other Cargo Ship			2	1		1	1	1		2

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.

Foreign Flag Ships Inspected in Isle of Man	Q1	Q2	Q3	Q4	Total
Ships with no MLC deficiencies	-	-	-	-	<b>0</b>
Ships with MLC deficiencies	-	-	-	-	<b>0</b>
MLC detentions	-	-	-	-	<b>0</b>

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

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.

	2022	2023	2024	2025
<b>Total Ships Inspected:</b>	381	368	276	<b>270</b>
<b>Inspections with MLC Deficiencies:</b>	31	36	30	<b>28</b>
<b>Detentions with MLC Deficiencies:</b>	2	3	2	<b>4</b>
Deficiencies Raised:	49	70	43	<b>52</b>

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

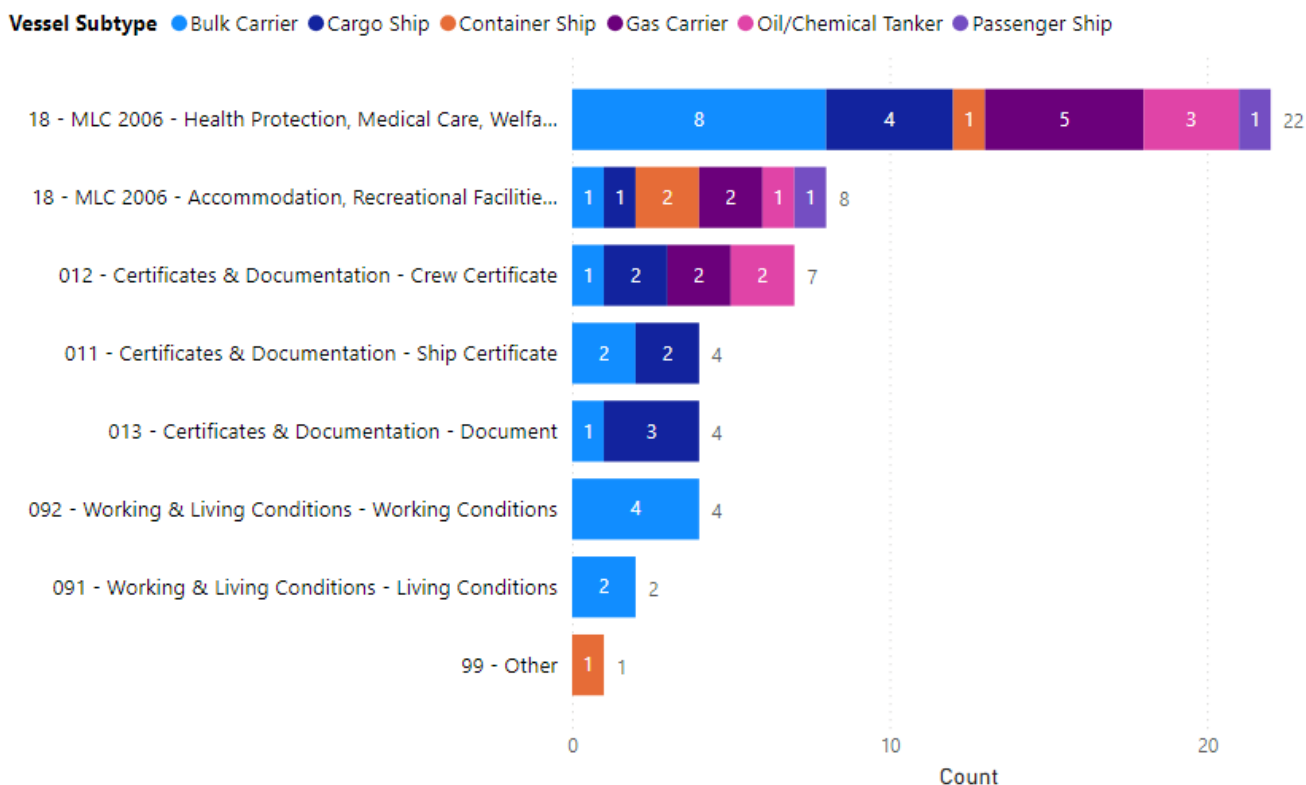


Figure 3 - MLC deficiencies raised during Port State Control

## 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 the [Merchant Shipping \(Accident Reporting and Investigation\) Regulations 2001 \(SD 815/01\)](#).

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 that is not a serious injury. This report does not include statistics relating to death from natural causes, by suicide, or injuries/fatalities to non-seafarers or seafarers not subject to the Maritime Labour Convention.

	2025		2024	2023	2022	2021
	No. of Seafarers	*Rate	Rate	Rate	Rate	Rate
Fatalities	1	14	14	61	14	26
Serious injuries	8	112	114	36	122	157
Minor injuries	22	307	284	109	81	65

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](#).

### **6.1 MLC Seafarer Injuries**

	Minor	Serious	Fatality	Total
Officer	2	1	-	<b>3</b>
Rating	9	6	1	<b>16</b>
<b>Total</b>	<b>11</b>	<b>7</b>	<b>1</b>	<b>19</b>

### **6.2 Individual Seafarer Activities Being Conducted Leading to Injury or Fatalities**

Activity	Fatality	Minor Injury	Serious Injury	<b>Total</b>
Mooring and anchoring		1	2	<b>3</b>
Lifting or carrying by hand		1	1	<b>2</b>
Access to the ship	1			<b>1</b>
Galley operations		1		<b>1</b>
Hotel / Accommodation duties		1		<b>1</b>
Maintenance - machinery			1	<b>1</b>
Maintenance - other			1	<b>1</b>
Moving about the ship			1	<b>1</b>
Moving from C/O toilet to cabin		1		<b>1</b>
No activity being carried out			1	<b>1</b>
Opening or closing a pressurised vessel		1		<b>1</b>
Painting, cleaning, de-rusting		1		<b>1</b>
Unknown		1		<b>1</b>
Unknown time		1		<b>1</b>
Using hand / portable tools		1		<b>1</b>
Watchkeeping duties - deck / cargo		1		<b>1</b>
<b>Total</b>	<b>1</b>	<b>11</b>	<b>7</b>	<b>19</b>

### **6.3 Occupational Diseases Reported per Seafarer**

- None

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

- None