

KPI MLC Information Notice MLCIN-October-2013 (Sample of Possible MLC Deficiencies)

The MLC entered force on 20.Aug.2013.

In order to be able to achieve a reasonable status of readiness for MLC related Port State Control inspections; a list of possible deficiencies has been drawn up as a guideline.

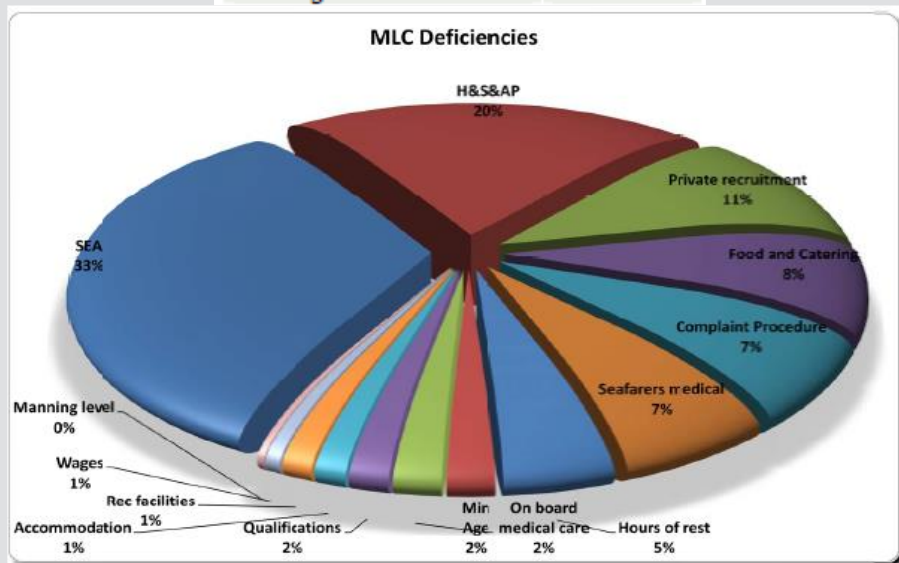
As there are not many PSC related information concerning the subject matter yet released; the following data have been extracted from the reliable international sources which are based on the voluntary examination results.

Studying the data will help prevent similar issues & possible detentions.

All members are advised to note & promulgate the information duly.

► The table & pie chart below show the breakdown of the deficiencies:
(We need to be careful about the Seafarers' Employment Agreement issue!!!)

Inspection Area	Number of deficiencies
SEA	97
H&S&AP	60
Private recruitment services	31
Food and Catering	24
Complaint Procedure	22
Seafarers medical	20
Hours of rest	14
Min Age	6
On board medical care	6
Qualifications	5
Accommodation	4
Rec facilities	4
Wages	2
Manning level	1



►To put more detail behind the larger figures in the table and on the chart; the following are noteworthy:

SEA deficiencies:

23 – No SEAs in use or were a work in progress. (This is prior to MLC being in force)
22 – No evidence could be demonstrated of financial security for repatriation or financial liability for sickness/injury or death.
11 – SEA not fully compliant (leave entitlement, repatriation destination, different notice period for each party)
10 – CBA (If existing) not on board
7 – ship-owners name and address not on SEA or the name of the vessel not mentioned on the CBA.
+ Various other single deficiencies.

Health Safety and Accident Prevention deficiencies:

Almost all of the 60 were related to Noise/Vibration/Chemical handling because there were either no procedures in place or no risk assessments to evidence that this was being carried out.

Private recruitment and placement services:

All 31 related to no evidence onboard that the service used had a license or certificate issued, or that the ship-owner monitored their conformance if not in a ratifying country.

Food and Catering:

Almost all the deficiencies related to the production and storage of fresh water, or the temperatures of chilled and freezer storage.

Seafarer Medical Certificates:

All related to the certificate not referencing the medical was in compliance with ILO 73, STCW or MLC. It has recently been noticed that more certificates are referencing international standards.

