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SUB-COMMITTEE ON STANDARDS OF
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REVIEW OF THE PRINCIPLES FOR ESTABLISHING THE SAFE MANNING LEVELS OF SHIPS

Submitted by the International Federation of Shipmasters' Associations (IFSMA)

SUMMARY

Executive summary: Fatigue is recognized as being a major contributory factor in many accidents and incidents. It is also considered that fatigue, hours of work and manning levels are inextricably linked. For this reason, IFSMA is of the opinion that the Sub-Committee should incorporate goal-based standards against which proposed manning levels on ships of similar size, trade, level of automation and IT support can be evaluated. Such standards would produce consistent results from applying the principles in the resolution at an international level.

Action to be taken: Paragraph 6

Related documents: Resolution A.890(21) – Principles of Safe Manning as amended by resolution A.955(23)

1 Fatigue is recognized as being a major contributory factor in many accidents and incidents. It is also considered that fatigue, hours of work and manning levels are inextricably linked. In his opening address at the thirty-seventh session of the STW Sub-Committee, the Secretary-General drew attention to the outcome of recent analyses of accidents which indicated that, due to inappropriate levels of manning and watchkeeping arrangements, particularly in short sea voyages, **fatigue had emerged as a significant contributory factor in accidents**. In this context, the Secretary-General said that the IMO Principles of Safe Manning and the provisions related to watchkeeping arrangements and hours of rest within the STCW Convention were arguably sufficiently comprehensive. However, against the background of continuing accidents attributable to fatigue, he expressed the view that perhaps the time had come for these principles to be re-assessed, possibly by identifying the factors against which maritime Administrations could evaluate proposed or actual manning levels on ships of similar types, size and trade.

2 Resolution A.890(20) – Principles of Safe Manning is a non-mandatory IMO instrument and is used by Administrations only as guidance. It is often interpreted widely from Administration to Administration. This makes it difficult for inspection regimes such as

port State control to assess fatigue, even when common sense indicates its presence. Ships not keeping work-hour logs or at times falsifying them exacerbate the problem.

3 Some shipowners use the assessment of manning levels as a deciding factor in selecting the flag Administration they chose. This puts commercial pressure on Administrations to compete on the acceptance of low manning levels.

4 For this reason, IFSMA is of the opinion that what is now required is an international agreement on safe manning laws. IMO can take the lead by adopting goal-based standards to evaluate manning levels on ships of similar size, trade, level of automation and IT support. Such standards would produce consistent results from applying the principles in the resolution.

5 One possible way to do this is to develop a manning calculator which all flag Administrations could use. The objective of such a calculator would be to reduce or eliminate the ambiguities that allow Administrations to interpret manning levels differently. The proposed manning calculator should index operating parameters of a vessel such as: size and type of ship; number, size and type of main propulsion units and auxiliaries; construction and equipment of ship; method of maintenance used; cargo to be carried; frequency of port calls; length and nature of voyages to be undertaken; trading area(s), water and operation in which the ship is involved; extent to which training activities are conducted on the ship; number of inspections and surveys likely to be required in ports; length of pilotage, etc.

Action requested of the Sub-Committee

The Sub-Committee is requested to consider the proposals outlined above when revising resolution A.890(20) – Principles of Safe Manning to ensure a consistent implementation of the provisions of the revised resolution.
