

**Report of the 2014 Concentrated Inspection
Campaign (CIC) on STCW Hours of Rest**



DATA extract = 15-12-2014

Executive Summary

The decision to carry out a Concentrated Inspection Campaign (CIC) on compliance with STCW Hours of Rest was taken at the Paris MoU Port State Control Committee 45 in Riga, Latvia, May 2012.

The purpose of the CIC was to gain an overall impression of compliance with STCW Hours of Rest following concern over several incidents where fatigue was considered to be a factor. Also of concern was that a bridge lookout was being maintained.

A CIC Questionnaire and guidance was developed by the Paris MoU in conjunction with the Tokyo MoU. The Questionnaire comprised 14 questions to be answered by the Port State Control Officer (PSCO) during every Port State Control (PSC) inspection during the period of the CIC. Out of the 14 questions, 9 were directly related to the CIC and 4 were for information gathering purposes. A train the trainer session regarding guidance on completing the CIC questionnaire was held by the Paris MoU for PSCOs in June 2014 in Greece.

The CIC was carried out on all ships targeted for inspection within the Paris MoU Region from 1st September 2014 until 30th November 2014.

The Questionnaire was completed on a total of 4041 ships.

A total of 16 ships were detained as a direct result of the CIC Questionnaire. Whilst the detention rate appears low (0.4%) it has to be borne in mind that detention was not always the most appropriate action, as the breach of hours of rest may have happened in the past.

In 11.2% of cases (449) the hours of rest were not being recorded correctly and in 5.1% of cases (203) the watchkeeping personnel did not have sufficient rest.

In 2.5% of cases (101) a bridge lookout was not being maintained.

A total of 27 ships were not manned in accordance with the Minimum Safe Manning Document of which 5 were detained for non-compliance.

A total of 912 CIC-topic related deficiencies were recorded.

It is concerning that during the CIC, which was publicised in advance, 912 deficiencies were recorded (22.57% of inspections) related specifically to STCW hours of rest and that 16 ships were detained as a result of the CIC.

It is recommended that PSCOs continue to monitor STCW hours of rest during PSC inspections.

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Introduction

1.1 Purpose of this Report

To report on the results of the Concentrated Inspection Campaign on STCW Hours of Rest.

1.2 Objective of the CIC

The objective of the CIC was to establish that watchkeeping personnel are meeting the requirements regarding hours of rest as per STCW 78 as amended.

1.3 Scope of the CIC

The CIC was undertaken on all ships targeted for inspection within the Paris MoU Region between 1st September 2014 and 30th November 2014

1.4 General Remarks

- For the purpose of this report, a detention is an inspection containing at least one deficiency that is considered a ground for detention.
- The tables do not take into account inspections where the CIC questionnaire was not recorded, with exception of table 2.

Summary, Conclusions and Recommendations

2.1 Summary

The decision to carry out a Concentrated Inspection Campaign (CIC) on compliance with STCW Hours of Rest was taken at the Paris MoU Port State Control Committee 45 in Riga, Latvia, May 2012.

The purpose of the CIC was to gain an overall impression of compliance with STCW Hours of Rest following concern over several incidents where fatigue was considered to be a factor. Also of concern was that a bridge lookout was being maintained.

A CIC Questionnaire and guidance was developed by the Paris MoU in conjunction with the Tokyo MoU. The Questionnaire comprised 14 questions to be answered by the Port State Control Officer (PSCO) during every Port State Control (PSC) inspection during the period of the CIC. Out of the 14 questions, 9 were directly related to the CIC and 4 were for information gathering purposes. A train the trainer session regarding guidance on completing the CIC questionnaire was held by the Paris MoU for PSCOs in June 2014 in Greece.

The CIC was carried out on all ships targeted for inspection within the Paris MoU Region from 1st September 2014 until 30th November 2014.

The Questionnaire was completed on a total of 4041 ships.

A total of 16 ships were detained as a direct result of the CIC Questionnaire. Whilst the detention rate appears low (0.4%) it has to be borne in mind that detention was not always the most appropriate action, as the breach of hours of rest may have happened in the past.

In 11.2% of cases (449) the hours of rest were not being recorded correctly and in 5.1% of cases (203) the watchkeeping personnel did not have sufficient rest.

In 2.5% of cases (101) a bridge lookout was not being maintained.

A total of 27 ships were not manned in accordance with the Minimum Safe Manning Document of which 5 were detained for non-compliance.

A total of 837 inspections (20.71% of total CIC inspections) had one or more CIC related deficiencies recorded. The most common deficiency was related to "Records of seafarers' daily hours of work or rest" (STCW Section A-VIII/1 (7)) which was recorded in 492 cases

A total of 912 CIC-topic related deficiencies were recorded.

2.2 Conclusions

The purpose of the CIC was to obtain an overall impression as to the compliance with STCW Hours of Rest. It is concerning that during the CIC, which was publicised in advance, 912 deficiencies were recorded (22.57% of inspections) related specifically to STCW hours of rest and that 16 ships were detained as a result of the CIC.

The results show that there is generally a lack of overall compliance considering the number of deficiencies recorded.

2.3 Recommendations

It is recommended that PSCOs continue to look at STCW hours of rest during PSC inspections and take appropriate action.

CIC Questionnaire Results

3.1 Analysis

3.1.1 Response to CIC questionnaire

Table 1 Response to CIC questionnaire

Total number of inspections performed with a CIC questionnaire = 4041

Nr.	CIC 348729230 Questions Hours of Rest	'YES'(1)		'NO'(1)		N/A(2)		Blank(2)		% 'NO' adjusted Det.(3)
		#	%	#	%	#	%	#	%	
Q01	Is a watch schedule posted in an easily accessible area? STCW Section A- VIII/1 (5). Def code: 01306 (0253)	3957	98,2%	71	1,8%			13	0,3%	
Q02*	Is the ship manned in accordance with MSMD or an equivalent document? SOLAS 1999/2000 Amend / Chapter V Reg. 14. Def code: 01209 (0230)	4005	99,3%	27	0,7%			9	0,2%	66,7%
Q03	Are there records of daily hours of rest for each watchkeeper? STCW Section A-VIII/1 (7). Def code: 01308 (0261)	3970	98,6%	56	1,4%			15	0,4%	
Q04	Have the records in Qu 3 been endorsed by an appropriate person? STCW Section A-VIII/1 (7). Def code: 01308 (0261)	3916	97,5%	99	2,5%			26	0,6%	
Q05	Are records related to hours of rest being recorded correctly? STCW Section A-VIII/1 (7). Def code: 01308 (3240)	3571	88,8%	449	11,2%			21	0,5%	
Q06	Do rest periods for all watchkeeping personnel comply with STCW requirements, including the weekly requirements of rest? STCW Section A- VIII/1 (2). Def code: 01307 (3230)	3812	94,9%	203	5,1%			26	0,6%	

Nr.	CIC 348729230 Questions Hours of Rest	'YES'(1)		'NO'(1)		N/A(2)		Blank(2)		% 'NO' adjusted Det.(3)
		#	%	#	%	#	%	#	%	
Q07**	Will the watchkeepers on the first and subsequent watch after departure have sufficient time to rest? STCW RegI/4 or STCW Reg VIII/1.1.2 .Def code: 09235 (3230)	3997	99,6%	18	0,4%			26	0,6%	83,3%
Q08	Is there evidence that on-call seafarers receive adequate compensatory rest periods if disturbed by call-outs to work? STCW A-VIII/1.6	2726	97,4%	74	2,6%	1222	30,2%	19	0,5%	
Q09	Do the records indicate that a bridge lookout is being maintained? STCW Section A-VIII/ 4-1 (14). Def code: 01306 (0253))	3909	97,5%	101	2,5%			31	0,8%	
Q10	Was the ship detained as a result of this CIC?	41	1,0%	3968	99,0%			32	0,8%	
Q11	Is there a two watch system on board including the master?	1268	32,4%	2648	67,6%			125	3,1%	
Q12	Does the MSMD require an Engineer Officer?	3742	95,0%	198	5,0%			101	2,5%	
Q13	Is the ship designated UMS?	3086	78,3%	856	21,7%			99	2,4%	
Q14	If ship does not have UMS notation is there more than one certificated engineer on board	897	92,4%	74	7,6%	2965	73,4%	105	2,6%	

* If the actual crew number or composition is not brought in accordance with the minimum safe manning document or the flag State does not advise that the ship may sail, the ship may be considered for detention.

** If the PSCO determines that a watchkeeper due to take the first or relieving watch at the commencement of a voyage has not had, or will not have, the minimum rest periods required in STCW then the PSCO should consider detention of the vessel until such time as those rest periods have been taken.

Calculation notes:

- 1) The percentages of Yes and No answers are based on the total number of Yes and No answers only.
 - 2) The percentage of N/A and Blank answers are based on the total number of inspections with CIC questionnaires (4041)
 - 3) The percentage of "NO adjusted" = Nr realised CIC related detentions / Nr detentions conform Questionnaire
- The reason for this method of calculation is that the N/A answers will not influence the Y/N answers results.

3.1.2. Analysis of answers to questionnaire in relation to detention

A total of 16 ships were detained as a direct result of the CIC being undertaken as reported in THETIS. It will be noted, however, that according to the answer to Question 10, regarding detention, it appears 41 ships were detained. This is an input error and was most likely related to the fact a ship in full compliance would have all “YES” answers to the questionnaire apart from “NO” for detention and thus by error could accidentally be recorded as “YES”.

The detention figure would seem low (0.4%) considering the number of deficiencies recorded (912), however detention was not always considered an appropriate action regarding hours of rest as the breach of the requirements may have been in the past.

3.1.3. Analysis of CIC-topic related deficiencies

A total of 912 CIC-topic related deficiencies were recorded. A total of 837 inspections (20.71% of total CIC inspections) had one or more CIC related deficiencies recorded (see Table 3).

The most common deficiency was related to “Records of seafarers’ daily hours of rest” (STCW Section A-VIII/1 (7)) which was recorded in 492 cases (53.94% of all deficiencies).

3.1.4. Number of inspections and number of ships in CIC (Table 2)

	# of individual ships inspected during CIC	# of inspections performed with a CIC questionnaire	# of inspections without a CIC questionnaire
Total # of inspections	4283	4041	364
# of inspections with detentions	132	117	15
# of detentions with <i>CIC</i> -topic related deficiencies	16	16	1

3.1.5 Specification of CIC-topic related deficiencies

(Table 3)

CIC-topic related deficiencies		Inspections	Detentions CIC-topic related	Detentions CIC-topic related with RO responsibility
		(# of inspections with this deficiency) One inspection can have multiple deficiencies	(# of inspections with this deficiency recorded as ground for detention)	(# of inspections with this deficiency recorded as ground for detention and RO related)
1209	Manning specified by the minimum safe manning doc (SOLAS 1999/2000 Amend / Chapter V Reg. 14)	21	5	0
1306	Shipboard working arrangements (STCW Section A- VIII/1 (5))	145	1	0
1307	Maximum hours of work or minimum hours of rest(STCW Section A- VIII/1 (2))	131	1	0
1308	Records of seafarers' daily hours of work or rest (STCW Section A-VIII/1 (7))	445	7	1
9235	Fitness for duty - work and rest hours (STCW Regl/4 or STCW Reg VIII/1.1.2)	95	5	0

3.1.6. Number of ships to number of inspections during CIC campaign

(Table 4)

# of inspections performed per ship	# of ships	% of total
1	4041	100.0%
2	0	0.0%
3	0	0.0%
Total	4041	100.0%

3.1.7 Number of inspected ships per Ship Risk Profile

(Table 5)

Ship Risk Profile	# of inspections	# of detentions	detention as % of inspections	detentions CIC-topic related	detentions CIC-topic related as % of inspections
High Risk Ship (HRS)	204	16	7.8%	3	1.5%
Standard Risk Ship (SRS)	3408	91	2.7%	12	0.4%
Low Risk Ship (LRS)	204	4	2.0%	1	0.5%
Unknown	225	6	2.7%	0	0.0%
Total	4041	117	2.9%	16	0.4%

3.1.8 Number of inspected ships and detentions per ship type

(Table 6)

Ship type	# of inspections	# of detentions	detention as % of inspections	detentions CIC-topic related	detentions CIC-topic related as % of inspections
Bulk carrier	948	26	2.7%	3	0.3%
Chemical tanker	376	7	1.9%	0	0.0%
Combination carrier	2	0	0.0%	0	0.0%
Commercial yacht	17	0	0.0%	0	0.0%
Container	407	2	0.5%	1	0.2%
Gas carrier	113	2	1.8%	0	0.0%
General cargo/multipurpose	1207	58	4.8%	11	0.9%
Heavy load	5	0	0.0%	0	0.0%
High speed passenger craft	1	0	0.0%	0	0.0%
NLS tanker	11	0	0.0%	0	0.0%
Offshore supply	94	0	0.0%	0	0.0%
Oil tanker	325	2	0.6%	0	0.0%
Other	34	2	5.9%	1	2.9%
Other special activities	139	5	3.6%	0	0.0%
Passenger ship	32	2	6.3%	0	0.0%
Refrigerated cargo	73	4	5.5%	0	0.0%
Ro-Ro cargo	177	4	2.3%	0	0.0%
Ro-Ro passenger ship	25	3	12.0%	0	0.0%
Special purpose ship	17	0	0.0%	0	0.0%
Tug	38	0	0.0%	0	0.0%
Total	4041	117	2.9%	16	0.4%

3.1.9 Inspections and detentions per Flag State

(see Annex 1.4)

3.1.10 Inspections and detentions per Recognized Organization

(see Annex 1.5)

3.1.11 Ship age overview

(Table 7)

Ship age*	# of inspections	# of detentions	Detention as a % of inspections	Detentions CIC-topic related	Detentions CIC-topic related as a % of inspections
≤ 5 years	817	9	1.1%	0	0.0%
6-10 years	1135	19	1.7%	0	0.0%
11-15 years	530	12	2.3%	2	0.4%
16-20 years	603	22	3.6%	3	0.5%
21-25 years	311	13	4.2%	3	1.0%
26-30 years	222	14	6.3%	3	1.4%
31-35 years	207	14	6.8%	2	1.0%
> 35 years	216	14	6.5%	3	1.4%
Total	4041	117	2.9%	16	0.4%

3.2 Results on former CIC's on same subject

Not applicable

3.2.1. Analysis

There is a spread of detentions over the age range, which would be expected as hours of rest is a human element issue rather than a hardware issue.

3.2.2. Comparison of CIC's on the same topic over the years

Not applicable

3.3 Results other CIC participants (if applicable)

3.3.1. Analysis

The total number of inspections during the period of the campaign varies widely between the other MoUs/Agreements with the Paris MoU, at 4041 inspections, being the highest and the MED MoU, with 930 inspections, being the lowest. However the detention rate of actual CIC detentions against total inspections is low for the Paris MoU (0.4%) and for the MED MoU being the highest at 3.01%. The lowest detention rate was in the Latin American Agreement with only 0.06%. (see Table 8)

3.3.2. Comparison of CIC-results with other participants

(Table 8)

	Paris MoU	Latin American Agreement	Black Sea MoU	Med MoU	Indian Ocean MoU
# of inspections	4041	1762	1146	930	1623
# of detentions	117	19	21	64	117
Detentions as % of inspections	2.9%	1.08%	1.8%	6.88%	7.2%
Detentions with CIC-topic related deficiencies	16	1	6	28	23
Detentions CIC-topic related as % of inspections	0.4%	0.06%	0.5%	3.01%	1.8%
Detentions CIC-topic related as % of detentions	13.7%	5.26%	28.6%	43.75%	19.66%

Annex 1

Annex 1.1 Inspection form of the CIC

CIC ON STCW HOURS OF REST 01 SEPTEMBER 2014 – 30 NOVEMBER 2014

Ship's Name:
Inspection Authority:
Port of Inspection:
Date of Inspection:

IMO No:

Qu No	AREA	YES	NO	N/A
1	Is a watch schedule posted in an easily accessible area? STCW Section A-VIII/1 (5). Def code: 01306 (0253)			
2*	Is the ship manned in accordance with MSMD or an equivalent document? SOLAS 1999/2000 Amend / Chapter V Reg. 14. Def code: 01209 (0230)			
3	Are there records of daily hours of rest for each watchkeeper? STCW Section A-VIII/1 (7). Def code: 01308 (0261)			
4	Have the records in Qu 3 been endorsed by an appropriate person? STCW Section A-VIII/1 (7). Def code: 01308 (0261)			
5	Are records related to hours of rest being recorded correctly? STCW Section A-VIII/1 (7). Def code: 09236 (3240)			
6	Do rest periods for all watchkeeping personnel comply with STCW requirements, including the weekly requirements of rest? STCW Section A-VIII/1 (2). Def code: 09235 (3230)			
7**	Will the watchkeepers on the first and subsequent watch after departure have sufficient time to rest? STCW Regl/4 or STCW Reg VIII/1.1.2 .Def code: 09235 (3230)			
8	Is there evidence that on-call seafarers receive adequate compensatory rest periods if disturbed by call-outs to work? STCW A-VIII/1.6			
9	Do the records indicate that a bridge lookout is being maintained? STCW Section A-VIII/ 4-1 (14). Def code: 01306 (0253))			
10	Was the ship detained as a result of this CIC?			
These questions for information only:				
11	Is there a two watch system on board including the master?			
12	Does the MSMD require an Engineer Officer?			
13	Is the ship designated UMS?			
14	If ship does not have UMS notation is there more than one certificated engineer on board			

Any question answered with a "NO" MUST be accompanied by a relevant deficiency on the Report of Inspection. Deficiency codes and convention references are given for each question where appropriate.

Questions marked either * or ** answered with a "NO" may give clear grounds for a detention.

* If the actual crew number or composition is not brought in accordance with the minimum safe manning document or the flag State does not advise that the ship may sail, the ship may be considered for detention. See guidance for details.

** If the PSCO determines that a watchkeeper due to take the first or relieving watch at the commencement of a voyage has not had, or will not have, the minimum rest periods required in STCW then the PSCO should consider detention of the vessel until such time as those rest periods have been taken. See guidance for details.

Annex 1.2 Explanatory notes to the questions

Concentrated Inspection Campaign on STCW Hours of Rest

01 September – 30 November 2014

GUIDELINES

1. General

During Port State Control Committee 45 in Riga, Latvia, May 2012 it was agreed to undertake a Concentrated Inspection Campaign (CIC) on hours of rest in 2014. It was further agreed that the CIC would only look at deck and engine room watchkeepers' hours of rest under STCW 78 as amended by the Manila Conference. This CIC will be undertaken on every ship eligible for inspection during the period of the campaign.

2. Purpose

The purpose of the CIC is to establish that watchkeeping personnel are meeting the requirements regarding hours of rest as per STCW 78 as amended.

3. Definitions

- 3.1 "Hours of rest" means time outside hours of work; this term does **not** include short breaks. Ref ILO180 Art 2/MLC 2006 Standard A2.3. Note: there is no definition of Hours of Work or Rest in STCW.
- 3.2 "Watchkeeper" means all persons who are assigned duty as officer in charge of a watch or as a rating forming part of a watch.
- 3.3 "Minimum Safe Manning Document or Equivalent" means a document issued by the Administration as evidence of the minimum safe manning considered necessary to comply with the provisions of SOLAS regulation V/14."
- 3.4 "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. Ref SOLAS Ch II-1 Part E Reg 46

4. References

- 4.1 STCW 78 as amended
- 4.2 Paris MoU PSCC Instruction – Guidelines on the Inspection of Hours of Work/Rest
- 4.3 Paris MoU PSCC Instruction – Guidelines on STCW

**CIC ON STCW HOURS OF REST
01 SEPTEMBER 2014 – 30 NOVEMBER 2014**

Ship's Name:
Inspection Authority:
Port of Inspection:
Date of Inspection:

IMO No:

Qu No	AREA	YES	NO	N/A
1	Is a watch schedule posted in an easily accessible area? STCW Section A-VIII/1 (5). Def code: 01306 (0253)			
2*	Is the ship manned in accordance with MSMD or an equivalent document? SOLAS 1999/2000 Amend / Chapter V Reg. 14. Def code: 01209 (0230)			
3	Are there records of daily hours of rest for each watchkeeper? STCW Section A-VIII/1 (7). Def code: 01308 (0261)			
4	Have the records in Qu 3 been endorsed by an appropriate person? STCW Section A-VIII/1 (7). Def code: 01308 (0261)			
5	Are records related to hours of rest being recorded correctly? STCW Section A-VIII/1 (7). Def code: 09236 (3240)			
6	Do rest periods for all watchkeeping personnel comply with STCW requirements, including the weekly requirements of rest? STCW Section A-VIII/1 (2). Def code: 09235 (3230)			
7**	Will the watchkeepers on the first and subsequent watch after departure have sufficient time to rest? STCW Regl/4 or STCW Reg VIII/1.1.2 .Def code: 09235 (3230)			
8	Is there evidence that on-call seafarers receive adequate compensatory rest periods if disturbed by call-outs to work? STCW A-VIII/1.6			
9	Do the records indicate that a bridge lookout is being maintained? STCW Section A-VIII/ 4-1 (14). Def code: 01306 (0253))			
10	Was the ship detained as a result of this CIC?			
These questions for information only:				
11	Is there a two watch system on board including the master?			
12	Does the MSMD require an Engineer Officer?			
13	Is the ship designated UMS?			
14	If ship does not have UMS notation is there more than one certificated engineer on board			

Any question answered with a "NO" MUST be accompanied by a relevant deficiency on the Report of Inspection. Deficiency codes and convention references are given for each question where appropriate.

Questions marked either * or ** answered with a "NO" may give clear grounds for a detention.

* If the actual crew number or composition is not brought in accordance with the minimum safe manning document or the flag State does not advise that the ship may sail, the ship may be considered for detention. See guidance for details.

** If the PSCO determines that a watchkeeper due to take the first or relieving watch at the commencement of a voyage has not had, or will not have, the minimum rest periods required in STCW then the PSCO should consider detention of the vessel until such time as those rest periods have been taken. See guidance for details.

Questionnaire Guidance

Qu 1 - Is a watch schedule with shipboard working arrangements posted in an easily accessible area?

The watchkeeping schedule for **all** watchkeepers is to be posted where it is easily accessible for all those who are affected by the schedule. The schedule should be in the working language or languages of the ship and in English. It should include, daily rest hours at sea **and** daily rest hours in port.

If the schedule is not posted, or not readily available as required, then a deficiency code 17 should be issued.

Convention Ref: STCW Section A-VIII/1 (5)

Deficiency Ref: 01306 (0253)

Nature of defect: Not posted

Suggested Action Taken Code: 17

Qu 2* – Is the ship manned in accordance with MSMD or an equivalent document?

Confirm by looking at a crew list that the ship is manned at least according to the requirements of the Minimum Safe Manning Document (MSMD) or equivalent. Confirm whether the ship is required to carry an engineer officer(s). Some smaller ships do not require an engineer officer(s), however the MSMD should set out any special conditions eg; the ship is designated UMS, one of the deck officers may be designated to attend to the machinery and be suitably qualified. **If the ship is not manned in accordance with the MSMD or an equivalent document, the flag State should be consulted. If after consultation, the actual crew number or composition is not brought in accordance with the minimum safe manning document or the flag State does not advise that the ship may sail, the ship may be considered for detention.**(See PSC Committee Instruction on STCW)

Convention Ref: SOLAS 1999/2000 Amend / Chapter V Reg. 14 for ships constructed on or after 25-5-1980

Deficiency Ref: 01209 (0230)

Nature of defect: Not as required

Suggested Action Taken Code: 17/30

Qu 3 - Are there records of daily hours of rest for each watchkeeper?

Check that there are records of rest for each individual watchkeeper serving on the ship. The records shall be maintained in a standardised format, in the working language or languages of the ship and in English in accordance with flag State provisions.

Convention Ref: STCW Section A-VIII/1 (7)

Deficiency Ref: 01308 (0261)

Nature of defect: Missing

Suggested Action Taken Code: 17

**The format of records may be as per IMO/ILO guidelines for the development of tables of seafarers' shipboard working arrangements and format of records of seafarers' hours of work or hours of rest.*

Qu 4 - Has the record in Qu 3 been endorsed by an appropriate person?

There is a requirement that seafarers shall receive a copy of the records pertaining to them, which shall be endorsed by the **master**, or by a person authorised by the master, and by the seafarers.

Convention Ref: STCW Section A-VIII/1 (7)

Deficiency Ref: 01308 (0261)
Nature of defect: Not endorsed
Suggested Action Taken Code: 17

Qu 5 - Are records related to hours of rest being recorded correctly?

It is important to try and establish that the hours of rest recorded on the daily hours of rest sheet for each watchkeeper are genuine and have not been falsified to show compliance with the requirements.

This may be obvious if the recorded hours are regular, day in day out, week in, week out and no account taken of additional hours such as drills, manoeuvring during arrival/departure, particularly for the master where there may be periods of pilotage, bad weather etc. In blatant cases the record will have been prematurely completed for the future.

If the PSCO suspects that the records are falsified then a comparison needs to be undertaken between the watchkeeping schedule, the hours recorded for a particular watchkeeper and with other documentation such as the official log book, bridge and engine room log books, bell books and crew overtime records to confirm accuracy of recording and compliance with the basic requirements concerning the minimum hours of rest.

When looking at the hours of rest of the watchkeepers, compare the 'hours of rest' records with what has actually been happening onboard ship. For example are the junior deck officers just recording the same rest hours every day, but actually doing 6 on 6 off in port from the records in the deck log book? What about mooring station time, does that information from the bell book match the hours of rest records?

The same is true for the engine room watchkeepers, do they just record 0800 -1200, 1300-1700 every day for an unattended engine room? What about night rounds and standby times? Some ships that are not designated as UMS on the MSMD are provided with only one qualified engineer officer and in some cases an engine rating in addition. Unless the ship is on restricted length of voyages it is not possible to operate like this.

There is also a requirement in STCW A-VIII/2 Part 5-1, paragraph 95.1 for an engineer to be in charge of the watch in port on ships of 3000kW and above. There are some ships that have engine power of greater than 3000kW, are UMS and have only one engineer on board. In effect this engineer cannot be granted any shore leave.

Whilst it may be unreasonable to record rest hours to the nearest minute, a fair record of the hours actually allocated for rest should be recorded. This will allow the Master to ensure that watchkeepers are adequately rested before taking up duty.

Evidence to be examined (and collected where necessary)

Information that may be examined as part of this process may include:

- Copies of records of rest
- Copies of relevant and contradicting records in the deck log or engine log, the more errors copied the better, perhaps 5 or so if possible with different sources/ personnel
- Copies of bell books
- Copies of watch keeping schedules
- Consider getting statements from the relevant watchkeepers

Convention Ref: STCW Section A-VIII/1 (7)
Deficiency Ref: 09236 (3240)
Nature of defect: Not as required. Additional Comment "Records of rest appear to be falsified"
Suggested Action Taken Code: 17

Qu 6 - Do rest periods for all watchkeeping personnel comply with STCW requirements, including the weekly requirements of rest?

The basic requirement for watchkeepers is that they should be provided with a **rest period** (Rest period means time outside hours of work, this does not include short breaks) of **not less** than:

- A minimum of 10 hours rest in any 24 hour period
- 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.

Note that the starting point of the 24 hour period is important. In the absence of any guidelines/instructions from the flag State 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, and additional short breaks and meal breaks could **not** be included in the total periods of rest.

If a watchkeeper is receiving less than 10 hours rest in 24 hours (ie working in excess of 14 hours) this should be recorded as a deficiency. It is also important to verify that the watchkeeper is obtaining 77 hours rest in **any** 7-day period, if not then a deficiency should be recorded. Note: a seven day period can be ANY consecutive 7 days. It is incorrect to assume that this refers to a working week such as Sunday to Sunday.. It is up to the professional judgement of the PSCO as to how far back to look at the records but 3-4 weeks would seem reasonable. However, the PSCO should take into account of any guidelines/instructions from the flag State.

*Note: Flag State administrations may allow exceptions in accordance with STCW Chapter VIII, Section A-VIII/1-9, see below under "Guidance on detention"

Convention Ref: STCW Section A-VIII/1 (2)
Deficiency Ref: 09235 (3230)
Nature of defect: Rest hours insufficient
Suggested Action Taken Code: 17

Qu 7* - Will the watchkeepers on the first and subsequent watch after departure be sufficiently rested and fit for duty?

Ask the Master to indicate how he/she will ensure the watchkeepers will be fit for the first and subsequent watches. What plan does he/she have for the expected departure?

The PSCO should try and obtain objective evidence* as to whether watchkeepers are suitably rested, having possibly been engaged in various activities while the ship is in port (for example, loading/unloading, attending to survey and inspection, etc). If the PSCO determines by objective evidence* that the watchkeeper(s) has not rested enough and is not fit for duty then the PSCO should consider detention of the vessel until such time as the watch keeper(s) becomes fit for duty. If the PSCO determines by objective evidence that a watchkeeper(s) due to take the first or relieving watch at the commencement of a voyage has not had, or will not have, the minimum rest periods required in STCW then the PSCO should consider detention of the vessel until such time as those rest periods have been taken.

PSCO's may inspect the voyage plan required by STCW Code A-VIII/2 and SOLAS Ch V Reg 34, taking into account the planned departure time and the watch schedule, together with any work in port, as objective evidence that watchkeepers will be sufficiently rested prior to taking the first and subsequent watches.

*Objective evidence could include, but is not limited to; log book entries.

Convention Ref: STCW Reg I/4.2.5 or STCW Reg VIII/1.1.2
Deficiency Ref: 09235 (3230)

Nature of defect: Other. Additional comment "Watchkeepers not sufficiently rested"
Suggested Action Taken Code: 17/30

Qu 8 - Is there evidence that an on-call seafarer receives adequate compensatory rest periods if disturbed by call-outs to work?

STCW allows for seafarers working on-call, for example engineer officers operating a periodically unattended machinery space to be compensated by an additional rest period if they have had to work additional hours. This would need to be confirmed by the Chief Engineer's records of machinery operations eg; Engineroom Log.

Convention Ref: STCW A-VIII/1.6
Deficiency Ref: 09235 (3230)
Nature of Defect: Rest hours insufficient
Suggested Action Taken Code: 17

Qu9 – Do records indicate that a bridge lookout is being maintained?

STCW is clear 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.

Under certain conditions the lookout can be **stood down during the day**, 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; and
- 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.

Check with the available records that a lookout is being kept particularly during the hours of darkness.

Convention Ref: STCW (Manila amendments) / STCW Code Part A / CHAPTER VIII / Part 4-1 (14)
Deficiency Ref: 01306 (0253)
Nature of defect: Other. Additional comment: "Bridge lookout not being maintained"
Suggested Action Taken Code: 17

Qu10 - Was the ship detained as a result of this CIC?

To be completed "Yes" or "No" accordingly. If the ship has been detained for other issues but includes one or more detainable deficiencies related to the questions for the CIC (Questions 1 – 8) then the question should be answered "Yes".

Guidance on Detention

Non compliance with STCW in respect of rest hours may result in detention, however detention may not always be appropriate as the breach may have taken place in the past. For example the ship may have been in the port overnight and the watchkeepers are suitably rested and in compliance with

STCW when the PSCO boards for an inspection in the morning, however on checking the records the PSCO may find a breach may have taken place several days before. In this case it is important to verify whether there is a systematic breach of the requirements which could call into question the effectiveness of the Safety Management System in ensuring critical operation of the ship. In such a circumstance, an ISM deficiency should be recorded in accordance with the PSCO guidelines on the ISM Code.

Note that STCW A-VIII/1(9) makes allowance for exceptions from the required hours of rest in paragraph 2.2 (77 hours in a 7 day period) and paragraph 3 (two periods of rest, one at least 6 hours) provided that the rest period is **not less than 70 hours in any 7 day** period. (Note that a seven day period can be ANY consecutive 7 days. Some think that this refers to a working week such as Sunday to Sunday, this is not correct. However the weekly exception **shall not** be allowed for more than **two** consecutive weeks.

Also an exception to paragraph 2.1 (10 hours rest in 24 hours) is allowed for provided that the 10 hours of rest is not divided into more than 3 periods and that 2 of those periods cannot be less than 1 hour. This exception shall not extend beyond 2 x 24 hour periods in any 7 day period. Any breach of the above should result in detention.

If the sailing of the vessel is imminent and if it is determined that watchkeepers on the first and subsequent watch after departure will not be sufficiently rested as required, a detention should be considered, until such time that the watchkeepers are suitably rested, under both ISM and watch keeping requirements.

The following could be used:

[09235 (3230)] - Watchkeeping staff not adequately rested. Code 30 (details of who is not rested should be provided in the comments field).

Note: Questions 11 – 14 are for information purposes only.

Reference question13:

The vessel holds an Unattended Machinery Space Document (UMS) issued by the Administration or a classification society. (S74/CII-1/R46.3)^{*}

Minimum Safe Manning Document should contain information that the ship is manned as UMS. (S74/CV/R14.2). (Requirements to Officers and Ratings are usually written on the Minimum Safe Manning Document when the ship is manned as UMS)

Crew List is available to verify if the ship is manned in accordance with the Safe Manning Document.

* Each classification society has its own class notation for indicating that the ship has been built and equipped to operate with periodically unattended machinery spaces, of which the most common are found in the following table :

Lloyds Register of Shipping	UMS
Det Norske Veritas	E0
American Bureau of Shipping	ABCU or ACCU
Germanischer Lloyd	AUT (but not AUT-Z !)

Questions 13 and 14 are related. If the answer to question 13 is “yes”, the answer to question 14 should be “N/A”. If the answer to question 13 is “no” proceed with answering question 14 “yes/no”.

Annex 1.3 Inspections and Detentions per Flag State

(Table Annex 1.3)

Flag	# of inspections	# of detentions	Detention as a % of inspections	# of detentions CIC-topic related	Detentions CIC-topic related as a % of inspections	WGB- list* 2013
Albania	2	0	0.0%	0	0.0%	Grey
Algeria	4	1	25.0%	0	0.0%	Grey
Antigua and Barbuda	240	11	4.6%	1	0.4%	White
Azerbaijan	2	0	0.0%	0	0.0%	unlisted
Bahamas	177	1	0.6%	0	0.0%	White
Bahrain	1	0	0.0%	0	0.0%	unlisted
Bangladesh	2	0	0.0%	0	0.0%	unlisted
Barbados	25	0	0.0%	0	0.0%	White
Belgium	11	0	0.0%	0	0.0%	White
Belize	42	7	16.7%	0	0.0%	Grey
Bermuda (UK)	15	0	0.0%	0	0.0%	White
Bolivia	1	0	0.0%	0	0.0%	unlisted
Bulgaria	1	0	0.0%	0	0.0%	Grey
Cambodia	25	2	8.0%	0	0.0%	Black
Canada	1	0	0.0%	0	0.0%	unlisted
Cayman Islands (UK)	17	0	0.0%	0	0.0%	White
China	21	0	0.0%	0	0.0%	White
Comoros	12	1	8.3%	1	8.3%	Black
Cook Islands	22	1	4.5%	0	0.0%	Black
Croatia	7	1	14.3%	0	0.0%	White
Curacao	13	1	7.7%	0	0.0%	Grey
Cyprus	151	2	1.3%	0	0.0%	White
Denmark	76	0	0.0%	0	0.0%	White
Dominica	2	0	0.0%	0	0.0%	Black
Egypt	5	1	20.0%	0	0.0%	Grey
Estonia	2	0	0.0%	0	0.0%	White
Faroe Islands	18	0	0.0%	0	0.0%	White
Finland	30	0	0.0%	0	0.0%	White
France	16	0	0.0%	0	0.0%	White
Germany	46	0	0.0%	0	0.0%	White
Gibraltar (UK)	57	0	0.0%	0	0.0%	White
Greece	64	0	0.0%	0	0.0%	White
Hong Kong, China	160	1	0.6%	0	0.0%	White
Iceland	3	0	0.0%	0	0.0%	unlisted
India	9	0	0.0%	0	0.0%	Grey
Iran, Islamic	6	0	0.0%	0	0.0%	White

Flag	# of inspections	# of detentions	Detention as a % of inspections	# of detentions CIC-topic related	Detentions CIC-topic related as a % of inspections	WGB- list* 2013
Republic of						
Ireland	7	0	0.0%	0	0.0%	White
Isle of Man (UK)	62	0	0.0%	0	0.0%	White
Israel	2	0	0.0%	0	0.0%	unlisted
Italy	64	1	1.6%	0	0.0%	White
Jamaica	2	0	0.0%	0	0.0%	unlisted
Japan	4	0	0.0%	0	0.0%	White
Jersey (UK)	1	0	0.0%	0	0.0%	unlisted
Kazakhstan	7	0	0.0%	0	0.0%	White
Korea, Republic of	12	0	0.0%	0	0.0%	White
Kuwait	4	0	0.0%	0	0.0%	unlisted
Latvia	5	0	0.0%	0	0.0%	White
Lebanon	8	0	0.0%	0	0.0%	Grey
Liberia	329	9	2.7%	1	0.3%	White
Libya	2	0	0.0%	0	0.0%	Grey
Lithuania	11	0	0.0%	0	0.0%	White
Luxembourg	13	0	0.0%	0	0.0%	White
Malaysia	3	0	0.0%	0	0.0%	Grey
Malta	348	10	2.9%	1	0.3%	White
Marshall Islands	271	4	1.5%	0	0.0%	White
Moldova, Republic of	29	4	13.8%	3	10.3%	Black
Morocco	1	0	0.0%	0	0.0%	Grey
Netherlands	195	3	1.5%	0	0.0%	White
Norway	110	3	2.7%	0	0.0%	White
Palau	11	0	0.0%	0	0.0%	unlisted
Panama	528	23	4.4%	3	0.6%	White
Peru	1	0	0.0%	0	0.0%	unlisted
Philippines	8	0	0.0%	0	0.0%	White
Poland	9	0	0.0%	0	0.0%	White
Portugal	24	0	0.0%	0	0.0%	Grey
Qatar	1	0	0.0%	0	0.0%	unlisted
Russian Federation	78	3	3.8%	0	0.0%	White
Saint Kitts and Nevis	20	0	0.0%	0	0.0%	Grey
Saint Vincent and the Grenadines	47	2	4.3%	1	2.1%	Black
Sao Tome and Principe	1	0	0.0%	0	0.0%	unlisted
Saudi Arabia	14	0	0.0%	0	0.0%	White
Seychelles	1	0	0.0%	0	0.0%	unlisted
Sierra Leone	17	1	5.9%	1	5.9%	Black
Singapore	158	0	0.0%	0	0.0%	White
Spain	12	0	0.0%	0	0.0%	White

Flag	# of inspections	# of detentions	Detention as a % of inspections	# of detentions CIC-topic related	Detentions CIC-topic related as a % of inspections	WGB- list* 2013
Sweden	12	0	0.0%	0	0.0%	White
Switzerland	10	0	0.0%	0	0.0%	White
Syrian Arab Republic	2	0	0.0%	0	0.0%	Grey
Taiwan, China	1	0	0.0%	0	0.0%	unlisted
Tanzania, United Republic of	16	3	18.8%	0	0.0%	Black
Thailand	5	1	20.0%	0	0.0%	White
Togo	35	4	11.4%	1	2.9%	Black
Tunisia	1	0	0.0%	0	0.0%	Grey
Turkey	108	8	7.4%	2	1.9%	White
Tuvalu	2	0	0.0%	0	0.0%	Grey
Ukraine	13	0	0.0%	0	0.0%	Grey
United Arab Emirates	3	0	0.0%	0	0.0%	unlisted
United Kingdom	85	1	1.2%	0	0.0%	White
United States	14	1	7.1%	0	0.0%	White
Vanuatu	27	5	18.5%	1	3.7%	Grey
Venezuela	1	0	0.0%	0	0.0%	unlisted

* The official WGB-list (2012) of the Paris MoU is published in the Annual Report. The scope of this table is only the CIC.

Annex 1.4 Inspections and detentions per Recognized Organization

(Table Annex 1.4)

Issuing authority	Inspection*	Detentions CIC- topic related with RO responsibility**
	533	
American Bureau of Shipping	116	
Bulgarian Register of Shipping	3	
Bureau Veritas	276	
China Classification Society	19	
Columbus American Register	1	
CONARINA LLC	1	
CR Classification Society	1	
Croatian Register of Shipping	3	
Det Norske Veritas	243	
DNV GL AS	159	
Dromon Bureau of Shipping	6	
Germanischer Lloyd	299	
Global Marine Bureau Inc.	1	
Global Shipping Bureau Inc	3	
Hellenic Register of Shipping	2	
Intermaritime Certification Services, ICS Class	5	
International Naval Surveys Bureau	12	
International Register of Shipping	3	
International Ship Classification	2	
Iranian Classification Society	1	
Isthmus Bureau of Shipping, S.A.	8	
Korea Classification Society	1	
Korean Register of Shipping	30	
Lloyd's Register	349	
Macosnar Corporation	2	
Maritime Bureau of Shipping	3	1
National Shipping Adjuster Inc.	2	
Nippon Kaiji Kyokai	266	
Other	3	
Overseas Marine Certification Services	4	
Panama Marine Survey and Certification Services Inc.	1	
Panama Maritime Documentation Services	5	
Panama Register Corporation	4	
Panama Shipping Registrar Inc.	1	
Phoenix Register of Shipping	4	
Polski Rejestr Statkow (Polish Register of Shipping)	10	
Registro Italiano Navale	43	

Issuing authority	Inspection*	Detentions CIC- topic related with RO responsibility**
	533	
Russian Maritime Register of Shipping	79	
Shipping Register of Ukraine	5	
Turkish Lloyd	1	
Venezuelan Register of Shipping	6	
Grand Total	1983	1

* Number of inspections where the certificate is recorded as issued by the RO

** Number of inspections where the RO issued the certificate and a deficiency covered by that certificate was recorded as detainable and RO related

Certificate 533: Maritime Labour Certificate