



Office of
Deputy Commissioner
of Maritime Affairs

THE REPUBLIC OF LIBERIA
LIBERIA MARITIME AUTHORITY

Email: Prevention@liscr.com
Tel: +1 703 291 3434

Maritime Labour Convention (MLC), 2006

Annual Report

**Inspection Activities
1 January 2020 to 31 December 2020**

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	5
5. Violations of Legislation, Penalties Imposed, Cases of detention of Ships and complaints received	5
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 2020 to 31 December 2020. 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

No new laws or regulations have come into effect in 2020.

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 300 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 under the “Maritime” tab then click on “Inspector & Auditor Search”. The list of authorized RO’s can be found on, www.liscr.com under the “Maritime” tab then click on Maritime Operations Services/Regulations and Standard 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 ‘Auditor and Inspector Oversight’ 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 inspections conducted by Liberian Maritime Labour Inspectors	983
Number of inspections conducted by authorized RO's	1143
Total number of inspections	2126
Number of inspections with no deficiencies	1928
Number of inspections with deficiencies	241
Total number of deficiencies	300

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

Regulation 1.2 – Medical Certificates	10
Regulation 1.3 – Training and Qualifications	8
Regulation 1.4 – Seafarers recruitment and placement services	0
Regulation 2.1 – Seafarers employment agreements	38
Regulation 2.2 – Payment of wages	11
Regulation 2.3 – Hours of work and hours of rest	19
Regulation 2.5 – Repatriation	3
Regulation 2.7 – Manning Levels	2
Regulation 3.1 – Accommodation and recreational facilities	91
Regulation 3.2 – Food and catering	50
Regulation 4.1 – Medical care on board ship and ashore	6
Regulation 4.2 – Shipowners' liability	3
Regulation 4.3 – Health and safety protection and accident prevention	48
Regulation 5.1.5 – On-board complaint handling procedures	5
Regulation 5.1.1 – General principles	6

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

- a. **Standard A2.1 – Seafarers employment agreements (SEA's)- 38 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 – 11 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- 19 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 – 91 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 – 50 deficiencies**
 - Storage of food not as required
 - Insufficient food for the intended voyage
 - f. **Standard A4.1 – Medical care on board ship and ashore –6 deficiencies**
 - Medicines on board not as per required scale (Medical Guide for Ships)
 - g. **Standard A4.3– Health and safety protection and accident prevention – 48 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 – 5 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 9 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 302,589 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 eleven

(11) ships were reported abandoned to the ILO database.

5.2 Detention of Liberian registered ships

During the period of this report, thirteen (13) 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 A3.2 – Food and catering – 4 ships

- Quantity of food, cleanliness of galley and food storage rooms

d. Standard A4.3 – Health and safety protection and accident prevention – 3 ships

- Unsafe working conditions

e. Standard A3.1 – Accommodation and recreational facilities – 1 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	Liberian Inspector	Vessel Class	ITF		
Minimum age										
Recruitment and placement										
Seafarers' employment agreement	13	8					4	1	12	1
Payment of wages	31	13	3			3	10	2	21	10
Hours of work and hours of rest	1			1						1
Repatriation	41	20	3	1	1		14	2	33	8
Entitlement to leave	2	2							2	
Accommodation/recreational facilities	2		1					1	2	
Food and catering	5	3	1					1	5	
Medical Care o/b and ashore	4	2	1				1		3	1
Ship-owners' liability										
Health, safety & accident Prevention	4	1		1			2		3	1
Harassment										
Total	103	49	9	3	1	3	31	7	81	22

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	2	1
Working on chemicals		
Working on electrical equipment		1
Working on auxiliary equipment (non-electrical)		1
Working on/lighting Boiler or Main Engine	1	14
Climbing up / down		4
Walking on same level		12
Carrying / lifting / lowering		4
De-rusting	1	1
Painting		3
Overhauling machinery		
Mooring/anchoring/line handling operations		9
Inspection / Working inside Hold / Tank		2
Securing cargo		1
Working Aloft (Relating to Rigging of a vessel)		
Working Aloft (Other)		1
Working over side	1	
Hot work / welding	1	
Working in galley		1
Bunkering		
Operating Hatch Covers		1
Cargo operations / preparation		6
Embarking/Disembarking vessel		1
Transfer of person by boat / transfer basket		
Securing Gangway		1
Ashore (Recreational)		
Ashore (Other)		
Watch-keeping		
Responding to vessel emergency/casualty (Not fire)		
Fire fighting		
Launching/Lowering/Working with Survival Craft		
No Activity Being Conducted	41	36
Cleaning/Taking Inventory		
Drill/Inspection		
Total	47	100

6.2 Type of incident leading to death or injury

Description	Number	
	Death	Injury
Cardiac Arrest	8	
Natural Causes	27	3
Illness - Contagious	2	16
Illness – Not Contagious		5
Struck / hit by falling / moving / flying objects		17
Criminal Acts/Physical/Crew Conflict		3
Suicide	2	
Drowned		
Contact with electricity / electric shocks		
Chemical exposure/vapor inhalation: Contact with/swallowing of toxic substances	2	3
Suffocation/Asphyxiation		
Missing from ship	3	2
Heavy Weather		1
Over exertion: strain / sprain		2
Over exposure to cold		
Over exposure to heat		
Lack of oxygen		
Cut from knife or sharp object		17
Caught in or between objects		6
Contact with steam or hot gases		
Fire/Explosion/Blasts/Burns		4
Contact with hot liquid or other heat source		1
Transfer of person by boat/transfer basket		
Jump/fall overboard		1
Slip/fall same level	1	8
Slip fall to lower level	2	10
Unknown		1
Total	47	100

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-five (35) deaths on board were related to cardiac arrest and unspecified causes, including missing from ship and alleged suicide. All accidents involving serious injury and death are investigated by the Administration and published in the IMO's Global Integrated Shipping Information System (GISIS). Where a new trend is identified as cause of deaths, Marine Safety Advisories are published and information shared with the Marine Accident Investigator's International Forum (MAIIF). The Administration's proactive conduct of annual safety and special safety inspections ensure that all Liberian registered ships are in compliance with all applicable Conventions and Codes related to maritime safety, thereby contributing to prevention of accidents

and injuries.

Shipowners should also 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, mental health; and particularly seafarers' health related to the COVID-19 pandemic and bring this to the attention of seafarers on board their ships. Some of these initiatives are listed below:

1. Liberia Maritime Authority Marine Advisory on [Guidance](#) to Assist Seafarers with Possible Crew Health Concerns due to COVID-19
2. 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, an audio relaxation exercise, and guidance for shipping companies and ship operators to help devise and implement mental health policies and practices to promote and protect seafarers' mental health.
3. INTERTANKO guidance "[Crew welfare management and mental illness](#)" June 2020.
4. Shell has now launched their wellbeing website and this can be accessed here, along with an introductory video: <http://www.maritimewellbeing.com>
5. ILO – [Information note](#) on Maritime Labour issues and COVID-19 – 7 April 2020
6. [World Health Organisation page](#) including sections on Situation Reports, Technical Guidance, Travel Advice and How to Protect Yourself
7. WHO [Operational considerations for managing COVID-19 cases and outbreaks on board ships](#)
8. [IMO Coronavirus page](#) (which includes links to information in Arabic, Chinese, English, French, Russian Spanish)
9. IMO Crew change and travel safety [protocols](#) 5 May 2020
10. International Chamber of Shipping – [Guidance for Ship Operators](#) for the Protection of the Health of Seafarers (Version 4 dated 7 June 2021)
11. ISWAN with International Maritime Health Association (IMHA) [advice for shipping companies](#) on Coronavirus

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 2020 through 31 December 2020.
2. The average number of deficiencies is about 0.14 per inspection. The overall detention rate for the Liberia fleet to which MLC applies was about 0.36%, mainly as a result of in non-payment of wages at monthly intervals; quantity and quality of food; and health and safety

on board the ship.

3. It is the aim of the Liberian Administration to reduce detentions in port under MLC to zero (0) in the year 2021. 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.

* * * * *