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15th March 2011

To: Shipowners / Ship Managers and Classification Societies

Dear Sir/Madam,

Review on Hours of Rest onboard Hong Kong Registered Ships

The Cargo Ships Safety Section has recently conducted a review on the minimum safe manning requirements on Hong Kong registered ships with reference to the standards of STCW and the new Maritime Labour Convention 2006 (MLC). Under the present manning scale, special attentions need to be paid for onboard operation that affects crewmember's hours of rest.

The review selected a number of sample records provided by participating shipping companies. The records showed detailed hours of rest taken by the crewmembers onboard different types of vessel. In order to reflect shipboard operations under the most constrained situations, particular attention was paid for the period while the ships were at berths and during coastal voyages.

The following standards were used for evaluating the samples:

- A. STCW Section A-VIII/1 - Fitness for duty
- B. MLC 2006, Standard A2.3 - Hours of work and hours of rest

For details of the requirements, please refer to the Paragraph 1 of the Annex.

The results of the study indicate that most of the vessels are in compliance with the above requirements. Only two occasions of non-compliances were found where the crewmembers' hours of rest did not meet the minimum standards when their vessels were calling ports for cargo operation, i.e.

- (a) the Master on an LPG carrier; and

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- (b) a Chief Officer on a general cargo/multipurpose ship.

(Please refer the Paragraph 2 of the annex for an example of non-compliances)

It has also been noted that most of the vessels are using templates of the same or similar design of the IMO/ILO Model Format (For details, please refer to our previously issued Circular Letter dated 25 August 2010, http://www.mardep.gov.hk/en/pub_services/pdf/psc_insp.pdf). While this format provides a comprehensive overview of the hours of rest a crewmember has taken, additional efforts are needed when verifying regulation compliances:

1. Despite of the fact that at the end of each row (calendar day from 0001 to 2359 hours), the total hours of rest taken by the crewmember for that day has been inputted, when verifying compliances, records need to be checked not only for the 24-hour period from 0001 hours to 2359 hours for the same day, but also for ANY 24-hour periods. This includes the 24-hour periods starting also from any hour, i.e. 0100 hours, 0200 hours, 0300 hours etc. till the same hours of the following day. In other words, records need to be checked on hourly basis, instead of daily basis.
2. If the hours of rest are divided into two periods, verification is needed to ensure that one of these rest hour periods shall be at least six hours in length, and the interval between consecutive periods of rest shall not exceed 14 hours.

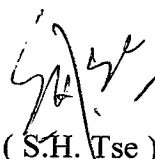
For details of the verification, please refer to the example case in the Paragraph 2 of the Annex.

With the hard copy of the record, it is difficult to verify all the above requirements manually. As such, we strongly recommend that ships should be provided with adequate tools/systems to record and examine the hours of rest for each crewmember effectively.

Should you have any questions related to hours of rest for Hong Kong ships, please feel free to contact Senior Surveyor/Cargo Ships Safety Section at

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Yours faithfully,



(S.H. Tse)

Senior Surveyor/Cargo Ships Safety Section
for Director of Marine

Encl. : **Annex** : - Relevant Regulations and Example of Non-compliance Case

Annex : Relevant Regulations and Example Case of Non-compliance

1. The following standards were used for evaluating the samples:

A. STCW Section A-VIII/1 - Fitness for duty

1. All persons who are assigned duty as officer in charge of a watch or as a rating forming part of a watch shall be provided a minimum of 10 hours of rest in any 24-hour period.
2. The hours of rest may be divided into no more than two periods, one of which shall be at least 6 hours in length.
3. The requirements for rest period laid down in paragraphs 1 and 2 need not be maintained in the case of an emergency or drill or in other overriding operational conditions.
4. Notwithstanding the provisions of paragraphs 1 and 2, the minimum period of 10 hours may be reduced to not less than 6 consecutive hours provided that any such reduction shall not extend beyond two days and not less than 70 hours of rest are provided each seven-day period.

B. Part 5 (b) and 6 of MLC 2006, Standard A2.3 - Hours of work and hours of rest

The limits on hours of rest shall be as follows:

- minimum hours of rest shall not be less than:
 - (i) ten hours in any 24-hour period; and
 - (ii) 77 hours in any seven-day period.
- Hours of rest may be divided into no more than two periods, one of which shall be at least six hours in length, and the interval between consecutive periods of rest shall not exceed 14 hours.

2. The following example case demonstrates the discrepancies found during the study:

2.1 Calculated by each day from 0000 to 2400, the hours of rest complies with the above requirements for both day 1 and day 2 respectively:

Hours	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Total Hours of Rest
Day1	X	X	X	X	X	X					X	X	X	X	X										11
Day2										X	X	X	X	X	X					X	X	X	X	X	12

Table 1

2.2 However, when calculated by the 24-hour period from 0600 of day 1 to 0600 of day 2, there are only 5 hours of rest, and there are more than 14 hours till the next rest period. These violate both of the above requirements:

Hours	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	Total Hours of Rest	
Date																										
Day1	X	X	X	X	X	X					X	X	X	X	X											11
Day2										X	X	X	X	X	X					X	X	X	X	X		12

Table 2