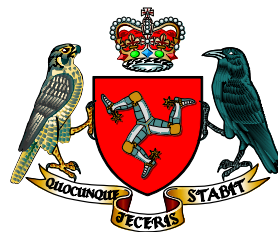




Maritime Labour Convention Annual Report 2024

Isle of Man Government
Department for Enterprise



**Isle of Man
Government**

Reiltys Ellan Vannin



Executive Summary

- In 2024, there were no changes to MLC regulations, 9 Maritime Labour Notices were amended
- IOMSR or Classification Society inspectors conducted 212 inspections (111 MLC and 101 Flag GI) of Isle of Man registered ships in 2024. The biggest source of MLC related deficiencies was Qualification of Seafarers (this includes endorsements), accounting for 25% of all MLC related deficiencies raised
- The Isle of Man Ship Registry audited 10 recruitment and placement companies on the Isle of Man in 2024, no deficiencies were identified
- The biggest source of seafarer complaints referred to the Isle of Man Ship Registry in 2024 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 2024, there was 1 fatality, 8 serious injuries and 20 minor injuries relating to MLC seafarers reported to IOMSR. Most injuries occurred when lifting or carrying by hand
- 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 1st January 2024 to 31st December 2024

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:-

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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 20th 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 2024

- None

Amendments to MLNs that came into effect in 2024

The latest MLNs as of 31st December 2024 are listed below (9 amended in 2024):

MLN Number	MLN Title	Date Last Amended	Latest Revision
MLN 001	Index of MLNs	Dec 24	Rev 22
MLN 1.1	Young Persons	Jun 22	Rev 2
MLN 1.2	Medical Certificates	Mar 19	Rev 3
MLN 1.3	Training and Qualifications	Jan 15	Rev 1
MLN 1.4	Recruitment and placement	Aug 12	Rev 0
MLN 1.4.8	Possible problems signing on a non MLC ship	Aug 12	Rev 0
MLN 2.1	SEAs & Record of Sea Service	Dec 24	Rev 8
MLN 2.2	Seafarers' wages	Dec 24	Rev 2
MLN 2.3	Hours of work and hours of rest	Jun 22	Rev 4
MLN 2.4	Entitlement to leave	Feb 13	Rev 2
MLN 2.5	Repatriation	Dec 24	Rev 3
MLN 2.6	Seafarer compensation for the ship's loss or foundering	Oct 12	Rev 3
MLN 3.1	Accommodation & recreational facilities	Dec 24	Rev 3
MLN 3.2	Food and catering	Dec 24	Rev 1
MLN 4.1	Medical Care Onboard Ship and Shore	Sep 22	Rev 7
MLN 4.2	Shipowner's liability	Dec 24	Rev 5
MLN 4.3a	Health & safety policies and programmes	Dec 24	Rev 2
MLN 4.3b	Health & safety - vibration	Aug 12	Rev 0
MLN 4.3c	Health & safety - noise	Sept 12	Rev 0
MLN 4.3d	Health & safety - chemicals	Sept 12	Rev 0
MLN 4.3e	Reporting accidents, incidents & diseases	Oct 12	Rev 0
MLN 4.4	Access to shore based welfare facilities	Mar 12	Rev 0
MLN 5.1.3/4	Inspection, Certificate & Definitions	May 20	Rev 3
MLN 5.1.5	On board complaint procedure	Feb 22	Rev 3
MLN 6.0	Amendments to DMLC Part II and SEA	Jan 14	Rev 0
MLN 7.0	MLC Amendments – Financial Security	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 Societies¹ (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.

¹ 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 Class 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 2024 and any MLC related deficiencies raised is as follows:

Type of inspection:	MLC	Flag GI	Total
Number of inspections:	88 Class	101	212 (124 IOM)
	23 IOM		
Ships with no MLC deficiencies:	18 (IOM)	82	100
Ships with MLC deficiencies:	5	19	24
MLC Deficiencies raised:	7	31	39
0. MLC certification and documentation		1	1
1. Minimum Age			
2. Medical Certificates	1		1
3. Qualification of Seafarers	2	7	9
4. Seafarer Employment Agreements	1	4	5
5. Use of any Licensed, Certified or Regulated Private Recruitment and Placement Service			
6. Hours of Work and Rest	1		1
7. Manning Levels for the Ship			
8. Accommodation		4	4
9. On Board Recreational Facilities			
10. Food and Catering		4	4
11. Health and Safety and Accident Prevention	1	4	5
12. On Board Medical Care		7	7
13. On Board Complaint Procedures			
14. Payment of Wages			
15. Financial Security for Repatriation	1		1
16. Financial Security for Ship-owner's Liability			

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

3.2 Isle 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	3	1	1	10

4. Seafarers subject to Isle of Man Legislation

A summary of the deficiencies found in MLC areas relating to seafarers in 2024 follow below:

4.1 Seafarer Qualifications

- Evidence of Type specific ECDIS training required for all navigational watchkeeping officers. The SMS bridge navigational equipment familiarisation form alone is not sufficient.

4.2 Seafarer SEAs

- SEA contains clause for recovery of repatriation costs in case of dismissal by gross misconduct. IOM interpret this as a deduction of wages from the seafarer which is not permitted by IOM MLC Regulations

4.3 Accommodation

- The ship's accommodation air conditioning system was found undercharged due to refrigerant gas loss from AHU, leading to reduced cooling in crew spaces. The system was recharged already with 65 kg of refrigerant (26% of its 240 kg capacity) on three occasions. The AHU leaks to be fixed, and further investigation is needed to determine the root cause and to prevent reoccurrence.
- D deck public toilet faucet out of service, to be repaired.
- Some MLC related cabin items were found including grout missing and cracked sink.

4.4 Food & Catering

- Fridges do not have locked in alarms. Alarms to be fitted with alarm siren to be fitted in appropriate area.
- Galley Deck head and Bulkhead splashed in cooking oil near the Deep Fat Fryer. Same to be cleaned.
- The temperatures in the meat room and fish room, ranging from -9 to -11.5 degrees centigrade, significantly exceed the recommended levels. Troubleshooting of the refrigeration system is urgently needed to guarantee the safety of food storage.

4.5 Onboard Medical Care

- ER workshop 2 x eye wash bottles expired
- Spare 40l Oxygen bottle in Hospital which is secured by a piece of string is to be removed
- Medical certificate for onboard supplies expired. The inspection has been carried out but the certificate is outstanding

4.6 IOM STCW Endorsements

The following table shows Isle of Man STCW endorsements issued in 2024.

STCW ref	Capacity	Q1	Q2	Q3	Q4	Total
II / 2	Master	112	137	130	135	514
II / 2	Ch. Officer	53	69	54	45	221
II / 1	OOW Nav.	111	119	119	136	485
III / 2	Ch. Eng.	106	121	126	120	473
III / 2	2 nd Eng.	52	47	64	42	205
III / 1	OOW Eng.	137	117	129	103	486
III / 6	ETO	49	53	52	72	226
	Total	620	663	674	653	2610

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](#).

4.7 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 2024 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					1		3
Other Cargo Ship			1				1			1

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.

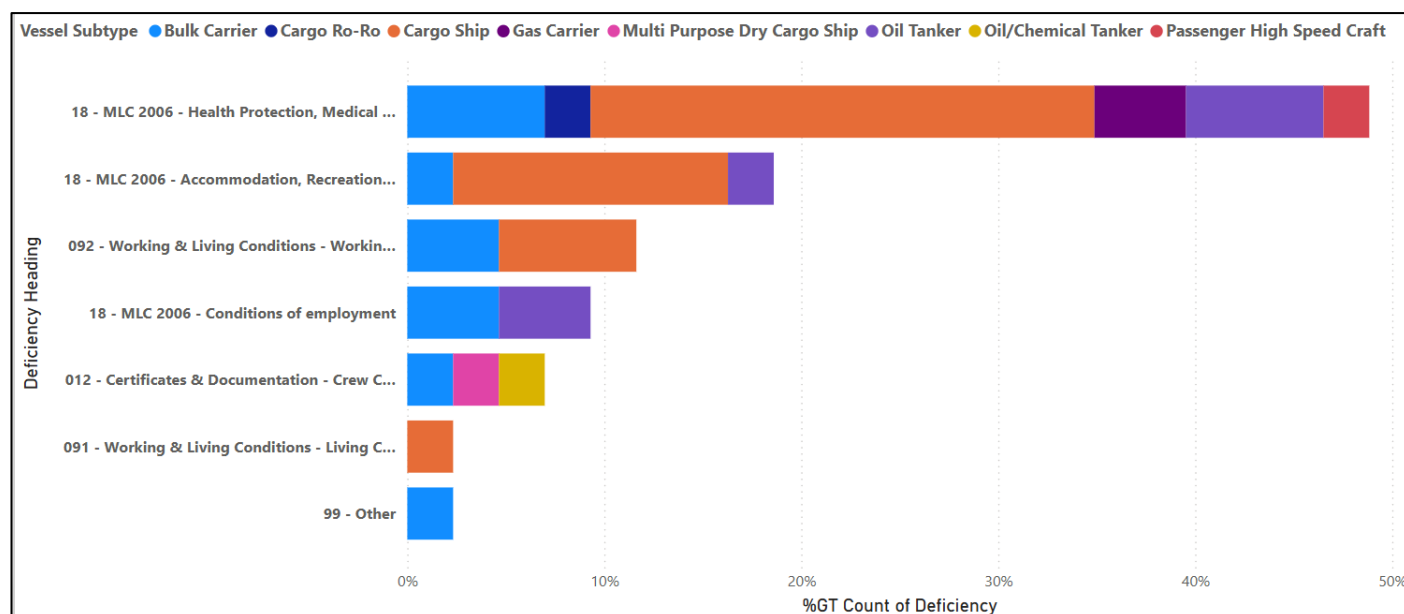
Foreign Flag Ships Inspected in Isle of Man	Q1	Q2	Q3	Q4	Total
Ships with no MLC deficiencies	-	-	-	-	0
Ships with MLC deficiencies	-	-	-	-	0
MLC detentions	-	-	-	-	0

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.

	2021	2022	2023	2024
Total Ships Inspected:	535	381	368	276
Inspections with MLC Detentions:	5	2	3	2
Inspections with MLC Deficiencies:	54	31	36	30
Deficiencies Raised:	87	49	70	43

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



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.

	2024		2023	2022	2021	2020
	No. of Seafarers	*Rate	Rate	Rate	Rate	Rate
Fatalities	1	14	61	14	26	0
Serious injuries	8	114	36	122	157	134
Minor injuries	20	284	109	81	65	155

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 Individual Seafarer Injuries by Rank & Severity

MLC Seafarer by Rank	Minor	Serious	Fatality	Total
Master	-	-	-	0
Chief Officer	-	1	-	1
OOW Nav.	1	1	-	2
Chief Engineer	1	-	1	2
2nd Engineer	2	-	-	2
OOW Engineer	1	-	-	1
ETO / Electrician	-	-	-	0
Deck Rating	6	4	-	10
Engine Rating	2	1	-	3
Deck/Eng. Cadet	-	-	-	0
Cook/Steward	1	-	-	0
Unspecified	6	1	-	7
Seafarer Total	20	8	1	29

6.2 Individual Seafarer Activities Being Conducted Leading to Injury or Fatalities

Activity Being Carried Out	Minor	Serious	Fatality	Total
Mooring or Anchoring	1	2	0	3
Electrical Maintenance	0	0	1	1
Moving about the Ship	3	1	0	4
Access to the ship	2	0	0	2
Watch keeping duties	1	0	0	1
Towing Operations	0	1	0	1
Lifting or Carrying by hand	5	3	0	8
Leisure Activity	2	0	0	2
No activity being carried out	2	0	0	2
Using Sharp hand tools	1	0	0	1
Using portable tools	1	0	0	1
Opening or closing a pressurised vessel	2	0	0	2
Operating hatch covers	0	1	0	1
Seafarer Total	20	8	1	29

6.3 Occupational Diseases Reported per Seafarer

- None

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

- None