



MARITIME SAFETY COMMITTEE  
82nd session  
Agenda item 21

MSC 82/21/2  
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## WORK PROGRAMME

### Promoting safe behaviour in a safety culture

Submitted by New Zealand, South Africa, the Philippines and ICFTU

#### SUMMARY

- Executive summary:** This document is a proposal for a new work programme item to amend the ISM Code to enable full involvement of seafarers in health and safety initiatives
- Action to be taken:** Paragraph 22
- Related documents:** MSC 77/17/1; MSC 77/17/4; resolution A.947(23); MSC-MEPC.2/Circ.3 and ISM Code

#### Introduction

- 1 Paper MSC 77/17/1 submitted by the United Kingdom promoting safe behaviour in a safety culture recognized under the safety culture maturity model that the involvement of ‘frontline staff’ in health and safety is critical if further, or ongoing, improvements are to be made.
- 2 Further the United Kingdom paper identified that ‘the International Safety Management (ISM) Code is the primary vehicle through which reductions in incidents and accidents at sea can be achieved’.
- 3 The co-sponsors of this paper believe that promoting safe behaviour for a safety culture onboard ship requires the involvement of all personnel, ashore and afloat, officers and crew in a co-operative environment without fear of any repercussions or intimidation.
- 4 It is the view of the co-sponsors that, at present, the ISM Code is a top down approach to safety culture. The co-sponsors believe that the objectives of the ISM Code can only be fully met if the seafarer, officers and crew, are considered as an essential and integral element of the safety culture and are empowered to provide input into the safety management systems onboard a ship.
- 5 The ILO at its 94<sup>th</sup> (Maritime) session completed work on the proposed consolidated maritime labour convention. This Convention under regulation 4.3 – standard A4.3.1(c) states:

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“The laws and regulations and other measures to be adopted shall include on-board programmes for the prevention of occupational accidents, injuries and diseases and for continuous improvement in occupational safety and health protection, involving seafarers’ representatives and all other persons concerned in their implementation....”

6 Further it should be noted that the ILO Code of practice on accident prevention on board ships at sea and in port states under clause 2.6 – General duties and responsibilities of shipboard health and safety committee:

“A safety and health committee should assist in the implementation of the shipowner’s safety and health policy programme and provide seafarers with a forum to influence safety and health matters”;

“the committee should as a minimum consist of officers and ratings who should be appointed or elected as appropriate”;

“committee members should not be subject to dismissal or other prejudicial measures for carrying out functions assigned to this role”.

### **Scope of the proposal**

7 The co-sponsors propose that the ISM Code is amended to more closely align with the ILO Maritime Labour Convention and appropriate training is developed for seafarer safety representatives.

### **Need or compelling need**

8 A recent US Coast Guard report on the explosion and sinking of a chemical tanker revealed a lack of safety culture and an inability of seafarers, officers and crew, to raise safety concerns with the ship’s master or shore side staff, due to fear of losing their jobs. Unfortunately, anecdotal evidence indicates that this lack of interaction and co-operation in the workforce can be found in other vessels. Even though these ships are in full compliance with the Code this lack of co-operation results in a failure to effectively implement the ISM Code on a day-to-day basis or gain the required safety culture to enable continuous improvement.

9 Safety management systems require a team approach in order to succeed, as illustrated in the North of England P&I association publication ‘A seafarers guide to ISM’, but the ISM Code does not specifically empower seafarers with the ability to be heard on matters relating to ship safety and environmental protection, onboard and ashore.

10 The majority of the world’s ships are manned and operated by a mix of personnel from many nations and cultures. This can add a further obstacle in the way of achieving a co-operative and integrated safety management system. Formalizing the requirement of safety representatives in the ISM Code will assist in overcoming this obstacle.

### **Analysis of the issues involved**

11 The co-sponsors do not envisage significant legislative, administrative, or cost burden above that of the original intent of ISM Code. It is clear that the intent is for all seafarers to have input and responsibility for the safety culture on board a ship and this intermit is supported by appendix 2 of MSC-MEPC.2/Circ.3.

### **Benefits**

12 Closer alignment and linkage with the consolidated maritime labour convention, and an ability for all seafarers to participate formally in safety management systems on board ships.

13 The ISM Code to provide a path for frontline staff to improve on a continuous basis the safety gains made to date.

### **Priority and desired completion date**

14 The co-sponsor request that a high priority be attached to this matter and that two sessions be devoted to it (work completion date 2009).

### **Indication of required action**

15 It is proposed that clauses 1.4, 6 and 12 of the International Safety Management Code are reviewed with the view to incorporating a requirement for seafarer safety representation.

16 It is further proposed that appropriate training for seafarer safety representatives is developed.

### **Remarks on the criteria for general acceptance**

17 Is the subject of the proposal within the scope of the IMO's objectives? Yes.

18 Do adequate industry standards exist? – There are many land based training courses for safety representatives, which may be able to be adapted by IMO for maritime use.

19 Do the benefits justify the proposed action? – Yes.

### **Identification of which subsidiary bodies are essential to complete the work**

20 The work of reviewing and amending the ISM Code should be able to be accomplished by the sub-committee on flag state implementation.

21 The development of appropriate training for safety representatives should be accomplished by the sub-committee on standards of training and watchkeeping.

### **Action requested of the Committee**

22 The Committee is invited to add a new, high priority item to the work programme of the FSI and STW Sub-Committees.

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