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To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	ILO Guidelines for Occupational Safety and Health
Reference:	ILO - MLC

ILO Guidelines for Occupational Safety and Health

In 2014, the ILO published Guidelines for implementing the occupational safety and health provisions of the Maritime Labour Convention. They were formally endorsed by the ILO Governing Body in March 2015.

The Guidelines should bring about a more comprehensive approach to risk management than that current under ISM. The requirement for Plan-Do-Check-Act continuous improvement will be familiar to many (e.g. from TMSA) but should help to stop compliance cultures e.g. by updating risk assessments as circumstances change.

Hazards to be addressed include the long and short-term effects of ambient factors (exposure to noise, vibration, lighting, ultraviolet (UV) light, non-ionizing radiation and extreme temperatures).

The hazards inherent to working onboard pose serious risks. They include means of access, asbestos-related risks, work in enclosed spaces, use of equipment and machinery such as loading/unloading, anchoring, docking and mooring, dangerous cargo and ballast.

The hazards from poor ergonomic design are addressed, including those related to manual handling.

Testing, risk assessment and the use of preventive principles are required. The preventive principles combat risk at source, and use the following risk control hierarchy:

• eliminate the hazard
• substitute a less hazardous material or process
• isolate the hazard at source
• technical and engineering controls
• organizational controls

Reliance on Personal Protective Equipment (PPE) comes last.

The requirements for reporting and investigating accidents and injuries could bring about a significant change. In addition, there are requirements for learning from accidents.

Readers will be familiar with the ILO Code of Practice on accident prevention on board ship at sea and in port. This is joined by

Codes of Practice on:
• Ambient factors in the workplace
• Safety in the use of chemicals at work
• Protection of workers against noise and vibration in the working environment
• Management of alcohol- and drug related issues in the workplace
• HIV/AIDS and the world of work

The risk-based approach to safety in the MLC contrasts with the prescriptive approach adopted in much of SOLAS. How the inevitable contradictions and conflicts will be resolved is unclear. The hope must be for a comprehensive risk-based approach supported by prescription where useful, going beyond SOLAS where appropriate. Much will depend on how national legislation is implemented and enforced.

There is no formal obligation on design offices to follow the preventive principles in workspace design. Presumably, owners will ask designers for a risk assessment, and an assessment of how the design meets the preventive principles. Ship design that took the preventive principles seriously could be very different.

In summary, the Guidelines offer shipping the chance to adopt the sort of comprehensive risk-based approach to health and safety that land-based Westerners have enjoyed. They represent a great opportunity, and it would be tragic if their use became just another paperwork exercise.

REFERENCES:

   ILO - MLC

ATTACHMENTS: No.

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