

## **Report of the 2024 Concentrated Inspection Campaign (CIC) on Crew wages and SEAs**

## **Executive Summary**

A Concentrated Inspection Campaign (CIC) on compliance with some MLC, 2006 provisions was carried out jointly by the Paris MoU and Tokyo MOU during the period 1st September 2024 to 30th November 2024.

The purpose of the CIC was to assess seafarers' employment conditions under the MLC, 2006 Convention on board ships of various flag states, ensuring their contracts (SEAs) comply with MLC, 2006 provisions. It also aimed to verify that seafarers receive appropriate wages, that shipowners provide financial security for compensation in the event of death, disability, or repatriation, and to raise awareness among shipowners, operators, and seafarers of the specific requirements of the CIC.

A CIC Questionnaire and guidance were developed by the Tokyo MOU in collaboration with the Paris MoU. The questionnaire consisted of 10 questions to be answered by Port State Control Officers (PSCOs) when conducting a Port State Control (PSC) inspection during the CIC period.

The questionnaire was completed on a total of 3863 ships, given that the CIC was conducted on all ships targeted for inspection within the Paris MoU Region during the relevant period, but only one CIC report was required per ship in case of multiple inspections.

Overall, the results show a good level of implementation of the MLC, 2006 provisions on which the CIC focused. A total of 30 ships out of the total of 3863 ships (0,78%) were detained for at least one CIC-related topic detainable deficiency.

In detail, the deficiencies on Seafarers' Employment Agreement Wages, Collective Bargaining Agreement Maritime Labour Certificate ran up compared to the same period in 2023.

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## **Introduction**

The Maritime Labour Convention, 2006 (MLC, 2006) was adopted in 2006 and came into force in 2012. Since then, the convention has been amended several times, most recently 2018.

In order to effectively enhance the conditions of the employment for seafarers, their working and living conditions, health and safety and welfare of the seafarers on-board ships, the Tokyo MOU and Paris MOU jointly carried out a joint concentrated inspection campaign on MLC, 2006 focusing on crew wages, SEA's and financial securities.

### **1.1 Purpose of this report**

The purpose of this report is to present the results of the CIC on MLC, 2006.

### **1.2 Objective of the CIC**

The objective of the CIC was to:

- have a better understanding of the employment conditions of seafarers for each party to the Convention and on board ships of various flags, as well as checking the arrangements made by the shipping company in the fulfillment of their obligations;
- confirm that the SEAs, employment conditions are in conformity with the relevant provisions of MLC and the applicable requirements of the flag State;
- confirm that seafarers serving on board receive payments in accordance with their SEA, collective bargaining agreements and with the MLC, 2006;
- confirm that the shipowners hold the appropriate instruments of financial security for compensation of seafarer death and long term disability, as well as for repatriation of the seafarers; and
- raise awareness of shipowners, operators and seafarers on the specific requirements that the CIC will address.

### **1.3 Scope of CIC**

The CIC was to be applied to all ships targeted for inspection within the Paris MoU Region between 1 September to 30 November 2024.

### **1.4 General Remarks**

- For the purpose of this report, a detention is an inspection containing at least one deficiency in the area of the CIC that is considered as a ground for detention.
- The tables do not take into account inspections where the CIC questionnaire was not recorded, with exception of table 2.

## Summary, Conclusions and Recommendations

### 2.1 Summary

The decision to carry out a joint Concentrated Inspection Campaign (CIC) with Tokyo MOU on compliance with MLC, 2006 was taken by Paris MoU Port State Control Committee.

The following summarizes the results of the CIC:

- The highest compliance was observed in relation to Question 6, relating to whether the wage or salary payments were made to the seafarer at no greater than monthly intervals, where 99.7% responded 'yes'. The second highest compliance was relating to Question 7 on whether the seafarers have been given a status of accounts and wages paid on at least a monthly basis, where 99.3% responded 'yes'. Notably, even if the compliance for both questions was high it resulted in 7 detentions.
- There was a high compliance rate averaging 98.7% in general.
- The least compliance was noted concerning Question 4, whether the seafarers' employment agreement include all the required elements specified in the MLC, 2006, where 2.8% responded 'no'. The second least compliance was relating to Question 2 on whether the seafarer is able to access information regarding their employment conditions on board, where 2.7% responded 'no'.
- The overall detention rate based on total CIC inspections was 0.78%.
- 30 vessels with deficiencies marked as grounds for detention were in the Standard Risk category.
- By ship type, as in previous years, General cargo/multipurpose ships has highest CIC-topic detention rate (57.1%) followed by bulk carrier (19%) and oil tanker (9.5%).
- Similar to previous CICs, ship age <6 years had 0% detention rate for CIC-topic detentions, while the highest rate was for ships 25-30 years (26.8%).
- The flag State with highest number of CIC related deficiencies was Liberia (81 corresponding to 14,9% of the total number of deficiencies) followed by Marshall Islands (74 / 13,6%), Panama (68 / 12,5%) and Malta (54 / 9,9%).
- Ships with CIC related grounds for detention, the highest number of detentions, by flag State, was Panama (7 corresponding to 23,3% of the total number of detentions) followed closely by Tanzania, United Republic of (6 / 20%), Liberia and Malta with (5 / 16,7%) each.
- The Flag administrations which had CIC topic detentions were a mix of White, Grey, Black and not listed in the Paris MOU WGB list. Therefore no trend could be discerned.
- Only one CIC related deficiency was recorded **as RO related** on Certificate or Documentary evidence of financial security relating to shipowners' liability on a Tanzanian General cargo/multipurpose of more than 37 years old. Due to this small number and in order to make the report more readable, the columns on RO related have been deleted in every table.

### 2.2 Conclusions and recommendations

The results show a good level of compliance in general.

However, the significant difference on number of deficiencies between 2023 and 2024 for almost every question and particularly for those related to SEAs should be taken into consideration.

It is therefore recommended that the industry pay greater attention to compliance with the requirements of the MLC, 2006 when establishing seafarers' employment contracts.

## **CIC Questionnaire Results**

### **3.1 Analysis**

The CIC was carried out between the period of 1 September to 30 November 2024. A total of 3962 inspections of these 3863 completed a CIC questionnaire.

#### **3.1.1 Response to CIC questionnaire**

The following table (Table 1) shows the results on the CIC questionnaire.

For the 3863 inspections using the questionnaire the results are divided into “Yes”, “No”, “N/A”, “Blank” and ‘Detained’.

Table 1 - Response to CIC questionnaire

Nr.	CIC Crew wages and SEAs	Nr. Yes	"/Total Y+N"	Nr. No	"/Total Y+N"	Nr. N/A	"/Line total Insp"	Nr. Detained	"Dets/Total Q CIC"
		Measured over only Yes and No answers				Measured over Total of CIC Inspections			
		'YES'(1)		'NO'(1)		N/A(2)		Detained	
		#	%	#	%	#	%	#	% of CIC
1*	Is the seafarer given a SEA signed by both the seafarer and the shipowner or a representative of the shipowner?	3.749	98,1%	72	1,9%	36	0,9%	6	0,2%
2*	Is the seafarer able to access information regarding their employment conditions on board?	3.725	97,3%	103	2,7%	35	0,9%	0	0,0%
3	Are standard form of seafarers' employment agreements and parts of any applicable collective bargaining agreements subject to port State control under Reg.5.2, available in English?	3.747	99,0%	37	1,0%	79	2,0%	0	0,0%
4*	Does the seafarers' employment agreement include all the required elements specified in the MLC, 2006?	3.711	97,2%	107	2,8%	41	1,1%	4	0,1%
5*	Do particulars included in the seafarers' employment agreement comply with the MLC, 2006 requirements?	3.756	98,4%	62	1,6%	44	1,1%	1	0,0%
6*	Are wage or salary payments made to the seafarer at no greater than monthly intervals?	3.809	99,7%	10	0,3%	40	1,0%	4	0,1%
7*	Have seafarers been given a status of accounts and wages paid on at least a monthly basis?	3.793	99,3%	27	0,7%	40	1,0%	3	0,1%
8*	Are wage or salary payments in accordance with any applicable CBA or SEA?	3.741	98,3%	65	1,7%	55	1,4%	2	0,1%
9*	If payments made to a seafarer include deductions, are they in accordance to the MLC, 2006?	3.606	99,6%	14	0,4%	242	6,3%	1	0,0%

<b>10A*</b>	Is a certificate or documentary evidence of financial security, issued by the financial security provider, available on board in the event of compensation for death and long-term disability?	3.802	99,4%	23	0,6%	36	0,9%	2	0,1%
<b>10B*</b>	Is a certificate or documentary evidence of financial security, issued by the financial security provider, available on board in the event of the repatriation?	3.792	99,3%	25	0,7%	44	1,1%	2	0,1%

\* If the answer to this question is 'NO' the ship may be considered for detention, in case of a Detention, "No" is replaced with "Detained", the score of "Detained" is added to the "NO" scores (In Thetis just 1 answer is possible). The details of any detention should be appropriately entered on the PSC report B.

(1) The percentages are calculated using the total number of inspections where the answer was "YES" or "NO" only.

(2) The percentages are calculated using the total number of inspections.



### 3.1.2. Analysis of answers to questionnaire in relation to detention

Question 1 - Is the seafarer given a SEA signed by both the seafarer and the shipowner or a representative of the shipowner, had the third highest number of “no” answers (72) although highest number of detentions (6).

Question 4 - Does the seafarers’ employment agreement include all the required elements specified in the MLC, 2006, had the highest number of “no” answers (107) and also had a high number of detentions (4).

Question 6 - Are wage or salary payments made to the seafarer at no greater than monthly intervals, show a high compliance of 99.7%, however it results to 4 detentions.

### 3.1.3. Analysis of CIC-topic related deficiencies, including ISM related deficiencies

The data extract for this report did not specify which deficiencies were ISM related.

The focus on the particular areas of the CIC results into an increase of number of deficiencies recorded against MLC, 2006 requirements for all areas covered by the questionnaire compared to the same period in 2023. One possible cause of that result is that verification of SEAs compliance to MLC, 2006 provisions is not required during an initial inspection, but if clear grounds are established, during a more detailed inspection and systematically during an expanded inspection.

### 3.1.4. Number of inspections in CIC

Table 2 - Number of inspections and number of ships in CIC

	INSPECTIONS WITH* A CIC QUESTIONNAIRE	INSPECTIONS WITHOUT A CIC QUESTIONNAIRE
TOTAL	3863	99
DETENTIONS	165	-
DETENTIONS WITH <i>CIC-TOPIC</i> RELATED DEFICIENCIES	30	-

The detention rate in this CIC was 0,78% (30 detentions related to 3863 inspections).

### 3.1.5. Specification of CIC-topic related deficiencies

Table 3 - Specification of CIC-topic related deficiencies

CIC-topic related deficiencies			Nr. of deficiencies, (One inspection can have multiple deficiencies)		Nr. of deficiencies recorded as ground for detention	
Deficiency		Convention	2023	2024	2023	2024
01220	Seafarer’s employment agreement (SEA)	MLC 2006 Title 2	139	317	8	25
18203	Wages	MLC 2006 Title 2	23	82	0	4
01331	Collective Bargaining Agreement	MLC 2006 Title 2	7	79	0	0
01139	Maritime Labour Certificate	MLC 2006 Title 5	30	56	2	4
01140	DMLC (part I & part II)	MLC 2006 Title 5	13	49	0	1
01337	Certificate or Documentary evidence of financial security relating to shipowners’ liability	MLC 2006 Title 4	14	33	2	3
01336	Certificate or documentary evidence of financial security for repatriation	MLC 2006 Title 2	19	29	2	2
18204	Non-payment of wages	MLC 2006 Title 2	11	23	4	4
18205	Measures to ensure transmission to seafarer’s family	MLC 2006 Title 2	1	0	0	0

### 3.1.6. Number of inspected ships per Ship Risk Profile

Table 4 shows that the majority of the vessels with CIC deficiencies and CIC related detentions were Standard Risk. However, looking at the overall number of inspections they make up the majority of the inspections, so this is considered proportional.

*Table 4 - Number of inspected ships per Ship Risk Profile*

CIC-topic related deficiencies	Based on Inspections with CIC related deficiencies in Months 9/10/11			
	Nr. CIC related deficiencies		Nr. CIC related deficiencies recorded as ground for detention	
Ship risk profile	2023	2024	2023	2024
SRS	206	528	14	30
HRS	42	113	4	12
LRS	4	23	0	0
UNKNOWN	1	4	0	1

### 3.1.7. Number of inspected ships and detentions per ship type

Table 5 shows that General Cargo/multipurpose ships had the highest number of CIC related deficiencies and CIC related deficiencies recorded as grounds for detention (252/24) followed by Bulk carrier (177/8).

*Table 5 - Number of inspected ships and detentions per ship type*

CIC-topic related deficiencies	Based on Inspections with CIC related deficiencies in Months 9/10/11			
	Nr. CIC related deficiencies		Nr. CIC related deficiencies recorded as ground for detention	
	2023	2024	2023	2024
Ship Type				
General cargo/multipurpose	62	252	4	24
Bulk carrier	70	177	4	8
Oil tanker /chemical tanker	29	74	1	4
Container	15	27	0	0
Oil tanker	20	26	1	1
Other special activities	9	24	2	0
Ro-Ro passenger ship	6	15	2	0
Offshore supply	2	12	0	0
Tug	5	12	2	0
Chemical tanker	3	11	0	0
Ro-Ro cargo	6	8	1	1
Commercial yacht	1	6	1	0
Gas carrier	10	6	0	1
Dredger	1	5	0	0
Livestock carrier	4	5	2	2
Special purpose ship	1	2	0	1
Passenger ship	3	2	0	0
Refrigerated cargo	3	2	0	0
Fish Factory	0	1	0	0
High speed passenger craft	0	1	0	0
High speed cargo	1	0	0	0
NLS tanker	2	0	0	0

### 3.1.8. Inspections and detentions per Flag State

The flag State with highest number of CIC related deficiencies was Liberia (81 corresponding to 14,9% of the total number of deficiencies) followed by Marshall Islands (74 / 13,6%), Panama (68 / 12,5%) and Malta (54 / 9,9%).

Ships with CIC related grounds for detention highest numbers were Panama (7 corresponding to 23,3% of the total number of detentions) followed by Tanzania (6 / 13,6%), Liberia and Malta with (5 / 16,7%) each.

No trend could be discerned for the Flag State performance which had CIC related deficiencies or detentions as they were made up of a combination of White, Grey, Black on the PMOU WGB list.

Nor could any trend be discerned as to whether or not the MLC, 2006 has been ratified or not by the Flag State.

Table 6 - Inspections and detentions per Flag State

	Based on Inspections with CIC related deficiencies in Months 9/10/11					
CIC-topic related deficiencies	Nr. CIC related deficiencies		Nr. CIC related deficiencies recorded as ground for detention		Current position on WGB list	MLC, 2006 in force
Ship Flag	2023	2024	2023	2024		
Liberia	39	81	2	5	White	2006
Marshall Islands	13	74	1	2	White	2007
Panama	47	68	2	7	Grey	2009
Malta	12	54	1	5	White	2013
Netherlands	6	38			White	2011
Antigua and Barbuda	12	29	1	2	White	2011
Cyprus	5	23			White	2012
Portugal	2	23		1	White	2016
Singapore	7	21	1		White	2011
Denmark	2	19			White	2011
Norway	15	18		1	White	2009
Bahamas	5	15			White	2008
Barbados	2	14			White	2013
Tanzania, United Republic of	3	12		6	Black	2019
Cameroon	4	11	2	4	Black	
Hong Kong (China)	3	11			White	2018
Saint Vincent and the Grenadines	1	11		2	Grey	2010
United Kingdom	2	10	2		White	2013
Comoros	3	9		2	Black	enter into force on 18 Feb 2025
Italy	2	9			White	2013
Saint Kitts and Nevis	2	8		1	Grey	2012
Gibraltar, UK	3	7			White	
Sweden		7			White	2012
Luxembourg		6			White	2011
Greece	3	5			White	2013
Guinea-Bissau	2	5		3	Not Listed	enter into force on 10 Jun 2025
Belize	4	4			Black	2014
Cape Verde		4			Not Listed	2015
Cayman Islands		4			White	

Based on Inspections with CIC related deficiencies in Months 9/10/11						
CIC-topic related deficiencies	Nr. CIC related deficiencies		Nr. CIC related deficiencies recorded as ground for detention		Current position on WGB list	MLC, 2006 in force
	2023	2024	2023	2024		
<b>Ship Flag</b>						
Faroe Islands		4			White	
Isle of Man, UK	1	4			White	
Korea, Republic of		4			Grey	2014
San Marino		4			Not Listed	2022
Latvia		4			Grey	2011
Togo	2	4			Black	2012
China		3			White	2015
Germany	4	3			White	2013
Indonesia	1	3			Not Listed	2017
Japan		3			White	2013
Morocco	2	3	2		Grey	2012
Palau	9	3	1		Black	2012
Sierra Leone	1	3	1		Grey	2022
Tunisia		3		1	Grey	2017
Türkiye	5	3			White	
Vanuatu	6	3	1		Black	
France	1	2			White	2013
Ireland		2			White	2014
Tuvalu		2			Not Listed	2012
Cook Islands	1	1			Grey	2019
Finland	2	1			White	2013
Iran, Islamic Republic of	3	1		1	Grey	2014
Poland		1			White	2012
Russian Federation	2	1			White	2012
Saudi Arabia		1			White	
Spain		1			White	2010
United Arab Emirates		1			Not Listed	
Azerbaijan	1				Black	
Bangladesh	1				Grey	2014
Brazil	1				Not Listed	2020
Estonia	1				White	2016
Jamaica	1		1		Not Listed	2017
Libya	1				Not Listed	
Philippines	1				Grey	2012

### 3.1.9. Ship age overview

Based on the CIC's related deficiencies the ship age group with the highest number of deficiencies was 13-18 years.

*Table 7 - Ship age overview*

Based on Inspections with CIC related deficiencies in Months 9/10/11				
CIC-topic related deficiencies	Nr. CIC related deficiencies		Nr. CIC related deficiencies recorded as ground for detention	
Ship Age Group	2023	2024	2023	2024
13 – 18	64	249	4	6
07 – 12	49	121	2	4
25 – 30	27	91	3	11
19 – 24	59	81	2	6
37 ∞	27	60	4	5
31 – 36	15	40	3	9
00 – 06	12	26	0	0

## **Annex 1**

### **CIC Questionnaire**

	Questions	Yes	No	N/A	Detention
Q1*	Is the seafarer given a SEA signed by both the seafarer and the shipowner or a representative of the shipowner?				
Q2*	Is the seafarer able to access information regarding their employment conditions on board?				
Q3	Are standard form of seafarers' employment agreements and parts of any applicable collective bargaining agreements subject to port State control under Reg.5.2, available in English?				
Q4*	Does the seafarers' employment agreement include all the required elements specified in the MLC, 2006?				
Q5*	Do particulars included in the seafarers' employment agreement comply with the MLC, 2006 requirements?				
Q6*	Are wage or salary payments made to the seafarer at no greater than monthly intervals?				
Q7*	Have seafarers been given a status of accounts and wages paid on at least a monthly basis?				
Q8*	Are wage or salary payments in accordance with any applicable CBA or SEA?				
Q9*	If payments made to a seafarer include deductions, are they in accordance to the MLC, 2006?				
Q10a*	Is a certificate or documentary evidence of financial security, issued by the financial security provider, available on board in the event of compensation for death and long-term disability?				
Q10b*	Is a certificate or documentary evidence of financial security, issued by the financial security provider, available on board in the event of the repatriation?				

Note:

- Questions 1 to 10b answered with a "NO" MUST be accompanied by a relevant deficiency on the Report of Inspection.
- If the box "NO" is ticked off for questions marked with an "\*", the ship may be considered for detention