



Merchant Marine Notice 26-005

Title:	Maritime Labour Convention (MLC 2006) Amendments of 2014 on Repatriation (Regulation 2.5) and Shipowner's Liability (Reg. 4.2)		
To:	Deputy Registrars, Ship Owners/Isms Operators, Recognized Organizations/Shipping Agents/General Safety Inspectors		
Issuance Date:	7 October 2026	Effective Date:	7 October 2026
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1. INTRODUCTION

- 1.1 On 11 June 2014, the International Labour Organization (ILO) adopted amendments to the Maritime Labour Convention, 2006 (MLC, 2006) to enhance seafarer protection in cases of abandonment, occupational injury, illness, or death. These amendments established mandatory financial security requirements under:
- 1.1.1 Regulation 2.5 (Repatriation - Standard A2.5.2) to ensure seafarers are repatriated and provided with essential maintenance and support if abandoned by the shipowner.
 - 1.1.2 Regulation 4.2 (Shipowners' Liability - Standard A4.2.1) to ensure financial security for contractual compensation in the event of seafarer death or long-term disability due to work-related injury, illness, or hazard.
- 1.2 The 2014 amendments entered into force on **18 January 2017** and are binding on all ratifying States which included Belize. This 2026 reissue does not establish a new international effective date; it updates and clarifies the Belize Administration's requirements relating to those amendments.

2. PURPOSE

- 2.1 This Notice clarifies the mandatory requirements for all Belize-registered vessels to maintain continuous, valid financial security under Regulations 2.5 and 4.2 of the MLC, 2006, as amended, in order to protect seafarers, facilitate compliance with international labour standards, and minimize the risk of deficiencies, detention, or other control actions during Port State Control inspections.

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3. APPLICATION & SCOPE

- 3.1 This Notice applies to all Belize-registered ships falling within the scope of the Maritime Labour Convention, 2006, unless expressly exempted under this Notice.
- 3.2 Vessels of 500 GT or more engaged in international voyages must carry valid documentary evidence of financial security issued by the financial security provider and maintain a Maritime Labour Certificate together with the Declaration of Maritime Labour Compliance (DMLC Parts I and II), as applicable.
- 3.3 As an additional Belize Flag-State administrative requirement, vessels less than 500 GT engaged in international or domestic voyages shall maintain financial security covering Regulations 2.5 and 4.2 and carry evidence on board, however, a formal MLC certification is not required for vessels below 500 GT.

4. MLC EXEMPTIONS

- 4.1 In accordance with Article II of the MLC, 2006, this Notice does not apply to:
 - 4.1.1 Ships navigating exclusively in inland waters or sheltered waters where port regulations apply.
 - 4.1.2 Fishing vessels or vessels engaged in similar pursuits.
 - 4.1.3 Ships of traditional build (e.g., dhows or junks).
 - 4.1.4 Warships, naval auxiliaries, or state-owned/operated non-commercial vessels.
 - 4.1.5 Private pleasure yachts not engaged in commercial trade.
- 4.2 Any exemption granted by the Administration shall relate solely to the documentary or administrative requirements established by this Notice and shall not relieve the shipowner from any obligation under applicable Belize legislation, employment agreements, social security legislation, or obligations relating to repatriation, compensation, and seafarer welfare.

5. ADMINISTRATIVE EXEMPTION

- 5.1 Vessels operating exclusively within designated port limits or sheltered waters are primarily governed by national legislation, local port authority bylaws, inland waterway regulations, and national labour laws, rather than international MLC certification and enforcement regimes.

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- 5.2 As a Flag-State measure, the Administration may grant a conditional exemption from the financial-security requirements established by this Notice to a commercial vessel operating exclusively with an entirely national crew covered by domestic statutory social security and labour protections.
- 5.3 In these cases, the owners must apply for a conditional exemption, subject to the following strict conditions.
- 5.3.1 The shipowner must submit a formal exemption request, a complete crew list, and a notarized affidavit confirming compliance with local statutory social security/labour coverage.
- 5.3.2 The shipowner must submit an updated crew list to IMMARBE (technicalservices@immarbe.com) every three (3) months.
- 5.3.3 Failure to submit quarterly crew lists within prescribed timelines will result in immediate revocation of the administrative exemption, requiring full compliance with the financial requirements established by this notice.
- 5.3.4 Exemptions may be revoked at any time where the Administration determines the conditions are no longer satisfied.
- 5.3.5 Any exemption granted under this section relates solely to the documentary, certification, reporting, or administrative requirements established by this Notice and shall not exempt the shipowner from obligations relating to repatriation, abandonment protection, contractual compensation, seafarer welfare, or any other applicable requirements under Belize law or the Maritime Labour Convention, 2006, as amended.

6. IMMARBE'S APPROVED PROTECTION & INDEMNITY INSURANCE

The list of approved insurance providers can be found on IMMARBE's website: <https://www.immarbe.com/approved-entities/policy-indemnity-insurance/>.

7. COMPLIANCE REQUIREMENTS

- 7.1 All Belize-flagged vessels to which this notice applies, whether special, provisional, permanent or dual-in registered, must maintain valid financial security under Regulation 2.5 (Repatriation) and Regulation 4.2 (Shipowners' Liability), where applicable under the MLC, 2006 and this Notice.

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7.2 As a Flag -State requirement, all deputy registrars, shipowners or ship operators shall submit updated evidence of financial security to the Administration upon issuance, renewal or replacement for verification and record-keeping purposes.

8. CONTENT

8.1 Amendments relating to the Code Standard A2.5 - New Standard A2.5.2 - Financial security

8.1.1 Standard A2.5.2 of the MLC, 2006 establishes the requirements for shipowners to provide and maintain financial security to cover situations of abandonment. For the purposes of this Standard, a seafarer shall be deemed to have been abandoned where, in violation of the requirements of this Convention or the terms of the seafarers' employment agreement, if the shipowner:

- (a) fails to cover the cost of the seafarer's repatriation; or
- (b) has left the seafarer without the necessary maintenance and support; or
- (c) has otherwise unilaterally severed their ties with the seafarer including failure to pay contractual wages for a period of at least two (2) months.

8.1.2 The shipowner must maintain financial security, for example, P&I Club or insurer for abandonment cases as described above. The financial security required under Standard A2.5.2 shall be sufficient to cover:

- (a) outstanding wages and other entitlements due from the shipowner to the seafarer under the seafarers' employment agreement, collective bargaining agreement, or national law;
- (b) up to four (4) months of outstanding wages and up to four (4) months of any outstanding contractual entitlements;
- (c) all expenses reasonably incurred by the seafarer, including the cost of repatriation; and
- (d) the seafarer's essential needs, including adequate food, accommodation, drinking water, shipboard fuel necessary for survival, and any required medical care until the seafarer's repatriation has been completed.

8.1.3 For the purposes of the Convention, the financial security shall provide direct access, sufficient coverage and expedited financial assistance to abandoned seafarers.

8.1.4 Financial assistance under the financial security system shall be made available without delay upon request by the seafarer or the seafarer's representative and shall not be unreasonably withheld pending the resolution of any dispute concerning the abandonment.

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8.1.5 Evidence of financial security under Regulation 2.5, paragraph 2 must be provided in the form of a certificate or other documentary proof referred to in Standard A2.5.2, paragraph 7. Such documentation shall be in English and include the following information:

- (a) name of the ship;
- (b) port of registry of the ship;
- (c) call sign of the ship;
- (d) IMO number of the ship;
- (e) name and address of the provider or providers of the financial security;
- (f) contact details of the persons or entity responsible for handling seafarers' requests for relief;
- (g) name of the shipowner, or of the registered owner if different from the shipowner;
- (h) period of validity of the financial security; and
- (i) an attestation from the financial security provider that the financial security meets the requirements of Standard A2.5.2.

8.1.6 The Financial Security (P&I Club or insurer) must also provide that:

- (a) Seafarers, their representatives, or designated beneficiaries shall have the right to submit claims directly to the financial security provider without requiring the prior consent, involvement, or authorization of the shipowner.
- (b) The insurance cover or other financial security does not terminate before the end of the employment contract unless technicalservices@immarbe.com the insurer gives at least thirty (30) days' prior written notice to the Technical and Seafarers Department of the International Merchant Marine Registry of Belize and to the affected seafarers where required by the applicable financial security arrangement.

8.1.7 Shipowners are required to ensure that their ships are covered by financial security, such as P&I Club or insurer, in accordance with MLC, 2006, as amended.

8.2 Amendments to the Code implementing Regulation 4.2 - Shipowners' Liability under the MLC, 2006

8.2.1 Regulation 4.2 of the MLC, 2006, as amended, concerns shipowners' liability. The amendments to the Code introduce an enhanced requirement for financial security to ensure compensation in the event of the death of, or long-term disability suffered by seafarers arising from occupational injury, illness or hazard.

8.2.2 For the purposes of Standard A4.2.2, a "contractual claim" means any claim relating to the

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death or long-term disability of a seafarer resulting from an occupational injury, illness, or hazard, where compensation is provided under national law, a seafarers' employment agreement, or an applicable collective bargaining agreement. The financial security shall ensure the prompt payment of such contractual claims.

8.2.3 Shipowners are required to maintain financial security (e.g. through a P&I Club or insurer) to compensate crew members, or their survivors, in cases of disability or death resulting from occupational accidents or diseases. This obligation is reflected in Resolution DG-004, Part E section 2, which provides that shipowners must maintain financial security to guarantee compensation in such cases, as stipulated in the seafarers' employment agreement or any applicable collective agreement.

8.2.4 The certificate or other documentary evidence of financial security required under Standard A4.2.1, paragraph 14, shall be in English and must include the following information:

- (a) name of the ship,
- (b) port of registry of the ship,
- (c) call sign of the ship,
- (d) IMO number of the ship,
- (e) name and address of the provider or providers of the financial security,
- (f) contact details of the persons or entity responsible for handling seafarers' contractual claims,
- (g) name of the shipowner, or of the registered owner if different from the shipowner;
- (h) period of validity of the financial security (P&I Club or insurer); and
- (i) An attestation from the financial security provider (P&I Club or insurer) stating that the financial security meets the requirements of Standard A4.2.1.

8.2.5 The financial security (P&I Club or insurer) shall remain valid for the period of its stated validity and shall not terminate before the end of that period, unless the provider gives at least thirty (30) days' prior written notice to the Technical and Seafarers' Department of International Merchant Marine Registry of Belize technicalservices@immarbe.com.

- (a) In both cases (Sections A and B) a copy of financial security documentation shall be posted in a conspicuous place on board, accessible to the seafarers. Where more than one financial security provider is involved, the documentation issued by each provider shall be carried on board and made available to the seafarers.

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8.3 Verification of Compliance with the amendments to the Maritime Labour Convention, 2006

- 8.3.1 Upon satisfactory review of the required documentation, including evidence of financial security under Regulations 2.5 and 4.2, IMMARBE will issue the Declaration of Maritime Labour Compliance Part I (DMLC Part I) to vessels falling within the scope of the Convention.
- 8.3.2 The application form for DMLC-Part I (TD-FR-005, in its latest version) must be submitted together along with copies of the financial security (P&I Club or insurer) documents referred to in sections A and B above. Shipowners wishing to apply for new DMLC-Part I must contact their responsible Deputy Registrar Office to ensure submission of the required documentation. The Deputy Registrar Office processing the application will be responsible for the applicable fee, as set out in IMMARBE's Fee Schedule.
- 8.3.3 Once DMLC-Part I has been issued at the shipowner's request, the vessel must complete the DMLC-Part II. The shipowner shall then contact the relevant Recognized Organization to arrange an additional inspection for the issuance of an updated Maritime Labour Certificate.

8.4 Declaration of Maritime Labour Compliance (DMLC).

- 8.4.1 The DMLC- Part I issued from 18th January 2017 onwards incorporates the amendments to the MLC 2006.
- (a) Financial Security for Repatriation (Regulation 2.5): All ships that fly the flag of Belize must provide the competent authority with evidence of financial security to ensure the proper repatriation of seafarers, in accordance with Resolution DG-004, Maritime Labour Convention 2006, Part C, section 5.
 - (b) Financial Security relating to shipowner's Liability (Regulation 4.2): Shipowners are required to maintain financial security to ensure compensation in the event of death or long-term disability of seafarers. This requirement is set out in Resolution DG-004-Maritime Labour Convention, 2006, Part E, section 2.
- 8.4.2 All Belize-flagged vessels must maintain on board valid financial security (P&I Club or insurer) covering both Regulation 2.5 (Repatriation) and Regulation 4.2 (Shipowner's Liability). Compliance with these requirements will be verified during the first intermediate or renewal inspection carried out on or after 18th January 2017.

8.5 Relation to Subsequent Amendments to the Maritime Labour Convention, 2006

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8.5.1 This Notice specifically addresses the financial security requirements introduced by the 2014 amendments to the Maritime Labour Convention, 2006, concerning seafarer abandonment and shipowners' liability. Shipowners, operators, Masters and Recognized Organizations are reminded that compliance with this Notice does not relieve them of obligations arising from any subsequent amendments to the Maritime Labour Convention, 2006, adopted and brought into force by the International Labour Organization and implemented by Belize. In particular, the MLC, 2006 has also been amended in 2016, 2018, and 2022; shipowners and other persons responsible for compliance shall ensure that all applicable amendments currently in force are observed.

9. DISCIPLINARY MEASURES & ENFORCEMENT FOR NON-COMPLIANCE

- 9.1 The maintenance of valid financial security at all times is a mandatory condition of both registration and operation under the Belize flag. Failure to maintain valid coverage, operation with lapsed or expired policies, failure to submit evidence of coverage, or failure to comply with reporting requirements constitutes a serious breach of Belize Flag State requirements and may result in administrative, regulatory, or disciplinary action by the Administration.
- 9.2 Disciplinary actions under this Notice are issued pursuant to the statutory authority vested in the International Merchant Marine Registry of Belize (IMMARBE) under the *Merchant Ships (Registration) Act, Chapter 236 of Substantive Laws of Belize, Revised Edition 2020* and the *Registration of Merchant Ships (Disciplinary) Regulations, Statutory Instrument No. 56 of 1999*.
- 9.3 Depending on the severity and recurrence of the non-compliance, IMMARBE may impose one or more of the following measures, as outlined in the applicable enforcement framework.
- 9.4 The penalties outlined below are administrative enforcement measures established by the International Merchant Marine Registry of Belize pursuant to applicable Belize legislation and are supplementary to any corrective actions, detention measures, or other sanctions that may be imposed by Port State Control authorities, courts, or competent governmental authorities. All penalties remain subject to applicable due process requirements under Belize law.

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Table 1: Direct Offense and Penalty Schedule

Non-Compliance	Penalty
9.4.1 <u>Failure to Submit Documentation</u> (Including renewed evidence of insurance, crew lists, or updated financial security certificates within prescribed timelines)	<u>Administrative Fine:</u> USD 1,000.00 – USD 2,000.00
9.4.2 <u>Lapse in Financial Security Coverage</u> (Operating a vessel with expired financial security)	<u>Administrative Fine:</u> USD 3,000.00 – USD 5,000.00
9.4.3 <u>PSC Detention or Misrepresentation</u> (Non-compliance resulting in Port State Control detention, seafarer abandonment, or fraudulent declarations)	<u>Administrative Fine:</u> USD 5,000.00 (Up to USD 50,000.00 for severe cases under S.I. 56)
9.4.4 <u>Deliberate or repeated abandonment</u>	Cancellation/deregistration for deliberate or repeated abandonment Any cancellation or deregistration action shall be taken only pursuant to applicable Belize legislation, the Registration of Merchant Ships (Disciplinary) Regulations, and applicable due process requirements.

9.5 Any of the above measures may be supplemented by the issuance of a formal Prohibition of Sailing Order, which would prevent the vessel from departing port until full compliance with the financial security requirements has been verified.

10. ACTION REQUESTED

10.1 ROs are requested to include in their respective MLC inspection checklists the verification covering both Regulation 2.5 (Repatriation) and Regulation 4.2 (Shipowner's Liability) and to ensure that these requirements are properly examined during the initial, intermediate, and renewal inspections.



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