



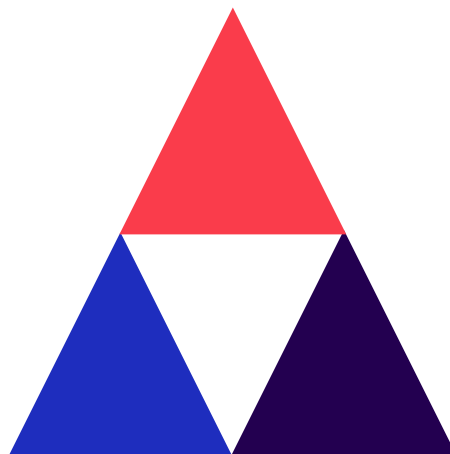
International
Labour
Organization



► STCMLC/2025/6

► Summary of observations and suggestions on the proposals for amendments to the Code of the Maritime Labour Convention, 2006, as amended

Information document for discussion at the fifth meeting of the Special Tripartite Committee established under Article XIII of the Maritime Labour Convention, 2006, as amended
(Geneva, 7-11 April 2025)



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► I. Introduction

1. The International Labour Office received [16 proposals of amendment](#) to the Code of the Maritime Labour Convention, 2006, as amended (MLC, 2006) to be examined at the fifth meeting of the Special Tripartite Committee of the MLC, 2006 to be held from 7 to 11 April 2025.
2. In a letter of 15 October 2024, the Director-General invited all Members of the Organization, pursuant to Article XV, paragraph 3 of the MLC, 2006, to transmit, by 15 March 2025, any observations or suggestions on the proposals of amendment to the provisions of the Code.
3. In accordance with Article XV, paragraph 4 of the MLC, 2006, the present document provides a summary of the observations and suggestions that were communicated in response to the Director-General's letter. It is meant to be read in conjunction with the [Background paper](#) for the meeting.
4. The following 13 Members States responded: Guatemala, Japan, Mauritius, Nigeria, Panama, Peru, Philippines, Russian Federation, Thailand, Trinidad and Tobago, Türkiye, United Kingdom of Great Britain and Northern Ireland, United Republic of Tanzania.
5. Some governments indicated that they had held tripartite consultations with respect to their observations and suggestions.¹ In that connection, certain governments transmitted the comments received from social partners, which are reflected in this document.
6. Moreover, the Members who presented Proposal No. 12 submitted a revised text of their original proposal. In addition, the Government of France, on behalf of the Members of the European Union, submitted a statement regarding the revised text.

► II. Observations and suggestions on the proposals for amendments to the Code of the MLC, 2006

Proposal No. 1 (Seafarers' and Shipowners' groups)

7. A number of Governments in general supported the proposal (Guatemala, Mauritius, Nigeria, Panama, Peru, Thailand, Trinidad and Tobago, United Republic of Tanzania).
8. The Government of *Guatemala* considered that including the provisions of the Violence and Harassment Convention, 2019 (No. 190) into the legislative maritime framework was fundamental to protect the labour rights of seafarers. Countries should work to create tripartite partnerships to implement these policies and foster a culture of zero tolerance for violence and harassment in the workplace. Although the MLC, 2006 and the Guidance on eliminating shipboard harassment and bullying jointly published by the International Chamber of Shipping (ICS) and the International Transport Workers' Federation (ITF), already addressed access to confidential reporting systems, those mechanisms should be operational in ports. A specific reporting system should be established for incidents constituting violence and harassment, including

¹ The following Members indicated that consultations were carried out with the relevant social partners: *Guatemala, Nigeria, Panama, Thailand, Türkiye* and *United Kingdom*. The Governments of *Panama, Türkiye* and *United Kingdom* transmitted the observations received from the social partners.

comprehensive support for victims. Therefore, Convention No. 190 was the appropriate instrument that should apply to flag States parties to the Convention; non-ratifying countries had the option of implementing the corresponding measures in national legislation. While Guatemala had not ratified the Convention, it had different instruments in place related to the issue.

9. The Government of *Japan* did not support this proposal, as it was not appropriate to require a non-Party to Convention No. 190, to adopt measures in accordance with that Convention and take account of its accompanying Recommendation No. 206.
10. The Government of *Nigeria* stated that there was a need to ensure that the provision was enforceable. Welcoming the outcome of the second meeting of the Joint ILO-IMO Tripartite Working Group (JTWG) to identify and address seafarers' issues and the human element, the Government observed that the inclusion of a stand-alone text emphasizing the importance of prevention of violence and harassment on board ship, would improve the Standard. It also suggested replacing, in Standard A4.3, paragraph 2(b), the words "as well as with the measures implemented to prevent ..." with "as well as measures to prevent ...".
11. The Government of *Panama*, as a party to Convention No. 190, agreed to the proposal and recommended to analyse the possibility of merging the three proposals on the topic of violence and harassment (proposals Nos 1, 12 and 13).
12. The Government of the *Russian Federation* opposed the proposal, as it went beyond the scope of national law. It expressed concern regarding the proposal to assign to the competent authority responsible for occupational accidents, the additional responsibility of recording and investigating cases of violence and harassment, including sexual harassment, bullying, and sexual assault. The Government observed that Convention No. 190 did not impose such an obligation. It was not appropriate to provide for the reporting and investigation of violence and harassment in paragraphs 5, 7, 8 of Standard A4.3 and paragraphs 2, 4, 5 and 6 of Guideline B4.3.1. If such provisions were to be retained, the Government suggested that this matter be treated in a separate guideline, with cases recorded by the relevant authority recording criminal offences.
13. The Government of *Thailand* indicated its support to the principles of prevention and elimination of violence and harassment, including sexual harassment, bullying and sexual assault, in the maritime sector. However, given that some Members had not yet ratified Convention No. 190 and the option of implementing substantially equivalent measures in respect of seafarers was not applied to all ships under the MLC, 2006, it was suggested replacing, in the proposed *Standard A4.3, paragraph 1(e)*, the words "in accordance with" with "taking into account" to ensure flexibility and consistency of the implementation of the standard in the maritime sector, in line with the recommendations of the second meeting of the JTWG.
14. The Government of *Trinidad and Tobago* indicated that the proposal was aligned with national laws and policies.
15. The Government of *Türkiye* rejected the proposal, noting that Convention No. 190 had been ratified by only 49 countries, which underscored the need for a balanced approach that considered the varying levels of commitment among ILO Member States. Given that many Members, including Türkiye, had not ratified Convention No. 190, the Government stressed the importance of clarifying how the proposed amendment would be applied in non-ratifying States. It expressed concern that a direct reference to Convention No. 190 in a binding standard could create challenges in terms of legal obligations and implementation for such States. Consequently, the Government considered that it would be more appropriate to incorporate the principles of Convention No. 190 into non-binding guidelines. It argued that this approach would ensure

broader acceptance while allowing States to implement relevant measures in accordance with their national legal frameworks and commitments.

16. The Government of the *United Republic of Tanzania* proposed to add “or equivalent measures” at the end of Standard A4.3, paragraph 1, new letter (e), to give non-ratifying Members of Convention No. 190 an option of implementing substantially equivalent measures. The Government also suggested adding the word “measures” after the words “... programmes and ...” under the proposed amendment to Standard A4.3, paragraph 4.
17. *The National Council of Organized Workers – CONATO (Workers, Panama)* indicated that Convention No. 190 was applicable and should be enforced in all workplaces, including on board ships. It was important to establish reporting mechanisms for workers affected.

Proposal No. 2 (Seafarers’ and Shipowners’ groups)

18. A number of Governments in general supported the proposal (Guatemala, Nigeria, Philippines, United Kingdom, United Republic of Tanzania).
19. The Government of *Guatemala* believed that this proposal constituted a crucial step in strengthening seafarers’ rights in relation to repatriation, by ensuring that they could return home in safety and dignity, avoiding the process of visa or special permits and excluding any discrimination by States. During the COVID-19 pandemic, seafarers had been trapped on board ships for long periods due to travel restrictions, quarantine and lack of repatriation arrangements.
20. The Government of *Nigeria* indicated that, during the pandemic, it had taken key steps to facilitate MLC, 2006 implementation regarding crew change and repatriation, including the issuance of a Marine Notice providing guidelines for the embarkation and disembarkation of crew members to ensure compliance with national and international COVID-19 protocols.
21. The Government of *Panama* recalled that the COVID-19 pandemic had proven that repatriation could be carried out effectively and without discrimination in compliance with the requirements established by national competent authorities. Members should ensure that repatriation protocols were carried out and were not blocked due to the shipowners’ lack of will or bureaucracy. The necessity of the proposal should be analysed by the STC without implying a prohibition for Members to apply their national requirements aimed at ensuring public safety, especially when Members ensured the seafarers’ right to repatriation, as was the case in Panama.
22. The Government of the *Philippines* stated that the proposal was in line with the green lane procedure under national law, was beneficial to the visa privileges of its seafarers and intended to mirror the Seafarers’ Identity Documents Convention, 1958 (No. 108) and the Seafarers’ Identity Documents Convention (Revised), 2003, as amended (No. 185), ratified by the Philippines. The Government proposed to add, at the end of Standard A2.5.1, paragraph 8, “to the repatriation destination subject to compliance with national laws and regulations in effect in the territory of the port State.”, in order to provide flexibility, address national security concerns on waiving the visa or special permit requirements of seafarers and clarify that the exemption was subject to adherence to domestic laws and immigration rules of the port State and only applied from the country of disembarkation to the repatriation to the point of hire or repatriation destination. The Government also suggested inserting, in Standard A2.5.1, new paragraph 10, the word “immediate” between “facilitate the” and “repatriation” to highlight the urgency of repatriating seafarers and the failure of several flag States to aid and repatriate abandoned seafarers. Flag States should exhaust reasonable efforts to facilitate the repatriation of seafarers within a reasonable period.

23. The Government of *Thailand* noted that visa requirements pertained to the authority of port States, which had varying security policies and regulations.
24. The Government of *Trinidad and Tobago* suggested inserting, in Standard A2.5.1, new paragraph 10, the words “, consistent with national legislation,” after “discrimination on any grounds”.

Proposal No. 3 (Seafarers’ and Shipowners’ groups)

25. A number of Governments in general supported the proposal (Guatemala, Nigeria, Philippines, United Republic of Tanzania).
26. The Government of *Guatemala* indicated that, in practice, the right to shore leave was denied to seafarers working on scrapping vessels, alleging safety reasons or the nature of the work. Therefore, this right should be clarified and strengthened, establishing clear procedures for requesting and obtaining shore leave, as well as monitoring measures. In addition, it should be ensured that seafarers could enjoy this right without unnecessary obstacles, such as administrative barriers or restrictions based on the ship’s flag. The COVID-19 pandemic had evidenced the vulnerability of seafarers. This proposal would help ensure that rules were adopted to increase the protection of seafarers during future crises. Coordination with immigration, and health and safety authorities was required. The Government eventually suggested a more in-depth study on this proposal which would focus on the existence of different categories of seafarers, for example, those working on board merchant ships who enjoyed shore leave based on the time they remained at sea and those working on board cruise ships and yachts, whose permits were limited to the situations provided for by collective agreements.
27. The Government of *Japan* proposed to insert, in new Standard A2.4.2, paragraphs 1 and 2, the words “to the extent that national laws or regulations permit” after “Each Member shall”, to ensure the practicability of these provisions. With regard to paragraph 4, the Government indicated that the disposition of foreign nationals on entry, including the necessity of communicating the reasons for denial of shore leave, fell within the remit of a sovereign State. With regard to paragraph 2 of new Guideline B2.4.5, the Government considered that it was not appropriate to include the text “the seafarers’ right to shore leave and the need to access welfare facilities” in the port facility security plans because the International Ship and Port Facility Security (ISPS) Code did not cover matters of seafarers’ rights and welfare and because entry permission for foreigners was subject to the sovereignty of each Member. In addition, the Government did not support the proposed paragraph 3 of new Guideline B2.4.5 because this personnel was not explicitly included in the scope of application of the MLC, 2006 (Article II).
28. The Government of *Nigeria* felt that the reasons for denying shore leave should not only be provided in writing at the seafarer’s or master’s request. It proposed to delete the second sentence of new Standard A2.4.2, paragraph 4, and add the words “in writing” after “denial”. This would ensure that written reasons would be automatically stated for example in the shore leave form, in order to eliminate discretion and establish a proper procedure to prevent discrimination on any grounds.
29. The Government of *Panama*, while recognizing the importance of the proposal, considered that its necessity needed to be examined by the STC. The proposal should not imply a prohibition for Members to apply national requirements, especially when they ensured shore leave for seafarers, as was the case in Panama.
30. The Government of the *Philippines* considered that the proposal, which must be aligned with the Convention on Facilitation of International Maritime Traffic, 1965, as amended (FAL Convention),

required each Member to ensure compliance with Standard 3.19 of the FAL Convention by ensuring that seafarers were allowed ashore by the public authorities while the ship was in a port of its jurisdiction, provided that the relevant formalities had been fulfilled and the public authorities had no reason to refuse permission to come ashore for reasons of public health, public safety, and security or public order. Since the proposal limited the waiver of visa requirements to seafarers disembarking their vessel for repatriation or shore leave, the Government was of the understanding that a crew list visa would be required for seafarers on board foreign vessels for initial entry at national ports or seafarers entering the country to join a vessel anchored at a national port. Given that the proposal would result in the visa-free entry to the Philippines of nationals from visa-required countries disembarking a vessel for repatriation or shore leave, and there was a need to vet visa-required foreign nationals entering the country to ensure that they would not become a public charge or pose a threat to national security, the Government felt that the visa waiver would require consultations with and concurrence of the relevant security sector agencies. In new Standard A2.4.2 on shore leave, the Government suggested adding, at the end of paragraph 3, the wording “subject to the national laws and regulations in effect in the territory of the port State” to provide flexibility and address national security concerns.

31. The Government of *Thailand* indicated that it did not prohibit seafarers from coming ashore, provided that the relevant formalities had been fulfilled, and the public authorities had no reason to refuse permission. During the COVID-19 pandemic, permission to come ashore could be refused for reasons of public health as appropriate in accordance with national legislation; nevertheless, medical assistance had been provided to the seafarers on board when necessary.
32. The Government of *Trinidad and Tobago* suggested inserting, in new Standard A2.4.2 on shore leave, new paragraph 2, the words “, consistent with national legislation,” after “discrimination on any grounds”.
33. The Government of the *United Republic of Tanzania* stated that the proposal reflected the conditions of the FAL Convention, which they had ratified (new Standard A2.4.2, paragraphs 2 and 4); intended to protect the welfare of the seafarer (new Standard A2.4.2, paragraph 5) and safety and security of the coastal state (new Standard A2.4.2, paragraph 6); facilitated laying down procedures for shore leave (new Guideline B2.4.5, paragraphs 1–2), and sought to bring awareness on seafarers’ rights to all relevant stakeholders (new Guideline B2.4.5, paragraph 3). The Government did not support the proposed text of new Standard A2.4.2, paragraph 3, as it conflicted with immigration law and other coastal state permits allowing to enter ashore.

Proposal No. 4 (Seafarers’ and Shipowners’ groups)

34. A number of Governments in general supported the proposal (Nigeria, Panama, Philippines, United Kingdom, United Republic of Tanzania)
35. The Government of *Guatemala* considered that the intervention of actors at the national level and the inclusion of provisions in domestic legislation designating seafarers as key workers would be necessary to implement the proposal in practice. While Guatemala had not ratified the MLC, 2006, it should take action to guarantee respect for the rights of seafarers and designate seafarers as key workers, thereby justifying the corresponding actions in cases of public health emergencies of international concern (PHEIC). At the same time, the Government considered it necessary to undertake a deeper study on the subject matter. Special permits that Members granted to key workers, for disembarkation or other purposes, should be adjusted according to the seriousness of the PHEIC to guarantee the interests of the population over that of key workers. Likewise, States should ensure the safety of key workers to avoid stock-outs and maintain global supply chains,

which is essential in times of health emergencies to ensure the continuity of vital services for the population.

36. The Government of *Japan* did not support this proposal. As regards Standard A5.1.1, new paragraphs 3 and 4, it considered that it was not appropriate to uniformly designate seafarers as key workers, the definition and scope of which were not clear, in order to facilitate their safe and unhindered movement when embarking or disembarking a vessel, as this would cause confusion in each Members' preventive measures during public health emergencies. As to Standard A5.2.1, the Government stressed that the matter did not pertain to a Standard entitled "Inspections in port" and obligations such as new paragraph 10(a) ran counter to the sovereignty of each Member in relation to entry permission for foreigners. With respect to Standard A5.3, the Government indicated that allowing all seafarers to return to their territory in the event of a PHEIC, with unrestricted movement when disembarking a vessel, could cause confusion in each Members' preventive measures.
37. The Government of *Mauritius* stated that if the proposal was accepted, it would initiate actions to implement the new requirements.
38. The Government of *Nigeria* supported the proposal, highlighting that Nigeria had issued a Marine Notice recognizing seafarers as key workers. However, it sought clarification on the proposed paragraph 6 of Standard A5.1.1, specifically regarding what exceptions would constitute irresistible force or unforeseen events beyond the control of the State.
39. The Government of *Panama* highlighted the importance of such recognition for seafarers and indicated that Panama had designated seafarers as key workers on 12 May 2020. It was crucial that flag States, port States and labour-supplying States recognized seafarers as key workers to avoid them from being affected by future crises due to travel restrictions. The requirement of designation of seafarers as key workers was also established in section 6.22 of the FAL Convention.
40. The Government of the *Philippines* supported the proposal, considering the welfare of its seafarers in instances such as the onset of the COVID-19 pandemic. While the concept "key worker" was not explicitly defined in the MLC, 2006, the term had been used in the context of the COVID-19 response with respect to seafarers who were essential to maintaining global supply chains and maritime transport. The ILO and the International Maritime Organization (IMO) had advocated for seafarers to be recognized as key workers, and the ILO Governing Body had issued a resolution in this regard. Several governments had designated seafarers as key workers to facilitate crew changes, medical assistance, and repatriation.
41. The Government of *Thailand* did not oppose this proposal, realizing the significance of the designation of seafarers as key workers. In cases where shore leave, repatriation, crew changes, or shore-based medical treatment are necessarily required, the Marine Department, as the competent authority under the MLC, 2006, could grant seafarers exemptions from restrictive measures as appropriate, taking into account minimum safe manning according to the International Convention for the Safety of Life at Sea (SOLAS). For cases related to public health, the Department of Disease Control examined seafarers on board a ship before referring the patients to Bamrasnaradura Infectious Diseases Institute to provide them with further medical treatment.
42. The Government of the *United Republic of Tanzania* suggested inserting the wording "in accordance with national laws and regulations" immediately after the word "restrictive measures" under Standard A5.2.1, new paragraph 11, to align with the preceding paragraphs and ensure that exemptions from restrictive measures were subject to national law. The Government

proposed to add at the end of Standard A5.2.1, new paragraph 10(e), the phrase “unless such modifications are for the best interest of the national on public health and protection of seafarers.” While some modifications might be repetitive and hinder ship voyage planning, they were crucial for the protection of public health and seafarers.

43. CONATO (*Workers, Panama*) supported the proposal in light of the lessons learned during the COVID-19 pandemic.

Proposal No. 5 (Seafarers’ and Shipowners’ groups)

44. A number of Governments in general supported the proposal (Guatemala, Mauritius, Nigeria, Panama, Philippines, Thailand, Trinidad and Tobago, United Kingdom, United Republic of Tanzania).
45. The Government of *Guatemala* indicated that, given the global nature of the shipping industry, it is essential that seafarers receive fair protection in accordance with existing legal provisions, due process and the rule of law. Members should cooperate, to the extent possible, with the flag States, port States and labour-supplying States concerned, with a view to supporting the implementation of the *joint IMO/ILO Guidelines on fair treatment of seafarers in the event of a maritime accident*.
46. The Government of *Mauritius* considered that there was a need to: strengthen collaboration through memoranda of understanding with neighbouring States for better coordination and effective application of the Guidelines; provide capacity-building for investigators via specialized training programmes to be conducted for fair investigations related to maritime casualties; review existing legislation to minimize discrepancies during investigations; and engage with stakeholders through regular consultations and workshops.
47. The Government of *Nigeria* noted that the joint IMO/ILO Guidelines sought to tackle unfair treatment, intimidation, and the absence of legal representation and ensure that seafarers’ rights, dignity and freedoms were respected.
48. The Government of *Panama* indicated that, as a flag State, Panama had cooperated in cases of seafarers on board ships flying the Panamanian flag who had faced prosecution in other States, and had solicited the application of the Guidelines where necessary.
49. The Government of the *Philippines* wished, in addition, to draw attention to the *Guidelines on fair treatment of seafarers detained in connection with alleged crimes* adopted at the third meeting of the JTWG, which would ensure the fair treatment of seafarers detained while working aboard ships, recognize the special status of seafarers and their need for legal protection across different jurisdictions, prevent arbitrary detention, and ensure access to legal aid and human rights protections. The Guidelines also referred to pertinent provisions of the MLC, 2006 concerning seafarers’ rights, repatriation and contractual entitlements, the International Covenant on Civil and Political Rights (ICCPR) protecting legal rights during arrest and trial, and the Vienna Convention on Consular Relations granting seafarers’ access to consular assistance.
50. The Government of *Thailand* indicated that national law already required shipowners to submit reports of crew injury or loss of life.
51. CONATO (*Workers, Panama*) supported the proposal.

Proposal No. 6 (Seafarers’ group)

52. A number of Governments in general supported the proposal (Guatemala, Nigeria, Russian Federation, Trinidad and Tobago, United Kingdom, United Republic of Tanzania).

53. The Government of *Guatemala* indicated that the proposal avoided the discretionary and inconsistent annual leave or compensatory leave conditions of seafarers where they were not regulated in any instrument or collective bargaining agreement. The proposed increase in rest hours was considered viable as it was most favourable to the worker. Fatigue of seafarers was a critical factor in relation to occupational safety and health and a risk factor contributing to maritime casualties, which could result in tragic fatalities and damage to the marine ecosystem. This decision could not be left solely to the discretion of collective agreements and selective application by shipowners or masters.
54. The Government of *Nigeria* considered that the proposal addressed the issue of fatigue among seafarers.
55. The Government of *Panama* indicated that the proposal and its necessity should be further analysed by the STC, in particular the possible lack of application and supervision. The STC should also examine the coexistence of the two hours of work regimes.
56. The Government of the *Philippines* decided to take a neutral stand on this proposal, indicating that national law was in line with the proposed 77 rest hours in any seven-day period.
57. The Government of the *Russian Federation* supported the proposal, noting that it would contribute to the establishment of a unified standard and facilitate the recording of work and rest hours on board ships. It indicated that its national requirements were more stringent than the proposed provisions.
58. The Government of *Thailand* opposed the proposal, as it would result in non-compliance with the hours of rest requirement in many countries. Furthermore, the existing provision was not new but reproduced the text of the Seafarers' Hours of Work and the Manning of Ships Convention, 1996 (No. 180), so it should be considered that the provision had been agreed after protracted tripartite discussions. Both the Government and its social partners agreed that the existing provision of the MLC, 2006 should be retained as it granted more flexibility for both seafarers and shipowners.
59. The Government of the *United Kingdom* agreed in principle but indicated that additional consideration of the practical implications might be necessary.
60. *CONATO (Workers, Panama)* expressed its support for the proposal. National legislation should establish that in the case of non-compliance by the shipowner, competent authorities should inspect and apply sanctions in case of violation of the MLC, 2006 provisions on hours of rest.
61. *The Turkish Shipowners' Employers Trade Union – TAIS (Employers, Türkiye)* indicated that it shared the position of the ICS.
62. *The Istanbul & Marmara, Aegean, Mediterranean, Black Sea Regions Chamber of Shipping – TCS (Employers, Türkiye)* opposed the proposal considering that the current minimum rest hours should remain unchanged.

Proposal No. 7 (Seafarers' group)

63. A number of Governments in general supported the proposal (Guatemala, Nigeria, Russian Federation, Trinidad and Tobago, United Republic of Tanzania).
64. The Government of *Guatemala* considered that the proposal prevented eventual abuses that workers might suffer through exceptions. Respect for collective bargaining was a pillar of freedom of association, so authorized or registered collective agreements provided legal certainty. The comprehensive protection of the physical and mental health of seafarers was crucial. This

proposal was in harmony with national law and would have a positive impact on reducing fatigue among seafarers.

65. The Government of *Japan* did not support this proposal considering that it defeated its own purpose by encouraging the use of exceptions via collective agreements.
66. The Government of *Nigeria* believed that the proposal reduced the scope of possible exceptions. It suggested replacing the term “maximum voyage length” with “maximum working hours” to tackle fatigue.
67. The Government of the *Russian Federation* stated that the proposal would contribute to improving the situation of seafarers and that national law was more stringent.
68. The Government of the *Philippines* decided to take a neutral stand on Proposal No. 7.
69. The Government of *Trinidad and Tobago* indicated that the proposal was in harmony with national legislation.
70. The Government of the *United Kingdom* observed that further consideration was needed regarding how this would work in practice and be enforced.
71. The Government of the *United Republic of Tanzania* proposed to delete the words “follow the provisions of this Standard. Such exceptions shall, as far as possible”, as the remaining text covered the same context.

Proposal No. 8 (Seafarers’ group)

72. A number of Governments in general supported the proposal (Guatemala, Nigeria, Philippines, Thailand, United Kingdom).
73. The Government of *Guatemala* believed that training costs should be covered by the State or employers to ensure that seafarers had the necessary skills. The associated costs could not fall on workers, as this would represent an additional economic burden that could limit their access to quality training and employability. Employers should provide opportunities for skills development, especially for tasks related to alternative fuels and decarbonization. Benefits of training included professionalization, environmental awareness, and community improvement.
74. The Governments of *Japan*, *Panama* and *Trinidad and Tobago* were of the view that this proposal and its economic impact should be consulted and considered carefully by the STC tripartite constituents.
75. The Government of *Mauritius* stated that the financial implications of the proposal for Mauritius would need to be assessed.
76. The Government of *Nigeria* suggested replacing in the proposed Standard A1.3 the words “including in relation to any training” with “including any training in relation to shipping”. Furthermore, the Government proposed to add a new Guideline B1.3 as follows:

“Guideline B1.3 – Development and conduct of training.

1. When fulfilling its obligation under Standard A1.3, paragraph 1, the competent authority in consultation with shipowners, seafarers and the office should take necessary measures to:
 - (a) promote quality shipping through training on the basic knowledge and understanding of the Maritime Labour Convention 2006;
 - (b) develop model training programmes for delivery at maritime training institutions on safe navigation, pollution prevention, and living and working conditions.”

77. The Government of the *Philippines* considered that providing training, career and skills development at no additional cost to seafarers would advance upskilling and promote their welfare.
78. The Government of the *Russian Federation* stated that it did not support the proposal in its current wording. The proposal could, under certain circumstances, result in a deterioration of seafarers' conditions, and might encourage shipowners to recruit seafarers who had already completed the necessary training and obtained the required documents, rather than investing in the training of their own seafarers.
79. The Government of *Thailand* indicated that, in practice, some shipowners were already providing their seafarers with financial support for training which could be developed or required to meet future improvements in shipping.
80. The Government of *Trinidad and Tobago* felt that, should the cost be borne by shipowners alone, obligations might be placed on seafarers concerning their terms and conditions of work. Consideration may be given to division of fees, within reason.
81. The Government of *Türkiye* stated that it opposed the proposal, arguing that the reference to "any training" was overly broad and lacked a clear definition, making implementation uncertain. Prohibiting seafarers from bearing any training-related costs under all circumstances could create practical challenges, particularly regarding which company would be responsible for covering fees in fixed-term contracts or similar employment arrangements. The scope of the training covered should be explicitly defined to ensure clarity and feasibility in implementation.
82. The Government of the *United Kingdom* agreed in principle but observed that further development might be necessary. Exempting seafarers from training costs would likely shift the burden to shipowners or governments.
83. The Government of the *United Republic of Tanzania* considered that the proposal should only cover the seafarers who were already employed; such training should aim at the development of the seafarer's career. It should be specified who would bear the costs of the training and whether it applied to training covered by the IMO International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW).
84. The *TCS (Employers, Türkiye)* opposed the proposal. Training provided on board by the company should be free of charge, while seafarers should be responsible for covering the costs of training related to promotion or licence renewal.

Proposal No. 9 (Seafarers' group)

85. A number of Governments in general supported the proposal (Guatemala, Nigeria, Philippines, United Kingdom).
86. The Government of *Guatemala* considered that the proposal obliged each Member to establish clear objectives and effective coordination for the training of seafarers between government agencies responsible for its implementation. Continuous training and professional development of seafarers was crucial to promote skill development and equitable access to education in the maritime sector.
87. The Government of *Mauritius* felt that the financial implications of this proposal needed to be assessed. Free tertiary education schemes applied only to nationals.
88. The Government of *Nigeria* considered that the proposal sought to strengthen the mechanism established by each Member for the training of seafarers. Considering the shortfall in the number

of professionals in the sector, this allowed each Member to adopt customized policies encouraging careers at sea.

89. The Government of *Trinidad and Tobago* did not support this proposal. While there might be a role of the State in providing minimum or basic training for seafarers entering into the industry, training in general should be the responsibility of the seafarer or of the shipowner or employer.
90. The Government of the *United Kingdom* agreed in principle but observed that further development might be necessary. It noted that exempting seafarers from training costs would likely shift the burden to shipowners or governments.
91. The Government of the *United Republic of Tanzania* considered that the kind of training should be identified, and it should be clarified who would bear the costs.
92. The Government of *Türkiye* opposed the proposal, arguing that it shifted the focus of Standard A2.8, paragraph 3, from the obligation of Members to set clear objectives for the vocational guidance, education, and training of seafarers to ensuring that all required training would be provided free of charge to those engaged in the safe operation and navigation of ships. This proposal introduced a financial obligation rather than reinforcing the original objective-setting role of Members. The term “any required training” was overly broad, making implementation unclear. The proposal did not define which types of training would be covered or how financial responsibility would be distributed between public and private entities.

Proposal No. 10 (Seafarers’ group)

93. A number of Governments in general supported the proposal (Guatemala, Nigeria, Panama, Philippines, United Kingdom, United Republic of Tanzania).
94. The Government of *Guatemala* stressed the importance of establishing fair conditions and procedures for the repatriation of seafarers, ensuring that shipowners’ responsibilities and other conditions were clearly defined in employment contracts. The need to guarantee equity in workers’ rights during repatriation was crucial. In this context, the determination of cost and responsibilities for repatriation aimed to set minimum standards for effective repatriation. The Government indicated that national legislation mandated compliance with costs and procedures for repatriation.
95. The Government of *Japan* opposed the inclusion of “necessary medical care” and “clothing where necessary” in new paragraph 3 of Standard A2.5.1. It was not appropriate for shipowners to be responsible for medical care unrelated to repatriation, and it was difficult to determine whether or not it was repatriation-related. Similarly, the shipowner should not bear the cost for clothing because this cost should be included in allowances from the moment the seafarers leave the ship.
96. The Government of *Nigeria* sought clarification on whether the referenced luggage weight (30 kg) in Standard A2.5.1, paragraph 3, was the baseline allowance or additional luggage, given that airlines already had designated luggage allowances.
97. The Government of *Panama* indicated that the provisions of Guideline B2.5.1, paragraph 3, were already binding in the national legislation.
98. The Government of the *Philippines* supported the proposal as it was in line with national law and the provision of necessary clothing seemed reasonable. The Government further proposed to insert the words “until they reach the repatriation destination” after “accommodation” to ensure that food, necessary clothing and accommodation must be provided until the seafarer reached the repatriation destination.

99. The Government of *Türkiye* stated that it did not support the proposal, observing that while Guideline B2.5.1, paragraph 3, originally referred to all provisions of Standard A2.5, the proposal limited the reference to Standard A2.5.1, paragraph 2(c), without explanation. This change in scope could introduce unintended limitations on repatriation rights. Further clarification was needed regarding its rationale.
100. The Government of the *United Kingdom* indicated that it had supported a similar proposal during the fourth meeting of the STC, which had faced opposition from shipowners and certain governments. It indicated that it did not expect these positions to have changed.

Proposal No. 11 (Shipowners' group)

101. A number of Governments in general supported the proposal (Guatemala, Nigeria, Panama, Philippines, Trinidad and Tobago, United Kingdom, United Republic of Tanzania).
102. The Government of *Guatemala* considered that the proposal was crucial to promote the health and well-being of seafarers. Competent authorities should ensure that local regulations were aligned with international standards. The inclusion of the *International Medical Guide for Seafarers and Fishers* would ensure that seafarers had access to updated medical information, which was key in such a remote and dangerous work environment.
103. The Government of *Panama* indicated that national legislation recommended the use of the *International Medical Guide for Seafarers and Fishers* on board Panamanian-flagged ships.
104. The Government of the *Russian Federation* rejected the proposal. Updating medical information would be more effectively achieved through a new edition of the *International Medical Guide for Ships* rather than introducing a new guide, which would inevitably result in duplication of many issues.

Proposal No. 12 (Governments) Australia, Canada, Marshall Islands, Norway, South Africa, United Kingdom of Great Britain and Northern Ireland

105. A number of Governments in general supported the proposal (Guatemala, Nigeria, Peru, Philippines, Trinidad and Tobago, United Republic of Tanzania).
106. The Government of *Guatemala* considered that the proposal represented a significant advancement in protecting seafarers' rights and promoting a safe working environment on ships and was effective for the prevention and protection against violence and harassment. Those behaviours, in all forms, constituted a violation of the fundamental human rights of all workers, requiring a comprehensive and multisectoral approach. National laws should be adapted to specifically address these issues within the maritime sector given the vulnerability of seafarers, and include specific provisions concerning effective mechanisms for reporting and protection against any form of violence or harassment, and effective sanctions.
107. The Government of *Nigeria* noted that the term "violence and harassment" had been inserted in Standard A4.3, paragraph 1(a), without defining it. Furthermore, to avoid repetition, it suggested replacing "including" with "as well as" in the proposed paragraph 7 of Standard A4.3. Moreover, it proposed a stand-alone text emphasizing the importance of addressing violence and harassment on board ships in Guideline B4.1.3.
108. The Government of the *Philippines* indicated that the proposal was generally aligned with Convention No. 190, ratified by the Philippines. The inclusion of bullying in the definition would call for an alignment of national law to ensure the effective implementation of workplace bullying

provisions. In Standard A1.4, paragraph 5, the Government suggested adding at the end of new subparagraph (c) the words “in accordance with national laws and regulations”, to ensure that seafarer recruitment and placement services adhered to the national laws and regulations of the labour-sending State. It also proposed to add a new subparagraph after (d) reading as follows: “(e) require that seafarer recruitment and placement services ensure easy access to appropriate and effective remedies and safe, fair, and effective reporting and dispute resolution mechanisms and procedures in cases of violence and harassment in the world of work;”. In Guideline B3.1.10, paragraph 1, new subparagraph (d), the Government suggested inserting “appropriate and sufficient” before “health and hygiene supplies” to accommodate seafarers’ needs. The Government supported Standard A4.3, new paragraph 3, as it provided stronger reporting and support mechanisms to seafarers by requiring an onshore contact person and telemedical support to address seafarers’ isolation. In Standard A4.3, new paragraph 7, the Government suggested inserting “in English and” before “in the working language of the ship” to ensure an inclusive understanding of information concerning workplace hazards.

109. The Government of the *Russian Federation* opposed the proposed amendment to Standard A1.4, as it went beyond the scope of national legislation. It expressed concern that expanding requirements for private recruitment and placement services to include measures against violence and harassment would not effectively address the issue, since the proposal aimed to prevent violence and harassment against seafarers in their workplace. The nature of employment agencies’ activities did not typically create conditions for violence and harassment against seafarers. Furthermore, training and career development did not fall under the responsibility of recruitment agencies, making it impractical for them to ensure protection against harassment during these activities. It would be more appropriate to amend Guideline B3.1.10 to reflect cultural differences among crew members rather than to introduce new requirements under Standard A1.4. Regarding medical care, the Government questioned the feasibility of implementing the proposed changes to Standard A4.1, as well as the need for the amendment to Guideline B4.1.3, given that the existing text already ensured access to medical care regardless of the reason.
110. The Government of *Trinidad and Tobago* observed that the proposal was in harmony with national legislation and policy.
111. The Government of *Türkiye* did not support the proposal. While Guideline B2.8.1 aimed to support vocational education and training for seafarers, it was important to clarify that general education and training outside a seafarer’s working life did not fall under the Convention. Consequently, the Government suggested specifying that the measures applied only to on-board training and education, which was directly linked to maritime employment. It proposed to insert the term “on-board” before “training and education”. Additionally, the Government argued that the term “health and hygiene supplies” in Guideline B3.1.10 was too broad and could create difficulties in defining required provisions and ensuring consistent implementation. To enhance clarity and feasibility, the Government suggested inserting “necessary” before “health and hygiene supplies”. With regard to Guideline B4.1.3, the Government stated that mental health care did not necessarily fall under urgent medical treatment. This could complicate practical implementation, particularly in determining the duration of treatment and the appropriate procedures for such care. It was proposed to insert after “hospitalization and mental health care” the phrase “in consultation with the shore-based telemedical provider”.
112. The Government of the *United Republic of Tanzania* observed that the proposal did not state whether the existing Standard A4.3, paragraph 3, would be deleted or renumbered.

113. The Governments that presented proposals 12 and 13 submitted the following joint proposal (consolidated proposal 12/13), which replaces proposals 12 and 13:

Standard	Guideline	Proposed text – Amendments in track changes
	Guideline B1.4.1 – Organizational and operational guidelines	In paragraph 2, add a new subparagraph (l): 2. [...] These operational practices for private seafarer recruitment and placement services and, to the extent that they are applicable, for public seafarer recruitment and placement services should address the following matters: [...] <u>(l) measures to prevent and address violence and harassment in recruitment and placement processes.</u>
	Guideline B3.1.10 – Bedding, mess utensils and miscellaneous provisions	In paragraph 1, add a new subparagraph (d): 1. Each Member should consider applying the following principles: [...] (b) bedding should be of good quality, and plates, cups and other mess utensils should be of approved material which can be easily cleaned; and (c) towels, soap and toilet paper for all seafarers should be provided by the shipowner-; <u>and</u> <u>(d) menstrual hygiene products and disposal should be available for seafarers.</u>
Standard A4.3 – Health and safety protection and accident prevention		In paragraph 1, add a new subparagraph (e): 1. The laws and regulations and other measures to be adopted in accordance with Regulation 4.3, paragraph 3, shall include the following subjects: [...] (d) requirements for inspecting, reporting and correcting unsafe conditions and for investigating and reporting on-board occupational accidents-; <u>and</u> <u>(e) prohibition and prevention of shipboard violence and harassment, including sexual harassment, bullying, and sexual assault.</u>
Standard A4.3 – Health and safety protection and accident prevention		In paragraph 2, add new subparagraphs (e) to (h): 2. The provisions referred to in paragraph 1 of this Standard shall: [...] <u>(e) define shipboard violence and harassment, including sexual harassment, bullying and sexual assault, after consultation with shipowners' and seafarers' organizations. For the purpose of this Code, the term violence and harassment has the same meaning as Article 1</u>

Standard	Guideline	Proposed text – Amendments in track changes
		<u>of the Violence and Harassment Convention, 2019 (No. 190).¹</u> <i><u>Footnote 1: For the purposes of the Violence and Harassment Convention, 2019, the term “violence and harassment” in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.</u></i> <u>(f) require shipowners to adopt and implement relevant policies and measures to prevent and address shipboard violence and harassment, including sexual harassment, bullying and sexual assault;</u> <u>(g) require shipowners to report to the appropriate flag State authorities unresolved and serious incidents of violence and harassment, including sexual harassment, bullying and sexual assault. Such reports shall be handled in accordance with national regulations and procedures.</u> <u>(h) require seafarers and others concerned, to comply with the applicable standards and measures implemented to prevent and address shipboard violence and harassment, including sexual harassment, bullying and sexual assault.</u>
	Guideline B4.3.1 – Provisions on occupational accidents, injuries and diseases	Paragraph 1, amend as follows: 1. The provisions required under Standard A4.3 should take into account the ILO code of practice entitled Accident prevention on board ship at sea and in port, 1996, and subsequent versions and other related ILO and other international standards and guidelines and codes of practice regarding occupational safety and health protection, including any exposure levels that they may identify. Account should also be taken of <u>the Violence and Harassment Recommendation, 2019 (No. 206), and</u> the latest version of the Guidance on eliminating shipboard harassment and bullying jointly published by the International Chamber of Shipping and the International Transport Workers’ Federation.
	Guideline B4.3.1 – Provisions on occupational accidents, injuries and diseases	Paragraph 2, subparagraph (m), amend as follows: 2. The competent authority should ensure that the national guidelines for the management of occupational safety and health address the following matters, in particular: [...] (m) <u>appropriately-sized</u> personal protective equipment for <u>all</u> seafarers <u>on board</u>; [...]

Standard	Guideline	Proposed text – Amendments in track changes
	Guideline B4.3.1 – Provisions on occupational accidents, injuries and diseases	Paragraph 4, subparagraph (d), amend as follows: 4. In addition, the competent authority should ensure that the implications for health and safety are taken into account, particularly in the following areas: [...] <u>(d) violence and harassment, including sexual harassment, and bullying and sexual assault.</u>
	Guideline B4.3.1 – Provisions on occupational accidents, injuries and diseases	Add new paragraphs 5 and 6: <u>5. Each Member should give due consideration to participating in international cooperation in the area of assistance, programmes and research on issues pertaining to preventing and addressing violence and harassment, including sexual harassment, bullying and sexual assault. International cooperation should be based on bilateral or multilateral agreements or consultations among Members.</u> <u>6. Members should cooperate in managing on-board incidents involving violations to seafarer welfare or incidents of violence and harassment, including sexual harassment, bullying and sexual assault. In particular, labour-supplying States should be notified as a substantially interested State when reported incidents are investigated.</u>
Standard A5.1.5 – On-board complaint procedures		Amend paragraph 2 as follows: 2. Each Member shall ensure that, in its laws or regulations, appropriate onboard complaint procedures are in place to meet the requirements of Regulation 5.1.5. Such procedures shall seek to resolve complaints at the lowest level possible. However, in all cases, <u>and in particular for the reporting of incidents of violence and harassment, including sexual harassment, bullying and sexual assault,</u> seafarers shall have a right to complain directly to the master <u>or the shipboard chain of command</u> and, where they consider it necessary, to <u>designated shoreside personnel or to</u> appropriate external authorities, <u>as the seafarer deems more appropriate.</u> Amend paragraph 3 as follows: 3. The on-board complaint procedures shall include the right of the seafarer to be accompanied or represented during the complaints procedure, as well as safeguards against the possibility of victimization of seafarers for filing complaints. The term “victimization” covers any adverse action taken by any person with respect to <u>a seafarer for lodging a complaint which is not involved in the complaint process, with due regard for situations where a</u>

Standard	Guideline	Proposed text – Amendments in track changes
Standard A5.1.5 – On-board complaint procedures		<u>complaint is</u> manifestly vexatious or maliciously made.
		Add a new paragraph at the end: <u>5. Appropriate steps shall be taken to safeguard, at all stages, the confidentiality of complaints made by seafarers.</u>
	Guideline B5.1.5 – On-board complaint procedures	In paragraph 2, add a new subparagraph (h): 2. At a minimum the procedures discussed during the consultative process referred to in paragraph 1 of this Guideline should include the following: [...] (g) in all cases seafarers should have a right to file their complaints directly with the master and the shipowner and competent authorities-; <u>and</u> <u>(h) unencumbered access to appropriate remedies for victims of violence and harassment, including sexual harassment, bullying and sexual assault.</u>

- 114.** In relation to the above revised proposal, the Government of France, on behalf of the Members of the European Union, expressed its gratitude to the co-proponents of proposal No. 12 for their availability and strong commitment to achieve this revised version. The Governments of the Member States of the European Union were overall supportive of the revised draft and acknowledged that this streamlined version brought them closer to gathering consensus between governments and social partners. They were confident that the co-proponents of all proposals on this topic shared the common objective of ensuring a strong protection for seafarers suffering from violence and harassment on board. They would therefore continue engaging with the co-proponents of Proposal No. 12 as well as the social partners to reach the highest degree of success at the STC meeting.

Proposal No. 13 (Governments) Belgium, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden

- 115.** A number of Governments in general supported the proposal (Guatemala, Mauritius, Nigeria, Peru, Trinidad and Tobago).
- 116.** The Government of *Guatemala* suggested that the term "violence and harassment" be clearly defined to avoid ambiguities. The ILO and the IMO were working together to combat violence and harassment, taking into account existing legislation, mechanisms, and policies to obtain possible future measures to prevent and address this serious global issue. Therefore, amending the MLC, 2006, was of vital importance to adopt relevant policies and measures to ensure that seafarers on board vessels are not deprived of their rights. Effectively addressing violence and harassment in the maritime environment would promote better living and working conditions for seafarers, contributing to their well-being and increasing the attractiveness of the maritime sector as a viable professional option.

117. The Government of *Nigeria* suggested deleting, in Standard A4.3, paragraph 2, new (e), the phrase “including sexual harassment, bullying and sexual assault, in consultation with seafarers and their representatives, without prejudice to the roles and duties of stakeholders provided by Convention No. 190”.
118. The Government of the *Russian Federation* rejected the proposal, arguing that it significantly altered the scope of Standard A4.3 by incorporating definitions and requirements from Convention No. 190, leading to unnecessary duplication. Convention No. 190 did not mandate full reporting on, and investigation of, cases of violence and harassment, including by competent authorities. The Government also expressed concern over assigning the competent authority responsible for occupational accidents the additional task of recording and investigating cases of violence and harassment, including sexual harassment, bullying, and sexual assault. If such provisions were to be retained, the Government suggested that this matter be treated in the framework of a separate guideline, and that cases be registered by the relevant competent authority responsible for recording criminal offences.
119. The Government of *Trinidad and Tobago* stated the proposal was aligned with national law and policy.
120. The Government of the *United Republic of Tanzania* considered that the term “violence and harassment” should be defined as proposed in new Standard A4.3, paragraph 3, under proposal No. 12, and therefore suggested replacing the definition with reference to Article 1 of Convention No. 190, to allow non-ratifying Members of that Convention to implement measures against violence and harassment.
121. The Governments that presented proposals 12 and 13 submitted a joint proposal (consolidated proposal 12/13), which replaces proposals 12 and 13 (see paragraph 124).

Proposal No. 14 (Governments) Belgium, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and United Kingdom

122. A number of Governments in general supported the proposal (Guatemala, Mauritius, Nigeria, Philippines, United Republic of Tanzania).
123. The Government of *Guatemala* believed that the right to shore leave was essential for the physical and mental well-being of seafarers. Shore leave should be compatible with previously established administrative protocols. The proposal should not affect annual leave to which seafarers were entitled. In the event of an international pandemic, the provisions issued by the relevant authorities should be respected to guarantee the principle of the common good prevailing over individual interests. Ensuring that seafarers could rest and enjoy activities on shore contributed also to greater job satisfaction and productivity in their tasks on board.
124. The Government of *Japan* considered that the proposal might be interpreted as requiring landing permissions for seafarers without exception. The Government suggested inserting, in new paragraph 4 of Standard A2.4, “to the extent practicable” after “Members shall grant shore leave to seafarers”. In addition, the Government proposed to replace the phrase “in so far as it is consistent with the operational requirements of seafarers’ duties, and in compliance with the provisions of the Convention on Facilitation of International Maritime Traffic, 1965, as amended” with the words “consistent with laws and regulations of each Member”, considering that it was

not appropriate to require Members, which had not ratified the FAL Convention, to adopt such measures.

- 125. The Government of *Nigeria* indicated that, if need be, it would align with proposal No. 3.
- 126. The Government of *Panama* aligned to its comments under proposal No. 3.
- 127. The Government of the *Philippines* observed that the proposal aligned with the provisions of the FAL Convention on administrative facilitation and port entry procedures. The proposal emphasized the public authorities and shipowners' duty to facilitate shore leave, while ensuring compliance with security and health regulations. In Guideline B4.4.6, the Government proposed a new paragraph 5 as follows: "Each Member should ensure that personnel in its ports and terminals are provided with appropriate information and training on seafarers' rights, including the right to shore leave.", so that shipowners and personnel in ports and terminals were well-informed and trained regarding seafarers' rights.
- 128. The Government of *Trinidad and Tobago* indicated that the right of seafarers to shore leave was subject to extenuating circumstances for example, pandemics) and administrative procedures required at the ship's arrival in port.
- 129. The Government of the *United Republic of Tanzania* agreed in principle, while objecting to the change in title of Standard A2.4. It proposed to add under Standard A4.4, new paragraph 6, the words "in accordance with national laws, regulations" after the term "shore leave" to ensure that shore leave would be facilitated subject to national legislation.

Proposal No. 15 (Governments) Belgium, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden

- 130. A number of Governments in general supported the proposal (Guatemala, Nigeria, Panama, Philippines, Russian Federation, Thailand, Trinidad and Tobago, United Kingdom, United Republic of Tanzania).
- 131. The Government of *Guatemala* considered that continuous training and education were essential to ensure that seafarers were prepared for any emergency on board and could provide the best possible care to the rest of the crew. By investing in continuous training of personnel, safety and well-being on board were strengthened, thus contributing to a safer and more efficient work environment. The proposal aligned medical training with international best practices. Training courses offered by governments should be complemented by those offered by shipowners.
- 132. Several governments highlighted the need to ensure alignment with the IMO STCW Convention (Japan, Philippines, Türkiye, United Kingdom).
- 133. The Government of *Japan* considered that these training requirements should be specified in the STCW Convention, which currently contained no such provisions. This matter should be considered after the comprehensive review of the IMO STCW Convention and Code.
- 134. The Government of the *Philippines* observed that the proposal was stricter and went further than the provisions of the STCW by explicitly requiring to keep up to date with medical developments at maximum five-year intervals.
- 135. The Government of the *Russian Federation* considered that the implementation of the proposal would enhance the level of training of personnel responsible for medical care and first aid on board. Regulation I/11 of the STCW Convention required officers to demonstrate continued

professional fitness, including compliance with Section A-VI/4, at intervals not exceeding five years. Under national legislation, the maximum validity period of a specialist's certification was five years.

136. The Government of *Thailand* indicated that it offered courses with regard to medical first aid and medical care on board for seafarers such as Elementary First Aid Course, Medical First Aid Course, and Medical Care Course. The Elementary First Aid Course was a refresher course that the competent authority required seafarers to undergo at intervals not exceeding five years.
137. The Government of *Türkiye* opposed the proposal, expressing concern that it was not in accordance with STCW Regulation VI/4 or STCW Code Table B-I/2. Contradiction could create confusion and practical difficulties for seafarers and maritime authorities.
138. The Government of the *United Kingdom* noted that arguments might be made in favour of addressing this matter under the STCW Convention.

Proposal No. 16 (Governments) Belgium, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden

139. A number of Governments in general supported the proposal (Guatemala, Nigeria, Philippines, Russian Federation, Trinidad and Tobago, United Republic of Tanzania).
140. The Government of *Guatemala* considered that the proposal represented a significant advance in the protection of seafarers' rights and was aligned with core principles of labour protection. The proposed amendments to the appendices to the Convention reinforced the provisions related to ship inspection and the protection of seafarers, adding oversight of the maximum period of service on board.
141. The Government of *Panama* considered it necessary to analyse the proposal in light of the issues raised by the COVID-19 pandemic, which highlighted the need to establish precisely the maximum period of service on board after which seafarers should be repatriated to be in accordance with the unwaivable right to paid annual leave. This proposal would remedy situations that severely affected seafarers and continue to cause confusion due to the fact that the provisions of the Convention were probably insufficient to solve the issues linked to crew changes in recent years. In Panama, it is not possible to extend seafarers' employment agreements, including those of less than 11 months, without the explicit written agreement of the seafarer. Regarding the proposed amendments to the Declaration of Maritime Labour Compliance, parts I and II, and the Maritime Labour Certificate, the Government recommended their further discussion within the STC, in view of the consequences of such eventual changes.
142. The Government of the *Philippines* stated that the proposal was aligned with national law, and merely changed the duty of the Member from having a law or collective agreement ensuring that seafarers were repatriated after less than 12 months, to ensuring that seafarers were repatriated after a maximum of 11 months. The proposal codified the current practice in the maritime industry based on present Standard A2.5.1.
143. The Government of the *Russian Federation* stated that the implementation of the proposal would have a positive impact on seafarers' working conditions and safety at sea. National regulations were more stringent, as they limited, for vessels flying the Russian Federation's flag, the maximum period of service on board to 150 calendar days, with the possibility of an extension to 180 calendar days in exceptional circumstances that made crew changes difficult.

144. The Government of *Thailand* opposed the proposal, since, before gaining certificates to work on board, cadets were required to engage in sea service for 12 months in accordance with the IMO STCW Convention. Given that cadets were considered as “seafarers” in accordance with the MLC, 2006, this proposal would be inconsistent with the STCW Convention and impracticable for cadets. Moreover, in cases where seafarers’ repatriation was hindered or delayed by port States’ measures, and their period on board needed to be extended as a result, requiring maximum service periods of 11 months with limited 20-day extension would probably be a burden on both seafarers and shipowners in terms of expenses and non-compliance with the provision.
145. The Government of the *United Kingdom* indicated that it could not support the proposal in its current form. The proposal lacked flexibility for situations where repatriation might not be immediately feasible, such as natural disasters or conflicts affecting seafarers’ safety. The 20-day limit for border closures or restrictions was overly prescriptive. Strict compliance with this time frame could result in seafarers being repatriated without a viable route home or to an alternative entry point in a neighbouring country with hostile conditions.