GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
(PORTS & SHIPPING WING)
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No. 3 (3)/2021-CNS Karachi, 19th November, 2026.

MERCHANT SHIPPING NOTICE
Circular No. 008/2026

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Notice to All Pakistani Flag Shipowners, Ship Managers and Operators, Seafarers, Manning / Recruitment and Placement Services, Recognized Organizations authorized by the Government of Pakistan, Pakistan National Shipping Corporation and other concerned shipping companies, Karachi Port Trust, Port Qasim Authority, Gwadar Port Authority and other relevant port / terminal operators, Surveyors, Maritime Training Institutes in Public and Private sector and other all concerned.

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Subject: IMPLEMENTATION OF MARITIME LABOUR CONVENTION, 2006 (MLC, 2006), AS AMENDED; 2025 MLC AMENDMENTS; AND RELATED ILO / IMO REQUIREMENTS.

1. PURPOSE

1.1. This Merchant Shipping Notice is issued to bring to the attention of the Pakistani maritime industry the requirements of the Maritime Labour Convention, 2006 (MLC, 2006), as amended, the 2025 amendments to the MLC Code, and related ILO / IMO requirements which have entered into force during 2026 or scheduled to become applicable during 2027 and thereafter.

1.2. The purpose of this Circular is to ensure that shipowners, operators, ship managers, Masters, seafarers, recruitment and placement services, Recognized Organizations, surveyors, port authorities and training institutions take timely measures to protect seafarers rights, improve shipboard working and living conditions, prevent violence and harassment, facilitate shore leave and repatriation, and maintain compliance with applicable international and national requirements.

2. STATUS OF THE MLC, 2006 IN PAKISTAN

2.1. Pakistan deposited its instrument of ratification of the MLC, 2006 on 14 March 2025. In accordance with Article VIII of the Convention, the MLC entered into force for Pakistan twelve months after registration of ratification, i.e. on 14 March 2026. All concerned are therefore required to ensure that applicable national laws, regulations, procedures and shipboard arrangements give effect to the Convention.

2.2. The MLC applies, subject to its scope and exclusions, to seafarers and ships covered by the Convention. Shipowners and operators shall determine the applicability of the Convention to each vessel, including vessel type, gross tonnage, voyage and any applicable exemptions. The requirements of this Circular shall be read together with the Merchant Shipping legislation and directions issued by the competent Government authorities.

2.3. The ILO records that, consequent upon Pakistan's ratification of the MLC, Convention No. 22 (Seamen's Articles of Agreement Convention, 1926) was automatically denounced with effect from 14 March 2026, shall be addressed under the MLC and applicable Pakistani law.

3. INTERNATIONAL AMENDMENTS AND IMPLEMENTATION TIMELINE

3.1. MLC amendments adopted in 2025: The Fifth Meeting of the Special Tripartite Committee of the MLC (7–11 April 2025) considered amendments to the Code. These were approved by the 113th Session of the International Labour Conference on 06 June 2025 and notified to Member States on 23 June 2025. The formal disagreement period ends on 23 June 2027 and the amendments are expected to enter into force on 23 December 2027, in accordance with Article XV of the MLC.

3.2. The 2025 amendments comprise seven principal subject areas. The detailed requirements are set out below. Shipowners and other stakeholders are advised to prepare in advance; however, the amendments shall not be described as already in force before their applicable entry-into-force date.

3.3. The year 2026 requires implementation of the MLC for Pakistan, compliance with the STCW amendments effective from 01 January 2026, and preparatory action for the MLC amendments expected in December 2027.

4. SUMMARY OF THE 2025 MLC AMENDMENTS – EXPECTED 23 DECEMBER 2027

4.1 Repatriation without discrimination – Regulation 2.5 / Standard A2.5.1. The amendment requires Members to facilitate repatriation of seafarers without discrimination on any grounds and irrespective of the flag State of the ship on which they are employed, engaged or work. Companies shall review repatriation procedures to ensure that nationality, rank, gender, employment status or vessel flag does not result in discriminatory treatment.

4.2 Shore leave – Regulation 2.4 / new Standard A2.4.2. The amendments strengthen the entitlement to shore leave. Shipowners shall allow shore leave to seafarers when off duty upon the ship's arrival in port, except where departure ashore is prohibited or restricted by competent port authorities or prevented for genuine safety or operational reasons. Port and immigration procedures should facilitate shore leave without unjustified discrimination or unnecessary impediments, subject to applicable security, immigration and public-order requirements.

4.3 Seafarers as key workers – new Guideline B2.5.2. The new guideline calls upon Members to designate and recognize seafarers as key workers and facilitate their safe movement in connection with employment, including shore leave, repatriation, crew changes and access to medical care ashore. This is a Part B guideline and should be used to guide national policy and administrative arrangements; it is not to be represented as an independently binding Standard.

4.4 Fair treatment in marine casualties and alleged crimes – Regulations 4.4 and 5.1.

The amendments strengthen references to fair treatment of seafarers detained in foreign ports in connection with alleged crimes and to fair treatment during marine casualty investigations. Relevant authorities should take due account of the applicable joint IMO / ILO guidelines, respect due process and consular protection, and cooperate with concerned States. Masters and companies shall preserve records, provide prompt company / flag-State notification and facilitate access to consular and legal assistance as appropriate.

4.5 Costs of repatriation – Regulation 2.5 / Standard A2.5.1.

The amendments clarify shipowners' repatriation cost responsibilities. Companies should review contracts, insurance and financial arrangements to cover, at a minimum, the applicable passage to

the repatriation destination, accommodation and food during the journey, transportation of up to 30 kilograms of the seafarer's luggage, and necessary medical treatment until the seafarer is fit to travel to the repatriation destination, as specified in the amended text.

4.6 Medical training and medical information – Regulation 4.1 / Guidelines B4.1.1. The amendments update guidance concerning medical training and the availability of current medical information and guidance on board for persons responsible for medical care. Companies should ensure that shipboard medical guides, medical reference material, medical inventory procedures and training arrangements are current and suitable for the vessel's trade and complement. The relevant Part B provisions are guidance and should be implemented through the company's safety management and medical-care arrangements.

4.7 Violence and harassment – Regulations 1.4, 3.1, 4.3 and 5.1.

The amendments strengthen prevention and response to violence and harassment, including sexual harassment, bullying and sexual assault. Relevant measures extend to recruitment and placement, accommodation and recreational facilities, occupational safety and health, accident prevention and onboard complaint procedures. Companies should maintain a zero-tolerance policy, confidential reporting channels, impartial investigation arrangements, protection against retaliation, appropriate support to affected seafarers and documented training.

5. REQUIREMENTS ALREADY EFFECTIVE FROM 01 JANUARY 2026 – STCW

5.1. IMO amendments to the STCW Code adopted through Resolution MSC.560(108), effective from 01 January 2026, revise the competence requirements in Table A-VI/1-4 (Personal Safety and Social Responsibilities). They introduce mandatory basic training and instruction to prevent and respond to violence and harassment in the maritime sector, including sexual harassment, bullying and sexual assault.

5.2. Shipowners, operators, Masters and maritime training institutions shall ensure that seafarers receive the required training and instruction in accordance with the STCW Code and the applicable national implementation arrangements. Training providers shall review approved course materials, lesson plans, assessment methods and records. Companies shall retain evidence of training and familiarization, as applicable.

5.3. This STCW requirement is separate from, and should not be confused with, the MLC amendments expected to enter into force on 23 December 2027. Compliance with the STCW training requirement is required from its effective date, subject to the applicable STCW transitional provisions and national directions.

6. ACTION REQUIRED FROM SHIPOWNERS, OPERATORS AND SHIP MANAGERS

6.1. Review and update the Safety Management System (SMS), seafarer employment agreements, company policies and shipboard procedures to address violence, harassment, bullying, sexual harassment and sexual assault.

6.2. Establish confidential and accessible reporting and complaint mechanisms, ensure fair investigation, prohibit retaliation and provide appropriate support and referral arrangements for affected seafarers.

6.3. Review shore-leave procedures, port-call planning, immigration documentation and coordination with agents and port authorities to facilitate lawful shore leave for off-duty seafarers.

6.4. Review repatriation procedures, financial security, insurance and contractual arrangements to ensure timely, non-discriminatory repatriation and payment of all applicable costs.

6.5. Review crew-change procedures and arrangements for safe movement of seafarers, including access to medical care ashore and necessary travel documentation.

6.6. Ensure that current medical guides, medical reference information, onboard medical supplies and training are available and appropriate to the vessel and its trading pattern.

6.7. Ensure Masters and senior officers are familiar with the company's policies, complaint procedures, reporting obligations and the rights of seafarers under the MLC.

6.8. Maintain documentary evidence of implementation, including training records, employment agreements, hours of work and rest, wage records, medical-care records, complaint registers, repatriation records and shore-leave procedures.

7. RESPONSIBILITIES OF MASTERS AND SHIPBOARD MANAGEMENT

7.1. Ensure that all seafarers are treated with dignity and without discrimination, bullying, harassment, intimidation or abuse.

7.2. Promote a safe and respectful working environment and ensure that all crew members know how to report complaints confidentially and without fear of retaliation.

7.3. Handle complaints promptly, preserve confidentiality to the extent practicable, record relevant facts and report matters to the Company in accordance with the SMS and applicable law.

7.4. Facilitate shore leave for off-duty seafarers, subject to lawful restrictions imposed by port authorities and genuine safety or operational limitations. Any refusal or restriction should be recorded with reasons.

7.5. Ensure that crew members requiring medical attention ashore receive timely assistance and that the Company is informed without undue delay.

7.6. In the event of a marine casualty or detention of a seafarer, preserve relevant records, notify the Company and competent authorities as required, and facilitate appropriate consular and legal assistance.

8. RESPONSIBILITIES OF SEAFARERS

8.1. Familiarize themselves with their rights and obligations under the MLC, their Seafarers' Employment Agreement (SEA), the company's SMS and onboard complaint procedures.

8.2. Complete mandatory STCW training and shipboard familiarization, including the instruction on prevention of and response to violence and harassment.

8.3. Treat fellow seafarers with respect and refrain from violence, harassment, bullying, discrimination, sexual harassment or assault.

8.4. Report unsafe conditions, abuse, harassment, denial of applicable entitlements or other serious concerns through the onboard or shore-based complaint channels.

9. RECRUITMENT AND PLACEMENT SERVICES / MANNING AGENCIES

9.1. Recruitment and placement services shall review their procedures to prevent and address violence and harassment during recruitment and placement, provide accurate employment information, avoid discriminatory practices, and ensure that seafarers are not charged fees prohibited by the MLC or applicable national law.

9.2. Agencies shall provide seafarers with clear information concerning the identity of the shipowner, vessel, employment terms, wages, duration of employment, repatriation arrangements, complaint channels and relevant documentation before deployment.

10. RECOGNIZED ORGANIZATIONS, SURVEYORS AND INSPECTORS

10.1. Recognized Organizations acting under authorization of the Administration, and duly appointed surveyors and inspectors, shall verify compliance with applicable MLC requirements within the scope of their authorization and the approved inspection / certification regime.

10.2. During relevant inspections, attention should be given to the Maritime Labour Certificate and Declaration of Maritime Labour Compliance (DMLC), where applicable; seafarers' employment agreements; wage and rest-hour records; accommodation, food and catering; medical care; onboard complaint procedures; repatriation arrangements; and evidence of required STCW training.

10.3. ROs and surveyors shall distinguish between requirements already in force and the 2025 MLC amendments scheduled for December 2027. Preparatory observations may be recorded, but a future amendment shall not be treated as an existing deficiency before its effective date unless the same obligation is independently required by an existing instrument or national law.

10.4. Any serious deficiency, evidence of abuse, abandonment, non-payment of wages, denial of medical care or obstruction of seafarers' rights shall be reported through the established channels to the Administration for appropriate action.

11. PORT AUTHORITIES, TERMINAL OPERATORS AND OTHER PUBLIC AUTHORITIES

11.1. Port authorities, immigration, FIA, health, security and other relevant public authorities are encouraged to review procedures affecting seafarers' shore leave, crew changes, transit, medical attendance and repatriation, in coordination with the competent Government departments.

11.2. Port and terminal personnel should be made aware of seafarers' rights and the need to facilitate lawful shore leave and crew movements, while maintaining applicable port security, immigration, safety and public-order controls.

12. NATIONAL FLAG CARRIERS AND OTHER STAKEHOLDERS

12.1. PNSC and all other Pakistani-flag shipowners, national flag carriers, private shipowners, ship managers, offshore operators and companies employing Pakistani seafarers are requested to circulate this Marine Circular to their vessels and shore offices and to nominate a responsible officer for monitoring implementation.

12.2. Maritime training institutions shall review approved curricula and training arrangements to ensure that STCW requirements effective from 01 January 2026 are incorporated. They should also prepare for the relevant MLC developments expected in 2027.

12.3. Seafarers' organizations, shipowners' associations, manning agencies, port agents, welfare organizations and other relevant stakeholders are encouraged to cooperate with the Administration in promoting awareness, consultation and effective implementation.

13. IMPLEMENTATION AND COMPLIANCE SCHEDULE

Date / period	Instrument / requirement	Action / status
14 March 2026	MLC, 2006 – entry into force for Pakistan	Implement applicable MLC obligations under national law and Administration directions.
01 January 2026	STCW Code amendments – MSC.560(108)	Mandatory training / instruction on prevention of and response to violence and harassment.
23 June 2027	End of formal disagreement period for 2025 MLC amendments	Monitor ILO notifications and national implementation measures.
23 December 2027	Expected entry into force of 2025 MLC amendments	Comply with amended MLC Code, subject to final ILO status and applicable national measures.

14. SUBMISSION OF COMPLIANCE INFORMATION

14.1. Shipowners and ship managers are advised to conduct an internal gap assessment against the requirements described in this Circular and maintain an implementation plan, identifying responsible persons, target dates, training requirements and documentary evidence.

14.2. Where called upon by the Directorate General, Ports & Shipping, companies shall submit relevant compliance information, updated procedures or documentary evidence within the time specified. Any proposed national forms, reporting formats or additional certification instructions shall be communicated separately by the competent authority.

15. GENERAL

15.1. This Circular shall be read in conjunction with the MLC, 2006, as amended, the STCW Convention and Code, applicable IMO / ILO guidelines, relevant Pakistani legislation and directions issued by the Ministry of Maritime Affairs and the Directorate General, Ports & Shipping.

15.2. Nothing in this Circular shall be construed as altering the entry-into-force dates or legal status of an international instrument. Where any discrepancy arises, the authentic text of the applicable Convention, Code, amendment, national legislation and formal instructions of the competent authority shall prevail.

This Circular is issued with the Approval of the Competent Authority.



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Ministry of Maritime Affairs

Distribution:

1. The Director General, Ports & Shipping Wing, Karachi.
2. Director of Shipping.
3. The Shipping Master, Govt. Shipping Office (GSO), Karachi.
4. The Principal Officer, Mercantile Marine Department, Karachi.
5. The Chief Engineering & Ship Surveyor, (CESS)
6. Recognized Organizations authorized by the Administration.
7. The Chairman, Karachi Port Trust
8. Chairman Port Qasim Authority
9. Chairman Gwadar Port Authority.
10. The Chairman, Pakistan National Shipping Corporation (PNSC), Karachi.
11. Ship owner's Operators, Manning Agencies
12. All Public and Private Maritime Training Institutes.