



Office of  
Deputy Commissioner  
of Maritime Affairs

**THE REPUBLIC OF LIBERIA**  
LIBERIA MARITIME AUTHORITY

Email: [MLC@lisr.com](mailto:MLC@lisr.com)  
Tel: +1 703 291 3434

# **Maritime Labour Convention (MLC), 2006**

## **Annual Report**

### **Inspection Activities**

**1 January 2018 to 31 December 2018**

## **Contents**

	Page
Purpose	3
1. Liberian Administration's Legislation, Amendments and Guidance	3
2. System of Inspection	3
3. Ships and Premises Inspected	4
4. Seafarers subject to Liberian Administration's Legislation	6
5. Violations of Legislation, Penalties Imposed and Cases of detention of Ships	6
6. Reported Occupational Injuries and Diseases affecting Seafarers	7
7. Conclusion	10

## **Purpose**

This report is prepared in accordance with Standard A5.1.4.13, taking into consideration the guidance provided in B5.1.4.10 of the Maritime Labour Convention, 2006 (MLC) Code. This report covers the period from 1 January 2018 to 31 December 2018. The statistics contained in this report consider only ships to which MLC applies and to all seafarers on board.

### **1. Liberian Administration’s Legislation, Amendments and Guidance**

The Liberian Administration’s national regulations (Marine Notice MLC-005) were amended to implement the International Labour Conference (ILC)105 amendments of 2016 to Regulation 4.3 – Health and safety protection and accident prevention of MLC, 2006 requiring Shipowners to consider harassment and bullying including the implications for health and safety in their onboard occupational health and safety programmes.

### **2. Liberian Administration’s System of Inspection**

For Liberian-registered ships to which MLC applies, the Liberian Administration is the ‘Competent Authority’ as defined in Article II/1(a) of MLC and is responsible for implementing its obligations under Regulation 5.1.4 of MLC.

The Liberian Administration has trained over 230 Liberian auditors to serve as Liberian Maritime Labour Inspectors (LMLI) in order to provide effective and efficient inspection and verification of the working and living conditions on board Liberian flag ships and issue Maritime Labour Certificates. These inspectors have also been provided with specialized training by the Mission to Seafarers in addressing seafarer’s welfare concerns and complaint resolution.

The Administration after considering the requirements for authorization of recognized organizations (RO) in Standard A5.1.2.1, has also authorized RO’s to conduct maritime labour verification inspections and certification of Liberian flag ships, with exception that a shipowner can choose whether to have the on-board verification inspections and certification conducted by the Administration or an authorized RO. The names of LMLI’s can be found on Liberian Registry website, [www.liscr.com](http://www.liscr.com) under the “Maritime” tab then click on “Inspector & Auditor Search”. The list of authorized RO’s can be found on, [www.liscr.com](http://www.liscr.com) under the “Maritime” tab then click on Maritime Operations Services/Technical Department and “Recognized Organizations”.

The performance of the LMLI’s is monitored by a thorough review of the inspection reports that are submitted after the inspection and if necessary, additional training and oversight through the Administration’s ‘Audit the Auditor’ program.

The performance of the authorized RO’s is monitored through regular audits of the RO’s in accordance with the Code for recognized organizations (RO Code).

The Liberia Administration carefully reviews the deficiencies raised during MLC inspections and

actively monitors the evidence of implementation of the corrective action plan within the agreed timeline.

### **3. Ships and Premises Inspected**

**3.1** The following is a record of inspections for certification and to ensure continuing compliance on Liberian-registered ships, during the period of this report.

Number of ships inspected by Liberian Maritime Labour Inspectors	1228
Number of ships inspected by authorized RO's	988
Total number of ships inspected	2216
Number of ships with no deficiencies	1715
Number of ships with deficiencies	501
Total number of deficiencies	607

The total number of deficiencies noted during these inspections is broken down by category as follows:

Regulation 1.2 – Medical Certificates	8
Regulation 1.3 – Training and Qualifications	14
Regulation 1.4 – Seafarers recruitment and placement services	6
Regulation 2.1 – Seafarers employment agreements	39
Regulation 2.2 – Payment of wages	22
Regulation 2.3 – Hours of work and hours of rest	71
Regulation 2.5 – Repatriation	1
Regulation 2.7 – Manning Levels	11
Regulation 3.1 – Accommodation and recreational facilities	141
Regulation 3.2 – Food and catering	131
Regulation 4.1 – Medical care on board ship and ashore	33
Regulation 4.2 – Shipowners' liability	2
Regulation 4.3 – Health and safety protection and accident prevention	64
Regulation 5.1.5 – On-board complaint handling procedures	15
Regulation 5.1.1 – General principles	25

The following is a description of the deficiencies with high numbers:

- a. **Standard A2.1 – Seafarers employment agreements (SEA's)- 39 deficiencies**
  - Seafarers not provided signed original of SEA upon engagement
  - SEA does not contain the name and address of the shipowner under MLC
  - CBA not available on board for seafarers to review or not consistent with SEA
  
- b. **Standard A2.2 – Payment of wages – 22 deficiencies**
  - No monthly account of wages provided
  - Wages not paid regularly at monthly intervals
  
- c. **Standard A2.3 – Hours of work and hours of rest- 71 deficiencies**

- Record of rest hours not kept or not consistent with ships log or overtime records
- Minimum hours of rest not provided in any 24 hours or 7 days' period and no compensatory rest provided for seafarers on call
- Table of working arrangements not posted
- Seafarers not provided with copy of their individual work/rest hours

**d. Standard A3.1– Accommodation and recreational facilities – 141 deficiencies**

- Poor housekeeping
- Sanitary facilities not operational
- Flooring and cabin equipment damaged
- Weekly inspections not carried out or records not kept

**e. Standard A3.2 – Food, water and catering – 131 deficiencies**

- Storage of food not as required
- Insufficient food for the intended voyage

**f. Standard A4.1 – Medical care on board ship and ashore – 33 deficiencies**

- Medicines on board not as per required scale (Medical Guide for Ships)

**g. Standard A4.3– Health and safety protection and accident prevention – 64 deficiencies**

- No risk assessment for critical operations
- No functioning safety committee on board
- No evidence of reporting and investigation
- Unsafe working conditions

**h. Standard A5.1.5– On-board complaint procedures – 15 deficiencies**

- Seafarers not provided with a copy of on-board complaint procedures
- Seafarers not familiar with the procedure
- Required contact information of Administration and Shipowner not entered

**3.2** A total of 7 SRPS were audited and issued Authorization Letters by the Liberian Administration during the period of this report.

## **4. Seafarers subject to Liberian Administration’s Legislation**

### **4.1 Seafarer**

A seafarer is defined as any person who is employed or engaged or works in any capacity on board a ship to which this convention applies. Those categories of persons which are not considered seafarers for the purpose of MLC, 2006 are included in Marine Notice MLC-001/SEAFARERS.

During the period of this report, there were a total of 282,088 seafarers holding valid Liberian Endorsement Certificates and/or Special Qualification Certificates.

## **5. Violations of Legislation, Penalties Imposed and Cases of detention of Ships**

### **5.1 Violation of legislation and penalties imposed**

There was one (1) case of violation of Liberian legislation implementing the MLC, 2006 and one (1) ship was reported abandoned to the ILO database.

### **5.2 Detention of Liberian registered ships**

During the period of this report, twenty-one (21) Liberian-registered ships were detained with serious deficiencies related to:

- a. **Standard A2.2 – Payment of wages – 5 ships**
  - Wages not paid regularly at monthly intervals
- b. **Standard A2.3 – Hours of work and rest – 5 ships**
  - Record of rest hours not kept or not consistent with ships log or overtime records
- c. **Standard A2.1/A2.5 – Seafarers employment agreements/Repatriation – 3 ships**
  - Seafarers employment agreements expired and seafarers not repatriated
- d. **Standard A3.2 – Food and catering – 2 ships**
  - Quantity of food, cleanliness of galley and food storage rooms
- e. **Standard A3.1 – Accommodation and recreational facilities – 6 ships**
  - Condition of sanitary facilities

### **5.3 Complaints / Disputes received from seafarers on Liberian-registered ships**

The Liberian Administration is committed to ensuring that Seafarers who serve on Liberian registered ships have decent working and living conditions, a safe and secure workplace and fair employment.

Seafarers are encouraged to utilize the ship's Onboard Complaint Procedures in order to resolve complaints at the lowest level possible in accordance with MLC 2006. However, in the event a complaint is unable to be resolved onboard, the Liberian Administration provides an online complaint form through the link below and will assist Seafarers with all true and valid complaints.

<http://www.lisr.com/maritime/mlc-complaint>

Cause/Type of Complaints	Number of Complaints	Source of Complaint							Resolved	Ongoing/ Pending	
		Seafarer	Operator	Port State	Seafarers' organization	Inspector	Liberian	Vessel Class			ITF
Minimum age											
Recruitment and placement											
Seafarers' employment agreement	2	2								2	
Payment of wages	27	18		2	2	2		3		26	1
Hours of work and hours of rest	1	1								1	
Repatriation	4	3						1		4	
Entitlement to leave	0	0									
Accommodation/recreational facilities	1	1								1	
Food and catering											
Medical Care o/b and ashore	1	1								1	
Ship-owners' liability	3							3		2	1
Health, safety & accident Prevention											
Harassment	1	1								1	
<b>Total</b>	<b>40</b>	<b>27</b>		<b>2</b>	<b>2</b>	<b>2</b>		<b>7</b>		<b>38</b>	<b>2</b>

## **6. Reported Occupational Injuries and Diseases affecting Seafarers**

The owner or operator of a Liberian-registered ship is required by law to report in detail any loss of life or injury causing any person(s) to remain incapacitated for a period in excess of 72 hours. The form RLM 109-1 is to be used for this purpose.

The tables below indicate the seafarer deaths and injuries on board Liberian-registered ships.

## 6.1 Task or activity being conducted leading to an injury or death

Description	Number	
	Death	Injury
Working on pipelines or equipment containing hot gases / liquids	1	1
Working on chemicals		1
Working on electrical equipment		2
Working on auxiliary equipment (non-electrical)		8
Working on/lighting Boiler or Main Engine	1	19
Climbing up / down	1	7
Walking on same level		2
Carrying / lifting / lowering		3
De-rusting		1
Painting		
Overhauling machinery		2
Mooring/anchoring/line handling operations	1	11
Inspection / Working inside Hold / Tank	1	4
Securing cargo		5
Working Aloft (Relating to Rigging of a vessel)		
Working Aloft (Other)		1
Working over side	1	1
Hot work / welding		2
Working in galley		3
Bunkering		
Operating Hatch Covers	4	3
Cargo operations / preparation	3	6
Embarking/Disembarking vessel		
Transfer of person by boat / transfer basket		
Securing Gangway		3
Ashore (Recreational)		
Ashore (Other)		3
Watch-keeping		1
Responding to vessel emergency/casualty (Not fire)		
Fire fighting		
Launching/Lowering/Working with Survival Craft		1
No Activity Being Conducted	35	27
Cleaning/Taking Inventory		
Drill/Inspection		3
<b>Total</b>	<b>48</b>	<b>120</b>



## 6.2 Type of incident leading to death or injury

Description	Number	
	Death	Injury
Cardiac Arrest	10	
Natural Causes	13	
Illness - Contagious		4
Illness – Not Contagious		2
Struck / hit by falling / moving / flying objects		27
Criminal Acts/Physical/Crew Conflict		
Suicide	4	
Drowned	3	
Contact with electricity / electric shocks		
Chemical exposure/vapor inhalation: Contact with/swallowing of toxic substances	2	
Suffocation/Asphyxiation	1	
Missing from ship	6	
Heavy Weather		
Over exertion: strain / sprain		
Over exposure to cold		1
Over exposure to heat		
Lack of oxygen	1	
Cut from knife or sharp object		18
Caught in or between objects		10
Contact with steam or hot gases		
Fire/Explosion/Blasts/Burns		3
Contact with hot liquid or other heat source	8	
Transfer of person by boat/transfer basket		
Jump/fall overboard		3
Slip/fall same level		17
Slip fall to lower level		16
Unknown		19
<b>Total</b>	<b>48</b>	<b>120</b>

Shipowners conducting risk evaluation in relation to management of occupational safety and health shall refer to appropriate statistical information from their ships and to the statistics of injuries and deaths provided in this report.

It should be noted that thirty-three (33) deaths on board were related to cardiac arrest and unspecified causes, including missing from ship and alleged suicide. Shipowners should be aware of the role of the medical examination in the enhancement of safety and health at sea and in assessing the ability of seafarers to perform their routine and emergency duties and to live on board.

Shipowners are urged to take note of various initiatives to improve conditions for seafarers regarding issues related to seafarers' wellbeing, and particularly mental health and bring this to the attention of

seafarers on board their ships. Some of these initiatives are listed below:

1. The International Seafarers' Welfare and Assistance Network (ISWAN) have published [ISWAN guidance](#), which include a series of three self-help guides for seafarers, a range of mental health and wellbeing infographics, and an audio relaxation exercise.
2. In 2018, Seafarers Church International held a 'Seafarer Mental Health Roundtable'. The report can be found in the link [Seafarers' Mental Health Roundtable: Official Report](#).
3. There are a number of helplines that seafarers can contact if they reach crisis point or just want someone to talk to. Charitable institutions are the most prevalent providers of these lines; for example, Seafarer Help (<https://www.seafarerhelp.org/>) provides a telephone help service 365 days a year and an email address that seafarers can write to.
4. The Sailors' Society has a Crisis Network of Chaplains around the world that seafarers can phone for help when in port (<https://www.sailors-society.org/>) as does The Mission to Seafarers (<https://www.missiontoseafarers.org/>), and for the UK, The Apostleship of the Sea (<https://www.apostleshipofthesea.org.uk/our-work-supporting-seafarers>) deploy chaplains to a number of UK ports.
5. There are a number of other charitable institutions in the UK that provide seafarers with advice; e.g. SAIL (Seafarers Advice and Information Line) as well as their families ashore; for example, Watch Ashore (<http://www.watchashore.org.uk/>). In addition, seafarers in the UK can access national provision from the National Health Service (<https://www.nhs.uk/conditions/suicide/>).
6. In Australia, an organization called Hunterlink is working in a social partnership with the ITF Seafarers' Trust to provide early intervention for seafarers calling into Australian ports. Its website (<https://hunterlink.org.au/international-seafarers-help/>) explains that Hunterlink, "delivers an International Maritime EAP model that is providing mental wellness support to International Seafarers from around the globe."
7. The Marine Accident Investigation Forum (MAIF) have agreed to include seafarers' mental health issues on the agenda of their annual meeting to be held in Napoli in October 2019.

## **7. Conclusion**

1. The report has been prepared to provide an accurate account of the implementation of MLC on board Liberian-registered ships from 1 January 2018 through 31 December 2018.
2. The average number of deficiencies is about 0.3 per ship. The detention rate was about 0.58%, 0.25% higher than 2017, mainly as a result of an increase in non-payment of wages at monthly intervals and rest hours not in compliance with minimum requirements.
4. It is the aim of the Liberian Administration to reduce detentions in port under MLC to zero (0) in the year 2019. In that regard the Administration is continuously working with shipowners to ensure that their ships are always in compliance through regular monitoring during shipboard attendance and complaints resolution, including increased inspections on higher risk ships/owners.

\* \* \* \* \*