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Report of the 2024 Concentrated Inspection Campaign (CIC) on MLC, 2006



EXECUTIVE SUMMARY

From 1 September 2024 to 30 November 2024, the Black Sea MoU carried out a Concentrated Inspection Campaign (CIC) on Crew Wages and Seafarer Employment Agreement under the Maritime Labour Convention (MLC, 2006). The campaign involved member Authorities of the Black Sea MoU that have ratified the MLC, 2006. This CIC was conducted in conjunction with the Paris and the Tokyo Memoranda, and other Regional PSC Regimes. The campaign was conducted under the campaign coordination of the Maritime Administration of Bulgaria. Guidelines and Questionnaires of the Paris and Tokyo Memoranda were used. The member authority of Georgia used these resources for training purposes, given that the MLC, 2006 have been ratified but will enter into force there on 14 February 2025.

This CIC applied to all ships and a ship was subjected to only one CIC inspection during the campaign period. Over the course of the campaign, a total of 635 inspections were carried out by the member Authorities of the BS MoU which are a party to MLC, 2006, covering 626 individual ships. Among these, 553 inspections were carried out with the CIC questionnaire. During the CIC, 53 ships were detained in total. Of which, 45 detentions were the result of inspections with CIC questionnaires and 4 of them were detained directly attributed to CIC-related deficiencies.

A total of 28 questionnaires had at least one non-compliance to any of the requirements, resulting in 5.06 per cent of CIC inspections. The overall average per cent of nonconformities was 0.74 which means that the "unsatisfactory" answer was given to any question under this CIC.

The most common non-compliances were related to the absence of signed Seafarer Employment Agreements (SEA) (42.2%) and delays in wage or salary payments exceeding monthly intervals (24.4%).

The majority of CIC inspections were bulk carriers with 206 inspections (37.3%), followed by general cargo/multi-purpose ships with 149 inspections (26.9%), oil tankers with 74 inspections (13.4%) and oil/chemical tankers with 69 inspections (12.5%), which comprises 498 total CIC inspections with a rate of 90.1%. All detained 4 ships with CIC-related deficiencies in the Region were general cargo/multipurpose ships.

During the campaign, vessels registered under the flags of 44 different States were inspected under the CIC scope. Vessels flagged by Panama with 138 inspections (25.0%), Liberia with 77 inspections (13.9%) and the Marshall Islands with 39 inspections (7.1%) underwent the highest number of inspections. Detentions linked to CIC-related deficiencies involved vessels flagged by Belize, Cameroon, Saint Kitts and Nevis, and Vanuatu.

Notably, older ships, particularly those 25 years and older, comprised the three-fourths of detentions, while no detentions were observed among ships younger than 15 years old and no non-compliant CIC inspections were recorded for new ships aged 0-5.

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1 INTRODUCTION

1.1 Purpose of the report

This report documents the results of the Concentrated Inspection Campaign (CIC) on Crew Wages and Seafarer Employment Agreement under MLC, 2006, carried out by BS MoU Member Authorities who ratified the MLC, 2006 between September 1st and November 30th, 2024; which was conducted in conjunction with the Paris and Tokyo Memoranda, as well as other Regional PSC Regimes.

1.2 Objective of the CIC

The CIC on Crew Wages and Seafarer Employment Agreement under MLC, 2006, with the primary objective of:

- Ensuring compliance with MLC, 2006 requirements related to crew wages and SEAs;
- Improving awareness of these requirements within the maritime industry; and
- Enhancing the working and living conditions of seafarers, including their health, safety, and welfare.

1.3 Scope of the CIC

The campaign targeted to examine specific areas related to crew wages, seafarer employment agreements (SEAs), and financial securities, including repatriation and shipowners' liability, as outlined in MLC, 2006. The questionnaire for the CIC contains questions below:

Is the seafarer given a SEA signed by both the seafarer and the shipowner or a representative of the shipowner?

Is the seafarer able to access information regarding their employment conditions on board?

Are standard form of seafarers' employment agreements and parts of any applicable collective bargaining agreements subject to port State control under Reg.5.2, available in English?

Does the seafarers' employment agreement include all the required elements specified in the MLC, 2006?

Do particulars included in the seafarers' employment agreement comply with the MLC, 2006 requirements?

Are wage or salary payments made to the seafarer at no greater than monthly intervals?

Have seafarers been given a status of accounts and wages paid on at least a monthly basis?

Are wage or salary payments in accordance with any applicable CBA or SEA?

If payments made to a seafarer include deductions, are they in accordance to the MLC, 2006?

Is a certificate or documentary evidence of financial security, issued by the financial security provider, available on board in the event of compensation for death and long-term disability?

Is a certificate or documentary evidence of financial security, issued by the financial security provider, available on board in the event of the repatriation?

1.4 General remarks

This report presents an analysis of the responses to the CIC Questionnaire submitted during the campaign period. Thereby, for the purpose of this report:

- Inspection: An inspection with a completed CIC Questionnaire with an applicable response (Except Table 1);
- *Non-compliant response:* a "NO" response to any of the questions 1-10 which indicates non-compliance to a requirement in the questionnaire;
- CIC inspection with a non-compliant response: Questionnaire with at least one "NO" response to any question 1-10;
- *CIC Detention*: CIC-topic related detention which is indicated by a "Detention" response to any question; and
- *Total applicable responses:* Total number of "YES Compliant" plus "NO Non-compliant" answers to the questions. "N/A" responses filtered out from the result.

2 SUMMARY, CONCLUSIONS AND RECOMMENDATIONS

2.1 Summary

During the campaign, a total of 635 inspections were carried out by the member Authorities of the BS MoU which are a party to MLC, 2006, covering 626 individual ships. 553 of them were carried out with the CIC questionnaire. Only one CIC inspection has been carried out on board an individual vessel. This shows that the Regional CIC questionnaire submission rate is 88.33%.

The results of the CIC show that a total of 45 non-compliant responses is recorded. 28 of CIC inspections (5.06%) had at least one non-compliant response as a direct result of this campaign on board. 4 vessels were detained as a direct result of CIC inspections.

Analysis of the results of the CIC revealed the following:

- .1 A total of 28 questionnaires had at least one non-compliant response, which resulted in 5.06 per cent of CIC inspections not conforming to the requirements set out in the questionnaire. The overall average per cent of non-compliant responses to total applicable responses was 0.74.
- .2 During the campaign, a total of 53 vessels were detained. 45 of these detentions were the result of inspections with CIC Questionnaires and 4 of them were detained as a direct result of the campaign (7.5%). The overall detention rate regarding CIC topic related detentions was 0.72%.
- .3 A total of 206 (37.3%) CIC inspections concerned bulk carriers, followed by general cargo/multi-purpose ships with 149 (26.9%) inspections, oil tankers with 74 (13.4%) and oil/chemical tankers with 69 (12.5%) inspections, which comprises 498 (90.1%) total CIC inspections.
- .4 All detained ships with CIC-related deficiencies in the Region (4 ships) were general cargo/multipurpose ships.
- Vessels from 44 different States were inspected under the CIC scope. Most CIC inspections were carried out on board ships flying the flags of Panama with 138 inspections (25.0%), Liberia with 77 inspections (13.9%) and the Marshall Islands with 39 inspections (7.1%).

- .6 A total of 31 flags covering 24.77% of the total CIC inspections (137 inspections) had no non-compliant responses.
- .7 The detained ships with CIC-related deficiencies in the Region were flying the flags of Belize, Cameroon, Saint Kitts and Nevis and Vanuatu.
- .8 By ship age, there were no non-compliant CIC inspections for new ships aged 0-5 and no detentions were observed among ships younger than 15 years old.
- .9 Older ships, particularly those 30 years and older, are reported the least favourable results. They comprised the half of the CIC related detentions.
- .10 A very high level of compliance was observed for the majority of questions, except Q1 and Q6) with over 99% 'YES' answers. Questions 2, 3, and 7 showed the highest compliance rates.
- .11 There were 6 instances that resulted in recorded detainable deficiencies which include the absence of signed SEA, non-compliance with SEA coverage as specified in the MLC,2006 and delays in wage or salary payments exceeding monthly intervals.
- .12 The most unfavourable results were recorded in responses to Questions 1 and 6 which asked:

Question 1: Is the seafarer given a SEA signed by both the seafarer and the shipowner or a representative of the shipowner? (42.2%); and

Question 6: Are wage or salary payments made to the seafarer at no greater than monthly intervals? (24.4%).

.13 A breakdown of major non-compliant responses as indicated by "NO" answers has been studied concerning ship flag, ship type and ship age. Findings are presented in Section 4.6 below.

2.2 Conclusions

The overall detention rate regarding CIC topic related detentions is 0.72%.

Non-compliant responses of "Seafarer's employment agreement SEA", "Wages", and "Non-payment of wages" had the largest number of deficiencies.

CIC detentions, as a result of CIC-topic related detainable deficiency/deficiencies, are mostly related to the absence of signed SEA (Q1) and delays in wage or salary payments (Q6).

2.3 Recommendations

Although the overall results of the CIC were satisfactory in general, in order to enhance seafarers' employment conditions, including their working and living conditions, health, safety and welfare on board ships, attention should be paid:

- .1 Seafarers must have a signed original version or copy of their seafarers' employment agreement; and
- .2 Wages or salaries must be paid no later than monthly, in accordance with their employment agreements.

It is also recommended that PSCOs should continue to pay close attention to Crew Wages and Seafarer Employment Agreement related matters when performing PSC inspections.

3 CIC QUESTIONNAIRE RESULTS

3.1 General

The total number of inspected ships and the total number of inspections performed during the CIC are presented in **Table 1**.

No. of individual No. of inspections No. of inspections ships inspected with a CIC without CIC during CIC questionnaire questionnaire Total 626 553 73 53 45 8 Total number of detentions Detentions with CIC-topic deficiencies 4 4

Table 1 Summary of inspections during the CIC

Looking at the number of inspections performed with a CIC questionnaire (Column 2 of Table 1), the percentage of detentions that were CIC-topic related amounts to:

0.72%

3.2 CIC Questions

The responses to the CIC questionnaire are summarised in **Table 2** below. In order to analyse results on an individual question basis, all Not Applicable (N/A) and Blank responses are filtered for the percentage of compliance and noncompliance responses.

	YI	ES	N	0	N	/A	Dete	ntion
	Nr	%	Nr	%	Nr	%	Nr	%
Q1	534	96.6%	19	3.4%	0	0.0%	1	0.2%
Q2	552	99.8%	1	0.2%	0	0.0%	0	0.0%
Q3	550	99.8%	1	0.2%	2	0.4%	0	0.0%
Q4	548	99.1%	5	0.9%	0	0.0%	1	0.2%
Q5	552	99.8%	1	0.2%	0	0.0%	0	0.0%
Q6	542	98.0%	11	2.0%	0	0.0%	4	0.7%
Q7	551	99.8%	1	0.2%	1	0.2%	0	0.0%
Q8	550	99.6%	2	0.4%	1	0.2%	0	0.0%
Q9	543	99.6%	2	0.4%	8	1.4%	0	0.0%
Q10a	552	99.8%	1	0.2%	0	0.0%	0	0.0%
Q10b	552	99.8%	1	0.2%	0	0.0%	0	0.0%

Table 2 Responses to CIC questionnaire

Breakdown CIC inspections, inspections with nonconformities to the requirements set out in the questionnaire, the average percentage of nonconformities, number of unfavourable responses/nonconformities and CIC topic related detentions by ship type, ship age, ship flag and ship risk profiles presented in **Section 4.2 - Section 4.5** of this report. The breakdowns of the major nonconformities by ship flag, ship type and ship age are presented in **Section 4.6**. The comparison of questions with non-compliant responses is set out in **Section 4.7**.

4 DETAILED ANALYSIS OF CIC INSPECTION DATA

4.1 Inspection summary during CIC Period

During the campaign, a total of 53 vessels were detained. **Table 3** below captures "detention" resulted inspections during the campaign period. 45 of these detentions were the result of inspections with CIC Questionnaires and 4 of them were detained as a direct result of the campaign. This means that the percentage of Detentions with CIC-topic related deficiencies to total PSC of Detentions was 7.55. The overall detention rate regarding CIC topic related detentions was 0.72%.

Table 3 Inspection summary during CIC period

Total PSC Inspections	635
Nr. of PSC Inspections for individual vessels	626
Total PSC of Detentions	53
Inspections CIC-topic related	553
Detainable deficiencies CIC-topic related	44
Detentions with CIC-topic related deficiencies	4
% of Detentions with CIC-topic related deficiencies to Inspections CIC-topic related	0.72
% of Detentions with CIC-topic related deficiencies to Total PSC of Detentions	7.55
% of Detentions with CIC-topic related deficiencies to Total PSC Inspections for individual vessels	0.64

4.2 Analyses by ship flag

The following **Table 4** presents the results of the CIC by the ship flag. A total of 922 individual ships from 50 flag administrations were subjected to CIC inspections during the campaign.

Table 4 Results by ship flag

Ship Flag	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non- compliances	% of non-compliance	% total non- compliances	CIC topic related detentions	% CIC topic related detentions
Antigua and Barbuda	2	0	0.00	22	0	0.00	0.00	0	0.00
Bahamas	3	0	0.00	33	0	0.00	0.00	0	0.00
Bangladesh	1	0	0.00	11	0	0.00	0.00	0	0.00
Barbados	37	2	5.41	406	2	0.49	4.44	0	0.00
Belize	13	1	7.69	143	2	1.40	4.44	1	7.69
Cameroon	15	6	40.00	159	10	6.29	22.22	1	6.67
China	7	0	0.00	77	0	0.00	0.00	0	0.00
Comoros	15	0	0.00	165	0	0.00	0.00	0	0.00
Cook Islands	7	0	0.00	77	0	0.00	0.00	0	0.00
Egypt	5	0	0.00	55	0	0.00	0.00	0	0.00
Ethiopia	1	0	0.00	11	0	0.00	0.00	0	0.00
Gabon	8	0	0.00	88	0	0.00	0.00	0	0.00

Ship Flag	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non- compliances	% of non-compliance	% total non- compliances	CIC topic related detentions	% CIC topic related detentions
Greece	5	0	0.00	55	0	0.00	0.00	0	0.00
Guinea-Bissau	2	0	0.00	22	0	0.00	0.00	0	0.00
Honduras	4	0	0.00	44	0	0.00	0.00	0	0.00
Hong Kong, China	7	0	0.00	77	0	0.00	0.00	0	0.00
India	1	0	0.00	11	0	0.00	0.00	0	0.00
Indonesia	3	0	0.00	32	0	0.00	0.00	0	0.00
Iran, Islamic Republic of	2	0	0.00	22	0	0.00	0.00	0	0.00
Italy	1	0	0.00	11	0	0.00	0.00	0	0.00
Kazakhstan	1	1	100.00	11	3	27.27	6.67	0	0.00
Korea, Republic of	2	0	0.00	22	0	0.00	0.00	0	0.00
Liberia	77	2	2.60	847	2	0.24	4.44	0	0.00
Malta	20	0	0.00	220	0	0.00	0.00	0	0.00
Marshall Islands	39	1	2.56	428	1	0.23	2.22	0	0.00
Netherlands	1	0	0.00	11	0	0.00	0.00	0	0.00
Niue	1	1	100.00	11	1	9.09	2.22	0	0.00
Norway	1	0	0.00	11	0	0.00	0.00	0	0.00
Palau	35	1	2.86	385	1	0.26	2.22	0	0.00
Panama	138	4	2.90	1,517	11	0.73	24.44	0	0.00
Portugal	3	0	0.00	33	0	0.00	0.00	0	0.00
Saint Kitts and Nevis	21	3	14.29	230	5	2.17	11.11	1	4.76
Saint Vincent and the Grenadines	6	0	0.00	66	0	0.00	0.00	0	0.00
San Marino	5	0	0.00	54	0	0.00	0.00	0	0.00
Sierra Leone	21	2	9.52	231	2	0.87	4.44	0	0.00
Singapore	4	0	0.00	44	0	0.00	0.00	0	0.00
Tanzania, United Republic of	9	2	22.22	99	2	2.02	4.44	0	0.00
Thailand	1	0	0.00	11	0	0.00	0.00	0	0.00
Togo	2	0	0.00	22	0	0.00	0.00	0	0.00
Tunisia	1	0	0.00	11	0	0.00	0.00	0	0.00
Türkiye	11	0	0.00	121	0	0.00	0.00	0	0.00
Tuvalu	3	0	0.00	33	0	0.00	0.00	0	0.00
Vanuatu	9	2	22.22	99	3	3.03	6.67	1	11.11
Vietnam	3	0	0.00	33	0	0.00	0.00	0	0.00
TOTAL	553	28	5.06	6,071	45	0.74	100.00	4	0.72

The most inspected flags were Panama with 138 inspections (24.95%), Liberia with 77 inspections (13.92%) and the Marshall Islands with 39 inspections (7.05%). A total of 13 flag Administrations had one or more non-compliance responses to the questionnaire, the remaining flags covering 24.77% of the total CIC inspections had no non-compliance responses. The top 5 Flags in terms of the number of nonconformities were Panama (11 non-compliances and 24.44% of non-compliances), Cameroon (10 and 22.22%), Saint Kitts and Nevis (5 and 11.11%), Kazakhstan (3 and 6.67%) and Vanuatu (3 and 6.67%).

During the three-month campaign, Detentions for CIC-related deficiencies were linked to Belize, Cameroon, Saint Kitts and Nevis and Vanuatu.

When compared by ship flag, Malta, Comoros and Türkiye with more than 10 inspections, respectively showed the best results because of the CIC questionnaire recorded without any non-compliance to the CIC topic requirements in a larger amount of CIC inspections.

4.3 Analyses by Ship types

The following **Table 5** presents the results of the CIC by ship type. A total of 206 (37.3%) CIC inspections concerned bulk carriers, followed by general cargo/multi-purpose ships with 149 (26.9%) inspections, oil tankers with 74 (13.4%) and oil/chemical tankers with 69 (12.5%) inspections, which comprises 498 (90.1%) total CIC inspections.

Ship Type	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non- compliances	% of non-compliance	% total non- compliances	CIC topic related detentions	% CIC topic related detentions
Bulk carrier	206	10	4.85	2,266	10	0.44	22.22	-	-
Container Ship	33	3	9.09	359	4	1.11	8.89	-	-
Gas carrier	6	-	-	66	-	-	-	-	-
General cargo/multipurpose	149	14	9.40	1,637	30	1.83	66.67	4	2.68
Livestock carrier	1	-	-	11	-	-	-	-	-
MODU and FPSO	1	-	-	11	-	-	-	-	-
Oil tanker	74	-	-	814	-	-	-	-	-
Oil tanker/Chemical tanker (OILCHEM)	69	-	-	756	-	-	-	-	-
Other special activities	1	-	-	11	-	-	-	1	1
Ro-Ro cargo	4	-	1	41	-	-	-	-	ı
Ro-Ro passenger ship	4	-	-	44	-	-	-	ı	-
Tug	4	1	25.00	44	1	2.27	2.22	ı	ı
Vehicle carrier	1	-	-	11	=	-	-	-	=
TOTAL	553	28	5.06	6,071	45	0.74	100.00	4	0.72

Table 5 Results by ship types

The observed non-compliance responses were on general cargo/multi-purpose ships with 30 deficiencies (66.67% of non-compliance), bulk carriers with 10 deficiencies (22.22%), container ships with 4 deficiencies (8.89) and tug with 1 deficiency (2.22%).

During the campaign period, general cargo/multi-purpose ships accounted for all CIC-related detentions.

4.4 Analyses by ship age

By ship age, older ships, particularly those 30 years and older, had the highest non-compliance rates. They comprised the half of the CIC related detentions with 2 detentions. Also, it is observed that no non-compliances were recorded for new ships which are less than 5 years old and no detentions were observed among ships younger than 15 years. Results by ship age are presented in **Table 6** below.

Table 6 Results by ship age

Ship Age	Nr. of CIC inspections	Nr. of CIC inspection with non-compliant responses	% non-compliant CIC inspections	Total Nr. of applicable responses	Nr. of non- compliances	% of non- compliance	% total non- compliances	CIC topic related detentions	% CIC topic related detentions
0-5	9	-	ı	90	ı	ı	-	ı	-
6-10	25	2	8.00	249	2	0.80	4.44	1	-
11-15	85	3	3.53	850	5	0.59	11.11	1	-
16-20	173	4	2.31	1,728	13	0.75	28.89	1	0.58
21-24	91	3	3.30	907	3	0.33	6.67	-	-
25-29	82	9	10.98	817	12	1.47	26.67	1	1.22
30-34	39	4	10.26	390	7	1.79	15.56	2	5.13
35+	49	3	6.12	487	3	0.62	6.67	-	-
TOTAL	553	28	5.06	5,518	45	0.82	100.00	4	0.01

4.5 Analyses by ship risk group

The results of the CIC classified in accordance with the Ship Risk Groups are provided in **Table 7** below.

of non-compliant CIC topic related CIC topic related nspection with CIC inspections on-compliant **SHIP RISK** compliances compliances total nonnspections otal Nr. of detentions compliance Vr. of nonetentions pplicable esponses esponses **PROFILE** r. of CIC Nr. of CIC % of non-HRS 76 11 14.47 833 17 2.04 37.78 3 3.95 SRS 422 3.79 27 0.58 60.00 0.24 16 4,633 1 LRS 55 1 605 0.17 2.22 0.00 1.82 1 **TOTAL** 553 28 5.06 6,071 45 0.74 100.00 3 4

Table 7 CIC inspection data by ship risk groups

The table indicates that higher risk ships exhibited a non-compliance rate of 14.47%, significantly higher than standard and lower risk ships, 3.79% and 1.82% respectively. That is considered to be validation of the BS MoU Ship Risk Profile System to identify sub-standard vessels for inspection.

4.6 Analyses of the major non-compliances

In this part of the report, the breakdowns of the major non-compliances by ship flag, ship type and ship age are presented below for Questions 1 and 6; with 19 unsatisfactory responses and 42.22% of non-compliance responses to applicable responses and 11 unsatisfactory responses and 22.44% of non-compliance responses to applicable responses, respectively.

Question 1 Is the seafarer given a SEA signed by both the seafarer and the shipowner or a representative of the shipowner?

Of 553 applicable inspections, 19 of them were unsatisfactory in this area. This represents 3.4% non-compliance and 42.2% of the total unsatisfactory responses. The Question raises concern and accounts for the highest number of unsatisfactory results under this CIC. Of these unsatisfactory responses, 4 of them (8.9%) were observed on board of ships flying Cameroon and 9 of them were on general cargo/multipurpose ships. A breakdown of the non-compliances to **Question 1** by ship flag, ship type and ship age is presented below.

Ship Flag	Nr. of CIC inspections	Nr. of non- compliances	% of non- compliance	% total non- compliances
Cameroon	15	4	26.67	21.05
Panama	138	3	2.17	15.79
Barbados	37	2	5.41	10.53
Liberia	77	2	2.60	10.53
Tanzania, United Republic of	9	2	22.22	10.53
Others	277	6	2.17	31.58
TOTAL	553	19	3.44	100.00

Ship Type	Nr. of CIC inspections	Nr. of non- compliances	% of non- compliance	% total non- compliances
General cargo/multipurpose	149	9	6.04	47.37
Bulk carrier	206	7	3.40	36.84
Container Ship	33	3	9.09	15.79
TOTAL	553	19	3.44	100.00

Ship Age	Nr. of CIC inspections	Nr. of non- compliances	% of non- compliance	% total non- compliances
25-29	82	6	7.32	31.58
16-20	173	3	1.73	15.79
35+	49	3	6.12	15.79
Others	249	7	2.81	36.84
TOTAL	553	19	3.44	100.00

Question 6 Are wage or salary payments made to the seafarer at no greater than monthly intervals?

There were 11 unsatisfactory responses to this question. This represents 22.4% of all unsatisfactory responses. All detained ships with CIC-related deficiencies in the Region (4 ships) were as a result of unsatisfactory responses to this question. Most of Unsatisfactory responses were observed on board of ships flying Cameroon (3) and Saint Kitts and Nevis (3). More than four-fifths of Unsatisfactory responses were observed on ships older than 25 years old. A breakdown of the non-compliances to Question 10 by ship flag, ship type and ship age is presented below.

Ship Flag	Nr. of CIC inspections	Nr. of non- compliances	% of non- compliance	% total non- compliances
Cameroon	15	3	20.00	27.27
Saint Kitts and Nevis	21	3	14.29	27.27
Panama	138	1	0.72	9.09
Belize	13	1	7.69	9.09
Sierra Leone	21	1	4.76	9.09
Vanuatu	9	1	11.11	9.09
Palau	35	1	2.86	9.09
TOTAL	553	11	1.99	100.00

Ship Type	Nr. of CIC inspections	Nr. of non- compliances	% of non- compliance	% total non- compliances
General cargo/multipurpose	149	8	5.37	72.73
Bulk carrier	206	2	0.97	18.18
Container Ship	33	1	3.03	9.09
TOTAL	553	11	1.99	100.00

Ship Age	Nr. of CIC inspections	Nr. of non- compliances	% of non- compliance	% total non- compliances
25-29	82	6	7.32	54.55
30-34	39	3	7.69	27.27
16-20	173	2	1.16	18.18
TOTAL	553	11	1.99	100.00

4.7 Comparison of the recorded deficiencies

Difference between the non-compliant responses to the CIC topic requirements and the recorded deficiencies indicated in the CIC Guidelines presented below **Table 8**.

Table 8 Questions non-compliant responses and recorded deficiencies, detentions

Question	Deficiency Code	Nature of Deficiency	Nr. of NO response to this question	Nr. of CIC inspection with this deficiency	Number of this CIC Deficiency	Nr. of this CIC detainable deficiency	Number of CIC inspection with detention including this detainable deficiency	Nr. of RO Related this CIC detainable deficiency
Q1	1220	Seafarer's employment agreement SEA		26	30	6	4	0
	1220	Seafarer's employment agreement SEA		26	30	6	4	0
Q2	1331	Collective Bargaining Agreement	1	1	1	0	0	0
1139	1139	Maritime Labour Certificate		2	2	0	0	0
	1140 DMLC (part I & part II)	DMLC (part I & part II)		0	0	0	0	0
Q3 —	1220	Seafarer's employment agreement SEA	1	26	30	6	4	0
	1331	Collective Bargaining Agreement		1	1	0	0	0
Q4	1220	Seafarer's employment agreement SEA	5	26	30	6	4	0
Q5	1220	Seafarer's employment agreement SEA	1	26	30	6	4	0
Q6 ———	18203	Wages	11	10	10	2	2	0
	18204	Non-payment of wages	11	4	4	2	2	0
Q7	18203	Wages	1	10	10	2	2	0
00	18203	Wages	2	10	10	2	2	0
Q8 182	18204	Non-payment of wages	2	4	4	2	2	0
Q9 18203 18204 18205	18203	Wages		10	10	2	2	0
	18204	Non-payment of wages	2	4	4	2	2	0
	18205	Measures to ensure transmission to seafarer's family		0	0	0	0	0
Q10a	1337	Certificate or Documentary evidence of financial security relating to shipowners' liability	1	3	3	0	0	0
Q10b	1336	Certificate or documentary evidence of financial security for repatriation	1	2	2	0	0	0