



TECHNICAL CIRCULAR No. 269 of 06th May 2015

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	STCW Hours of Rest
Reference:	Black Sea MoU

BS MOU issues CIC Report on STWC Hours of Rest

The Black Sea MoU has issued its final report on the results of the Concentrated Inspection Campaign (CIC) on STCW Hours of Rest, which was carried out by 6 Member Authorities between September 1st and November 30th 2014. The objective of this report is to analyze the results of this CIC on STCW Hours of Rest. Results of the inspections without questionnaire are not included in the statistical analysis.

During the campaign a total of 1,146 inspections were carried out with the CIC questionnaire involving 1,146 individual ships. Of this quantity 21 ships were detained with 6 (28.57%) detentions were being within the CIC scope

A total of 168 deficiencies have been recorded as a direct result of this campaign.

The overall number of CIC-topic related deficiencies per inspection was 0.15.

- The most notable non-conformities observed were lack of correctly recorded records related hours of rest (7.33%), followed by lack of watch schedule posted in an accessible area (1.75%) and endorsement of the daily hours of rest records for each watch keeper (1.48%). 421 (36.74%) inspections concerned general cargo/multi-purpose ships, followed by bulk carriers with 399 (34.82%) inspections, oil tankers with 112 (9.77%) inspections and chemical tankers with 77 (6.72%) inspections.

- 5 (83.33%) of the ships detained for CIC-related deficiencies were general cargo/multipurpose ships.

- 1 (16.67%) of the ships detained was a commercial yacht.

- Most inspections were carried out on board ships flying the flags of Malta with 160 (13.96%) inspections, Panama with 149 (13.00%) inspections, Turkey with 102 (8.90%) inspections and Liberia with 87 (7.59%) inspections.

- ships younger than 6 years age performing relatively good with 240 (20.94%) inspections

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without detentions.

- Older ships, particularly those 30 years and older, show reason for concern with majority of detentions 6 (85.71%) and deficiencies 97 (65.54%), although subjecting minority of inspections 241 (21.29%).
- Most inspections were carried out on board ships flying the flags of Malta with 160 (13.96%) inspections, Panama with 146 (13.00%) inspections, Turkey with 102 (8.90%) inspections and Liberia with 87 (7.59%) inspections.
- A total of 6 flags had one each CIC-related detentions. These flags cover 22.86% of the CIC inspections.
- A total of 52 flags, covering 77.14% of the CIC inspections, had no CIC-related detentions at all.
- A total of 26 flags, covering 13.62% of the total CIC inspections, had no CIC-related deficiencies

The report concludes that reflecting on the objective of the CIC, i.e. to provide indications as to the level of compliance with vital points of the requirements of the hours of rest both deck and engine watch officers, the level of compliance with the provisions of STCW is reasonably good.

Recommendations

It is well recognized that fatigue is a major risk and frequently features as a contributory cause of casualties, particularly groundings. Thereby, despite to the announcement of the CIC Questionnaire to the industry, observation of lack of correctly records related to the hours of rest raise great concern. Non-compliance or inadequate record keeping is a significant potential danger to the vessel itself and all on board. High rate of non-compliances observed on board ships 25 years and older indicates a potential risk.

Thereby it is recommended:

- Basic findings of the report in general, analysis of the responses to the questionnaire and breakdown of major non-conformities by ship flag, ship type and age and responses to the information questions in particular, to be submitted IMO III 2nd session.
- PSC Officers should be instructed to submit CIC Questionnaire for each initial PSC inspection during the campaign, and;
- Continue to put emphasis on the vital requirements of the STCW Hours of Rest when performing PSC inspections, particularly the requirements that raised the most concern in the CIC.
 - a. lack of correctly records related to hours of rest (Q5);
 - b. non-compliance with the STCW requirements of watch schedule posted in an easily accessible area (Q1);
 - c. lack of records of daily hours of rest for each watch keeper (Q3)

REFERENCES:

-Black Sea MoU

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