Australian Government
Australian Maritime Safety Authority

MARINE NOTICE

Marine Notice 9/2012
Supersedes 18/2010

Fitness for Duty

The purpose of this Marine Notice is to draw the attention of ship operators, masters and officers to the need to comply with the fitness for duty requirements under the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW Convention), including hours of work and rest.

The potential for serious threats to health and safety and pollution of the marine environment as a result of fatigue of seafarers is well known. The principles of safe manning are intended to ensure each ship is adequately manned for all operations, not just the voyage between ports. Operational pressures and other factors can result in watchkeeping personnel having insufficient rest, resulting in lack of compliance with the STCW Convention and Code.

Section A-VIII/1.5 of the STCW Code requires that watch schedules are posted in an 'easily accessible' location on the ship. These schedules should relate to the 'actual' watchkeeping arrangement at sea and in port. Sections A-VIII/1.2 and A-VIII/1.3 require that hours of rest 'shall' not be reduced below the specified minimums:

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

Section A-VIII/1.4 allows some flexibility in cases of emergency, during drills or due to other overriding operational conditions. AMSA does not consider that the relaxation provided for 'overriding operational conditions' extends to the normal operations of the ship, such as port arrivals, berthing/unberthing and cargo operations. In addition, exceptions outlined in section A-VIII/1.9 will not automatically apply.

For Australian vessels, Marine Order 28 (Operations standards and procedure) sets out the full fitness for duty requirements. The ship operator may apply to AMSA for approval for an exception as outlined in section 15 of Marine Order 28 (Operations standards and procedures).

AMSA has increased its focus on compliance with the watchkeeping requirements of the STCW Convention. AMSA inspectors check the records of work and rest, and other onboard documents to validate those records. AMSA inspectors have issued deficiencies and detentions due to identified issues with work hours. These broadly fall within the following categories:

- hours of rest not being complied with in port resulting in watchkeeping personnel on duty for departures and first sea watches not being adequately rested;
- records of hours of work/rest not being maintained;
- records of hours of work/rest not reflecting actual working arrangements; and
- deficiencies in the Safety Management System of the ship that hinder compliance.

Ship operators and masters are reminded of their obligation to ensure the watchkeeping arrangements on board comply with international convention requirements. Failure to meet these requirements may make a ship a risk to other ships, human lives, or the marine environment.

Where inadequate rest arrangements are found to exist on a ship, AMSA will take necessary action to ensure compliance. To avoid this situation, ship operators and masters are encouraged to review their onboard arrangements and work practices.

Mick Kinley
A/g Chief Executive Officer
June 2012

Australian Maritime Safety Authority
GPO Box 2181
CANBERRA ACT 2601
File No: 2011/2699