



The Company of Master Mariners of Canada
Vancouver Division

31st July 2000

SUBMISSION TO THE INTERNATIONAL COMMISSION ON SHIPPING

The Company of Master Mariners of Canada, Vancouver Division, is greatly concerned at the operation of sub-standard ships and the on-going incidences of sudden sinkings with tragic loss of life. The Division fully supports the aims of the Commission (ICONS) however the funding seems to indicate concern regarding working conditions rather than an overall concern, by involved parties, on the safety of ships.

There is little doubt that “flags of convenience” registry is a major cause of the operation of sub-standard ships. Many of these registries have insufficient staff to enforce the responsibilities of a flag state government. Others are simply a source of income with the state having no intention of enforcing international standards. Thus, on many ships operating under these registries, not only are the ships poorly maintained but the crews are subject to long hours of work and are overworked and stressed. With limited crews they are being asked to do more and more. It should be noted that even new ships, which are badly maintained, soon become sub-standard and that well maintained older vessels are not necessarily sub-standard. However, sub-standard vessels do tend to be registered in countries that apply little or no standards. This is not always the case and some are found in registries that are not considered “flags of convenience.”

The owners of the vessels must shoulder some of the blame. The beneficial owners of many ships are resident in countries that are members of the G8 group or are considered traditional maritime nations. However they give the management of the ships to the cheapest bidder whom in turn looks towards hiring the cheapest labour available and operates the ship under the most lenient system available. When vessels are chartered out the charterer may or may not have a large say in the condition of the ship itself. Time charterers must be encouraged to demand high standards on the ships they charter.

The classification societies are not fulfilling the role that they should. The good societies do their best to ensure that ships meet international standards in the course of building and their surveys during the ship's operation. However they must also operate in a commercial world in which there are a number of groups which are willing to accept ships which have been turned down for acceptance or renewal following survey. Classification Societies receive their income from the owner who can play one group against another. Poor inspections are then covered by insurance. Classification Societies through IACS must establish, maintain and enforce high standards. If IACS is to be the authority for Classification Societies, it must ensure that its members maintain these standards. Societies must ensure that their port agents are competent and properly overseen. Complaints re acceptance of any substandard ship should be investigated and the results forwarded to IACS and IMO. It might be possible to have a joint group between these bodies which could recommend the necessary remedial action.

Underwriters must be encouraged to refuse coverage for any vessels classed by those societies that obviously do not insist on acceptable standards or are known to carry out poor or insufficient inspections.

Flag State authorities must play a part in any action taken. In accepting class inspections in lieu of flag state inspections, countries should only accept societies who consistently meet the standards. Any society that does not conform to standards should be denied this work with a loss of potential revenue and additional costs to the owners of ships making use of them.

In the long run the main culprit is lack of uniform enforcement, either by intent or through lack of properly trained inspectors. Port State Control has certainly done much to improve the situation but is hampered by the fact that some states have insufficient resources to apply the necessary inspections. Some small states, which wish to continue the revenue from its ships give their ships a clean bill of health and, although obviously sub-standard, do not show up in the computer files and thus avoid inspection unless some complaint is received.

Governments should be encouraged to participate in a global data base of ship safety related information (e.g. Equasis) providing ready access to records of the performance of specific ships and ship owners.

If flag states refuse to enforce international standards for whatever reason, then inevitably Port State Control or some other method, perhaps through IMO, must be considered. Some states, which are willing to carry out the required inspections but do not have or cannot afford the proper resources, may require financial support for training inspectors and administration. Only properly qualified and trained surveyors should be allowed to carry out inspections.

IMO must continue to be the focal point for international standards. Unfortunately the system under which it operates has inherent difficulties of ratification, endorsement and enforcement. If sub-standard ships are allowed to trade between countries that have no intention of enforcing international standards there is little that can be done. International sanctions are costly and difficult to enforce properly.

If standards are applied widely and consistently, ship owners will quickly realize that the financial penalties associated with operating sub-standard ships far outweigh any cost reductions from neglecting maintenance or crew training.

A system of reduced port charges for vessels that meet international standards might encourage ships to maintain these standards. On the other hand some form of environmental protection charge could be levied on sub-standard ships.

These suggestions are aimed at decreasing the profitability of operating sub-standard vessels while encouraging owners to meet International Standards. The overall safety of the ship must be the prime consideration, the cost of operation secondary.

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