| TC NO. | TC 365/26 | DATE | May 22, 2026 |
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| SUBJECT | LISCR – Most Common Maritime Labor Convention, as amended (MLC 2006) Deficiencies during PSC Inspections | | |
| REFERENCES | Marine Advisory: 11/2026 | REFERS TO | PHRS Head Office Staff and Exclusive Surveyors of INTL Network |

## 1. SCOPE & PURPOSE

The purpose of Technical Circular is to inform all concerned parties about the issuance of **Marine Advisory: 11/2026** by **the Liberia Maritime Authority**. This Marine Advisory draws the attention of shipowners, operators, inspectors, masters and crew to the most common MLC 2006 deficiencies raised during Port State Control (PSC) inspections of Liberian flagged vessels.

## 2. MOST COMMON MLC DEFFICIENCIES

The Administration has compiled a list of the most common MLC deficiencies – they are included in the table below for general Guidance to avoid these deficiencies:

| Most Common Deficiency | Description of Deficiencies and Action to Take |
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| **Seafarers' Employment Agreements** | • Seafarers' Employment Agreement (SEA) does not include the required particulars and is not signed by the ship owners' authorized representative.<br>• Seafarers working onboard with an expired SEA.<br>• While all seafarers must have a valid SEA, the SEA must in all cases contain the particulars in Standard A2.1.4 of MLC 2006; and must be signed by the ship owner or the ship owners' authorized representative.<br>• Refer to Standard A 2.1.1 and A 2.1.4 of MLC 2006 and Marine Notice MLC003/3.1. |
| **Payment of Wages** | • During inspection, clear and objective evidence was identified indicating that seafarers have been systematically underpaid in contravention of their SEAs. Wage records and crew testimony demonstrate discrepancies between contracted wages and actual payments |

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| | made and, in some cases, double bookkeeping.<br>• Seafarers must be paid for their work regularly and in full accordance with their employment agreements.<br>• Refer to Regulations 2.1 and 2.2 of MLC 2006 and Marine Notice MLC003/3.2. |
| **Hours of Work and Rest and Table of Shipboard Working Arrangements** | • Records of hours of work and rest for seafarers and table of shipboard working arrangements do not reflect the seafarers' actual hours of work and rest.<br>• Ship owners must ensure that seafarers have regulated hours of work or hours of rest and are provided with the minimum hours of rest, taking into account the danger posed by fatigue of seafarers, especially those whose duties involve navigational safety and the safe and secure operation of the ship.<br>• Refer to Regulation 2.3 of MLC 2006 and Marine Notice MLC-003/3.3. |
| **Entitlement to leave/Repatriation** | • Seafarers working on board for a period exceeding eleven (11) months before taking annual leave, without being permitted by the Administration to forgo minimum annual leave with pay.<br>• Any agreement to forgo the minimum annual leave with pay shall be prohibited, except in cases provided by the Administration. The maximum period that a seafarer can serve on board a ship is eleven (11) months before taking minimum paid annual leave. This is also linked to the requirement in Standard A2.5, paragraph 2(b), regarding the entitlement to repatriation in a period of less than 12 months.<br>• Refer to Regulations 2.4 and 2.5 of MLC 2006 and Marine Notice MLC003/3.5.4. |
| **Accommodation Facilities** | • Unhygienic conditions in sleeping rooms, sanitary facilities and hospital accommodation. Owners/Ships must maintain decent accommodation and hospital facilities for seafarers working or living on board, or both, consistent with promoting the seafarers' health and well- |

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| | being and ensure regular inspections of the seafarers' accommodation.<br>• Refer to Regulation 3.1 of MLC 2006 and Marine Notice MLC-004/3.0 and 4.0. |
| **Food, Catering and Drinking Water** | • Quantity of food onboard is inadequate for the intended duration and nature of the voyage.<br>• Seafarers are being charged for drinking water. Ships with a prescribed manning of ten (10) or more seafarers are not provided with a fully qualified cook.<br>• Ships must carry on board adequate quantities of food and drinking water of appropriate quality, nutritional value and quantity at no cost to the seafarer; and carry a fully qualified cook with a prescribed manning of ten (10) of more seafarers or obtain a dispensation if the ships' cook is repatriated for urgent reasons.<br>• Refer to Regulation 3.2 of MLC 2006 and Marine Notice MLC-004/5.0. |
| **Health and Safety Protection and Accident Prevention** | • Lack of implementation and promotion of occupational safety and health policies and programs on board ships.<br>• No procedures for inspections, reporting and correcting unsafe conditions, and/or investigating on board occupational accidents.<br>• Seafarers are not afforded the right to a safe and secure workplace, free of bullying and harassment. Ship owners must ensure that seafarers' work environment on board ships promotes occupational safety and health.<br>• Ship owners must ensure that there are procedures for inspections and reporting of unsafe conditions. They must also ensure that there are on board programs for the prevention of occupational accidents, injuries and diseases and for continuous improvement. Ship owners must ensure that policies are in place for the elimination of all forms of harassment and bullying of seafarers on board their ships.<br>• Refer to Regulation 4.3 of MLC 2006, Marine Notice MLC-005/3.3 and Marine Advisory |

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For the full text please follow the link below:

- **Marine Advisory: 11/2026**

For any questions or further assistance, please do not hesitate to contact us at technical@phrs.gr or Liberia's Maritime Labor Department at MLC@liscr.com

**REQUIRED ACTION:** Please acknowledge receipt and understanding of TC 365/26 by 29/05/2026.