



MARITIME SAFETY COMMITTEE  
84th session  
Agenda item 15

MSC 84/15/1  
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## ROLE OF THE HUMAN ELEMENT

### Promoting safe behaviour in a safety culture

Submitted by New Zealand & ITF

#### SUMMARY

<i>Executive summary:</i>	This document proposes amendments to the ISM code to enable full involvement of seafarers in health and safety initiatives
<i>Strategic direction:</i>	12.2
<i>High-level action:</i>	12.2.1
<i>Planned output:</i>	12.2.1.1
<i>Action to be taken:</i>	Paragraph 11
<i>Related documents:</i>	MSC 77/17/1; MSC 82/21/2; resolution A.947(23) and the ISM Code

#### Introduction

1 Document MSC 77/17/1 submitted by the United Kingdom promoting safe behaviour in a safety culture, recognized that, under the safety culture maturity model, the involvement of “frontline staff” in health and safety was critical if further, or ongoing, improvements are to be made.

2 Further the United Kingdom 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 document 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 on board a ship.

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## **Background**

5 A relatively 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.

6 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, on board and ashore.

7 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.

8 At MSC 82, the co-sponsors along with South Africa and the Philippines (MSC 82/21/2) proposed a new work item that:

- .1 section 1, paragraph 1.4, section 6 and section 12 of the International Safety Management Code need to be reviewed with the view to incorporating a requirement for seafarer safety representation; and
- .2 appropriate training for seafarer safety representatives is developed.

9 Accordingly, a new item "Amendments to the ISM Code relating to requirements for seafarer safety representation" was included in the work programme and agenda of FSI 16. Subsequently, MSC 83 decided that the Joint MSC/MEPC Working Group on Human Element should develop draft amendments to the ISM Code with the understanding that the intended scope of the amendments should be limited to those relating to requirements for seafarer safety representation (MSC 83/28, paragraph 15.6).

## **Proposed amendments**

10 The attached annex contains the proposed amendments to the ISM Code for the inclusion and empowerment of seafarers around the safety culture on board ships.

## **Action requested of the Committee**

11 The Committee is invited to consider the proposed draft amendments to the ISM Code, as set out in the annex, and take action as appropriate.

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**ANNEX****DRAFT AMENDMENTS TO THE  
INTERNATIONAL SAFETY MANAGEMENT CODE****Section 1.1 Definitions**

1 The following text is to be inserted after the existing paragraph 1.1.12:

“1.1.13 *seafarer safety representative* means a member of the ships’ crew, either officer or rating, who has been appointed or elected by the crew, to represent the ship’s crew in relation to the continuous improvement in occupational safety and health protection, and should not be subject to dismissal or other prejudicial measures for carrying out functions assigned to this role.”

**Section 1.4 Functional requirements for a safety management system**

2 The following text is to be inserted after the existing paragraph 1.4.6:

.7 procedures for the seafarer safety representative to make submissions or complaints to the Company.

**Section 6 Resources and personnel**

3 The following text is to be inserted after the existing paragraph 6.7:

6.8 The Company should ensure that the seafarer safety representative is trained to undertake the role and fully conversant with the Company’s safety management system.

**Section 12 Company verification, review and evaluation**

4 The following text is to be inserted after the existing paragraph 12.6:

12.7 Audits or reviews undertaken in accordance with paragraphs 12.1 and 12.2 should include participation of or input from the seafarer safety representative.