



TECHNICAL CIRCULAR No. 468 of 04th March 2018

To:	All Surveyors/Auditors
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Applicable to flag:	All Flags
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MLC Hours of Work and Rest	
Reference:	MLC

MLC Hours of Work and Rest

There are concerns about the different interpretations attributed to MLC 2006 Regulation 2.3 Hours of work and hours of rest, para. 5(b) and para. 6. The concern is about the phrase “in any 24-hour period” used when calculating crew work schedules to ensure that sufficient rest periods are taken.

The issue revolves around checks “in any 24-hour period” and whether such checks should commence during a seafarer’s rest period. This should be avoided because by not taking into consideration a part of the seafarer’s undisrupted rest period, irregularities may occur which could result in a violation of the regulations. The seafarer’s rest period should not be split into parts/sections, regardless if the rest period commenced during the previous day.

For example, if a seafarer’s rest period was between 2000 of day 1 and 0400 of day 2, then the undisrupted rest time is eight hours in total. Therefore, the beginning of “in any 24-hour period” checking during the rest period 2000 (day 1) - 0400 (day 2) i.e. starting at 2100, 2130, 2200, 2300 etc., should be avoided. It is recommended that when scheduling work patterns for crew, the “in any 24-hour period” should commence at the start of any period of work by moving backwards 24 hours. This type of calculation clearly indicates whether the seafarer has received adequate rest in accordance with the regulations before the commencement of a new work- related task.

The Constitution of the International Labour Office confers no special competence upon the ILO to

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interpret Conventions and any comment is without prejudice to what the supervisory bodies of the ILO may have to say about the issue.

REFERENCES:

- MLC
- ATTACHMENTS: No.

kindest Regards,
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