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SUB-COMMITTEE ON STANDARDS OF
TRAINING AND WATCHKEEPING
38th session
Agenda item 13

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REVIEW OF THE PRINCIPLES FOR ESTABLISHING THE SAFE MANNING LEVELS OF SHIPS

Submitted by Australia

SUMMARY

Executive summary:	This submission suggests some possible additional factors for inclusion in resolution A.890(21) as amended – Principles of Safe Manning – and then for supporting its implementation and enforcement
Action to be taken:	Paragraph 5
Related documents:	Resolution A.890(21), as amended by A.955(23); MSC 81/23/3; MSC 81/23/19; MSC 81/23/21 and MSC 81/23/23

1 The Maritime Safety Committee at its eighty-first session decided to include, in the STW Sub-Committee's work programme and the agenda for STW 38, a high priority item on "Review of the principles for establishing the safe manning levels of ships".

2 Reports consistently show the human element to comprise about 80% of the causes of incidents and accidents with the central cause often being fatigue related. Safety initiatives related to the review of resolution A.890(21) as amended by resolution A.955(23) should therefore focus on seafarer workload and the inter-related manning of vessels.

3 Australia believes that resolution A.890(21), as amended, has room for improvement particularly in reflecting contemporary shipboard operating environments but more particularly enhancement in the way of implementation and enforcement.

4 The following comments and suggestions are offered:

- .1 It is suggested that the intent of the resolution be clarified. The resolution is titled "Principles of safe manning" and the texts of annexes 1 and 2 then refer to "minimum safe manning" within the document. Consideration should be given to providing consistency throughout the document and it is suggested that the guidance be reflected as "minimum safe operational manning". It is worth noting that section 4.2.4 of annex 2 requires the Company responsible for the operation of the vessel to ensure, in their proposal, that the ".... safe manning level is

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adequate at all times and in all respects, including meeting peak workload situations ...” such as encountered in port.

- .2 The development of an appropriate checklist, to complement the resolution, for Administrations and operating companies to utilize may provide further assistance. Whenever a new regulation is introduced that places extra tasks on the ships crew this should then be added to the list.
- .3 Consideration should be given to including the concepts of task analysis and appropriate risks assessment tools, in the development of manning proposals.
- .4 Sections 4.2.5 and 5.4 of resolution A.890(21) place obligations on the Operator and Administration to revisit the manning documentation should the operational parameters of the vessel change. Section 5.5 provides that an Administration may withdraw a safe manning document due to non-compliance with rest hours.
- .5 With this in mind consideration should be given to introducing a mechanism which requires a company to demonstrate continued compliance. For example for a new build, major modifications or change in trading pattern, an interim manning document could be issued for 6 months. After this period the manning could be re-assessed, taking into account shipboard records, to ensure that safe operational manning is achieved in practice.
- .6 A further suggested mechanism is to propose that the Manning Document be issued with an expiry date which would require the manning arrangements to be reviewed for renewal, a relatively simple process if the operational parameters of the vessel have not changed. Australia has noticed that, during our Port State Control activities, a number of Administrations are in fact providing expiring dates on the manning documentation.
- .7 It is also proposed that the Manning Document be issued to the company that is responsible for the operational management of the vessel, or in other words the Company that is reflected on the ISM Certification.
- .8 In support of the Manning Document, STCW chapter VIII should be made explicit that the minimum hours for “watchkeeping personnel” is not intended to refer to “shift workers” but, as identified in chapter V for tanker endorsements, to all personnel responsible for the safe operation of the ship and in particular, the Master, Chief Engineer, and any non-watchkeeping Chief Mates and Engineers. Ideally, STCW should comply with the ILO Consolidated Maritime Labour Convention which limits the hours for all seafarers.

Action requested of the Sub-Committee

5 The Sub-Committee is invited to consider the comments and proposals raised in this document and take action as appropriate.