



SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
30th session  
Agenda item 7

STW 30/7/1  
9 October 1998  
Original: ENGLISH

## COMPREHENSIVE REVIEW OF RESOLUTION A.481(XII) - PRINCIPLES OF SAFE MANNING

Submitted by the ICFTU

### SUMMARY

<b>Executive summary:</b>	This document provides some additional comments by the ICFTU, as requested in paragraph 9 of STW 29/14.
<b>Action to be taken:</b>	Paragraph 12.
<b>Related documents:</b>	MSC/Circ.493, MSC/Circ.565, MSC/Circ.594, MSC/Circ.816 and MEPC/Circ.331, A.772(18), A.850(20), JCT/8/1990, MEPC 42/16, MSC 60/20/13, MSC 68/INF.9, MSC 68/13, MSC 69/INF.9, MSC 69/22, MSC 70/INF.2, STW 29/9/1 and STW 29/9/2.

1 During the discussions on this matter at STW 29, it was generally agreed that there had been a considerable number of changes in the shipping industry since the adoption of A.481(XII) in 1981. There have also been a considerable number of changes within the regulatory regime and within the Organisation.

### Relevant developments

2 The United Kingdom Report of Lord Donaldson's Inquiry into the Prevention of Pollution from Merchant Shipping stated that:

*"A more fundamental problem is that international standards of manning may be too low in some cases: in particular some aspects of manning standards are open to national interpretation, leading to variations in actual levels. Consistency is extremely important. There are strong commercial pressures on manning levels: too small a crew is not only dangerous, but also represents unfair competition. If consistency is not achieved, the concept of safe manning will inevitably be weakened"* (paragraph 8.38).

In this regard the report noted the importance of having the IMO conduct *"a review of manning standards and reconsideration of the extent to which they should remain open to interpretation by the Flag State. It is important that this is carried out quickly and effectively, and that sensible standards are set and adhered to"* (paragraph 8.39 (d)).

3 The Guidelines on the organisation and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC/Circ.816, MEPC/Circ.331) state:

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*“Recognising the human factor as an integral part of any effort to enhance maritime safety and the protection of the marine environment, the sub-committees should consider the involvement of the human factor whenever new requirements are developed and existing requirements reviewed, taking into account the human element principles addressed in MSC/Circ.763/MEPC/Circ. 313” (Paragraph 22).*

4 The Joint MSC/MEPC Working Group on the Human Element met during MSC 69 and noted that a considerable amount of work had been done within the Organisation during the last 10 years on fatigue and listed the following (Paragraph 12 of MEPC 42/16):

- the joint IMO/ILO Committee on Training (JCT/8/1990);
- the report of the Joint IMO/ILO Group of Experts (MSC 60/20/13);
- MSC/Circulars 493, 565 and 594;
- Resolution A.772(18) on Fatigue factors in manning and safety; and
- Resolution A.850(20) on Human element vision, principles and goals.

5 The ICFTU submitted to MSC 68 (MSC 68/INF.9) a Survey of the Hours of Work entitled “Give us a break” undertaken by members of the UK National Union of Marine, Aviation and Shipping Transport Officers (NUMAST) (MSC 68/13). The observations presented in paragraph 27 of MSC 68/13 are of relevance to the review of A.481, especially the following ones:

- due to the general reduction in the number of crew members, all personnel on board ships are experiencing increased workload and thus all crew members may suffer from fatigue;
- ocean sailing causes less fatigue than sailing in coastal waters with frequent port calls;
- fatigue is a dangerous factor which causes accidents;
- present work distribution and crew composition are based on standards and workplans on board ships developed more than 200 years ago;
- special fatigue problems related to crew on board ships from less developed seafaring nations were recognized;
- the seafarers themselves identify lack of sufficient crewing as the major cause of fatigue on board ships. Only well defined criteria for minimum crewing can solve this problem; and
- the role of relief systems in connection with fatigue.

The Joint MSC/MEPC Working Group adopted 6 recommendations made by NUMAST for further consideration within the Organisation (para. 28). Perhaps the most relevant was based on the adoption of the recommendation on urging the United Kingdom authorities and IMO, *“to improve the way in which minimum safe manning levels are set. A survey conducted by the Union last year showed that 54% of members considered that crewing levels on their ship are inadequate.”* (page 5 of the NUMAST report on fatigue at sea, entitled “Give us a break”).

6 In order to follow up the NUMAST survey, the ICFTU submitted to MSC 69 a survey on fatigue undertaken by the International Transport Workers' Federation (ITF) which was entitled "Seafarer Fatigue: Wake up to the dangers" (MSC 69/INF.9). This survey, which was based on the responses from 2,500 seafarers of 60 different nationalities serving on 63 different flagged vessels, demonstrated the disturbing extent of excessive hours and fatigue within the maritime industry. The report noted that :

*"The survey shows clear preferences for suggested measures to reduce the prevalence of fatigue, of which increased crewing levels are overwhelmingly the most strongly supported. The inadequacy of the existing principles for the assessment of minimum safe manning is widely accepted and this report underlies the importance of early action to ensure that crew complements properly reflect the actual operational requirements, trading patterns, maintenance programmes and other demands"* (Page 11 of the ITF Study).

7 The Australian study into fatigue, stress and occupational health of seafarers which has been submitted to MSC 70 (MSC 70/INF.2) notes that a large number of respondents raised concerns over demanning issues (page 149).

8 Reference should also be made to the relevant provisions contained in the amended STCW Convention and the relevant sections of the STCW Code, both Part A and Part B. In this regard it should be recalled that MSC 69 approved the report in general and noted the outcome of a Joint IMO/ILO Working Group which had been established to give effect to articles 5 and 8 of the Seafarers' Hours of Work and the Manning of Ships Convention, 1996 (No. 180) (paragraphs 7.30 to 7.32 of MSC 69/22).

9 Many of the issues raised above are not new as they were classified as fatigue factors in Assembly resolution A.772 (18). This clearly indicates the importance of ensuring the relevant provisions contained in A.772 (18) are taken into account and incorporated into the revised A.481.

## **Conclusions**

10 The ICFTU noted in document STW 29/9/1 that while the average age of the world fleet has continued to grow, there has also been a considerable reduction in ship board manning which has been driven by economic considerations rather than safety related ones. The ICFTU is of the view that, in some instances, the accepted manning scales are below those which would be necessary for the safe operation of the ship in all eventualities and to ensure that essential routine maintenance is undertaken. This has resulted in many ships operating with manning scales below those which they were originally designed for. The ICFTU (document STW 29/9/1) and the United States (document STW 29/9/2) submitted to STW 29 proposals which aimed to remove the flexibility which limits the impact of the existing A.481 by limiting the scope for different interpretations of this important assembly resolution. Therefore the ICFTU hopes that these documents will be further considered by the Working Group which will be established at STW 30.

11 The ICFTU believes that the IMO has done a great deal to address the human element in recent years and the revision of A.481 provides an opportunity not only to give substance to the human element vision, principles and goals but also to other work which has been undertaken within the Organization of a more theoretical and diagnostic nature. It also provides an opportunity for the adoption of an instrument which will profoundly improve the safety of life at sea and the protection of the marine environment and, in the process, address a substantial and long-standing concern of the seafarers.

## **Action requested of the Sub-Committee**

12 The Sub-Committee is invited to note the comments and to take into account the suggestions contained in this document during the work on the revision of A.481.