



Title: Guidelines for the Implementation of MLC 2022 Amendments

To: Deputy Registrars, Ship Owners, ISM Operators, Recognized Organizations, Recognized Security Organizations

MMN Superseded: N/A **Revision No.:** N/A
Issuance Date: 18 December 2024

1. REFERENCE

- Maritime Labor Convention, 2006 (MLC 2006).
- Amendments to the Maritime Labor Convention, 2006, approved by the International Labor Conference at its 110th Session (2022 Amendments).

2. INTRODUCTION

2.1 The 2022 amendments to the Maritime Labour Convention (MLC) were adopted by the International Labour Conference in June 2022 to address various issues impacting seafarers. These include:

- Recruitment
- Repatriation
- Food and catering
- Personal protective equipment (PPE)
- Financial security
- Social connectivity
- Investigations of seafarer fatalities

The amendments, taking effect on **23 December 2024**, aim to update global maritime labor standards, reflecting challenges such as the COVID-19 pandemic and evolving industry needs.

3. PURPOSE

3.1 The purpose of this notice is to provide relevant information and guidance on applying, implementing, and ensuring compliance with the MLC 2022 amendments on Belize-flagged ships.

4. APPLICATION

4.1 This Merchant Marine Notice applies to: All Belize-flagged vessels subject to the MLC convention, and Seafarers as defined under Article II of the MLC 2006.



5. CONTENT

- 5.1 The 2022 Amendments, adopted on 6 June 2022, address a range of seafarer-related issues, including recruitment, repatriation, welfare, and medical care. These amendments introduce eight key changes to the MLC 2006, as outlined below.

SUMMARY OF KEY AMENDMENTS:

1. AMENDMENTS TO REGULATION 1.4 OF MLC 2006 (RECRUITMENT AND PLACEMENT)

Replacement of Paragraph 5(c)(vi) of Standard A1.4 requires that SRPS establish a system of protection, by way of insurance or an equivalent appropriate measure, to compensate seafarers for monetary loss that they may incur as a result of the failure of a recruitment and placement service or the relevant shipowner under the SEA to meet its obligations to them. Seafarers must be informed, prior to or during the engagement process, of their rights under this system.

2. AMENDMENTS TO REGULATION 2.5 OF MLC 2006 (REPATRIATION)

The new Paragraph 9 of Standard A2.5.1 facilitates the prompt repatriation of seafarers, including those deemed abandoned under Standard A2.5.2, paragraph 2. Port States, Flag States, and labour-supplying States must cooperate to ensure that seafarers engaged as replacements for abandoned crew in their territory, or on a ship flying their flag, are accorded their rights and entitlements under the MLC 2006.

3. AMENDMENTS TO REGULATION 3.1 OF MLC 2006 (ACCOMMODATION AND RECREATIONAL FACILITIES)

Replacement of Paragraph 17 of Standard A3.1 requires that seafarers' recreational facilities, amenities and services, including social connectivity, be adapted to meet the special needs of Seafarers' living and working on ships. These must comply with Regulation 4.3 and associated Code provisions on health and safety protection and accident prevention.

Replacement of Paragraph 4(j) of Guideline B3.1.11 recommends that seafarers have reasonable access to ship-to-shore telephone communications, where available, with charges, if any, for the use of these services being reasonable in amount.

The new Paragraph 8 of Guideline B3.1.11 recommends that shipowners, as far as practicable, provide seafarers with internet access on board, with charges, if any, being reasonable in amount.



4. AMENDMENTS TO REGULATION 3.2 OF MLC 2006 (FOOD AND CATERING)

Replacement of Paragraph 2(a) of Standard A3.2 requires that food and drinking water supplies, are considered based on the number of seafarers on board, their religious requirements and cultural practices as they pertain to food, and the duration and nature of the voyage, and shall be suitable in respect of quantity, nutritional value, quality and variety, and shall be provided free of charge during the period of engagement.

Replacement of Paragraph 2(b) of Standard A3.2 requires that the organization and equipment of the catering department shall be such as to permit the provision to the seafarers of adequate, varied, balanced and nutritious meals prepared and served in hygienic conditions.

Replacement of Paragraph 7(a) of Standard A3.2 requires that the Master carries out frequent documented inspections on supplies of food and drinking water in relation to their quantity, nutritional value, quality and variety.

5. AMENDMENTS TO REGULATION 4.1 OF MLC 2006 (MEDICAL CARE ON BOARD SHIP AND ASHORE)

The new Paragraph 5 of Standard A4.1 requires that Member States provide prompt disembarkation of seafarers in need of immediate medical care from ships in its territory and access to medical facilities ashore for the provision of appropriate treatment.

New Paragraph 6 is included under Standard A4.1 requiring:

Where a seafarer has died during a ship's voyage. The Member State in whose territory the death has occurred or, where the death has occurred on the high seas, into whose territorial waters the ship next enters, shall facilitate the repatriation of the body or ashes by the shipowner, in accordance with the wishes of the seafarer or their next of kin, as appropriate.

6. AMENDMENTS TO REGULATION 4.3 OF MLC 2006 (HEALTH AND SAFETY PROTECTION AND ACCIDENT PREVENTION)

Paragraph 1(b) of Standard A4.3 is amended and requires:

Reasonable precautions are undertaken to prevent occupational accidents, injuries, and diseases on board ship, including through the provision of all necessary appropriately-sized personal protective equipment and measures to reduce and prevent the risk of exposure to harmful levels of ambient factors and chemicals, as well as the risk of injury or disease that may arise from the use of equipment and machinery on board ships.

A new Paragraph 5(a) is included under Standard A4.3 requiring each Members to ensure that:



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All deaths of seafarers employed, engaged, or working on board ships are adequately investigated, recorded, and reported, on an annual basis, to the Director-General of the International Labour Office to be published in a global register.

7. AMENDMENTS TO REGULATION 4.4 OF MLC 2006 (ACCESS TO SHORE-BASED WELFARE FACILITIES)

The new Paragraph 5 of Guideline B4.4.2 recommends that Member States, so far as is reasonably practicable, provide seafarers on board ships in their ports and at their associated anchorages with internet access, with charges, if any, being reasonable in amount.

AMENDMENTS TO APPENDICES

- Item (g) of Appendix A2-I (Evidence of financial security under Regulation 2.5, paragraph 2) is replaced by “name of the shipowner, or of the registered owner if different from the shipowner;”
- Item (g) of Appendix A4-I (Evidence of financial security under Regulation 4.2) is replaced by “name of the shipowner, or of the registered owner if different from the shipowner;”

6. COMPLIANCE

6.1 GENERAL REQUIREMENTS:

- 6.1.1 Vessels entering service after **23 December 2024** must comply with the amended MLC standards.
- 6.1.2 For existing vessels, the existing Maritime Labour Convention (MLC) certificates and associated Declarations of Maritime Labour Compliance (DMLCs) shall retain their validity. However, with the 2022 amendments to the Convention entering into force on 23 December 2024, vessels must confirm compliance with these amendments no later than the date of their first renewal inspection following this date, as it pertains to certification.

To demonstrate full compliance with the 2022 amendments, vessel operators must complete and submit Form TDF-034, "Declaration of Compliance with Maritime Labour Convention 2006 Amendments 2022," to technicalservices@immarbe.com, confirming that the amendments are in effect for their fleet. Additionally, a copy of the completed Declaration Form TDF-034 must be kept on board and presented to PSC officials upon request.

- 6.1.3 It should be noted that paragraph 6.2 does not prejudice the rights and obligations of seafarers and shipowners as established by the amendments, which take effect from the date of entry into force on **23 December 2024**.



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6.2 SHIP OWNERS are required to:

- 6.2.1 **Standard A3.1 and Guideline B3.1.11:** Make sure that recreational facilities on board include social connectivity, adapted to the special needs of seafarers, including reasonable access to ship-to-shore telephone communications, and internet connectivity, where available. Any charges for using these services must be reasonable in amount.
- 6.2.2 **Standard A3.2:** Provide food and drinking water free of charge and make sure that meals provided are nutritious, balanced, of sufficient quantity and quality. Food is to be prepared in hygienic conditions and with regard to the religious and cultural practices of the seafarers on board.
- 6.2.3 **Standard A4.3:** Make sure that all seafarers are provided with appropriately sized personal protective equipment as a means to prevent occupational accidents, injuries and diseases on board.
- 6.2.4 **Appendix A2-1 & Appendix A4-1:** Ensure that the certificate(s) or other documentary evidence of financial security required under Standard A2.5.2 and A4.2.1 must clearly indicate the name of the registered owner of the ship, if it differs from the shipowner. Additionally, a copy of the evidence of financial security must be submitted to the Flag State before the issuance of the DMLC Part I by the flag.
- 6.2.5 Shipowners must submit an updated DMLC Part II to the Recognized Organization (RO), outlining the measures adopted to ensure continuous compliance with the new requirements. This submission must be made as soon as practicable but no later than the next renewal date of the MLC certificate.

6.3 RECOGNIZED ORGANIZATION

- 6.3.1 The Recognized Organization with responsibility for MLC compliance is required to review and update their procedures for inspections, certifications, and audits taking into account the provisions of the 2022 amendments.
- 6.3.2 Verify that the vessel is provided with a new Declaration of Maritime Labour Compliance (DMLC) Part 1 and 2 no later than the date of the first renewal inspection following entry into force of the amendments.
- 6.3.3 Conduct inspections for compliance with amendments.



7. ACTIONS REQUESTED

- 7.1 Owners and operators, through their designated office, must contact the Administration to apply for a new DMLC Part I incorporating the updated requirements. This application must be made no later than the date of the first renewal of the MLC certificate following the entry into force of the amendments on 23 December 2024.
- 7.2 The Administration encourages all Shipowners, Operators, Deputy Registrars, and Recognized Organizations to review and comply with the contents of this Notice and to ensure that its provisions are enforced on vessels registered with IMMARBE.

8. DISCIPLINARY MEASURES

- 8.1 Failure to adhere to the requirements outlined in this Notice may result in disciplinary action as deemed appropriate by IMMARBE. This may include, but is not limited to:
- Suspension or revocation of the vessel's certification.
 - Imposition of fines or penalties.
 - Restrictions on the vessel's operations or trading activities.
 - Other legal actions as specified under the Belize Merchant Ships (Registration) Act and Statutory Instrument 56 of 1999.

It is imperative that all parties adhere fully to the procedures and requirements to ensure proper certification and avoid any regulatory issues.

IMMARBE appreciates your cooperation and assistance.

This notice was issued in Belize City, Belize on 18 December 2024.

Eng. Eduardo Simon
Technical Manager
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Valarie Lanza (Mrs.)
Acting Senior Deputy Registrar
IMMARBE

Any queries related to this Notice shall be directed to technicalservices@immarbe.com