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Shipping Guidance Notice – 171

Middle East Instability – MLC Guidance in respect of seafarers

(To be read in conjunction with SGN 169)

To: Masters, Seafarers, MLC Shipowners & Operators

1. References

- Maritime Labour Convention 2006
- FCDO Travel advice

2. Summary

2.1. The Gibraltar Maritime Administration (GMA) continues to maintain an active overview of the current developments arising from the current instability affecting the Middle East region, in particular the Persian Gulf, Gulf of Oman, and Strait of Hormuz.

2.2. The guidance published in Shipping Guidance Notice (SGN) 169 continues to be relevant in respect of available security guidance and recommendations, together with safety and travel advice resources.

2.3. In respect of the impacts on seafarers, the International Maritime Organization (IMO) is on 18 & 19 March 2026 holding an extraordinary session of its council to address the impacts on shipping and seafarers of the situation in the Arabian Sea, the Sea of Oman and the Gulf region, particularly in and around the Strait of Hormuz.

2.4. Pending conclusion of the IMO's extraordinary session and any guidance which may be published as a result, the GMA via the publication of this SGN aims to provide some practical interim guidance in respect of some aspects of Maritime Labour Convention (MLC) 2006 which may be impacted as well as general seafarer welfare.

3. Seafarer Employment Agreements

3.1. The GMA is conscious that temporary restrictions, such as airspace closures or reduced transport options, may be having an impact of seafarer repatriations. In respect of any such circumstances the GMA encourages MLC shipowners and seafarers to collaborate to achieve safe, timely solutions.

3.2. Every effort should be made on part of the MLC shipowner to continue to meet its repatriation obligations under MLC should it be safe to do so.

3.3. Notwithstanding 3.2 above, consideration should be given to the mutually agreed extension of SEA's where repatriation is impacted by imposed travel restrictions, or where there is reason to determine that travel from the ship's location to the agreed destination is not determined to be safe. FCDO Travel Advice may prove a useful related information resource.

3.4. In cases related to 3.3 above, and where any such SEA extension may mean that a seafarer will exceed a period of 11 months on board, the GMA should be contacted for the issuance of an acknowledgement letter for the purposes of Port State Control or any applicable authorities. Any applications in respect of the aforementioned should be directed to maritime.survey@gibraltar.gov.gi and include the following:

- Seafarer name
- Rank
- MLC Shipowner name
- Date of joining
- SEA expiry date
- Reasons for SEA extension
- Proposed term of extension
- Expected date of revised repatriation
- Confirmation letter from the seafarer of his/her agreement to the SEA extension and any underlying changes (e.g. change of reparation destination etc)

3.5. In cases related to 3.3 & 3.4 above where the SEA may be subject to a collective bargaining agreement (CBA), the relevant seafarer representatives should be consulted.

4. Seafarer Welfare Recommendations

4.1. In conjunction with SEA periods of extension, MLC shipowners should consider the following:

- extended periods working on board without leave are likely to give rise to greater risk of fatigue, and increased risk to welfare particularly if anticipated leave is deferred at short notice;
- Masters and all seafarers should monitor and be alert for such signs, reporting any concerns to the master, the on-board safety committee and trade union representatives, if appropriate;
- consideration should be given to rearranging work patterns to allow for additional rest periods/shore leave where possible, and to providing increased connectivity to allow seafarers to contact home, contract trade union representatives and to access online entertainment on board;
- if repatriation is not possible through scheduled ports of call, consideration should be given to diverting the ship to a port where it is possible; and,
- MLC shipowners should consider whether it is safe to continue operating where there are signs of fatigue or a significant or sustained deterioration in the wellbeing of crew members.

4.2. Furthermore, the GMA is grateful for any measures being taken by owners/operators in support of affected seafarers.

5. Support

5.1. The GMA remains available via maritime.survey@gibraltar.gov.gi for any support or guidance it may be able to provide in respect of the contents of this SGN.

Steve Gomez - Chief Surveyor
For & on behalf of the Maritime Administrator

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