Bulletin

CCS Australian Office, No. 107, 2026 Issue 006

Notice on Key Matters in AMSA's 2025 Maritime Labour Convention Annual Report

1. Background

The Maritime Labour Convention Annual Report 2025 (the Annual Report), published by the Australian Maritime Safety Authority (AMSA), presents information on Maritime Labour Convention (MLC) complaints and compliance in Australian waters during 2025, together with AMSA's follow-up actions. The Annual Report explains that AMSA verifies MLC compliance by responding to seafarer complaints and conducting port State control (PSC) inspections of foreign-flagged vessels entering Australian ports. When investigating an MLC complaint, AMSA may also board the vessel to carry out an MLC inspection. If deficiencies are identified, AMSA will undertake a port State or flag State control inspection and may conduct further inspections.

2. MLC Complaints in 2025

2.1 Number and Sources of Complaints

In 2025, AMSA received 169 MLC complaints, a decrease of 2.31% from 173 in 2024. Since the MLC entered into force in August 2013, AMSA has received and handled a total of 2,271 complaints. Of the 169 complaints received in 2025, 102 were lodged directly by seafarers, making them the largest source of complaints. The Annual Report indicates that seafarers are increasingly aware of their MLC rights and are willing to report matters directly to AMSA.

2.2 Distribution by Region and Ship Type

By the State or Territory in which the vessel arrived, Western Australia accounted for 34.63% of complaints and Queensland for 25.06%. These were the two highest shares, consistent with the large number of vessel arrivals in those jurisdictions.

Bulk carriers were the subject of 99 complaints, representing 58.58% of all complaints. Complaint rates by ship type were 4.9% for container ships, 3.1% for oil tankers, 3.1% for general cargo/multipurpose ships, and 2.4% for bulk carriers.

2.3 MLC Titles Involved in Complaints

In 2025, Title 2, Conditions of Employment, accounted for 167 complaint issues and continued to constitute the majority. These included:

1. hours of work and rest: 50 issues (30.3%);
2. wages: 41 issues (24.8%);
3. seafarers' employment agreements: 40 issues (24.2%);
4. repatriation: 23 issues (13.9%);
5. entitlement to leave: 9 issues (5.5%); and
6. manning levels: 2 issues (1.2%).

Title 3, Accommodation, Recreational Facilities, Food and Catering, accounted for 57 issues.

Title 4, Health Protection, Medical Care, Welfare and Social Security Protection, accounted for 63 issues, of which:

7. health and safety protection and accident prevention represented 84.1%;
8. medical care on board ship and ashore represented 12.7%; and
9. access to shore-based welfare facilities and shipowners' liability each represented 1.6%.

2.4 Outcomes of Complaints

Of the complaints handled in 2025, 28.4% were resolved, 23.7% were not substantiated, 20.1% were referred to the flag State, 19.5% resulted in deficiencies, and 8.3% were referred to the Fair Work Ombudsman.

Follow-up investigations resulted in MLC-related deficiencies being issued to 39 vessels, 5 of which were detained for MLC-related deficiencies.

3. MLC-related PSC Inspections in 2025

In 2025, AMSA conducted 2,769 initial PSC inspections. A total of 133 vessels were detained, including 12 detained for MLC deficiencies. Following PSC inspections, AMSA issued a total of 1,185 MLC deficiencies.

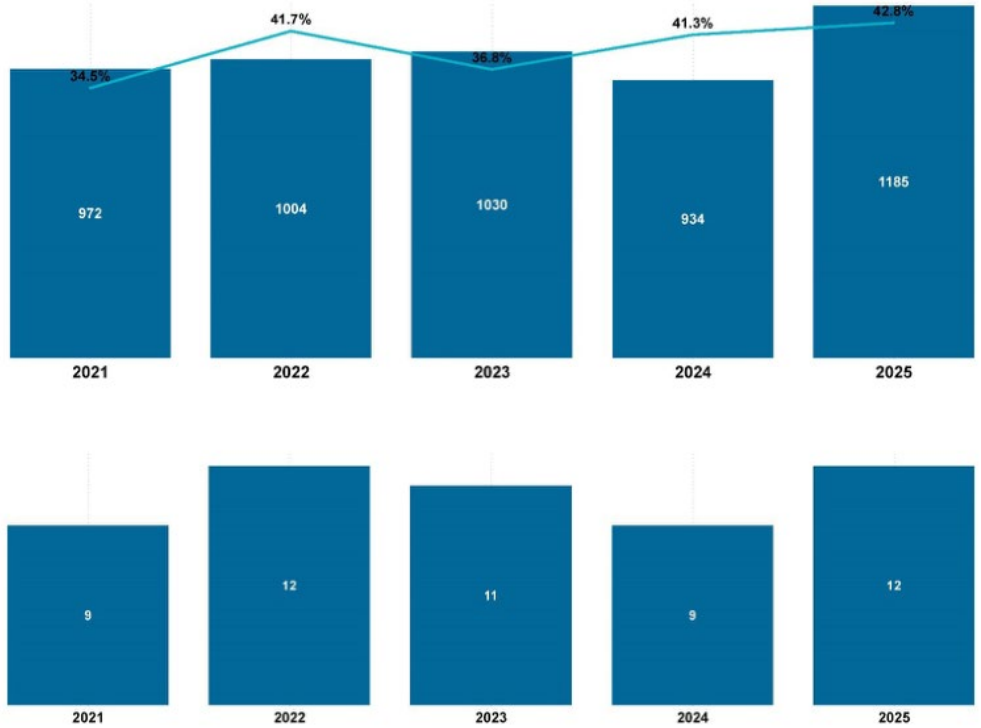


Figure 1 — MLC deficiencies and MLC-related detentions arising from PSC inspections, 2021–2025

By MLC Title, PSC deficiencies issued in 2025 comprised 724 under Title 4, 342 under Title 3, 105 under Title 2, 11 under Title 5, and 3 under Title 1.

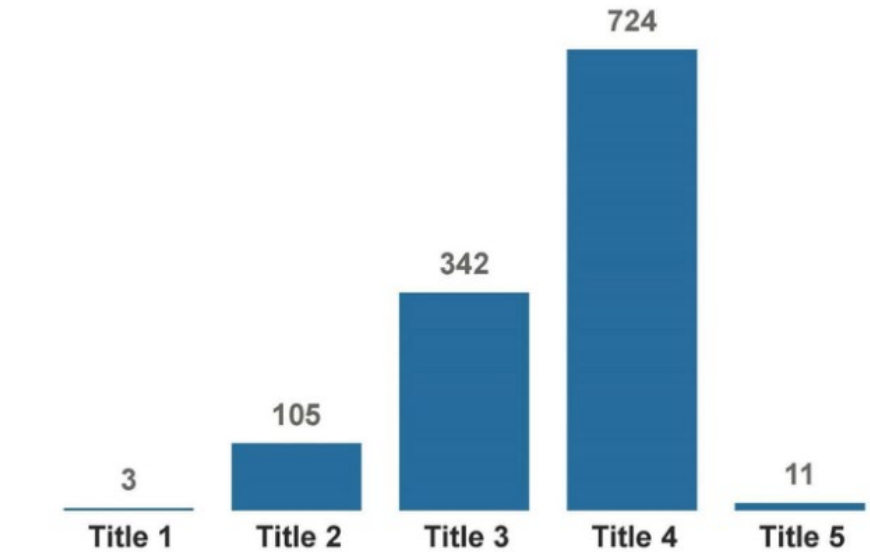


Figure 2 — 2025 PSC MLC deficiencies by MLC Title

The deficiencies identified during PSC inspections mainly concerned Title 4, Health Protection, Medical Care, Welfare and Social Security Protection, whereas complaints mainly concerned Title 2, Conditions of Employment. This difference shows that the MLC complaint mechanism can reveal working and living condition issues, such as underpayment of wages, that may not be directly observable during an inspection.

4. Case Studies

Case 1: In June 2025, AMSA received a complaint concerning unpaid wages, excessive work demands and insufficient rest. Company records indicated that wages had been paid in full in accordance with the seafarers' employment agreements, but the seafarers' bank statements showed that the amounts actually received were substantially lower. The investigation also found that the manning agent had made unauthorised deductions and produced falsified bank documents; some seafarers had paid unlawful recruitment-related fees before joining the vessel; and seafarers had also been subjected to disciplinary fines that were inconsistent with the collective bargaining agreement. The vessel was detained as a result of these findings.

Case 2: In July 2025, AMSA received a complaint concerning excessive workload, insufficient rest, a lack of wage documentation, restricted access to cash advances, and seafarers being required to purchase their own drinking water. AMSA's inspection found that cash advances were not offered proactively or regularly, restricting seafarers' access to funds. Evidence also showed that the master's inappropriate involvement influenced shipboard practices. The matters were recorded as deficiencies and the case was closed after corrective action was taken.

Case 3: In September 2025, AMSA received a complaint concerning a lack of fresh fruit and vegetables on board. After boarding the vessel, AMSA determined that the fresh food available was insufficient for the next voyage and required the deficiency to be rectified before departure. As the issue had recurred within two months, AMSA also issued an ISM-related deficiency requiring the company to implement effective corrective action to prevent recurrence.

5. Matters Requiring Particular Attention

MLC-related PSC inspections remain a focus for AMSA. Vessels intending to operate in Australian waters, together with their managers and owners, are reminded to review the complaint categories, deficiency classifications and case studies set out in the Annual Report, with particular attention to the following matters:

- Payment of wages and supporting evidence: ensure that wage records are continuous, complete and valid, and correspond with the amounts actually received in seafarers' bank accounts. Avoid unauthorised deductions, falsified documents, unlawful recruitment fees and restrictions on seafarers' access to cash advances.

- Validity of SEAs: ensure that a complete, current and valid seafarers' employment agreement (SEA) is retained on board for every seafarer. Ensure that the standards referenced by each SEA, including any applicable collective bargaining agreement (CBA) and ITF requirements, remain current.
- Hours of work and rest: ensure that the table of shipboard working arrangements reflects actual operations, and that records of hours of work and rest, the working arrangements and actual work performed are consistent.
- Accommodation and living conditions: keep accommodation and living areas clean and hygienic, and maintain living facilities in good condition. Pay particular attention to the supply of food and free drinking water.
- Health and welfare: pay attention to health and safety protection, accident prevention, medical care on board and ashore, and access to shore-based welfare facilities.
- Common complaints: address the common complaint items noted above, ensure that the shipboard MLC management system operates effectively, and prevent complaints and serious deficiencies.

Reference

AMSA, Maritime Labour Convention Annual Report 2025

CCS Australia Office
July 20, 2026

Announcement:

1. Intention is to assist and ensure owners to understand and well prepared, ensuring all updated requirements from AMSA can be met

2. For more information, please visit AMSA website at www.amsa.gov.au and CCS website at www.ccs.org.cn

3. The information contained does not and cannot supersede any AMSA or related governing parties requirements as well

Australian Government

Australian Maritime Safety Authority

Maritime Labour Convention Annual Report

2025

Contents

Overview 3
Australia's obligation under the MLC 3
The Australian Seafarers' Welfare Council 4
Seafarer welfare campaigns 6
Guidance and publications 6
MLC - Complaints data 2021-2025 8
MLC complaints 8
Source of complaints 9
Breakdown of complaints by State 10
Breakdown of complaints by vessel type 11
Breakdown of complaints by flag State 12
Breakdown of complaints by MLC Titles 14
Breakdown of complaints by outcome 17
Actions taken 18
Case studies 19
Reported serious injuries and fatalities 20
Serious injuries 2021-2025 20
Fatalities 2021-2025 21
MLC - flag State and port State control 23
FSC MLC deficiency by Title 25
PSC MLC deficiency by Title 26
Glossary 27
Tabled Trends 28

Overview

The Australian Maritime Safety Authority (AMSA) is pleased to present the 2025 Australian Maritime Labour Convention, 2006 (MLC) annual report.

This report presents findings on key MLC data in Australian waters. It includes an analysis of MLC complaints, compliance and follow-up actions undertaken by AMSA in Australia for 2025.

The information in this report will be used to inform some of the 2026-2027 National Compliance Plan. Every year AMSA undertakes a range of planned and responsive activities to keep people safe, ensure their working conditions are not breached and to protect the marine environment which is outlined in the National Compliance Plan.

Application of the MLC

The MLC applies[1] to all commercial vessels[2] whether publicly or privately owned. It does not apply to fishing vessels, vessels of traditional build (such as dhows and junks), warships or naval auxiliaries or vessels not ordinarily engaged in commercial activities.

A list of the 112 member states that have ratified the convention after 20 August 2013 is available on the International Labour Organization (ILO) website.

Australia's obligation under the MLC

In Australia, the MLC is implemented primarily through the *Navigation Act 2012*[3] and delegated legislation such as Marine Order 11 (Living and working conditions on vessels) 2024.

AMSA verifies compliance with the MLC by:

- Responding to MLC complaints received from seafarers engaged on vessels in, or coming into, Australian ports.
- Conducting port State control inspections on foreign flagged vessels coming into Australian ports and flag State control inspections on regulated Australian vessels irrespective of their location.
- Requiring regulated Australian vessels to be certified in accordance with the MLC, as given effect by Marine Order 11 (Living and working conditions on vessels) 2024.
- Registering seafarer recruitment and placement services operating in Australia
- Taking a leading role in supporting seafarer welfare through the Australian Seafarers' Welfare Council.

AMSA continues to do its part to ensure seafarers on vessels visiting Australian ports are being afforded the requirements under the MLC.

---

[1] Article II.4 of the MLC

[2] Article II.1(i) of the MLC (Derivations of the word 'vessel' are used by AMSA interchangeably with derivations of the word 'ship', as in IMO, ILO, Australian legislation, and other relevant documents. Note: domestic commercial vessels are subject to other provisions.)

[3] Note the requirements of the MLC are met through various legislative instruments not limited to the Navigation Act.

The Australian Seafarers' Welfare Council

The MLC requires signatory countries to establish welfare boards at the port, regional and national level to support seafarer welfare. In Australia, the Australian Seafarer Welfare Council (ASWC) was established to ensure there is a national co-ordinated approach in the provision of welfare services for seafarers visiting Australian ports.

ASWC consists of members from national organisations that contribute to the welfare of seafarers with AMSA assuming the roles of Chair and secretariat.

ASWC works closely with the Port Welfare Committees (PWCs), which serve as port-based regional bodies dedicated to providing local, on-the-ground support to seafarers across Australia. They are made up of various stakeholders, including representatives from port authorities and operators, shipping companies, unions, welfare organizations, and port community groups. ASWC helps coordinate efforts by the PWCs to create a network of support for seafarer welfare services in Australian ports.

ASWC meets three times a year to collaborate in the work it aims to achieve, namely to:

- Provide leadership in the implementation of Australia's obligations to seafarers under the MLC
- Assist in the establishment of a national network of seafarer support arrangements
- Promote, encourage, and support the delivery of seafarer welfare services at Australian ports.

These aims are encompassed by ASWC's strategic goals and progressed against these goals for 2025 as listed in Table 1 below.

Table 1: Progress against the ASWC strategic goals for 2025.

Strategic Goals	What we will do	Activities in 2025
Provide leadership in the implementation of Australia's obligations to seafarers under the MLC	Promote awareness for ASWC, its role and vision Promote awareness and supports seafarer welfare Maintain contact with, and membership of, the International Seafarers' Welfare Assistance Network (ISWAN)	ASWC Chair participated in an interview with *Safety4Sea* highlighting ASWC's national leadership in strengthening Port Welfare Committees and coordinating shore-based support across Australian ports and drew attention to the major welfare challenges faced by seafarers particularly the ongoing barriers to shore leave caused by tight turnaround times, port access restrictions and company policies. AMSA re-issued a Marine Notice outlining expectations for vessel owners and operators when considering appropriate crewing to consider fatigue risks and ensure compliance with hours of rest

Strategic Goals	What we will do	Activities in 2025
		requirements, ensuring seafarer fitness for duty. In June 2025 AMSA published the 2024 Australian Maritime Labour Convention, 2006 (MLC) annual report. ASWC and Maritime New Zealand (MNZ) continue to work collaboratively on seafarer welfare matters with MNZ attending ASWC meetings and Port Welfare Committee (PWC) forums. AMSA represented Australia at the 5th meeting of the International Labour Organization (ILO) MLC Special Tripartite Committee (STC). Some of the key MLC amendments adopted include new requirements to prevent shipboard violence and harassment, stronger repatriation entitlement requirements and improved guidelines on the provision of medical care.
Assist in the establishment of a national network of seafarer support arrangements	Encourage, support and guide the establishment of Port Welfare Committees (PWCs) Facilitate and promote a network of communication and cooperation between Port Welfare Committees.	In 2025 ASWC continued to facilitate and promote engagement between ASWC and PWCs. There are now 18 PWCs located in major ports around Australia. ASWC launched a Seafarer Port Welfare Survey in October 2025 which ran into early 2026. The survey aimed to gain a better understanding of the welfare needs of seafarers arriving in Australian ports. A report on the findings will be published once analysis is complete. The bi-annual PWC Forum was held in June and October. Representatives from each PWC, ASWC members and invited guests discussed and shared issues and insights regarding the operation of their

Strategic Goals	What we will do	Activities in 2025
		respective PWCs at a national level.
Promote, encourage, and support the delivery of seafarer welfare services at Australian ports	Identify seafarer needs and future welfare requirements in line with shipping and crew trends Promote the need for seafarers to be treated as valued and respected members of our port communities Assist in investigating ongoing funding opportunities that may assist in providing sustainable seafarer welfare services	In November 2025, ASWC held a strategic planning session where its mission, vision, strategic goals and objectives over a 5-year outlook were revisited, taking into consideration the current and emerging risks affecting seafarer welfare and to align with Australia's obligations under the MLC. AMSA sponsored the Mission to Seafarers (MtS) Sydney Annual Parliamentary Luncheon taking place in June 2025. AMSA CEO Kaylene Dale was in attendance and spoke on the psychosocial pressures experienced by seafarers. In 2025, MtS reported visiting 6,065 ships, provided transport for 91,597 seafarers, and recorded 67,258 volunteer hours in Australia. A total of 97,546 seafarers visited the MtS seafarer centres across Australia.

Seafarer welfare campaigns

Every year AMSA undertakes a range of planned compliance and educational activities outlined in the AMSA National Compliance Plan. As part of the National Compliance Plan, AMSA continues to ensure seafarers on vessels visiting Australian ports were, and are, being afforded the requirements under the MLC.

Guidance and publications

MARITIME SAFETY AWARENESS BULLETINS

AMSA published two Maritime Safety Awareness Bulletins in 2025. The Maritime Safety Awareness Bulletin published in March 2025 focused on managing risk. The bulletin highlighted risk assessment is a key part of the vessel's safety management system under the International Safety Management (ISM) Code and the importance of owners and operators to ensure risks are identified and effective control measures are implemented.

The Maritime Safety Awareness Bulletin published in September 2025 focused on cargo securing of containers and provides strategies to improve compliance such as the need to regularly inspect and

maintain securing equipment, regularly review safety measures, ensure crew are appropriately trained and the importance to plan for heavy weather.

AMSA AND FAIR WORK OMBUDSMAN COLLABORATION ON SEAFARER WAGES

AMSA and Fair Work Ombudsman (FWO) have signed an updated Memorandum of Understanding (MoU), formalising their commitment to the Strategic Fleet Pilot Program, a key recommendation of the Government's Maritime Strategic Fleet taskforce.

This initiative is part of AMSA's ongoing efforts to uphold the rights of seafarers and improve working conditions in the maritime industry. Through the updated MOU, both agencies have committed to improving compliance monitoring, sharing regional contacts, and conducting joint inspections of foreign-flagged vessels operating in Australian waters operating under coastal trading temporary licences. AMSA continues to support the FWO in combatting wage theft and ensuring seafarers receive their lawful entitlements.

The FWO monitors, investigates and enforces compliance with the Fair Work (FW) Act. This includes compliance with wage entitlements for seafarers engaged on foreign-flagged vessels operating under the Seagoing Industry Award 2020 – Schedule A. A total of $783,001.54 in wages were recovered in 2025 as part of this strategic fleet pilot program.

MLC - Complaints data 2021-2025

MLC complaints

The MLC requires all vessels to establish an onboard complaints procedure that provides seafarers with the opportunity to make complaints without concern or repercussion. The MLC also has provisions which gives rights to seafarers to make a complaint to the relevant flag or port State authorities when they believe that their living and/or working conditions on board are below standard.

AMSA has received and processed a total of 2271 MLC complaints since the implementation of the MLC in August 2013.

In 2025, AMSA received 169 complaints[4] representing a 2.31 per cent decrease on the number received in 2024 (173). The number of complaints has continued to decline from the peak of 320 in 2020, during COVID.

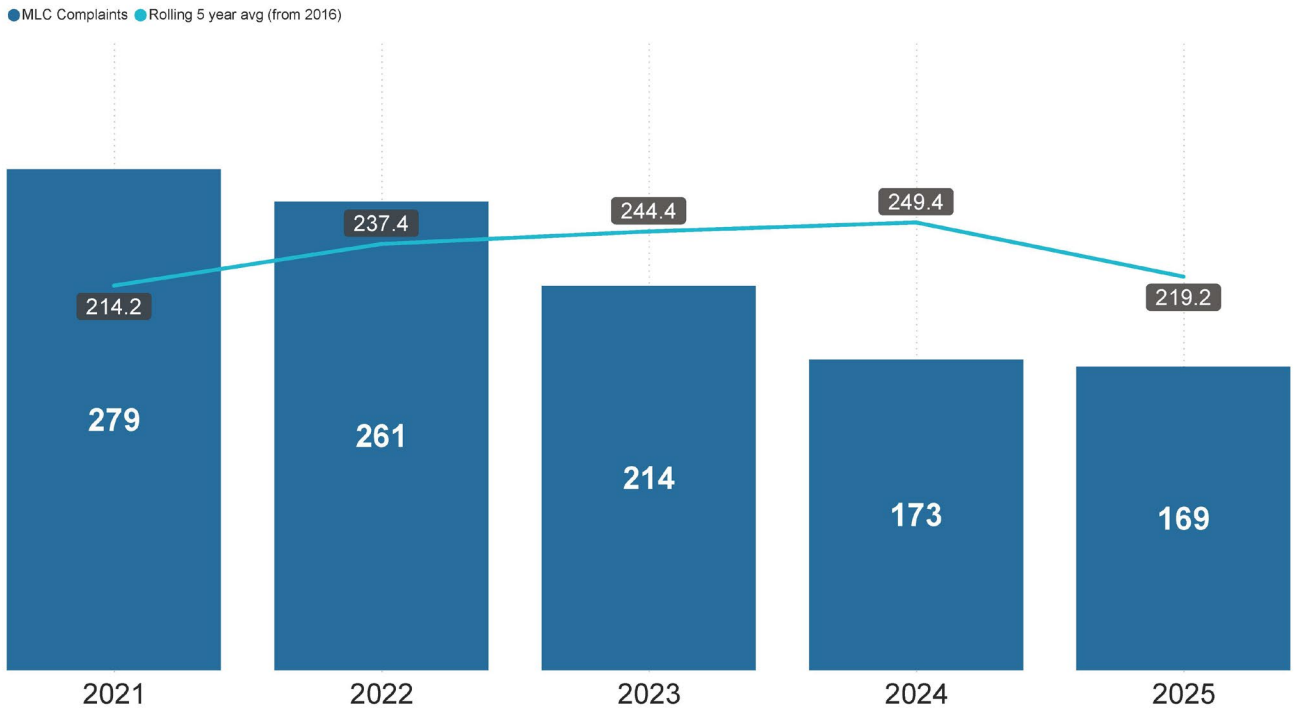


Figure 1: MLC complaints received by year

Image description

[4] The 2025 data include nine complaints received from eight regulated Australian vessels (RAVs). One of the complaints resulted in deficiencies being issued, and one resulted in observations issued. The complaints received were under MLC Title 2, 3 and 4.

Source of complaints

Most of the complaints originated directly from seafarers. This is consistent with previous years showing seafarers' increased awareness of their rights under the MLC and the reputation Australia has on addressing MLC complaints. Seafarers feel confident and are more willing to report directly to AMSA.

Table 2: Source of complaints 2021-2025

Source	2021	2022	2023	2024	2025
Fair Work Ombudsman	-	-	-	-	0
Family or friends of seafarer	-	-	-	-	5
Government agencies	10	18	9	10	10
ITF/MUA	54	40	27	19	22
Other[5]	35	20	20	17	15
Seafarer	171	159	134	109	102
Welfare group	9	24	24	18	13

The 'Family or friends of seafarer' category was added for the 2025 reporting period to present a more complete picture of the source of complaints received.

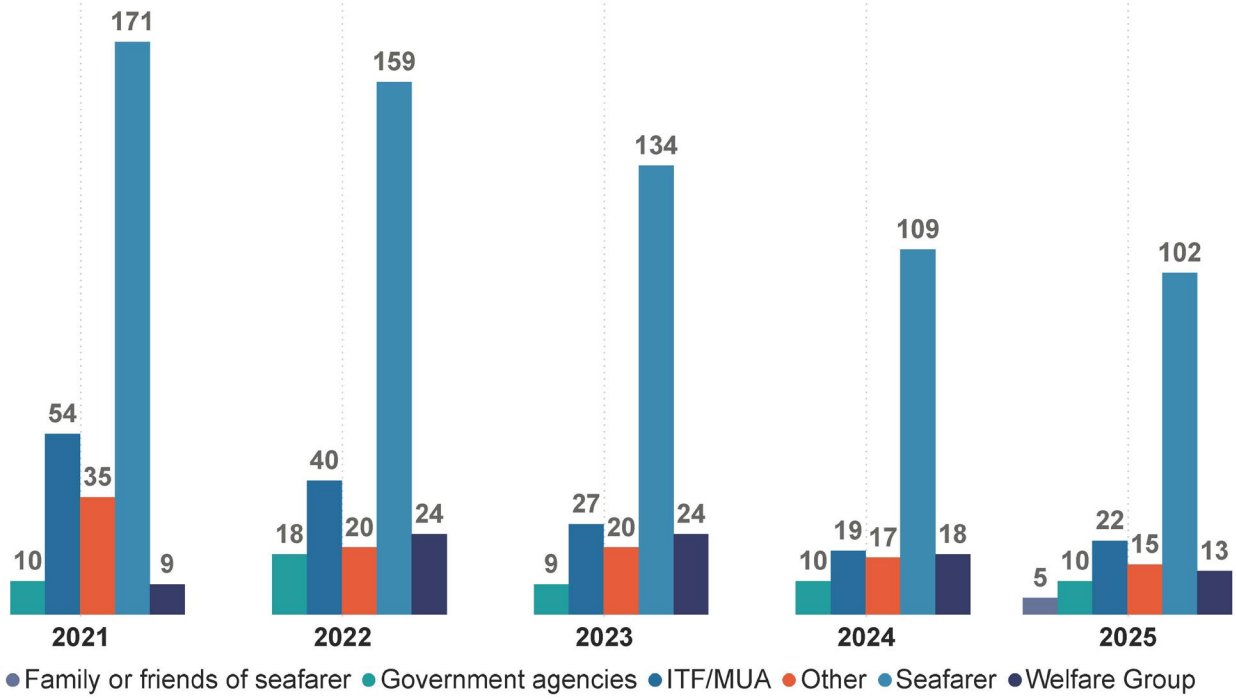


Figure 2: Breakdown of the source of complaints 2021-2025

Image description

[5] 'Other' (2021-2024) previously included complaints received from family or friends of affected seafarers.

Breakdown of complaints by State

Figure 3 shows complaints received broken down by the Australian state or territory in which the vessel arrived in 2025. Western Australia (34.63 per cent) and Queensland (25.06 per cent) represented the highest number of complaints. This reflects the number of vessel arrivals in 2025, with Western Australia and Queensland continuing to represent the majority of vessel arrivals.

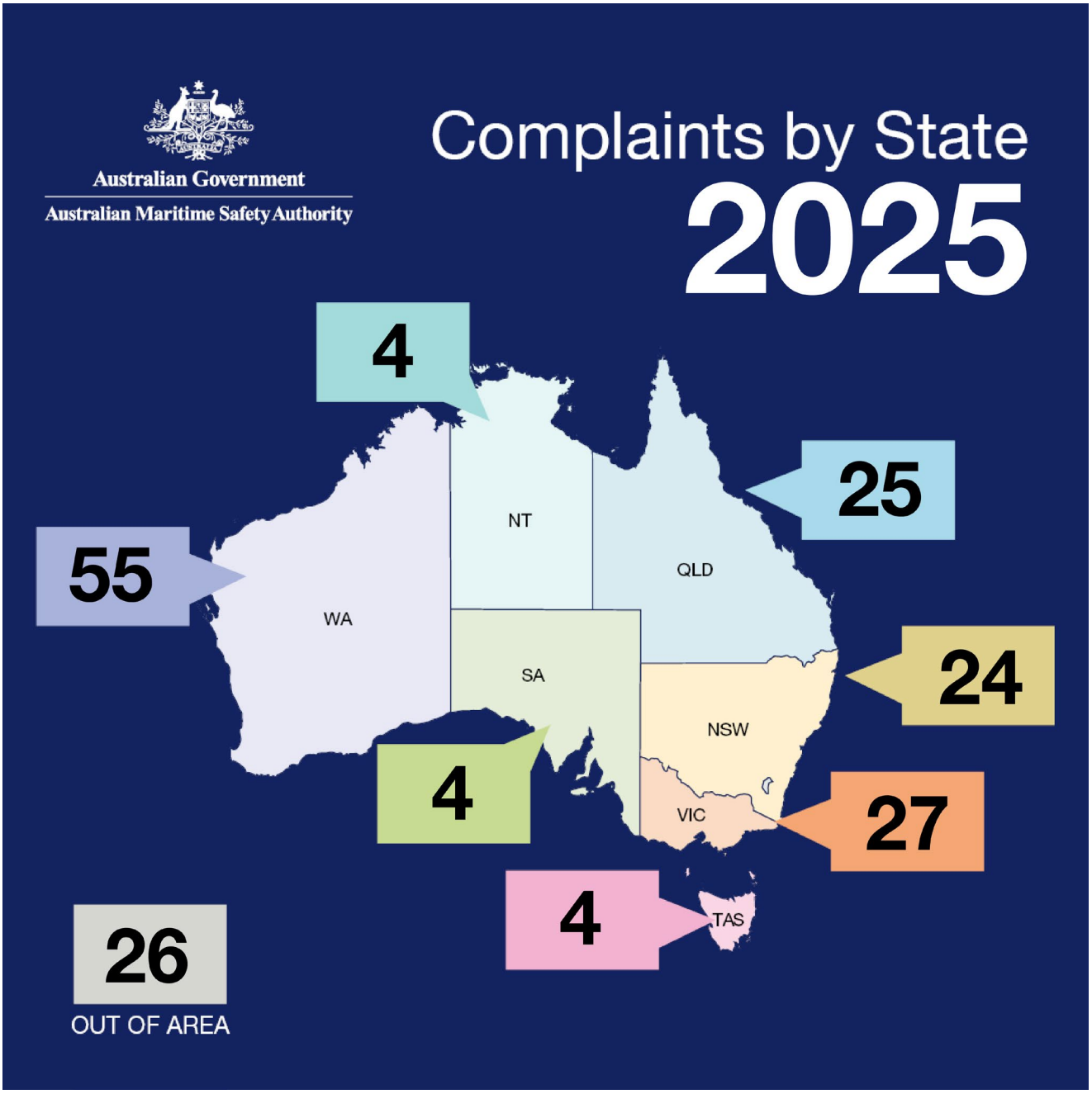


Figure 3 Number of complaints received by State for 2025[6]

Image description

[6] Complaints received from out of area, where the vessel is outside of Australian waters or not bound for an Australian port, AMSA refers the complaint to the flag State and/or the next port State of call

Breakdown of complaints by vessel type

In 2025, 58.58 per cent of complaints received were from seafarers engaged on bulk carriers as seen in Figure 4. This is a 6.12 per cent decrease from the 2024 complaints. Bulk carriers accounted for 51.8 per cent of all arrivals and 58 per cent of initial port State control (PSC) inspections[7].

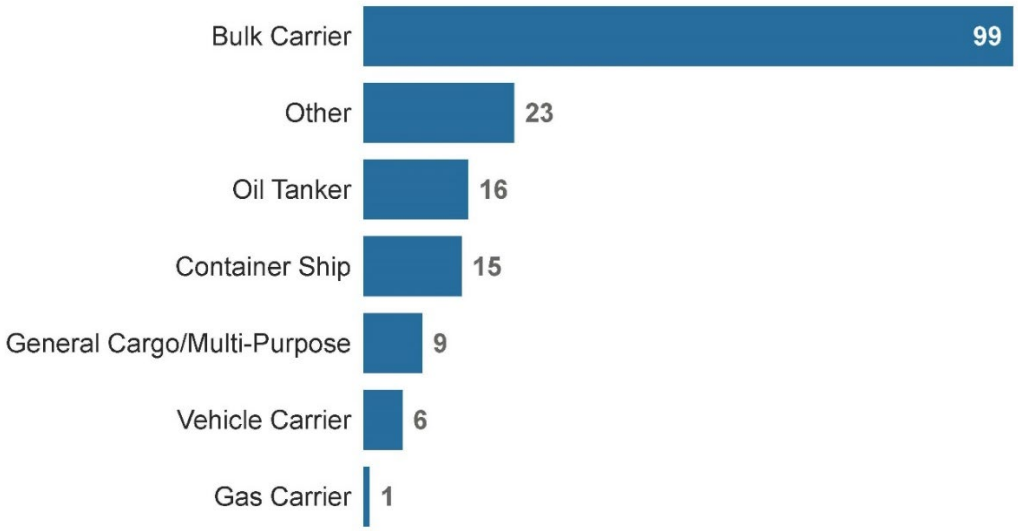


Figure 4: Breakdown of 2025 complaints by vessel type

Image description

Table 3 shows the breakdown of complaints by vessel type when unique arrivals for each vessel type is taken into consideration. This provides a better reflection of the complaint rate by vessel type. Containers, oil tankers, and general cargo/muti-purpose make up the top 3 complaints by vessel type.

Table 3: Percentage of MLC complaints by vessel type as a proportion of the unique arrivals for each vessel type

Vessel type	2021	2022	2023	2024	2025
Bulk carrier	4.5%	4.1%	3.1%	2.8%	2.4%
Chemical tanker	5.3%	2.3%	2.8%	2.3%	0%
Container ship	6.5%	9.2%	7.8%	3.4%	4.9%
Gas carrier	4.6%	3.5%	2%	1.9%	0.4%
General cargo/muti-purpose	4.9%	4.5%	3.6%	2.9%	3.1%
Livestock carrier	14.8%	4.2%	0	4.8%	0%

[7] Further information on AMSA's PSC activities is available in the 2025 AMSA Annual Inspections report.

Vessel type	2021	2022	2023	2024	2025
Oil tanker	2.3%	4.2%	3.2%	2.1%	3.1%
Vehicle carrier	1.4%	1.7%	3.0%	0.4%	2.7%
Other	4.5%	5.3%	4.6%	5.9%	5.7%

Breakdown of complaints by flag State

The flag States in Figure 5 and 6 accounted for 71.8 per cent of foreign flagged port arrivals in Australia and represented 82.2 per cent of complaints received from foreign flagged vessels in 2025. Figure 5 shows the distribution of complaints received from foreign flagged vessels by flag State for 2025.

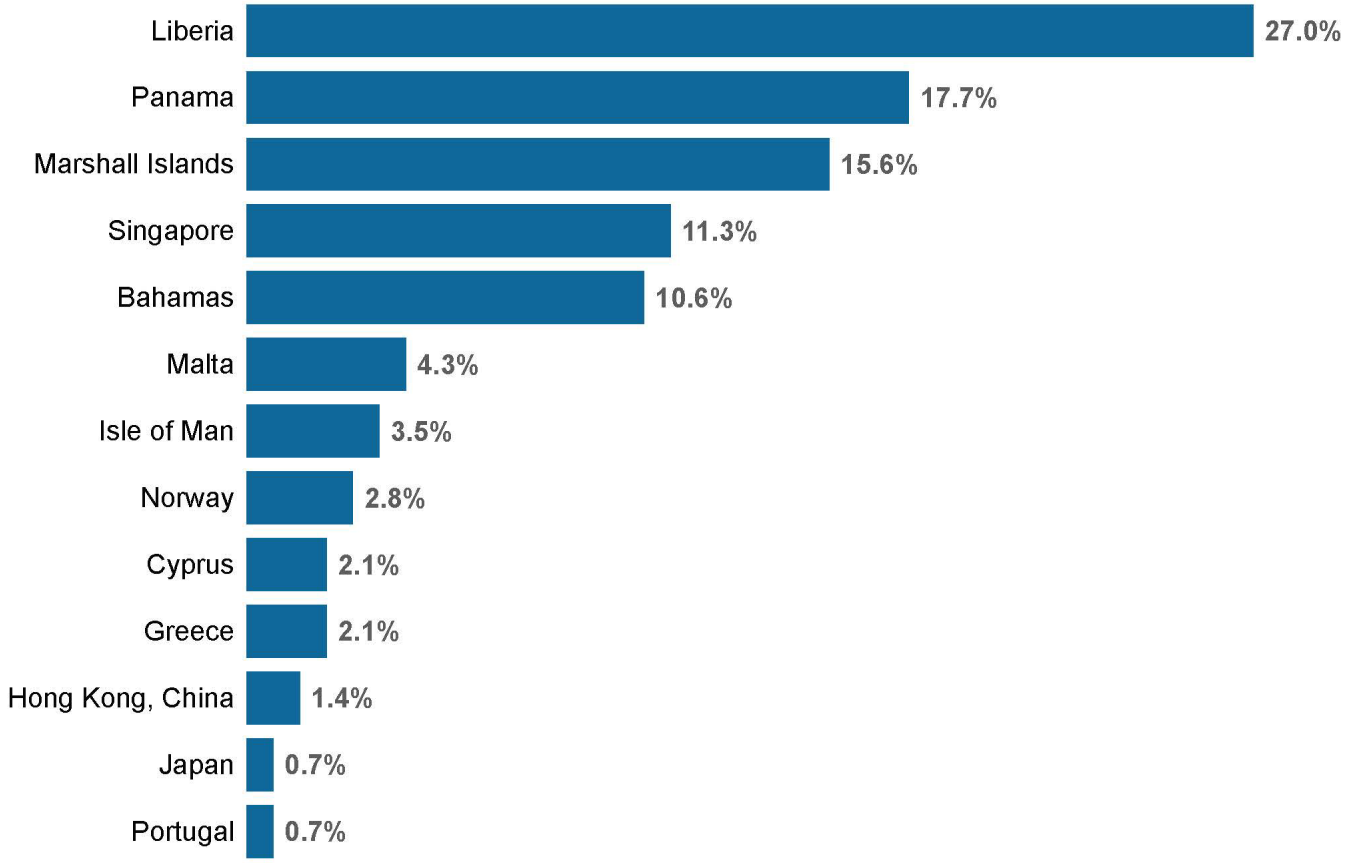


Figure 5: Data showing percent of complaints received by flag State for 2025

Image description

Figure 6 shows the distribution of complaints when the number of port arrivals for each flag state is taken into consideration[8]. The top 5 flag States are Isle of Man, Bahamas, Greece, Liberia, and Marshall Islands. These flag States generate a disproportionately higher number of complaints relative to their port arrival frequency, possibly indicating an elevated risk profile as compared to other flags.

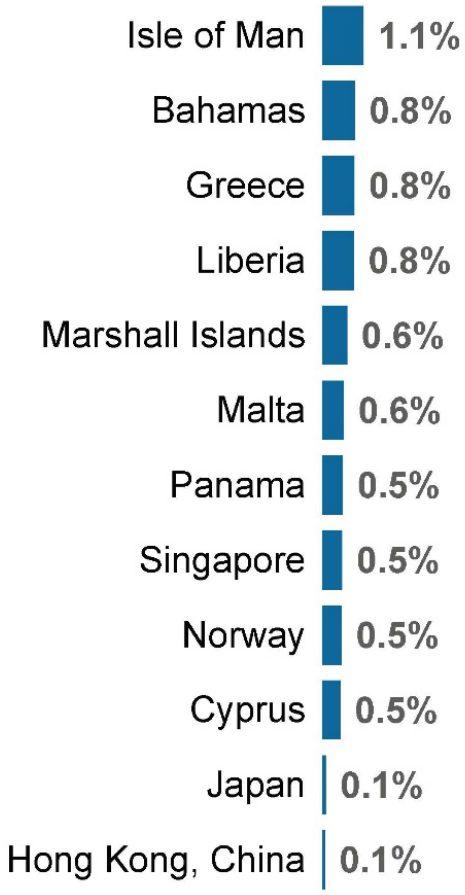


Figure 6: Data showing percent of complaints received as a proportion to port arrivals for each flag State for 2025

Image description

[8] Normalising the data by port arrivals provides for a better reflection of the complaint rate of vessels from different flag States.

Breakdown of complaints by MLC Titles

The main body of the MLC (the regulations and the code) is grouped into five main titles with complaints data coded accordingly.

Title 1 – Minimum requirements for seafarers to work on vessels

Title 2 – Conditions of employment

Title 3 – Accommodation, recreational facilities, food and catering

Title 4 – Health protection, medical care, welfare, and social security protection (including bullying and harassment)

Title 5 – Compliance and enforcement

Table 4 shows that complaints on Title 2 of the MLC - *Conditions of employment* continue to make up the majority of MLC complaints received. Numbers remain consistent across the years. AMSA will continue to monitor these trends and ensure compliance with the MLC is upheld by vessels visiting Australian ports.

Table 4: Breakdown of MLC complaints by title[9] 2021-2025

MLC Title	2021	2022	2023	2024	2025
Title 1 Minimum requirements	1	2	0	2	1
Title 2 Conditions of employment	292	234	169	167	167
Title 3 Accommodation, recreational facilities, food and catering	51	68	60	58	57
Title 4 Health protection, medical care, welfare, social security protection	88	100	81	84	63
Title 5 Compliance and enforcement	0	7	4	5	1

[9] An MLC complaint can include more than 1 concern, therefore more than 1 MLC Title can be assigned to the complaint.

Conditions of employment (Title 2)

In 2025, Title 2 complaints received related to seafarers' employment agreements and hours of work and rest increased in comparison with 2024 figures. As per Figure 7, complaints involving hours of work and rest were the most reported (30.3 per cent) for all Title 2 complaints, followed by wages (24.8 per cent).

Table 5: Title 2 complaints for 2021-2025

MLC Regulation (Title 2)	2021	2022	2023	2024	2025
2.1 Seafarers' employment agreements	83	41	28	34	40
2.2 Wages	71	58	42	49	41
2.3 Hours of work and hours of rest	32	37	45	42	50
2.4 Entitlement to leave	0	39	31	10	9
2.5 Repatriation	104	56	23	32	23
2.7 Crewing levels	2	3	0	0	2

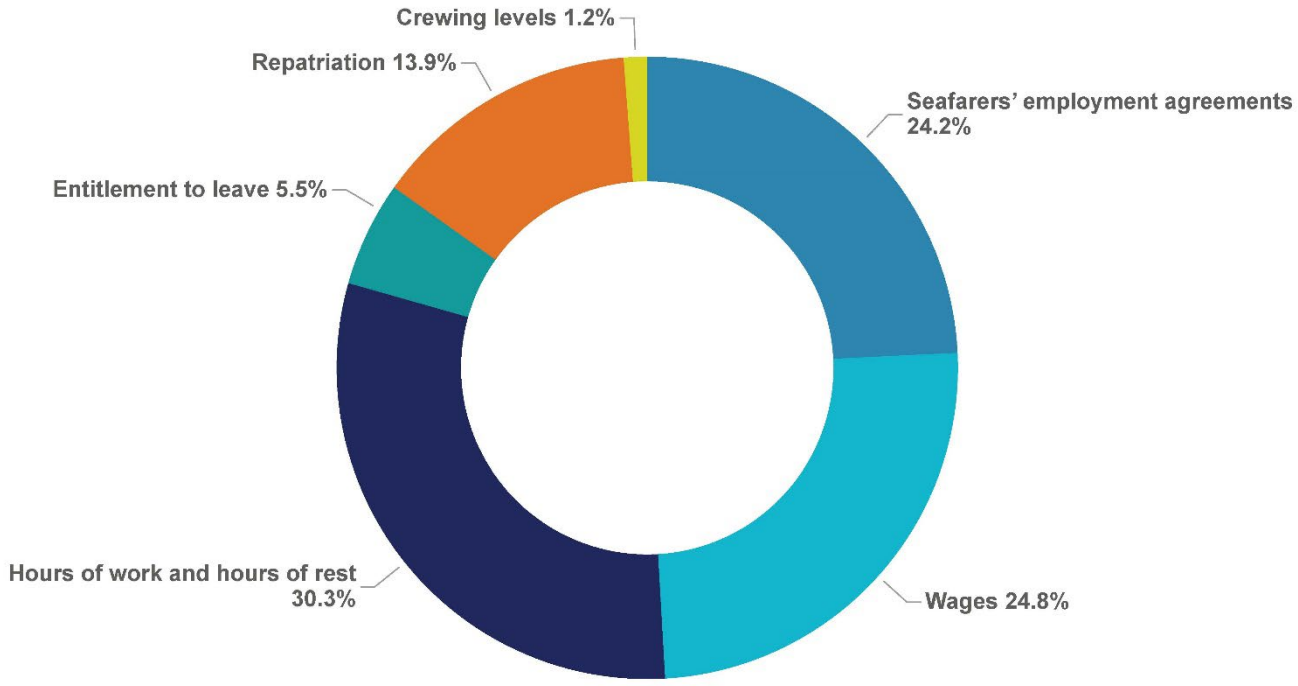


Figure 7: Title 2 percent of complaints by regulation for 2025

Image description

Health protection, medical care, welfare, social security protection (Title 4)

In 2025 Title 4 complaints received decreased in comparison to 2024. As per Figure 8, most of the complaints (84.1 percent) received for Title 4 were health and safety protection and accident protection, followed by medical care on board ships and ashore (12.7 percent). The numbers have remained consistent across the years.

Table 6: Title 4 complaints for 2021-2025

MLC Regulation (Title 4)	2021	2022	2023	2024	2025
4.1 Medical care on board ship and ashore	29	25	12	19	8
4.2 Shipowners' liability	1	1	1	1	1
4.3 Health and safety protection and accident protection[10]	54	72	63	60	53
4.4 Access to shore-based welfare facilities	1	1	5	4	1
4.5 Social Security	0	1	0	0	0

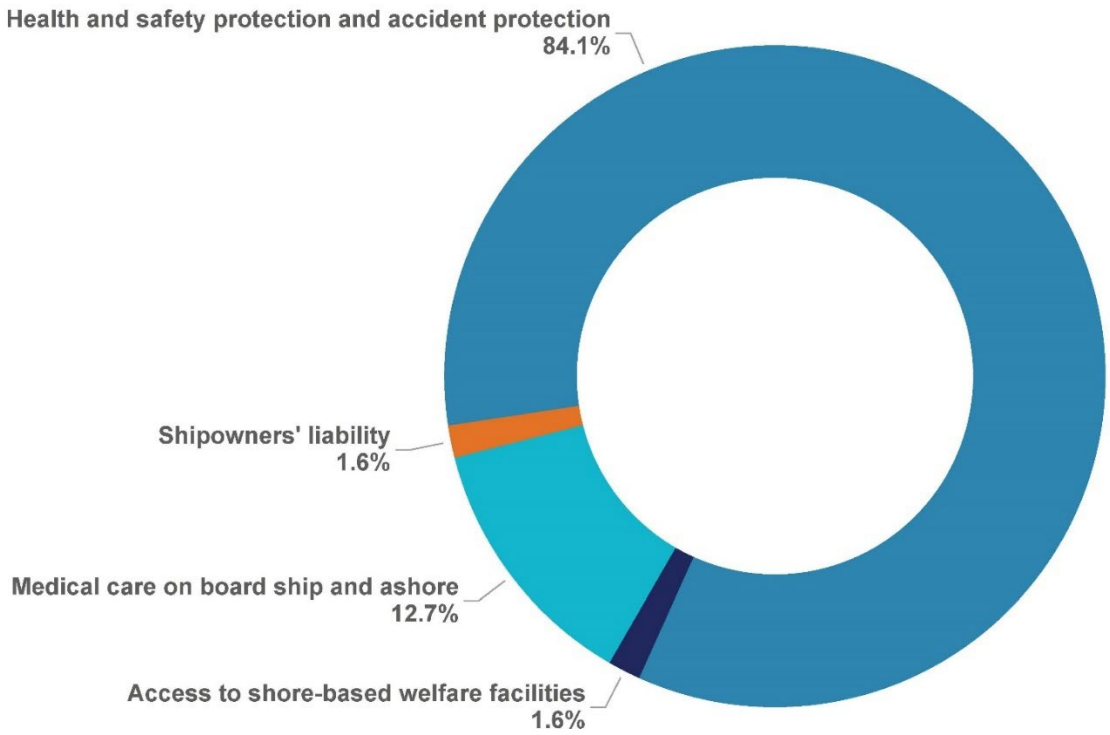


Figure 8: Title 4 percent of complaints by regulation for 2025

Image description

[10] Regulation 4.3 Health and safety protection and accident protection include bullying and harassment.

Breakdown of complaints by outcome

AMSA endeavours to investigate all reported MLC complaints —and has done so—except in cases where the vessel is outside of Australian waters or not bound for an Australian port and therefore beyond the regulatory oversight of AMSA. In those situations, AMSA refers the complaint to the flag State of the vessel and/or the next port State.

AMSA may also place alerts on the vessel to ensure the complaint is followed up when the vessel next arrives in Australia. In all cases we aim to ensure the confidentiality of the seafarer making the complaint. Where AMSA refers information to the flag State or next port State, we expect that similar steps are taken to ensure the confidentiality of the complainant, consistent with the requirements of the MLC, Title 5.

Figure 9 provides a breakdown of the actions taken[11]. The figures remain consistent, with a slight increase in deficiencies being issued from 17.3% in 2024 to 19.5% in 2025.

We continue to receive complaints outside of our jurisdiction that originate from foreign flagged vessels that are not in Australian waters or on a voyage to Australia which resulted in referrals to the respective flag State. This is likely due to the reputation Australia has regarding seafarer welfare. Australia is supportive of flag States taking effective action to resolve seafarer complaints and continues to work with flag States where appropriate.

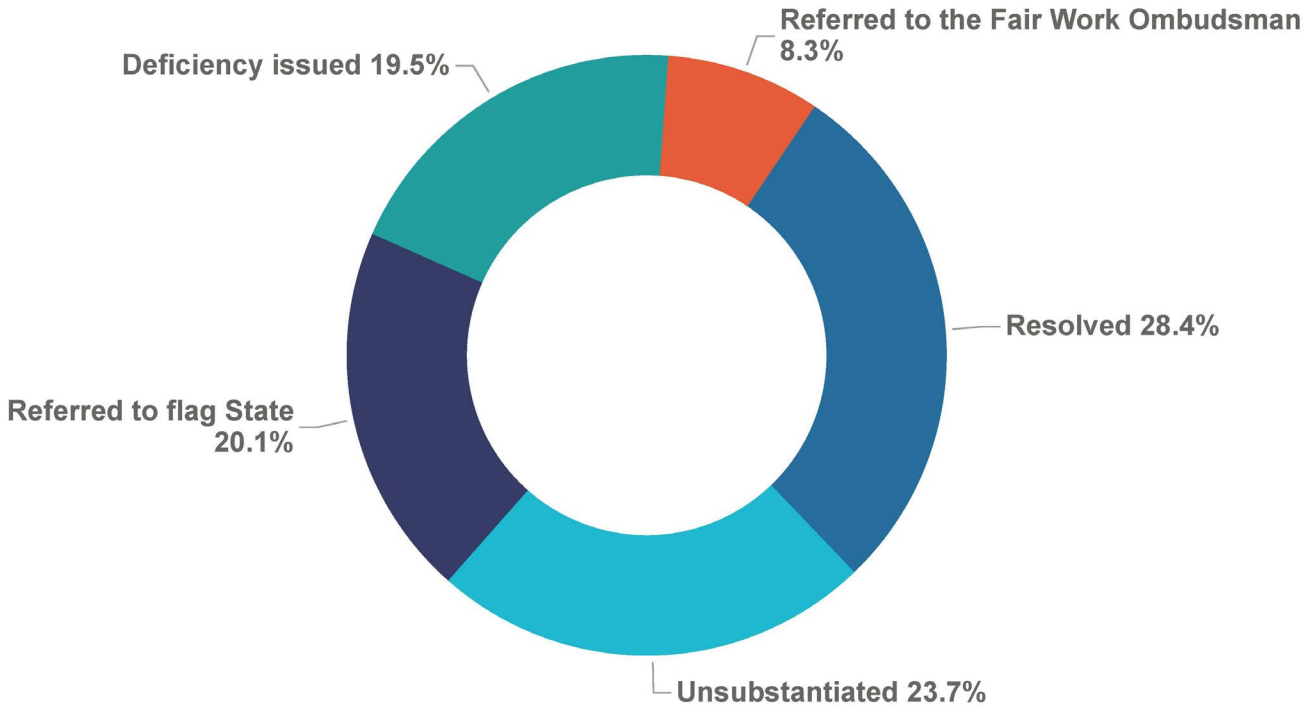


Figure 9: Breakdown of complaints by outcomes for 2025

Image description

[11] The 'Referred to the Fair Work Ombudsman' category was added for the 2025 reporting period as part of the collaboration between AMSA and FWO to ensure wage complaints under the Fair Work Act are addressed accordingly.

Actions taken

AMSA may refuse vessel access to Australia where there are significant concerns about the performance of vessels and/or they pose an increased risk to seafarers, other vessels or the marine environment. AMSA expects ships to be able to demonstrate full compliance with the requirements of the MLC and has issued direction notices refusing vessels access to Australian ports for systemic non-compliance with the MLC. A list of vessels refused access to Australian ports and given warnings is available on the AMSA website: Refusal of access list and letters of warning list.

Since 2018, a total of 29 vessels has been issued with a direction notice refusing them access to Australian ports. Of these vessels, 14 were banned[12] for serious breaches of the MLC primarily relating to underpayment of wages, decent working and living conditions and inadequate provisions. No vessels were banned in 2025.

Figure 10 shows that in 2025, follow up investigations of MLC complaints resulted in 39 vessels being issued with MLC-related deficiencies, five of which were detained[13].

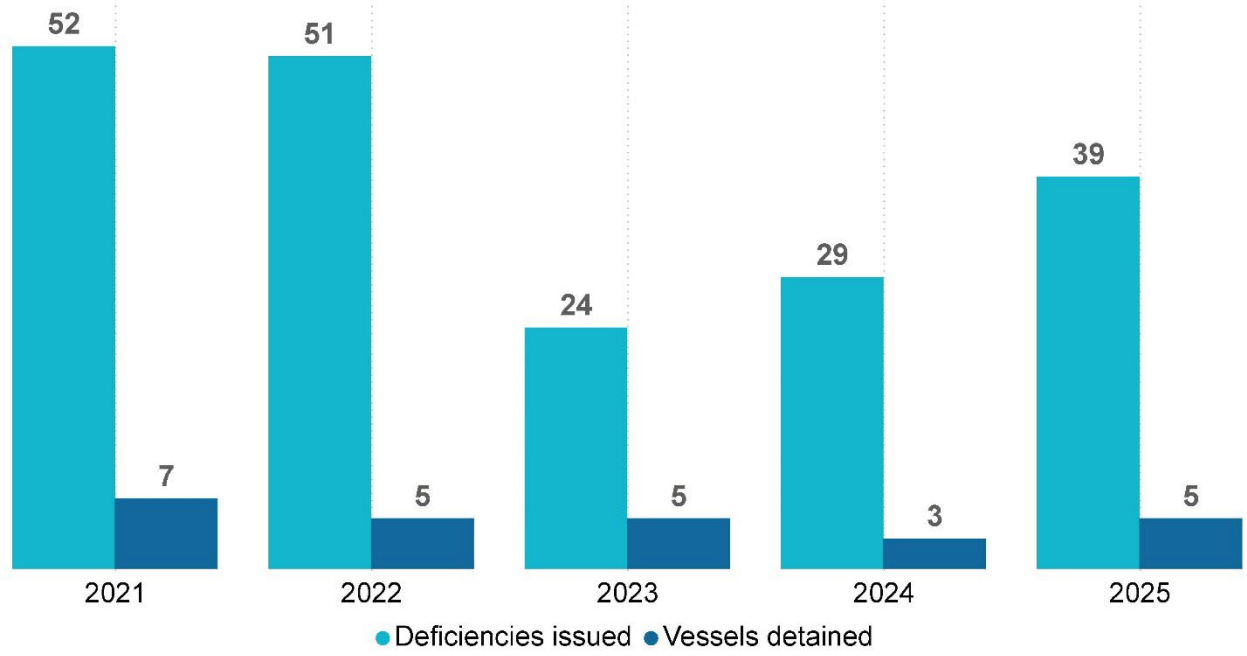


Figure 10: Number of MLC complaints resulting in deficiencies issued and vessels detained between 2021-2025

Image description

[12] Further information about previous bans is available on the AMSA website.
[13] During the follow up investigations of MLC complaints, one vessel was also detained for deficiencies other than MLC.

Case studies

SEACON YOKOHAMA

In June 2025, AMSA received a complaint from a seafarer alleging unpaid wages and excessive work demands without adequate rest.

AMSA attended the vessel and found that while company records showed that full wages had been paid in accordance with Seafarer Employment Agreements, evidence from crew bank statements revealed significantly lower amounts were received by the crew. Further investigation found that a crewing agent had made unauthorised deductions and issued falsified banking documentation. Some seafarers had also paid unlawful recruitment-related fees prior to joining the vessel. In addition, disciplinary fines had been imposed on crew in a manner inconsistent with the Collective Bargaining Agreement.

The vessel was detained as a result of these findings, with the complainant expressing positive feedback regarding AMSA's actions and resolution of the matter.

NAVIOS RAY

In July 2025, AMSA received a complaint from the Mission to Seafarers alleging concerns from the seafarers regarding excessive workload, insufficient rest, lack of wage documentation, restricted access to cash advances, and the crew having to purchase their own drinking water.

AMSA conducted an inspection and found evidence that cash advances were not being offered proactively or regularly, limiting seafarer access to funds. Evidence also indicated undue influence by the Master affecting crew practices.

These matters were recorded as deficiencies. The complaint was closed following corrective action.

HL MIDLAND

In September 2025, AMSA received a complaint regarding a lack of fresh fruit and vegetables onboard a vessel.

The vessel's Master initially indicated that provisions had been ordered. However, no updates were provided. AMSA attended the vessel and found evidence that fresh produce onboard was insufficient for the vessel's upcoming voyage.

The Master advised the order had been cancelled due to logistical constraints at the berth. AMSA determined that proceeding to sea without adequate provisions was unacceptable and issued a deficiency requiring rectification prior to departure. Arrangements were subsequently made for delivery of fresh provisions to the vessel at anchorage.

The deficiency was identified as a repeat occurrence within a two-month period. An additional ISM-related deficiency was issued, requiring the company to implement effective corrective actions to prevent recurrence.

Reported serious injuries and fatalities

Serious injuries 2021-2025

Since 2021, there were a total of 329 serious seafarer injuries[14] reported to AMSA from foreign flagged vessels in Australian waters and regulated Australian vessels. In 2025, 45 serious seafarer injuries were reported to AMSA, making up 27.78 per cent of all reported seafarer injuries.

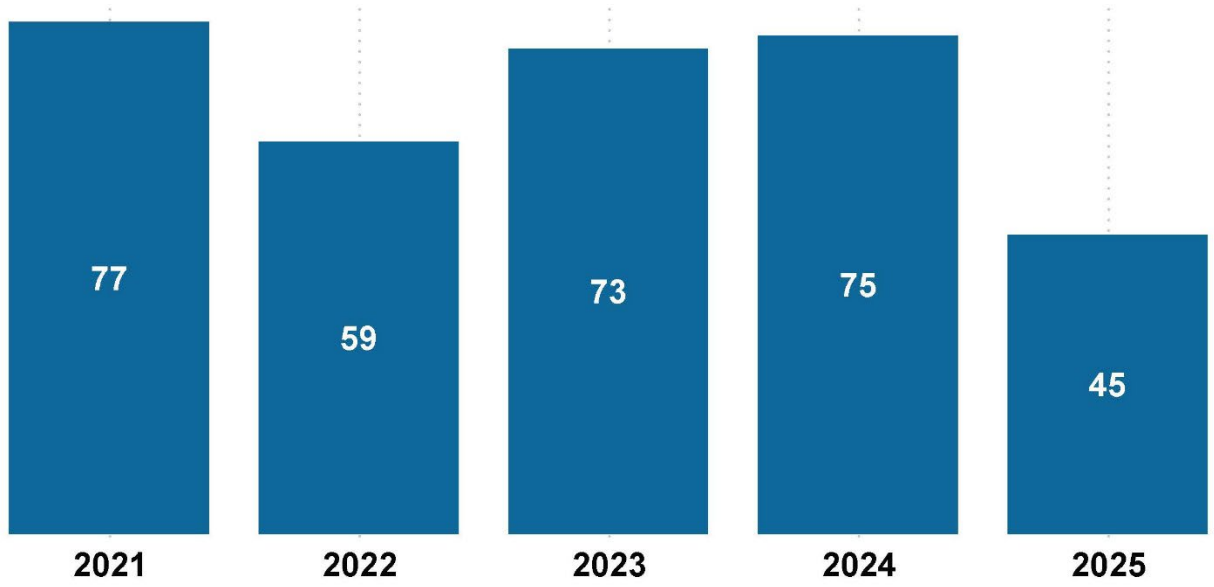


Figure 11 shows the number of serious seafarer injuries reported to AMSA between 2021 and 2025.

Image description

Table 7 shows a breakdown of the number of serious seafarer injuries reported by regulated Australian vessels and foreign-flagged vessels. It should be noted that regulated Australian vessels report to AMSA regardless of their geographical location. Foreign-flagged vessels are only required to report injuries that occur in Australian waters.

Table 7: Breakdown of serious crew injuries by regulated Australian vessels and foreign-flagged vessels, 2021-2025

Vessel	2021	2022	2023	2024	2025
Regulated Australian vessel	18	14	11	11	5
Foreign Flagged vessel	59	45	62	64	40

[14] Serious seafarer injury is defined as a seafarer involved in a marine incident suffers any injury requiring admission to hospital, or a seafarer involved in a marine incident suffers any injury which results in them being unable to return to their work onboard the ship.

Fatalities 2021-2025

AMSA categorises all fatalities (deaths at sea) according to the taxonomy[15] below as required under the MLC:

- Operational
- Illness/disease
- Person overboard (presumed deceased)
- Suicide
- Other

Seafarer fatalities reported to AMSA from 2021-2025 includes fatalities involving foreign-flagged vessels which occurred within the Australian Exclusive Economic Zone (EEZ)[16] and fatalities involving regulated Australian vessels (RAV) which occurred within and outside of the Australian EEZ.

In 2025, there were a total of 7 fatal marine incidents which resulted in 7 seafarer fatalities reported to AMSA. All 7 seafarer fatalities were illness related. 6 occurred on foreign flagged vessels and one on a regulated Australian vessel[17]. No operational-related fatalities were reported for 2025.

It is a requirement to report annually to the Director-General of the International Labour Office (ILO) for all deaths of seafarers working on a RAV (MLC, Standard A4.3). For 2025, AMSA reported 1 fatality (Master) on a RAV due to illness.

Table 8 Reported fatal marine incidents and seafarer fatalities involving foreign flagged vessels within the Australian EEZ, 2021-2025

Foreign Flagged Vessel	2021	2022	2023	2024	2025
Number of fatal marine incidents	11	8	5	11	6
Number of fatalities (seafarer)	11	8	5	11	6

Table 9 Reported seafarer fatalities by type involving foreign flagged vessels within the Australian EEZ, 2021-2025

Reported seafarer fatalities by type	2021	2022	2023	2024	2025
Illness/disease	7	7	2	8	6
Operational	1	1	1	1	0
Other	0	0	0	0	0
Person Overboard	0	0	0	2	0
Suicide	3	0	2	0	0

[15] Refer to the glossary of the report.
[16] The Exclusive Economic Zone (EEZ) is an area beyond and adjacent to the territorial sea. The outer limit of the exclusive economic zone cannot exceed 200M from the baseline from which the breadth of the territorial sea is measured. The Australian EEZ is defined in the *Seas and Submerged Lands Act 1973* ('the SSL Act').
[17] No seafarer fatalities onboard regulated Australian vessels were reported to AMSA between 2021 and 2024.

Fatality rate

In 2025, the fatality rate[18] for regulated Australian vessels was 0. This is lower than the Australian national fatality five-year average rate of 1.4[19] [20]. No operational-related fatalities onboard regulated Australian vessels were reported to AMSA between 2021 and 2025.

[18] 'Fatality rate' is generally defined as the number of traumatic injury fatalities per 100,000 workers by Safe Work Australia.
[19] Safe Work Australia, Key Work Health and Safety Statistics Australia, 2025
[20] As noted by the SafeWork Australia's Work-related, traumatic injury fatalities Australia 2021 report, fatality rates are sensitive to the number of people employed in the industry and this may be particularly evident with small variation in the number of fatalities for smaller industries that employ fewer employees. Therefore, the actual number of fatalities needs to be considered when interpreting the data involving fatality rates.

MLC - flag State and port State control[21]

Flag and port State control (FSC and PSC) inspections are conducted in accordance with the International Maritime Organization's (IMO) and International Labour Organization's (ILO) requirements. Primarily, compliance activities may involve issuing deficiencies or a detention (a prohibition on the vessel being allowed to depart the port).

When investigating an MLC complaint, AMSA may attend onboard to conduct an MLC inspection. Where this inspection identifies deficiencies, AMSA will then undertake a port or flag State control inspection, and this will likely include a more detailed inspection.

In 2025, AMSA conducted a total of 2,769 initial PSC inspections resulting in 133 detentions (12 of which were MLC-related).

It is important to note that MLC compliance is one element forming part of all FSC and PSC inspections. During inspections, AMSA will take action if necessary, which includes issuing MLC deficiencies for breaches against the MLC.

For RAVs a total of 39 deficiencies were issued in 2025 following an FSC inspection as seen in Figure 12.

Figure 13 shows the number of MLC deficiencies issued following PSC and the deficiency rate over total number of initial inspections. In 2025, a total of 1,185 MLC deficiencies were issued following a PSC inspection.

In 2025, AMSA detained 12 foreign flag vessels for breaches against the MLC as seen in Figure 14. No regulated Australian vessel was detained for breaches against the MLC.

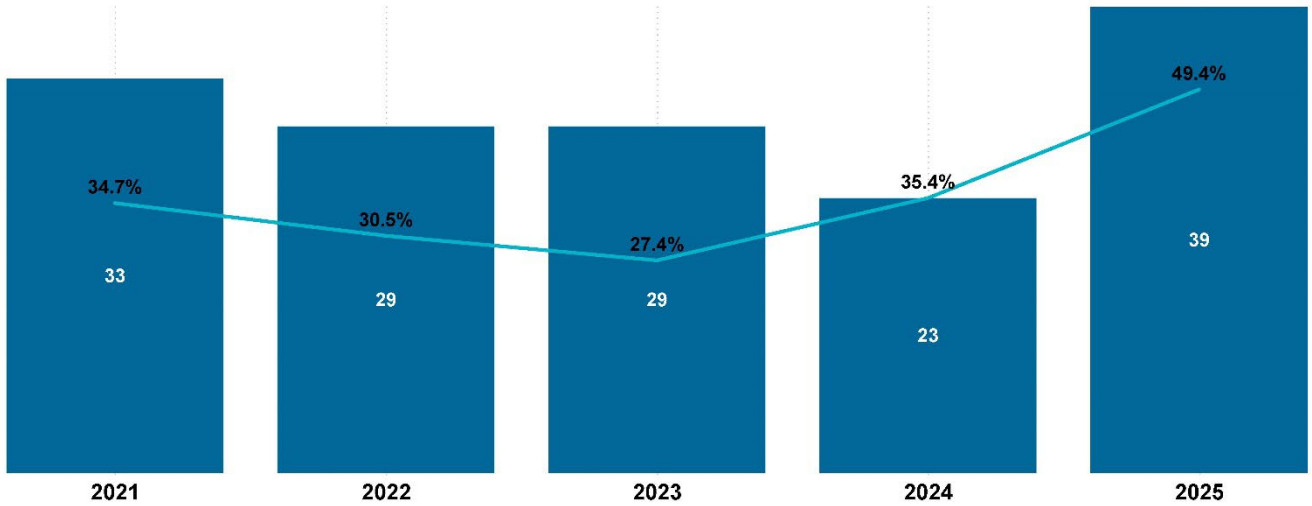


Figure 12 MLC deficiencies issued following a FSC inspection per year, 2021-2025.

Image description

[21] Further information on AMSA's PSC and FSC activities are available in the 2025 AMSA Annual Inspections report

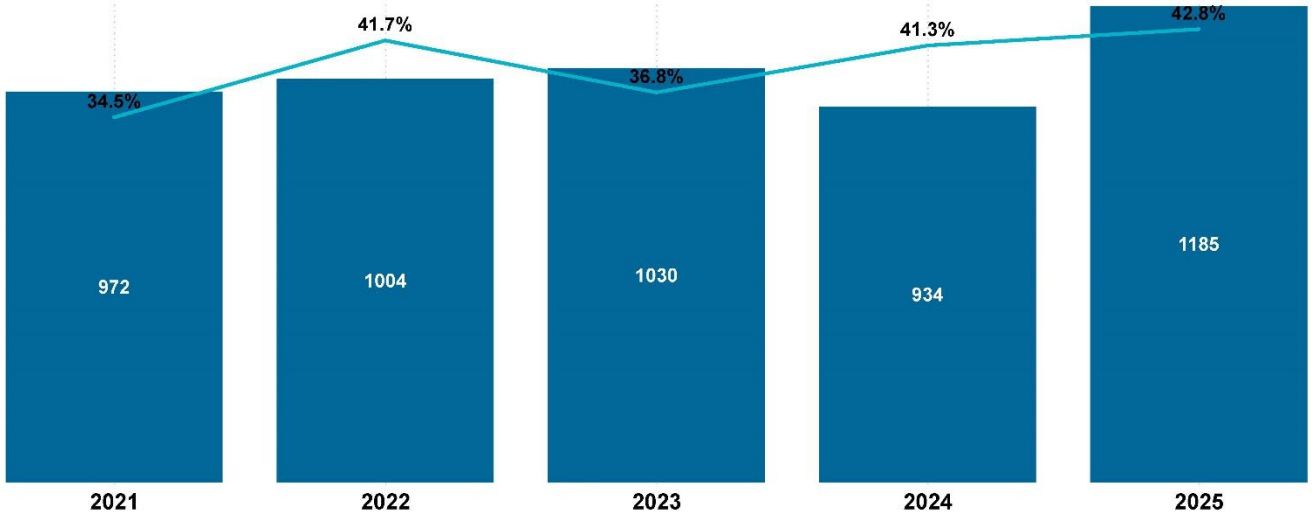


Figure 13 MLC deficiencies issued following a PSC inspection per year, 2021-2025.
Image description

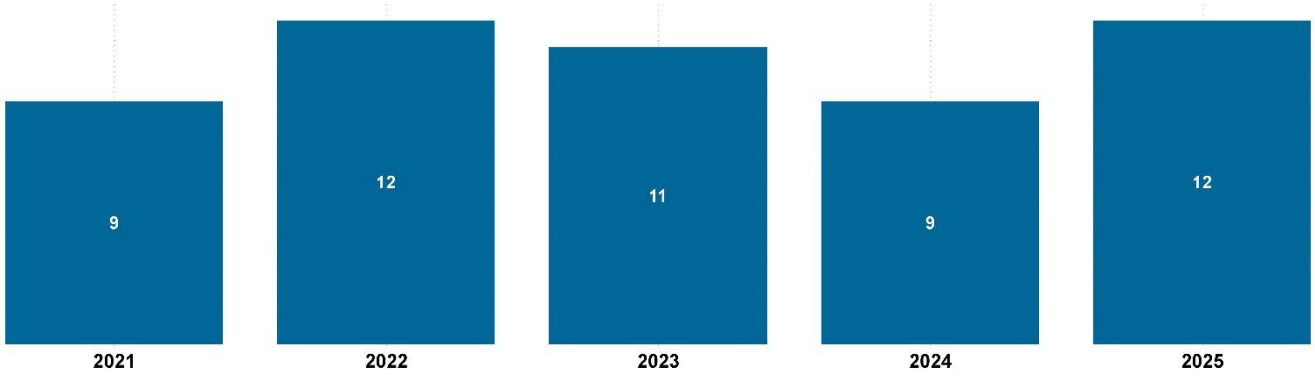


Figure 14 Number of PSC MLC related detentions per year 2021-2025
Image description

FSC MLC deficiency by Title

In 2025, a total of 79 initial FSC inspections were carried out. 39 MLC deficiencies were issued across a total of 19 regulated Australian vessels (eight vessels with one deficiency, five vessels with two deficiencies and six vessels with more than two deficiencies).

Figure 15 shows a breakdown of MLC deficiencies by MLC Title issued during FSC inspections on regulated Australian vessels with *Title 4 - Health Protection, medical care, welfare and social security protection* representing the highest number at 32 deficiencies.

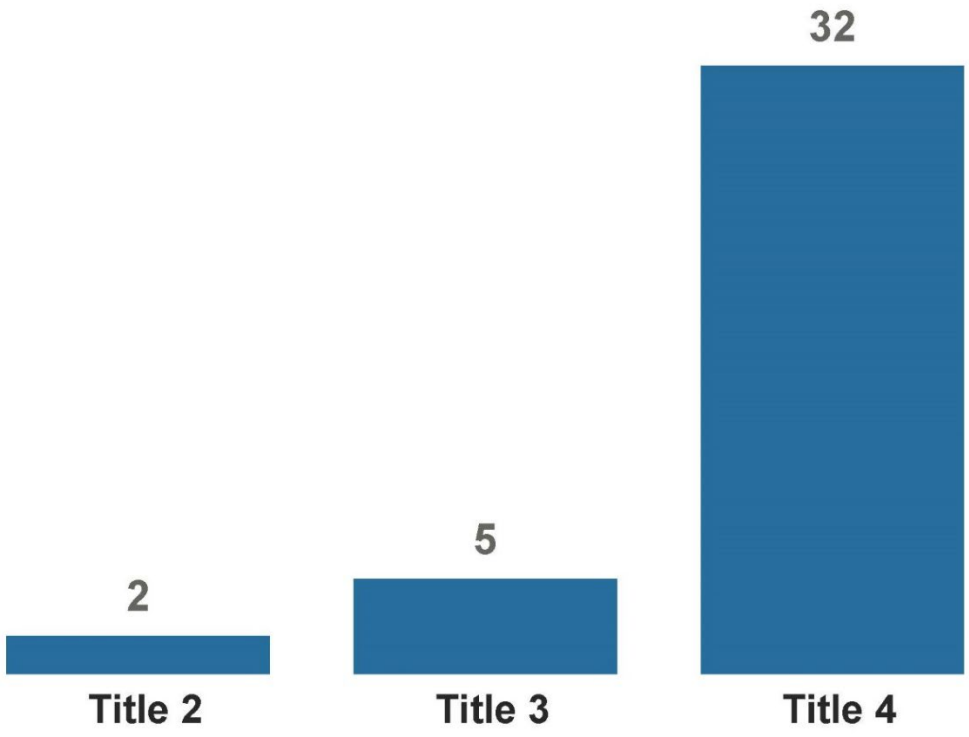


Figure 15 FSC MLC deficiencies by MLC Titles, 2025

Image description

PSC MLC deficiency by Title

Figure 16 shows the number of PSC MLC deficiencies issued by MLC title in 2025, originating from a complaint or a PSC inspection.

While most of the MLC complaints received were for Title 2 – Conditions of employment (as per Table 3), PSC inspections identified *Title 4 - Health protection, medical care, welfare and social security protection* (724) as the most frequently issued MLC deficiency on foreign-flagged vessels, followed by *Title 3– Accommodation, recreational facilities, food and catering* (342) and *Title 2 – Conditions of employment* (105).

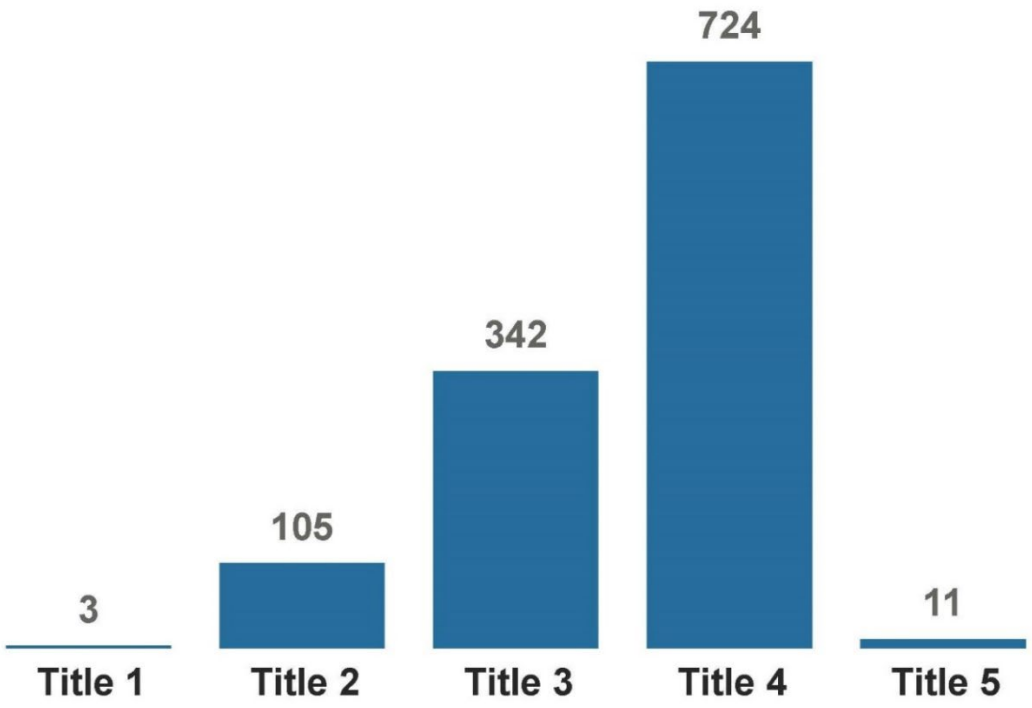


Figure 16 PSC MLC deficiencies by MLC Titles, 2025

Image description

AMSA continues to identify and issue deficiencies primarily under Title 4 during inspections. This contrasts with the profile of complaints received, which predominantly relate to Title 2. This divergence suggests that the MLC complaints mechanism is effective in capturing issues related to working and living condition—such as wage underpayment—that are not readily observable during inspections.

Glossary

Fatality Type	Definition
Operational	Fatality that occurred in relation to the operation of the vessel.
Illness/disease	Any death of a seafarer on a vessel resulting from any illness or disease that is not the result of an occupational injury. Includes deaths from natural causes where the death is a natural progression from disease[22].
Person Overboard (Presumed Deceased)	Any loss of a seafarer resulting from unintentional departure from the vessel into the water where the seafarer's body is not recovered.
Suicide	Any death of a seafarer on a vessel where the death resulted from a self-inflicted injury[23].
Other	Any deaths of a seafarer resulting from events of undetermined intent (e.g. poisoning, alcohol, accidental overdose of drug, wrong drug/medicaments given or taken in error).

[22] Refer to the ILO list of occupational diseases (revised 2010), available at: https://www.ilo.org/publications/ilo-list-occupational-diseases-revised-2010

[23] Use of term *injury* rather than harm as this is consistent with ILO definition of occupational injury (which includes fatal injuries).

Tabled Trends

Figure 1: MLC complaints received by year

Figure 1 is a bar graph showing the number of MLC complaints as well as the 5-year rolling average. The figures in that graph are represented in the table below:

	MLC complaints received	**5 year rolling average**
2021	279	214.2
2022	261	237.4
2023	214	244.4
2024	173	249.4
2025	169	219.2

Figure 2: Breakdown by source of complaints 2021-2025

Figure 2 is a bar graph showing the breakdown by source of the complaints 2021-2025
The figures in that graph are represented in the table below:

	Fair Work Ombudsman	**Family or friends of seafarer**	**Government agencies**	**ITF/MUA**	**Other**	**Seafarer**	**Welfare Group**
2021	–	–	10	54	35	171	9
2022	–	–	18	40	20	159	24
2023	–	–	9	27	20	134	24
2024	–	–	10	19	17	109	18
2025	0	5	10	22	15	102	13

Figure 3 Number of complaints received by State for 2025

Figure 3 is an infographic that shows the breakdown of MLC complaints received by state for 2025. The figures in the infographic are represented in the table below:

State	Number
NT	4
TAS	4
SA	4
VIC	27
NSW	24
Out of Area (Outside EEZ)	26
QLD	25
WA	55

Figure 4: Breakdown of 2025 complaints by vessel type

Figure 4 is a bar graph that shows the breakdown of complaints by vessel type for 2025 as follows:

- Bulk carrier – 99
- Other – 23
- Oil tanker – 16
- Container ship – 15
- General cargo/multi-purpose – 9
- Vehicle carrier – 6
- Gas carrier – 1

Figure 5: Data showing percent of complaints received by flag State for 2025

Figure 5 is a bar graph showing the percent of complaints received by flag State for 2025 as follows:

- Liberia – 27.0%
- Panama – 17.7%
- Marshall Islands – 15.6%
- Singapore – 11.3%
- Bahamas – 10.6%
- Malta – 4.3%
- Isle of Man – 3.5%
- Norway – 2.8%
- Cyprus – 2.1%
- Greece – 2.1%
- Hong Kong – 1.4%
- Japan – 0.7%
- Portugal – 0.7%

Figure 6: Data showing percent of complaints received as a proportion to port arrivals for each flag State for 2025

Figure 6 is a bar graph showing percent of complaints received as a proportion to port arrivals for each flag State for 2025 as follows:

- Isle of Man – 1.1%
- Bahamas – 0.8%
- Greece – 0.8%
- Liberia – 0.8%
- Marshall Islands – 0.6%
- Malta – 0.6%
- Panama – 0.5%
- Singapore – 0.5%
- Norway – 0.5%
- Cyprus – 0.5%
- Japan – 0.1%
- Hong Kong, China – 0.1%

Figure 7 Title 2 complaints by percentage of regulation for 2025

Figure 7 is a pie chart indicating Title 2 complaints by percentage of regulation for 2025
The figures displayed in the graph are as follows:

- Hours of work and hours of rest – 30.3%
- Wages – 24.8%
- Seafarers' employment agreements - 24.2%
- Repatriation – 13.9%
- Entitlement to leave – 5.5%
- Crewing levels – 1.2%

Figure 8 Title 4 complaints by percentage of regulation for 2025

Figure 8 is a pie chart displaying Title 4 complaints by percentage of regulation for 2025
The figures displayed in the graph are as follows:

- Health and safety protection and accident protection – 84.1%
- Medical care on board ship and ashore – 12.7%
- Access to shore-based welfare facilities – 1.6%
- Shipowners' liability – 1.6%

Figure 9 Breakdown of complaints by outcomes for 2025

Figure 9 is a pie chart displaying the Breakdown of complaints by outcomes for 2025

The figures displayed in the graph are as follows:

- Resolved – 28.4%
- Unsubstantiated – 23.7%
- Referred to flag State – 20.1%
- Deficiency issued – 19.5%
- Referred to the Fair Work Ombudsman – 8.3%

Figure 10: Number of MLC complaints resulting in deficiencies issued or vessel detention between 2021-2025

Figure 10 is a bar graph showing the number of deficiencies issued verses the number of Vessels detained between 2021 and 2025.

The statistics shown on the graph are as follows:

	Deficiencies issued	**Vessels detained**
2021	52	7
2022	51	5
2023	24	5
2024	29	3
2025	39	5

Figure 11 shows the number of serious seafarer injuries reported to AMSA between 2021 and 2025.

Figure 11 is a bar graph that shows the number of serious seafarer injuries reported to AMSA between 2021 and 2025.

The figures in that graph are listed below:

- 2021 – 77
- 2022 – 59
- 2023 – 73
- 2024 – 75
- 2025 – 45

Figure 12 MLC deficiencies issued following a FSC inspection per year, 2021-2025.

Figure 12 shows the total number of MLC deficiencies issued following a FSC inspection per year including MLC deficiencies per inspection for the years 2021 to 2025.

The data for that graph is in the table below:

	Deficiencies	**Deficiency rate per total inspections**
2021	33	34.7%
2022	29	30.5%
2023	29	27.4%
2024	23	35.4%
2025	39	49.4%

Figure 13 MLC deficiencies issued following a PSC inspection per year, 2021-2025.

Figure 13 represents the total number of MLC deficiencies issued following a PSC inspection per year including MLC deficiencies per inspection for the years 2021 to 2025.

The data for that graph is in the table below:

	Deficiencies	**Deficiency rate per total inspections**
2021	972	34.5%
2022	1004	41.7%
2023	1030	36.8%
2024	934	41.3%
2025	1185	42.8

Figure 14 Number of PSC MLC related detentions per year 2021-2025

Figure 14 represents the number of PSC MLC related detentions per year in the years 2021 to 2025 Those figures are listed below:

- 2021 – 9
- 2022 – 12
- 2023 – 11
- 2024 – 9
- 2025 – 12

Figure 15 FSC MLC deficiencies by MLC Titles, 2025

Figure 15 shows FSC MLC deficiencies by MLC title for 2025.

Those figures are listed below:

- Title 1 – 0
- Title 2 – 2
- Title 3 – 5
- Title 4 – 32
- Title 5 – 0

Figure 16 PSC MLC deficiencies by MLC Titles, 2025

Figure 16 shows PSC MLC deficiencies by MLC title for 2025.

Those figures are listed below:

- Title 1 – 3
- Title 2 – 105
- Title 3 – 342
- Title 4 – 724
- Title 5 – 11

amsa.gov.au