

海事處  
船舶事務科

香港中環統一碼頭道38號  
海港政府大樓24樓

電話號碼 : (852) 2852 4510  
傳真號碼 : (852) 2545 0556



MARINE DEPARTMENT

Shipping Division  
24/F., Harbour Building  
38 Pier Road, Central, Hong Kong

Tel. No. : (852) 2852 4510  
Fax No. : (852) 2545 0556

網站 Web Site : <http://www.mardep.gov.hk>  
電郵地址 E-mail : [ss\\_css@mardep.gov.hk](mailto:ss_css@mardep.gov.hk)  
貴署檔案 Your Ref. : ---  
本處檔案 Our Ref. : SD/S 800/9

7 August 2014

To: Shipowners, Ship Managers and Ship Masters

Dear Sirs/Madams,

**Concentrated Inspection Campaign on STCW Hours of Rest  
Conducted from 1 September to 30 November 2014**

The Paris MOU and the Tokyo MOU will jointly conduct a Concentrated Inspection Campaign (CIC) on STCW Hours of Rest from 1 September to 30 November 2014. Other MOUs may launch the same CIC during the period.

The campaign will target the compliance with provisions of deck and engine room watchkeepers' hours of rest under the STCW 78 as amended by the Manila amendments on every ship eligible for inspection. The CIC will be conducted in conjunction with the regular port State control inspection. The purpose of this CIC is to verify that watchkeeping personnel are meeting the requirements regarding hours of rest as per STCW 78 as amended.

The CIC will focus on 3 main areas, namely, documentation, watchkeepers' time of rest and watchkeeping. Excessive hours of work, insufficient hours of rest or insufficient manning, are contributing factors to maritime casualties and to health problems of seafarers. Any non-compliance detected in this respect by a PSCO may result in ship detention. If records are found to be falsified, the ship master and related personnel may be prosecuted by the local Authority.

To facilitate masters of Hong Kong registered ships in preparing for this CIC exercise, guidelines for the preparation of this CIC on STCW Hours of Rest are attached for reference (see Annex I). Your particular attention is drawn to the following actions before the campaign:

- (a) ship management companies should distribute this circular letter and guidelines to their Hong Kong registered ships and make sure that all shipboard staff are fully aware of the campaign;

- (b) ship management companies and/or shipboard staff should carry out similar inspection to verify compliance with the applicable requirements at all times, in particular prior to the commencement of the campaign; and
- (c) ship management companies should ensure that masters and officers onboard ships could communicate effectively with PSCOs. Poor communications with PSCOs during inspection may lead to the detention of ships.

During the CIC, PSCOs will utilize a questionnaire containing a number of items to be verified during the inspection. The questionnaire has been published on the websites of the Paris MOU and the Tokyo MOU:

<http://www.parismou.org>  
<http://www.tokyo-mou.org>

If you have any question, please contact Senior Surveyor of the Cargo Ships Safety Section as follows:

Telephone No.: (852) 2852 4510  
Fax: No.: (852) 2545 0556  
E-mail: [ss\\_css@mardep.gov.hk](mailto:ss_css@mardep.gov.hk)

Yours faithfully,

*No signature on website copy*

(P. K. Yeung)  
Senior Surveyor/Cargo Ships Safety  
for Director of Marine

Encl.

## Annex I

### **Guidelines for Preparation of the Concentrated Inspection Campaign on STCW Hours of Rest for Hong Kong Registered Ships**

#### **Introduction**

The Paris MOU and the Tokyo MOU will conduct the CIC on STCW Hours of Rest from 1 September to 30 November 2014. Other MOUs may launch the same CIC during the period.

#### **Purpose**

The purpose of this CIC is to verify that deck and engine room watchkeeping personnel are meeting the requirements regarding hours of rest as per STCW 78 as amended on ship eligible for inspection during the period of the campaign and the CIC will be conducted in conjunction with the regular port State control inspection.

The CIC will focus on 3 main areas, namely, documentation, watch keepers' time of rest and watch keeping. Any breaching of the STCW Hours of Rest would imply that the Safety Management System in ensuring safe operation of the ship is ineffective. In such circumstances, an ISM non-conformity may be recorded.

#### **Definitions**

- (a) "Hours of rest" means time outside hours of work; this term does not include short breaks.
- (b) "Hours of work" means time during which seafarers are required to do work on account of the ship.
- (c) "Watchkeeper" means all persons who are assigned duty as officer in charge of a watch or as a rating forming part of a watch.
- (d) "Minimum Safe Manning Document or Equivalent" means a document (MSMD) issued by the Administration as evidence of the minimum safe manning considered necessary to comply with the provisions of SOLAS Chapter V Reg. 14.
- (e) "UMS" means Unattended Machinery Space(s) and is a class notation whereby there are specific criteria to be met regarding controls, alarms and safeguards to operate the ship with the machinery space(s) unattended. The notation will be found on the Certificate of Class. Please refer to SOLAS Chapter II-1 Part E Reg. 46 for details.

#### **References**

STCW 78 as amended

## **Questionnaire Guidance**

### **Q1 Is a watch schedule posted in an easily accessible area?**

STCW Section A-VIII/1(5) requires that:

The watch schedules shall be posted where they are easily accessible. The schedules shall be established in a standardized format in the working language or languages of the ship and in English.

Easily accessible areas include navigation bridge, engine control room and ship's mess rooms etc. and the watch schedules should include daily rest hours at sea and daily rest hours in port.

### **Q2 Is the ship manned in accordance with MSMD or an equivalent document?**

SOLAS 1999/2000 Amend/Chapter V Reg.14 requires that:

The ship is manned at least in accordance with the requirements of the Minimum Safe Manning Document (MSMD) and the manning stated in the crew list should demonstrate compliance with the minimum safe manning requirement. Should the UMS system fail additional engineer will be required. If the ship's manning is not in accordance with the MSMD, the flag State should be consulted (e.g. shortage of crew due to sickness where reliever is not immediate available).

If the actual crew number is not in accordance with what was indicated on the MSMD or the flag State has not granted any dispensation for the ship to sail, the ship may be detained.

### **Q3 Are there records of daily hours of rest for each watchkeeper?**

STCW Section A-VIII/1(7) requires that:

The records of rest of seafarers (i.e. each individual watchkeeper) shall be maintained in a standardized format, in the working language or languages of the ship and in English, to allow monitoring and verification of compliance with the provisions of STCW Section A-VIII/1(7).

IMO/ILO has developed the "Guidelines for the Development of Tables of Seafarers' Shipboard Working Arrangements and Format of Records of Seafarers' Hours of Work or Hours of Rest". The format of records can be downloaded from the following website:

[http://www.imo.org/OurWork/HumanElement/VisionPrinciplesGoals/Documents/ILO-IMO-Hours%20of%20rest\\_1.pdf](http://www.imo.org/OurWork/HumanElement/VisionPrinciplesGoals/Documents/ILO-IMO-Hours%20of%20rest_1.pdf)

#### **Q4 Have the records in Q3 been endorsed by an appropriate person?**

STCW Section A-VIII/1(7) requires that:

The seafarers shall receive a copy of the records pertaining to them, which shall be endorsed by the master or by a person authorized by the master and by the seafarers.

#### **Q5 Are records related to hours of rest being recorded correctly?**

STCW Section A-VIII/1(7) requires that:

The hours of rest recorded on the daily hours of rest sheet for each watchkeeper should reflect the actual hours of rest and masters should ensure no false declaration.

Cross-checking records of the daily hours of rest with other documentation such as official log book, bell book and crew overtime records can assure the accuracy of recording and compliance with the requirement of the minimum hours of rest.

Extra hours of work such as drills, engineers' night checks of UMS ships, mooring station, manoeuvring during arrival/departure, particularly for the master where there may be periods of pilotage, bad weather etc., should be recorded and compensation of rest is needed.

Watch in port may be changed to 6 On/6 Off system and it should be recorded accordingly.

There is also a requirement in STCW Section A-VIII/2 Part 5, paragraph 95.1 for an engineer to be in charge of the watch in port on ships of 3,000 kW and above. When ships that have engine power of greater than 3,000 kW and are UMS and have one engineer on board, the engineer cannot be granted any shore leave.

Hour of rest should be recorded in whole hours and not in minutes. The master should ensure that watchkeepers actually allocated for rest should be adequately rested before taking up watch and duty.

#### **Q6 Do rest periods for all watchkeepers comply with STCW requirements, including the weekly requirements of rest?**

STCW Section A-VIII/1 (2) requires that:

All persons who are assigned duty as officer of a watch or as a rating forming part of a watch and those duties involve designated safety, prevention of pollution and security duties shall be provided with a rest period of not less than:

- a minimum of 10 hours of rest in any 24-hour period; and
- 77 hours in any 7-day period.

The hours of rest may be divided into no more than two periods, one of which shall be at least 6 hours in length, and the intervals between consecutive periods of rest shall not exceed 14 hours.

The 24 hour period should be from the beginning or end of a rest period. Since the hours of rest only may be divided into no more than two periods, consequently only the two longest rest periods should be counted. Short breaks and meal breaks should not be included in the total periods of rest.

If a watchkeeper is receiving less than 10 hours of rest in 24 hours (i.e. working in excess of 14 hours), it is a deficiency. It is also important to ensure that watchkeepers are obtaining 77 hours rest in any consecutive 7-day period.

STCW Section A-VIII/1(9) makes allowance for exceptions from the required hours of rest in paragraph 2.2 (77 hours in any 7-day period) and paragraph 3 (no more than two periods of rest and one of which shall be at least 6 hours) provided that the rest period is not less than 70 hours in any 7-day period. Note that a 7-day period can be any consecutive 7 days. However the exception shall not be allowed for more than two consecutive weeks. The intervals between two periods of exceptions on board shall not be less than twice the duration of the exception.

An exception to paragraph 2.1 (a minimum of 10 hours of rest in any 24-hour period) is allowed for provided that the 10 hours of rest is not divided into more than three periods, one of which shall be at least 6 hours in length and neither of the other two periods shall be less than 1 hour in length. The intervals between consecutive periods of rest shall not exceed 14 hours. This exception shall not extend beyond two 24-hour periods in any 7-day period. Any breach of the above should result in detention.

**Q7 Will the watchkeepers on the first and subsequent watch after departure have sufficient time to rest?**

STCW Reg. I/4.2.5 requires that:

Deficiencies which may be deemed to pose a danger to persons, property or the environment include inability to provide, for the first watch at the commencement of a voyage and for subsequent relieving watches, persons who are sufficiently rested and otherwise fit for duty.

STCW Reg. VIII/1.1.2 requires that:

Each Administration shall, for the purpose of preventing fatigue, require that watch systems are so arranged that the efficiency of all watchkeeping personnel (watchkeepers) is not impaired by fatigue and that duties are so organized that the first watch at the commencement of a voyage and subsequent relieving watches are sufficiently rested and otherwise fit for duty.

The Master should arrange watchkeepers to be sufficiently rested prior to taking the first and subsequent watches, taking into account that watchkeepers may have been engaged in activities in port (for instances, cargo operation, security watch, attending survey and receiving stores and spare parts etc.) together with other extra duties or lookout in poor weather condition for the expected departure. All arrangements should be properly recorded for PSC inspection. Any objective

evidence indicating that watchkeepers on the first and subsequent watches after departure have not rested enough, or will not have the minimum rest periods required in STCW, may cause delay of the ship until such time that those rest periods have been taken.

Moreover, PSCO may inspect the voyage plan required by STCW Section A-VIII/2 and SOLAS Chapter V Reg. 34, together with the watch schedule, the activities in port and the planned departure time as objective evidence to verify that watchkeepers are sufficiently rested prior to taking the first and subsequent watches.

**Q8 Is there evidence that an on-call seafarers receive adequate compensatory rest periods if disturbed by call-outs to work?**

STCW Section A-VIII/1(6) requires that:

When a seafarer is on call, such as when a machinery space is unattended, the seafarer shall have an adequate compensatory rest period if the normal period of rest is disturbed by call-outs to work.

Chief Engineer should maintain records of machinery operations e.g. Engine Room Log is accurate.

**Q9 Do the records indicate that a bridge lookout is being maintained?**

STCW Section A-VIII/2 Part 4-1(14) requires that:

A proper lookout shall be maintained at all times in compliance with rule 5 of the International Regulations for Preventing Collisions at Sea, 1972 as amended, and shall serve the purpose of:

- maintaining a continuous state of vigilance by sight and hearing, as well as by all other available means, with regard to any significant change in the operating environment;
- fully appraising the situation and the risk of collision, stranding and other dangers to navigation; and
- detecting ships or aircraft in distress, shipwrecked persons, wrecks, debris and other hazards to safe navigation.

During the day light and under certain conditions the lookout can be stood down, providing full account has been taken of all relevant factors, including, but not limited to:

- state of weather;
- visibility;
- traffic density;
- proximity of dangers to navigation;
- the attention necessary when navigating in or near traffic separation schemes; and
- assistance is immediately available to be summoned to the bridge when any change in the situation so requires.

The lookout records must be maintained, particularly during the hours of darkness and the conditions mentioned above.

**Q10 Was the ship detained as a result of this CIC?**

Any non-compliance detected by a PSCO may result in ship detention. Therefore, shipowners, ship managers and ship masters should well prepare for this forthcoming CIC.

- The End -