



Marine Notice 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 of the STCW Convention, including hours of work/rest.

The potential for serious threats to health and safety and pollution of the marine environment as a result of fatigue of crews 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. However, AMSA has found that operational pressures and other factors occasionally result in watch keepers having insufficient rest, resulting in lack of compliance with the guidelines as specified in the STCW Convention and Code.

To assist in the application of these requirements 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' watch keeping arrangement at sea and in port.

Section A-VIII/1.1 and 1.2 of the STCW Code require that hours of rest 'shall' not be reduced below the specified minimums. However, section A-VIII/1.3 does allow some flexibility in an emergency, during a drill or due to other overriding operational conditions. AMSA does not consider that the relaxation provided for 'overriding operation conditions' extends to the normal operations of the ship, such as port arrivals, berthing/unberthing, cargo operations etc.

In recent months AMSA has increased its focus on compliance with the watch keeping requirements of STCW. In doing so, AMSA surveyors not only check the records of work and rest but also use other onboard documents to validate those records.

During recent port State control inspections, AMSA surveyors have issued deficiencies and detentions due to identified issues with work hours. These deficiencies and detentions broadly fall within the following categories:

- hours of rest not being complied with in port resulting in watch keepers on duty for departures and first sea watches not being adequately rested;
- records of hours of work/rest are not being maintained;
- records of hours of work/rest do not reflect the actual working arrangements; and
- the Safety Management System of the ship is deficient in ensuring compliance.

Ship operators and masters are reminded of their obligation to ensure the watch keeping arrangement on board comply with the international requirements. Failure to meet these requirements may render a vessel dangerous to other human lives, vessels 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.

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A/g Chief Executive Officer
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