



TECHNICAL CIRCULAR No. 185 of 14th March 2014

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Manning and Training in focus
Reference	MLC

Manning and Training in focus

The year 2014 will focus on manning and training now that "phase-in period" for MLC and STCW amend ended

With the end of the "phase-in period" for Maritime Labour Convention 2006 and the 2010 STCW amendments, coupled with the revisions to the Guidelines on Minimum Safe Manning (IMO Resolution A. 1047(27)) and the Training of Personnel on Mobile Offshore Units (IMO Resolution A. 1079(28)), 2014 may see an increased focus on manning and training.

Companies will be aware of the national and international requirements for their ships to be sufficiently and efficiently manned with persons who are trained for their assigned duties.

The Bahamas Maritime Authority (BMA) has issued guidance to ensure continued compliance. This guidance includes:

- a requirement for the issuance of a revised Minimum Safe Manning Document (MSMD) is based on the company assessment of various onboard factors
- a need for re-assessment where there is a change of company and a new MSMD to reflect the new company's operation.

The "old" approach, that a manning level was based solely on watchkeeping arrangements for a voyage from point A to point B may not be deemed sufficient. Allowance now has to be made for other factors such as managing emergency situations, handling cargo operations, onboard maintenance and security duties. The BMA does not specify manning levels but rather takes into consideration the international guidelines when reviewing manning levels proposed by a company.

Documentary evidence of training is a responsibility shared by the company, Master and seafarer, based on assigned shipboard duties. The BMA only provides guidance on the training requirements but flag state/port state/MLC inspectors and ISM auditors will request documentary evidence of training based on the seafarer assigned shipboard duties. Inspectors and Auditors can rightly request documentary evidence of training for the Waiter who is assigned to assist with security searches or the

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Shop Assistant who is a Stairway Guide in an emergency.

MLC 2006 and 2010 STCW amendments harmonized the hours of rest requirements. Accurate recordkeeping is therefore critical to demonstrate compliance- a seafarer's hours of rest record should match his/her overtime records. Inconsistencies may be considered as the falsifying of records, resulting in delays, non-conformities or even detention of the ship. Frequent exceptions to the hours of rest may be evidence of insufficient manning levels.

A unified interpretation of seafarer and the finalization of national medical certification are amongst some on-going manning issues. Meanwhile, international port state inspection guidelines have been developed by IMO and ILO. The BMA believes that 2014 will be the year that port state authorities increase their level of inspection of manning and training areas.

BMAs expertise is always available to assist owners and seafarers to avoid any undue delays to ships. Contentious issues that could be a focus for Inspectors/Auditors should be identified through regular company assessments and audits of onboard manning and assigned duties.

REFERENCES:

- STCW amendments, MLC, training

ATTACHMENTS: No.

Kindest Regards,

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