



Date: 31th March 2025

CIRCULAR Ref.: 0069C/TG/03/25

Subject: 2022 Amendments to the MLC 2006 (Maritime Labour Convention)

To: All Ship-owners / Managers / Operators, Masters and Officers of Merchant Ships, Flag State Inspectors / Surveyors and Authorized Recognized Organizations, Deputy Registrars / Port State Control Officers and P&I Club – Insurers.

Scope: The purpose of the Circular is to provide relevant information and guidance on compliance with the 2022 amendments to the Maritime Labour Convention (MLC), which enter into force on 23 December 2024.

Applicability: This Marine Circular applies to all vessels registered under the Togolese Flag and to seafarers as defined in Article II of MLC 2006.

AMENDMENTS:

1. **Amendments to Regulation 1.4 of MLC 2006 (Recruitment and Placement)**
Paragraph 5(c)(vi) of Standard A1.4 is amended to require the establishment of a protection system by the recruitment and placement services (SRPS), such as insurance or an equivalent measure, to ensure compensation for seafarers in case of monetary loss due to the failure of the recruitment service or shipowner to fulfill their obligations under the seafarer employment agreement (SEA). Additionally, seafarers must be informed of their rights under this system before or during the engagement process.
2. **Amendments to Regulation 2.5 of MLC 2006 (Repatriation)**
A new paragraph (9) is added to Standard A2.5.1, ensuring the swift repatriation of seafarers, particularly those deemed abandoned as per Standard A2.5.2, paragraph 2. It is mandated that Port States, Flag States, and Labour-Supplying States cooperate to ensure that seafarers replacing abandoned crew members on ships in their jurisdiction or under their flag are provided with their rights and entitlements as outlined by the MLC 2006.
3. **Amendments to Regulation 3.1 of MLC 2006 (Accommodation and Recreational Facilities)**
 - i. Paragraph 17 of Standard A3.1 is revised to ensure that appropriate recreational facilities, amenities, and services are provided for seafarers. These must meet the special needs of those who live and work on ships, considering health, safety, and accident prevention standards as per Regulation 4.3 and related provisions.
 - ii. Paragraph 4(j) of Guideline B3.1.11 is updated to recommend that seafarers have reasonable access to ship-to-shore communication, with reasonable charges for the use of such services.
 - iii. A new paragraph 8 is added to Guideline B3.1.11, recommending that shipowners provide seafarers with internet access where possible, with any charges being reasonable. *4*



4. **Amendments to Regulation 3.2 of MLC 2006 (Food and Catering)**
 - i. Paragraph 2(a) of Standard A3.2 is modified to ensure that food and drinking water supplied on board is adequate in quantity, nutritional value, quality, and variety, based on the number of seafarers, their religious and cultural dietary needs, and the nature of the voyage. Such provisions must be free of charge during the period of engagement.
 - ii. Paragraph 2(b) of Standard A3.2 is amended to specify that the catering department's organization and equipment must be capable of providing balanced, nutritious meals in hygienic conditions.
 - iii. Paragraph 7(a) of Standard A3.2 is revised to require the Master to conduct regular documented inspections of food and drinking water supplies, ensuring their adequacy and quality.
5. **Amendments to Regulation 4.1 of MLC 2006 (Medical Care Onboard Ship and Ashore)**
 - i. A new paragraph 5 in Standard A4.1 mandates that Member States facilitate the prompt disembarkation of seafarers requiring immediate medical care and access to medical facilities for proper treatment.
 - ii. A new paragraph 6 in Standard A4.1 establishes that the Member State in whose territory a seafarer dies, or where a death occurs at sea, must assist with the repatriation of the body or ashes in line with the seafarer's or their next of kin's wishes.
 - iii. Paragraph 4 of Guideline B4.1.3 is updated to recommend that Member States ensure seafarers are not prevented from disembarking due to public health concerns and that they have the opportunity to replenish ship stores and supplies.
 - iv. Paragraph 5 of Guideline B4.1.3 is updated to recommend that seafarers should be considered in need of immediate medical care in cases such as serious injuries, diseases leading to disability, communicable diseases, severe pain, suicide risk, or a medical advisory recommending ashore treatment.
 - v. Paragraph 1(k) of Guideline B4.1.4 is revised to recommend that Member States cooperate to arrange for the repatriation of the bodies or ashes of deceased seafarers, respecting their or their next of kin's wishes, as soon as possible.
6. **Amendments to Regulation 4.3 of MLC 2006 (Health and Safety Protection and Accident Prevention)**
 - i. Paragraph 1(b) of Standard A4.3 is modified to require that appropriate precautions are taken to prevent occupational accidents, injuries, and diseases, including providing suitable personal protective equipment and reducing exposure to hazardous ambient factors and chemicals.
 - ii. A new paragraph 5(a) in Standard A4.3 mandates that all seafarer deaths must be properly investigated, documented, and reported annually to the Director-General of the International Labour Office, to be included in a global register.
 - iii. Paragraph 4 of Guideline B4.3.5 recommends that fatality data be reported following specific formats and classifications outlined by the International Labour Office.
 - iv. Paragraph 5 of Guideline B4.3.5 recommends that fatality data include, but is not limited to, the type of death, ship type, location, and the seafarer's gender, age, occupational position, and department.
7. **Amendments to Regulation 4.4 of MLC 2006 (Access to Shore-Based Welfare Facilities)**

A new paragraph 5 in Guideline B4.4.2 is added, recommending that Member States, where feasible, provide seafarers in their ports and anchorages with internet access, with reasonable charges, if applicable. ✕



8. Amendments to Appendices

- i. Item (g) of Appendix A2-I, concerning financial security evidence under Regulation 2.5, is replaced with "name of the shipowner, or of the registered owner if different from the shipowner."
- ii. Item (g) of Appendix A4-I, regarding financial security under Regulation 4.2, is replaced with "name of the shipowner, or of the registered owner if different from the shipowner."

COMPLIANCE:

- Existing MLCs and DMLCs remain valid even after the amendments come into force.
- These documents should be renewed no later than the first renewal inspection after 23 December 2024.
- Shipowners should contact the Administration to apply for a new DMLC Part I to reflect the 2022 amendments and submit an updated DMLC Part II to the Recognized Organization (RO) to show compliance with the new requirements.
- If the new DMLC Part I and Part II are already available, they should be attached to the vessel's existing MLC, which will only be reissued at the next renewal survey.

For the International Ship Registry of Togo



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Ship Registrar

For the Togolese Maritime Authority



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