

# Palau International Ship Registry



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## MEMO 169.1

Date: March 31<sup>st</sup>, 2023

**To: SHIP OWNERS, MANAGERS, MASTERS, OFFICERS OF PALAU-FLAGGED SHIPS AND DEPUTY REGISTRARS**

**Subject: ITF INSPECTION CAMPAIGN 2023 IN MEDITERRANEAN PORTS**

### Reference:

- [International Maritime Labor Convention 2006 \(MLC\) \(as amended\)](#)
- [MN.132 – Maritime Labor Convention 2006, Inspection and Certification Program \(as amended\)](#)

### Preface:

The International Transport Workers' Federation (ITF) announced an inspection campaign in the Mediterranean Sea against more than 1000 ships. The inspections will take place during the next eight weeks, starting from March 17<sup>th</sup> 2023, and focus on crew welfare, safety and maintenance issues.

ITF is entitled to come on board under the below circumstances:

- An MLC Complaint is received, which shall be accompanied by official documentation;
- An agreement between the ship, the crew and ITF is in place;
- Port State Control Officials seek for ITF cooperation during an inspection.

You are kindly requested to cooperate with Palau International Ship Registry (PISR) in order to avoid unjustified and unfair practices against our ships. You need to consider this matter as high priority and, as preventive actions, to comply and check onboard your ships the status of the below MLC requirements:



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## 1. Qualification of crew:

1.1. All officers and ratings onboard need to hold in their original form, valid Certificates of Competency, Certificates of Proficiency and Certificates Endorsement, which are issued according to the provisions of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 (STCW), as amended and the STCW Code.

## 2. Medical fitness certification:

2.1. All medical certificates onboard need to be valid, in their original form and ready to be presented to the Authorities.

## 3. Seafarer Employment Agreement:

- 3.1. All crew shall have a copy of his (her) valid Seafarer Employment Agreement;
- 3.2. A record of employment should be available to the crew upon request;
- 3.3. No crew should serve on the ship for a period exceeding 11 months.

## 4. Working Hours – Rest Hours:

- 4.1. You need to check that all crew comply with the requirements of MLC and PISR [MN.202 – Minimum Hours Of Rest \(as amended\)](#)
- 4.2. Seafarers' working – resting hours need to be recorded in a format compliant with [PISR F.019 – Record Of Hours Of Rest](#) and kept in the ship's working language(s) and in any case, in English. They need to be endorsed by both the seafarer (who receives a copy) and the master.
- 4.3. A table of working - rest hours needs to be filled in on a daily basis, printed on a monthly basis and be available for inspection at any time.
- 4.4. A table indicating shipboard arrangements, needs to contain as a minimum the information required by MLC, Regulation 2.3, Standard A2.3, should be posted in an easily accessible place, and shall be in the working language or languages of the ship and in English.



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## 5. Food and Catering:

- 5.1. Ship-owners need to ensure that minimum standards for food handling, storage and preparation are respected as required in [MC.131 - Guidelines for Food Handling, Storage and Preparation \(as amended\)](#)
- 5.2. Cooks need to be properly qualified and meet the requirements set out in MLC Standard: A3.2.3 & A3.2.4

## 6. Health and safety and accident prevention:

- 6.1. Ship-owners need to effectively implement and promote occupational safety and health policies and programs, including instructions and training of the crew. Risk evaluation is required for on-board occupational safety and health management. Ship-owners need to take reasonable precautions to prevent occupational accidents, injuries and diseases on board, including measures to reduce the risk of exposure to harmful levels of ambient factors and chemicals as well as the risk of injury or disease that may arise from the use of equipment and machinery on board.
- 6.2. Ship-owners need to prepare and keep updated a written statement of their policy in respect to health and safety matters on board, and present the arrangements for carrying out this policy.

## 7. On-board medical care:

- 7.1. All ships need to comply with the requirements of MLC and [MC.135 – Medical Care On Board Ship And Ashore: Medicine Chest, Recordkeeping And Responsibilities And Training For Medical Care \(as amended\)](#) in regard to:
  - 7.1.1. Ship's Medicine Chest: the kinds and amounts of medicines, medical supplies and equipment that should be considered for a ship's medicine chest, and requirements for their re-supply, replacement and disposal;
  - 7.1.2. Recordkeeping: requirements for inventorying and recording medicines, including controlled drugs;
  - 7.1.3. Seafarer Injury and Illness Medical Record: introduction of the form to facilitate the exchange of medical information between ship and shore;
  - 7.1.4. Ship Master's Report Form: to record each medical case managed on board; and



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7.1.5. Responsibilities - Training: Of owner/operator, master and others with duties for medical care.

7.2. On ships where a medical doctor does not serve, persons in charge of medical care on board shall have satisfactorily completed training in medical care that meets the requirements of STCW 1978, as amended ("STCW"). Seafarers designated to provide medical first aid shall have satisfactorily completed training in medical first aid that meets the requirements of STCW.

## 8. On-board complaint procedures:

The on-board complaints procedure may be used by seafarers to make a complaint relating to any matter that is alleged to constitute a breach of the requirements of the MLC. This includes a breach of seafarers' rights detailed in Article III and Article IV of the Convention as implemented in The Republic of Palau law. [MN.206 - On Board Complaint Procedures \(as amended\)](#)

### 8.1. Minimum content of Complaint Procedure:

8.1.1. All seafarers on board Palau Flag ships shall be provided with a copy of the onboard complaint procedures form by the owner or ship operator, together with a copy of their seafarer employment agreement. The On-Board Complaints procedure shall include:

- 8.1.1.1. The seafarer's right to representation;
- 8.1.1.2. Safeguard issues against victimization of the seafarer;
- 8.1.1.3. Contact information of the competent labor authority in the seafarers' country of residence, and name of a person or persons on board the ship who can, on a confidential basis, provide seafarers with impartial advice on their complaint and otherwise assist them in following the complaint procedures available to them on board the ship.
- 8.1.1.4. Contact information about the Company Designated Person Ashore (DPA) or his/her designee.
- 8.1.1.5. Contact information about the Palau International Ship Registry.

## 9. Payment of wages:

Seafarers must be paid for their work regularly and in full, in accordance with their employment agreement and at no greater than monthly intervals. Ship-owners need to apply PISR's



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minimum requirements for the payment of wages to seafarers, full and true accounting of wages, fixed salary plans and offshore based electronic accounting systems: [MN.201 - Payment of Wages \(as amended\)](#)

- 9.1. All Seafarer shall be paid at no greater than monthly intervals and in full for his (her) work in accordance with the Shipping Articles;
- 9.2. Wages shall commence on the day specified and agreed to in the Shipping Articles or at the time of presence on board the vessel for the purpose of commencing work, whichever first occurs, and shall terminate on the day of discharge or termination of the Shipping Articles;
- 9.3. In the absence of any other agreement, the owner or the Master of the ship shall pay to every seafarer his (her) wage within two (2) days after the termination of the Shipping Articles, or at the time when the seafarer is discharged, whichever is first;
- 9.4. A seafarer shall receive a shipboard transaction statement before signing off the ship, which shall be followed by a final wage account slip to his(her) mailing address during the month following the date on which the sign-off occurred.

## 10. Financial security for seafarers' repatriation and shipowners' liability:

- 10.1. Ship-owners shall maintain financial security policy in order to ensure that assistance is provided to abandoned seafarers and which, in regard to Regulations 2.2 and 2.5 of MLC, shall cover the following ([MN.201 - Payment of Wages, as amended, paragraphs 5-8](#)):
- 10.2. Outstanding wages and other entitlements due from the ship-owner
- 10.3. All expenses reasonably incurred by the seafarer, including the cost of repatriation and the essential needs of the seafarer including such items as: adequate food, clothing where necessary, accommodation, drinking water supplies, essential fuel for survival on board the ship, necessary medical care and any other reasonable costs or charges from the act or omission constituting the abandonment until the seafarer's arrival at home.

## 11. Accommodation: ([MN.243 - Accommodation and On Board Recreation Facilities \(as amended\)](#))

- 11.1. Minimum standards for living conditions and arrangements on board every ship flying the flag of the Republic of Palau need to be in line with the Maritime Labor Convention, to which the Palau Flag is signatory.



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- 11.2. Frequent documented inspections need to be carried out on board ships, by or under the authority of the master, to ensure that seafarer accommodations are clean, decently habitable and maintained in a good state of repair.

**Any inquiries concerning the subject matters of this MEMO should be directed to the Palau Ship Registry Administrator at either**

**[info@palaureg.com](mailto:info@palaureg.com) / [seafarers@palaureg.com](mailto:seafarers@palaureg.com) or [technical@palaureg.com](mailto:technical@palaureg.com).**

Thank you  
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