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## CIRCULAR

# Barbados – MLC 2006

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Notice to: Ship Owners / Managers / Operators / Surveyors / Auditors

The Barbados Maritime Ship Registry (BMSR) has issued a revised Bulletin [B007](#) – Maritime Labour Convention, which provides information on Barbados' policy on the application of the MLC 2006 as per the Barbados Merchant Shipping Act, 2024.

### Points to Note

#### Financial Security Documents

- The insurance cover and associated certificates are to be issued by a Barbados Approved Provider of Insurance as listed in Bulletin 013 and displayed on board.
- The Financial Security Documents have a validity of one year; a copy is to be provided to the BMSR every year.
- The insurance certificates are to be in a model format and include the information specified in the MLC Amendments. On these certificates, the assured party will normally be the registered owner, but this will not necessarily be the same as the "MLC Shipowner" named on other MLC documentation.
- Where the assured party named on the insurance certificates and the MLC Shipowner are different, evidence should be submitted to BMSR with PPO01-F07 DMLC Part 1 Application Form.

#### Certification

- The MLC Shipowner is to apply to the BMSR for the DMLC Part I by completing PPO01-F07 DMLC Part I Application Form and sending it to [registry@barbadosmaritime.com](mailto:registry@barbadosmaritime.com).

## Seafarers' Employment Agreements (SEAs)

- Any restriction on the term of an SEA in a collective bargaining agreement shall also apply to the SEA for service onboard a Barbadian vessel, provided the restriction is not in conflict with MLC 2006 regulations. However, without such a restriction, the seafarer's ability to extend their contract beyond its expiration date or 12 months, if so desired, would not be limited, subject to mutual agreement between the seafarer and the MLC Shipowner.
- Regardless of contract length, all SEAs are to provide for annual leave and repatriation per MLC 2006 Standards A2.4 and A2.5, respectively.

## On-board Complaints Procedure

- The MLC Shipowner and the Master are responsible for ensuring that victimisation of a seafarer for filing a labour grievance under the MLC 2006 does not occur. Any claims of victimisation should be investigated by the Master or MLC Shipowner, and where instances of victimisation are found to have occurred, these shall be dealt with under the Company's disciplinary procedures in the shortest possible time.
- BMSR will treat all complaints in confidence, and they will be given serious consideration. It is, however, essential that the person making any complaint is identified to BMSR. BMSR will not reveal the source of its information when investigating, but will not deal with any anonymous complaints.
- The complaint should be addressed to the head of the department of the seafarer lodging the complaint or to the seafarer's supervising officer, who should attempt to resolve the matter within the prescribed time limits appropriate to the seriousness of the issues involved. The MLC Shipowner should have time limits outlined in the shipboard management system.
- If a complaint cannot be resolved on board, the matter should be referred ashore to the MLC Shipowner, who should be given an appropriate time limit for resolving the matter, where appropriate, in consultation with the seafarer concerned or any person whom the seafarer may appoint as their representative.
- If, after twenty (20) days, a conciliated settlement cannot be reached, either party has a further 20 days to refer the complaint to the competent labour authority, to decide upon a satisfactory solution to the matter.
- If the seafarer lodges the complaint with an external authority rather than the BMSR, that authority is to be provided with the contact information of the BMSR and requested to communicate the complaint to the BMSR. Any investigation or action by an external authority should take into account the extent to which the on-board complaint procedure has been used, and its effectiveness in dealing with the complaint.
- If the seafarer is in any doubt about presenting a complaint and considers that they will be victimised due to doing so, they have the right to contact the BMSR for guidance, or they may submit the complaint directly to the BMSR at any time.

## Act now

Ship Owners/Managers/Operators of Barbados-flagged vessels should take note of the contents of Bulletin B007 and be guided accordingly.