



MARITIME SAFETY COMMITTEE
77th session
Agenda item 6

MSC 77/6/15
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MEASURES TO ENHANCE MARITIME SECURITY

The review of resolution A.890(21) on Principles of Safe Manning

Submitted by ICFTU

SUMMARY

- Executive summary:** This paper supports MSC 77/6/7 on the proposed amendment to resolution A.890(21) on Principles of Safe Manning and the need to take a holistic view of current ship workloads
- Action to be taken:** Paragraph 5
- Related documents:** MSC 76/4/5; MSC 76/23; STW 34/14; MSC/ Circ. 931, STW 34/9/1; IMO resolution A.890 (21)

Background

1 Over recent years the removal of skilled seafarers from vessels has been implemented primarily based on economic considerations rather than operational rational. At the same time administration and inspection duties have been increased, especially as a result of the ISM Code requirements, and the recognition of the problems caused by fatigue have resulted in the adoption on international requirements limiting hours of work and/or establishing minimum hours of rest. The requirements of a Ship Security Officer calls both for seafarers to have new skills, the reinstatement of many of the previous technical skills and high level of both administration, training and physical duties. These are elaborated in MSC 76/6/7 by the Philippines and in STW 34/9/1 by the ICFTU.

2 After consideration of papers STW 34/14 by Philippines and STW 34/9/1 by ICFTU and the requirements of chapter XI-2 of SOLAS and the related ISPS Code the STW 34 Sub-Committee recommended the review of manning requirements as per an amended resolution A.890 (21) should be carried out in a holistic manner.

3 Many of the skills which were formerly available on a ship in the areas of communications, an electronic technician and administration areas are required for the additional duties of the Ship Security Officer and the spare man hours required to facilitate these new duties are not available on the majority of vessels.

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4 In MSC/Circ.931 Guidelines on the organization, paragraph 13 required that a compelling need for amendments be demonstrated and account be taken of the cost and administrative burden etc. However, it does not address the human element related aspects and the impact on seafarers, both in terms of additional workload or them being able to secure the necessary additional training and to be able to secure the required additional certificates or documentary evidence. Nor is there a requirement that any assessment should be made of the impact on seafarers of the increased workloads and the resulting fatigue and excessive hours of work requirements. The ICFTU believes that it is impossible to consider the onerous requirements and workload that additional security measures will incur on ships' crew without considering fully the loss of important specialist skills in recent years and the additional workload that recent legislation has introduced through additional inspections etc.

5 Action requested of the Committee

- .1 The Committee is invited to agree that it is necessary to review current workloads on vessels in a holistic manner and to take into account the impact of various trades and ship types, as well as the need to ensure that all ships are adequately crewed and able to effectively and safely meet peak workload situations.
 - .2 The Committee is requested to consider adopting a mandatory requirement for the carriage of an additional person who form an integral part of the operational crew and able to perform the functional requirements of the Ship Security Officer, after a full review of the skills required and currently available under the applicable current minimum manning standards.
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