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| To: | All Surveyors/Auditors |
| Applicable to flag: | All Flags |
| Fatigue on board the ship | |
| Reference: | STCW and MLC |

Fatigue on board the ship

Fatigue. It's a way of life for so many of us. From first responders to students to the transportation industry, it's a badge of honor to pull the all-nighter or push through an extended period with no rest.

The military is another community for which fatigue is no stranger. U.S. Naval Special Warfare (NSWF) pushes their troops to the limit during initial training (Basic Underwater Demolition/Seal Training (BUD/S)) under very controlled circumstances, including stressors such as hypothermia and sleep deprivation.

But, at what cost?

Incidents within the past year involving U.S. naval vessels, including the fatal collisions of the *USS Fitzgerald* and *USS John S. McCain*, have highlighted fatigue and overwork as possible causal factors. The differences between fatigued crewmembers onboard these warships and soon-to-be SEALs in Basic Underwater Demolition/SEAL training (BUD/S) are the controls in place. During BUD/S training, carefully prepared spreadsheets tell instructors just how far they can push their sailors. These controls allow the prospective SEALs to understand how their bodies and minds will react when fatigued, under stress and overworked, while keeping them safe.

This is in stark contrast to the crew of warships that have no such controls in place.

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It is a difference between fatigue conditions and those routine conditions as well.

If you walk onboard any merchant vessel in the world, you will easily have a discussion of rest hours, fatigue mitigation and, yes, issues getting adequate rest, with most any crewmember. Why is this? The Standards of Training, Certification and Watchstanding for Seafarer's (STCW) Code from the IMO is the short answer.

The longer answer will also include the Maritime Labor Convention (MLC) of 2006 from the International Labor Organization (ILO). The combination of these international conventions limits the work hours of the average mariner to 13 hours/day on average and has requirements for tracking of their rest hours.

The STCW and MLC 2006 rest hour regulations pose challenges for merchant mariners yet provide targets towards which to aim. The U.S. Coast Guard has also looked at fatigue factors, including their Crew Endurance Management program - elements of which are linked below.

It is understandable why Admiral Davidson indicated to Military.com that sailors must come to terms with the fact that they will be asked to fight while exhausted. Warfare doesn't take timeouts for adequate rest, after all. The problem arises when sailors and soldiers are required to work far beyond their physical and cognitive capabilities on a routine basis. It is at this point of diminished cognitive ability that their decision making becomes questionable. When these same sailors are put in control of aircraft, warships and other modes of transportation, tragedy can and will occur.

REFERENCES:

- MLC and Captain Richard Madden

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Kindest Regards,
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