

Isle of Man Ship Registry Technical Advisory Notice



MLC Amendments – Updates to DMLC Part II

Ref. TAN 007-24
Issued: 27th Nov '24

1. Introduction

This notice applies to all vessels which are subject to the Maritime Labour Convention, irrespective of tonnage.

Amendments to the Maritime Labour Convention will be entering into force on the 23rd December 2024. A full summary of these amendments can be found [here](#) and inserted into the text of the Convention [here](#); the most notable amendment from the shipowner's point of view is the new requirement in Standard A3.1 to provide for 'social connectivity' and in Guideline B3.1.11 to provide 'internet access' 'as far as is reasonably practicable'.

2. Action Requested by 20th December 2024

To ensure that these amendments have been properly considered and implemented onboard on each vessel, the Ship Registry is asking all MLC shipowners to submit a revised DMLC Part II to us before **20th December 2024**. The revised DMLC Part II should be sent to marine.mlc@gov.im together with the names of all ships to which it shall apply.

As a minimum, the amended DMLC Part II must explain how the shipowner meets the requirement to facilitate both social connectivity and internet access onboard its vessels, taking account of the Ship Registry Policy in Appendix 1. The shipowner should amend Section 9 of the DMLC Part II. The amendment need not be excessively lengthy.

Shipowners may also consider whether it is necessary to amend the DMLC Part II to take account of the other amendments to MLC.

Upon approval of the amended DMLC Part II, the Ship Registry will issue an email confirming that an amended DMLC Part II has been received and approved by this office. A copy of this email shall be kept onboard all vessels, together with a draft of the amended DMLC Part II.

In order to ease the administrative burden, and not to impose any unnecessary costs on the shipowner, the Ship Registry will allow a ship already on the register as of 23 December 2024 to continue with its current DMLC Part I & II until the first MLC renewal survey after this date. Re-issue of the approved revised DMLC Part I & II should be requested from this office when the vessel is arranging the MLC renewal survey.

For the avoidance of doubt, all MLC ships shall comply with the amendments from the entry into force date of the MLC amendments regardless of the status of the DMLC Parts I & II, failure to do so may cause a vessel issue during Port State Control.

Additionally, any ship already on the register as of 23 December 2024 may request an updated DMLC Parts I & II at any time if they do not wish to wait until the first renewal.

Any ship joining the register after 23 December 2024 will be required to have an updated DMLC Parts I & II.

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.



Appendix 1 – Ship Registry Social Connectivity Policy

Social Connectivity (Standard A3.1)

Standard A3.1 now includes a mandatory requirement for 'social connectivity, as adapted to meet the special needs of seafarers who must live and work on ships'. The Ship Registry notes that the term 'social connectivity' is used separately to 'internet access' within the Convention and therefore these terms should be considered as related but distinct terms. Social Connectivity should be interpreted as relating to both onboard interactions between crews and interactions with wider world. The below policies give guidance as to what would be acceptable 'evidence of compliance' with the revised Standard A3.1 in respect of social connectivity. This does not preclude a shipowner from demonstrating an equivalent or higher standard as an 'alternative method' of compliance with Standard A3.1.

Off-Vessel Social Connectivity

As internet access becomes prevalent, Shipowners are encouraged to also continue to dedicate resources towards maintaining more traditional methods of off-vessel social connectivity. For instance, it remains the case that telephone and postal services are considered desirable to many seafarers and are required to be considered for provision by the Isle of Man Ship Registry. This is 'evidence of compliance' with Standard A3.1.

On-Board Social Connectivity

Research Commissioned by the Red Ensign Group into Social Interaction at Sea at its impact on working practices and mental health and wellbeing has shown that onboard social interaction is important for seafarer mental health and encourages positive relationships between crew, which form an intrinsic part of a strong onboard safety culture¹. This research was published by the International Seafarers Welfare and Assistance Network (ISWAN) and the following policy draws heavily on the results of this research. The full report can be viewed [here](#).

Shipowners will therefore be expected to be able to demonstrate an ongoing commitment to promote and facilitate on board social programs. This means that the leadership on board and ashore should actively and empathetically promote social interaction amongst crew and provide appropriate funding for the provision and maintenance of associated facilities and equipment.

In doing so, Shipowners may wish to consider the following recommendations, although these are non-mandatory:

- The appointment of a voluntary social ambassador or social committee on board every vessel to arrange social activities and promote crew engagement. If a social ambassador is appointed then the following recommendations may be delegated to them, otherwise they can be the responsibility of onboard leadership:
 - Reflect and respond to the crew's preferences for their recreation time, bearing in mind that preferences may change over time, based on a variety of factors.
 - Encourage a variety of social activities to provide a healthy balance of mental and physical stimulation
 - Plan social events pro-actively in response to varying workloads and, where possible, advertise them to crew members in advance
 - Initiate 'ice-breaker' activities for newly joined crew



- Consider the safety of activities and ongoing maintenance of associated facilities and equipment

Research showed that favoured activities onboard were shown to include barbeques, table tennis, basketball, gaming (e.g. PS5), and celebrating occasions such as birthdays and religious holidays, although the precise nature of activities onboard any ship is at the discretion of shipowner. Competitions encouraged more crew to engage in activities, and also provided the opportunity for different vessels to compete against each other and feel part of a wider social community. However the research also noted that social connectivity onboard vessels need not be promoted only through formal events and that informal events such as mealtimes and coffee breaks can provide vital occasions for interaction.

Provision of on-board social connectivity may take account of the trading pattern and design of a particular vessel. For instance, vessels on short voyages without live aboard crew may not be required to demonstrate the same level of commitment to onboard social connectivity as deep-sea vessels with live aboard crew.

Internet Access (Guideline B3.1.11)

The widely publicised amendment to MLC with reference to internet access is contained in Guideline B.3.1.11. The Isle of Man shall adopt this guideline and require all shipowners for Isle of Man Ships to provide facilities for seafarers to access the internet from their own devices. It is expected that connectivity should be available to seafarers for the majority of the time when a ship is operating on its normal trading pattern, however it is accepted that connectivity will not be able to be provided all times for a variety of reasons. Short term internet outages due to technical issues are accepted as inevitable and shall not constitute a breach of this policy, as long as best endeavours are made to resolve problems as quickly as practicable.

Internet access provided to seafarers should meet the following minimum standards:

- Be of sufficient speed and quality to enable access to applications such as web based messaging and call services including transmission of photographs and short videos, emails, basic social media sites/applications, websites and internet banking. There is no mandatory requirement under this policy for provision of streaming or other data intensive applications, nor for any activity which the shipowner may deem a cyber-security risk to the vessel. Shipowners are entitled to implement a cap on a seafarer's usage, provided that it is sufficient to enable use of the above applications in reasonable quantities.
- The speed, quality and availability of internet connection, as referenced above, should be included within accommodation inspections which are to be conducted at intervals not exceeding 7 days (see MLN 3.1 for more information).
- Internet access shall ideally be provided free of charge to seafarers, noting that surveys show that social connectivity is a key factor in wellbeing of crew and also their recruitment and retention. Seafarer's Organisations report social connectivity as being second only to improved pay in the hierarchy of collective bargaining issues.²
- Nonetheless, MLC guidelines do permit for charges, however they must be reasonable in amount.

As technologies evolve and improve over time, it is expected that provision of internet access to seafarers will correspondingly improve. All shipowners are encouraged to work towards the ultimate goal of achieving social connectivity and internet access for their seafarers at a level that is comparable to shore-based workers.



References

- ¹ – ISWAN – Social Interaction at Sea: Working Practices and the Impact on Seafarers’ Mental Health and Well Being
- ² – Nautilus White Paper – An Investigation into Connectivity at Sea

