



The International Maritime Human Element Bulletin

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There is so much that can be written about Regulation that it would take a whole series of Bulletins to cover the subject adequately.

Not surprisingly, each of the contributors to this Bulletin has focused on similar issues regarding the effects of Regulation, that is the abundance of Regulations; commercial pressures; enforcement; the burden of paperwork and inspections; and the value of goal-based, rather than prescriptive, regulation.

There are over 900 IMO Resolutions covering such areas as: Maritime safety, prevention of marine pollution from ships, prevention of pollution by dumping, technical cooperation, facilitation of maritime traffic and maritime security.

There are also some 60 ILO Conventions and Recommendations on seafarer conditions (shortly to be consolidated into one Maritime Labour Convention; 206 ISO Standards for shipbuilding and the operation of ships; and 87 IEC Standards relating to electrical equipment of ships and of marine structures, and to navigation and control equipment.

Many of these Resolutions, Conventions, Recommendations and Standards affect the Human Element either directly or indirectly. It is important, therefore, to remember that the purpose of Regulation is to protect people, machines, systems and the environment from danger, injury, damage or destruction.

To regulate is to control by rule, or to adapt to requirements – whichever, it makes sense to comply!

Through the **Alert!** Project, we seek to represent the views of all sectors of the maritime industry – contributions for the Bulletin, letters to the editor and articles and papers for the website database are always welcome.

The Editor
Alert!
The Nautical Institute
202 Lambeth Road
London SE1 7LQ
United Kingdom

editor@he-alert.org

For the guidance of wise men and the blind obedience of fools

Regulation is required to ensure safer and secure shipping and cleaner oceans; and for the setting of common standards for ship and system design and build, for the education and training of the various stakeholders, and for operational procedures. The seafarer also needs to be protected through regulation that can provide him/her with a safe and secure working environment, decent working and living conditions, fair terms of employment and a healthy lifestyle.

Human nature is such that we all, at times break the rules. This may be unintentional through slips, lapses or mistakes; or maybe because we simply do not know that the rule exists or do not understand it. Or it may be intentional because commercial or operational pressures are forcing us to 'cut corners'. But, each time we break the rules we take a risk, and occasionally we may take one risk too many, which can lead to an accident or hazardous incident.

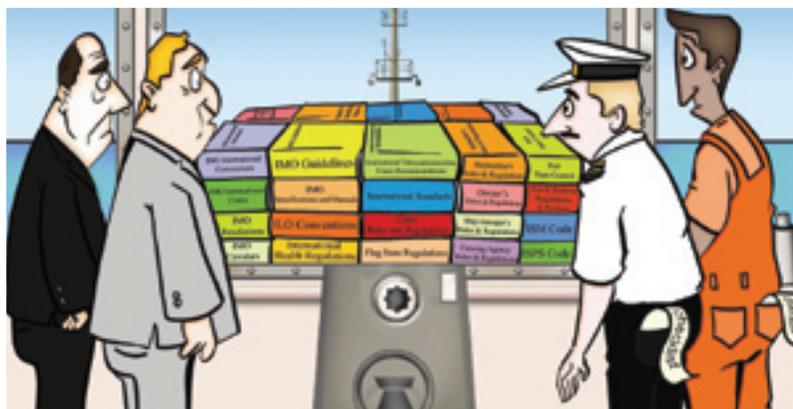
The statistics tell us that the majority of accidents are as a result of human failings, and many can be put down to violations of the rules and regulations. For example, as often as not, ship collisions result from the incorrect or improper interpretation of the International Regulations for

Preventing Collisions at Sea (known as the 'Collision Regulations' or 'Colregs', terms which in themselves are contradictions!) Indeed, it has led one observer to suggest that *'the overall picture tends to be one of a game with no referee, played by contestants with different rulebooks, each perfectly convinced they have the right answer.'*

Other violations can be put down to complacency - a form of self-satisfaction that leads to an unawareness of actual dangers or deficiencies. Those who are complacent perhaps think that they know better than they who have crafted the rules and regulations; or they have simply become such slaves to routine that they have been unable to recognise when they have strayed from the procedure.

Regulation also brings with it an administrative burden, in terms of added documentation, more inspections, formalised procedures and an ever-increasing reliance on checklists. These added pressures for the master and his crew might also cause them to violate the rules because they are too absorbed in the paperwork.

There is an ancient proverb, which says that *'laws are for the guidance of wise men and the blind obedience of fools'* - it is well worth remembering!



Keeping on top of regulation

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A culture of compliance

Steven Jones,
ConsultISM Ltd

As an industry we have evolved a compliance culture, reacting to 'what' we should do and 'how' we should act, set out across prescriptive rules and regulations.

However, when the safety, security, and environmental management revolutions came along we needed to alter course and to follow the 'management systems' approach. Sadly, many companies have failed to grasp the twin concepts of 'management systems' and 'goal' setting. They have become trapped in a vicious circle of over-reliance on rules, where they wanted regulations to tell them how they should comply. The pressure of complying then condemned them never to reach out and achieve more; they had neither the time nor the resources to reassess and move forward.

As a result they turned to ISM consultants, to produce whole libraries of 'off the shelf' rules and regulations which they called

their 'own' Safety Management System. Such systems have not worked; they may have persuaded a Flag State administration to issue a Document of Compliance and a Safety Management Certificate, and they may convince a PSC inspector – but in practice they are costing the ship operator money. Invariably, those on board view such systems as a major inconvenience - generating mountains of paper with no tangible benefit.

Thankfully, there are companies who have created a culture of continual improvement, using effective risk assessment and management, and by applying pro-active measures to manage safety through reporting, analysing and implementation. They are the ones who recognise that they need not wait for another major accident or incident or a new set of rules and regulations to guard against the same thing happening to them.

For further information about ConsultISM Ltd, go to: www.consultism.co.uk/

Alert!

The International Maritime Human Element Bulletin

Editor: David Squire, FNI

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The seafarer as a stakeholder, not a passive instrument

Chris York,
The Apostleship of the Sea

Headlines such as 'Vessels collide as master falls asleep' do not raise too many eyebrows in the shipping world today. This and lesser incidents are not for want of regulation. Doug Stevenson of the Center for Seafarers' Rights suggests, "Maritime safety regulations have become so refined that the highest risks to safe waterborne commerce are not the ships themselves but the humans that operate them. Nevertheless, safety regulations still largely focus on technical solutions rather than the human element."

There is a view that regulations can be discarded, or records falsified so that hours of rest and safe minimum manning levels can be overlooked, as commercial pressures predominate over concern for the wellbeing of the crew. There are many ships that both implement regulations and take into consideration the extra demands that regulation places on the crew. But, there still exist unscrupulous agents and owners and port authorities whose disregard or misinterpretation of regulations can subject seafarers to a

formidable struggle for survival.

This approach is far-removed from the concept of an ethically responsible implementation of regulations capable of treating seafarers as stakeholders and not as passive instruments. There can be little doubt of the need for the provisions in the Consolidated Maritime Labour Convention that will place the wellbeing of seafarers firmly within the context of the regulatory framework. But, regulation in itself is not the problem; rather, difficulties arise from the lack of effective proper direction given to it, often due to commercial pressures, which in the long run may not even make commercial sense.

Perhaps with guidance from the international community and adequate regulation on the part of the worldwide political establishment, the lot of seafarers and the image of shipping will eventually be improved.

For further information on the work of the Center for Seafarers' Rights, go to: <http://seamenschurch.org/csr>



Arthur Bowring
Managing Director
Hong Kong Shipowners' Association

Safe Manning

It is now quite clear, despite the obstinacy from those that should know better, that fatigue is a major issue with many of those who work at the front line in our industry - our seafarers. As fatigue is primarily caused by tiredness through overwork or stress, the natural answer to the problem is to amend or replace the present regulations so that there will always be a sufficient number of competent people on board every ship.

The industry is principally regulated through the application of the International Maritime Organization's Resolution on *Safe Manning*. This is a goal-based regulation, but not a complete one. It calls for the owner to put forward arguments and evidence to the ship's flag state to show that the owner's proposed complement will ensure that the ship is safely manned. Continued safe manning should be assured by the maintenance of work/rest hour records, which are also the subject of the Standards of Training Competence and Watchkeeping for Seafarers (STCW) and the International Labour Organization's Convention C180

(Seafarers' Hours of Work and the Manning of Ships Convention, 1996).

Recent analysis has confirmed that these records are routinely flogged. It is probably impossible for a port or flag state inspector easily to pick up the false entries, leaving their discovery to the in-depth analysis that follows an incident - useless, therefore, in preventing accidents from happening in the first place.

A true goal based standard would call for 'backing evidence' to show that the evidence (the work/rest hour record) is correct. And a true goal based standard would ensure that it is the owner who proposes what form that backing evidence would take.

Those that currently object to the revision of Safe Manning regulation make the point that there are sufficient regulations, but that they are not being properly enforced by administrations. The basics of a goal-based standard, however, call for the regulated - the owner - to show that his proposed complement is sufficient. This is not something that can be put on administrations as 'their problem', as it

is the owner who has to prove that the records being kept are correct.

The issue of fatigue is becoming an increasingly common subject in accident reports. This is not a problem that can be deferred by calling for further study. It is a problem that is rising to the top of the agenda of many administrations, and unless the industry proactively addresses the issue, it will be solved by those administrations through the re-introduction of prescription. Prescription, of course, is a pre-determined standard for the minimum number of people and competencies that must be on board every ship, with no regard for the differing requirements of different ship types and trades.

The industry urgently needs to act now to put systems in place to reassure administrations that there will always be sufficient people on board all ships before the issue is addressed for us, with a solution that none of us will like.

For further information on the Hong Kong Shipowners' Association, go to: <http://www.hksa.org/>

Marine Safety Regulations Save Lives



Doug Rabe

Doug Rabe is the Chairman of the Marine Accident Investigators' International Forum (MAIIF), which comprises of representatives from some 55 Administrations, and is dedicated to the advancement of maritime safety and the prevention of marine pollution. Here, Doug - who is also the Chief of the Marine Investigations Division at the US Coast Guard Headquarters - reflects on the value of marine safety regulations.

In these days of acronyms everywhere, I thought I'd give you one more. Hopefully, one that you can remember and repeat whenever appropriate: **MSRSL - Marine Safety Regulations Save Lives.**

Compliance with and enforcement of regulations makes a difference. Over the years, I've heard many complaints about

the excessive cost and inconvenience (and sometimes 'idiocy') of safety requirements. I've also investigated many accidents where simple, quick, and easy compliance with existing regulations would have prevented the accident and saved many lives.

For example, the commercial fishing industry has had a poor safety record in vessel losses and fatalities. According to a study published in 1991 by the US National Research Council, during the period from 1982 through 1987, an average of 250 US commercial fishing vessels and 73 lives onboard were lost per year. In addition, an average of 35 more lives were lost per year for other reasons, such as falling overboard or accidents while working on deck.

Through the efforts of many fishing vessel safety advocates and the US Coast Guard, safety regulations were published in 1991. These regulations focused on lifesaving equipment and crew training, and were aimed at improving crew survivability after an accident. After the regulations were implemented, there was a fairly consistent average vessel loss rate of 116 per year (1994 - 1999) with an average fatality rate

related to those vessel losses of about 37 per year.

Following several commercial fishing vessel losses in 1999, the US Coast Guard launched a vigorous effort to educate the commercial fishing industry about the regulations and greatly stepped up enforcement of the regulations.

As a result, for the period 2000 through 2004, vessel losses remained roughly the same at an average of 120 per year, but the average number of fatalities related to those vessel losses dropped from 37 to 23. Included in that average is the loss of the ARCTIC ROSE with 15 deaths - the single highest death toll US fishing vessel accident in 50 years. Nevertheless, the numbers speak for themselves - pre-regulation, 73 deaths per year, post-regulation, 23 deaths per year.

This is proof positive that the regulations specifically targeted at saving crewmembers' lives after an accident have worked exactly as intended.

For more information about the work of MAIIF, go to: www.maiif.org

The human face of regulation **Good intent**

Minimum Safe Manning

Intent:

- Acceptable work routines
- Safe operation of the ship

Side effects:

- Selection of Flag based on lowest manning
- Fatigue and overwork
- Ship operated in an unsafe condition
- Misreporting of hours worked
- Reduced training opportunities
- Poor staff retention

STCW

Intent:

- Proper education & training
- Adequate experience
- Skills & competence

Side effects:

- Forged certificates
- Seafarers treated as a commodity
- Private certification schemes
- Minimum investment in training
- Lack of trust between shipmates

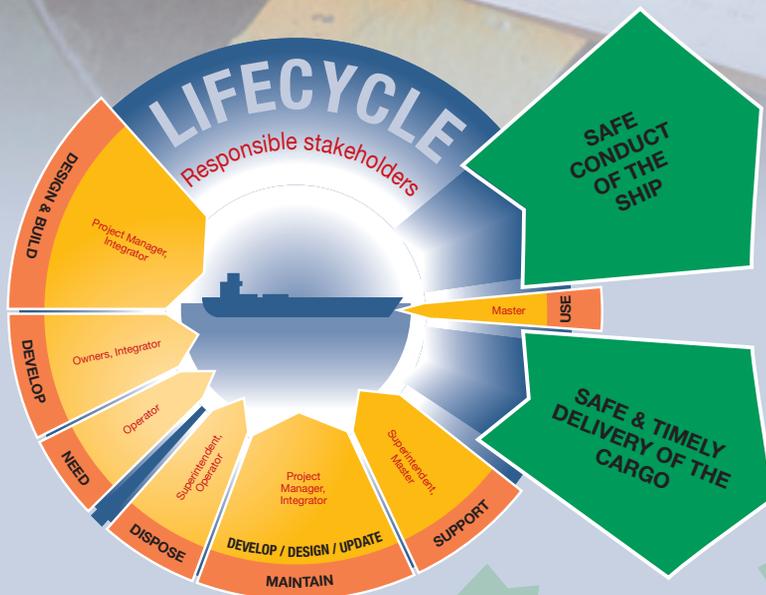
International Labour Conventions

Intent:

- Safe & secure working environment
- Decent working & living conditions
- Fair terms of employment
- Healthy lifestyle

Side effects:

- Low sign-up by flag states
- Flagging out
- Unscrupulous employers



Class Rules & Regulations

Intent:

- Technical fitness for purpose

Side effects:

- 'Glass ceiling' instead of 'safety net'
- Belief that safety can be outsourced
- Concealment of defects
- Trading of safety
- Obeying the letter of the law
- Change of Class

COLREGs

Intent:

- Safe navigation of the ship
- Avoidance of collision

Side effects:

- Inability to deal with real situations
- Reluctance to reduce speed
- Disputes over interpretation
- Near misses and forced groundings
- Vessel Traffic Services
- Marine Electronic Highway

ISM Code

Intent:

- Safe practices in ship operation
- Safe working environment

Side effects:

- Added documentation
- More inspections
- Ever-increasing reliance on checklists
- Violations of poorly specified procedures
- Increase in operational efficiency rather than improved safety
- 'Death by ISM'
- Criminalisation of the seafarer

International Health Regulations

Intent:

- Prevent/protect/control disease
- Ship sanitation

Side effects:

- Crew may not receive treatment for notifiable diseases
- Crew not informed about risks
- Covert spread of disease
- Flagging out

ISPS Code

Intent:

- Detect/deter acts which threaten security

Side effects:

- Criminalisation of the seafarer
- Reduced quality of life
- Divisive treatment of crews
- Poor staff retention

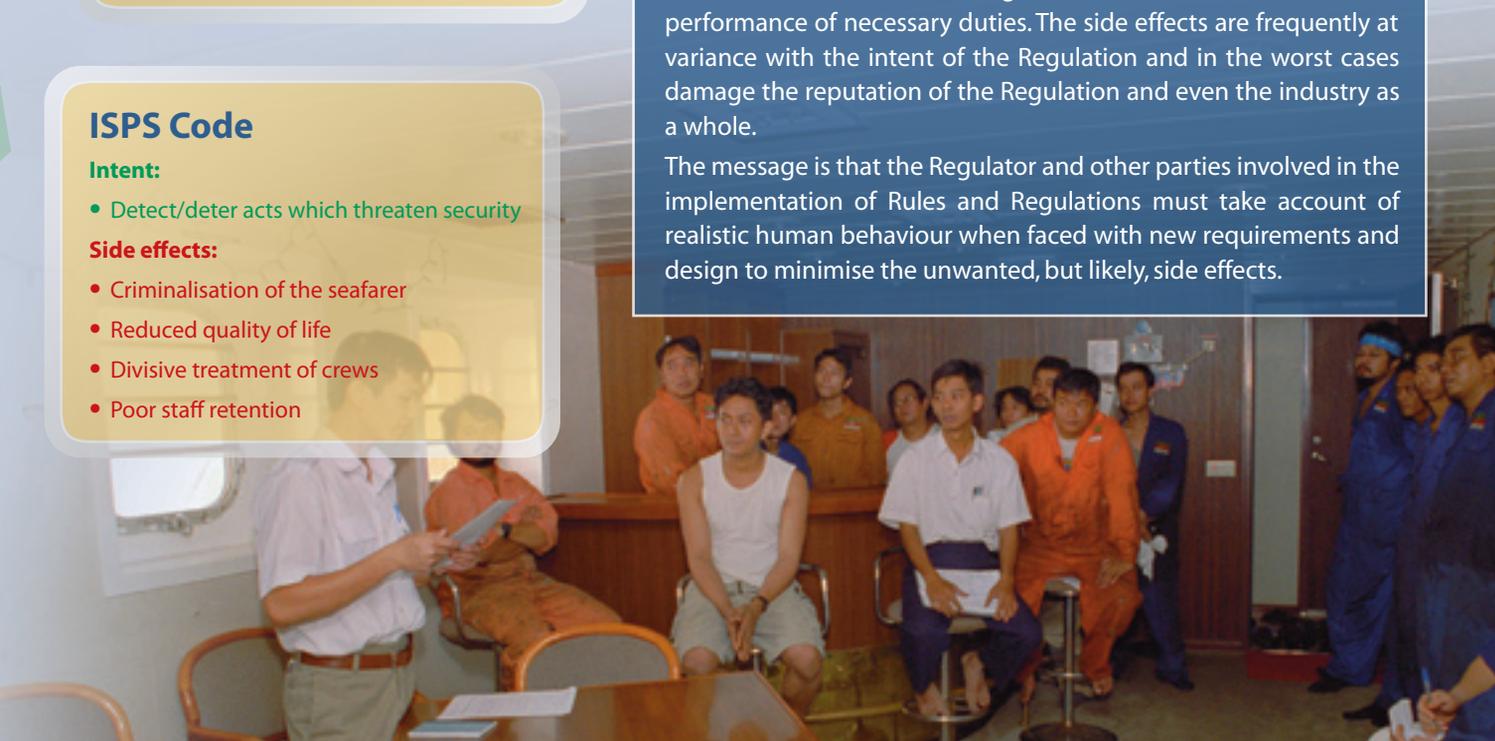
Appropriate rules and regulation

- Conventions, protocols, recommendations, codes, guidelines and resolutions, relating to standards of maritime safety, efficiency of navigation and prevention and control of marine pollution from ships:
- Maritime conventions on working and living conditions and basic human rights
- International Health Regulations
- Standards and regulations for telecommunications operations
- International standards for business, government and society
- International standards for electrical, electronic and related technologies
- Classification design, construction and through-life compliance rules and standards
- National standards for acceptable practice conforming to generally accepted international regulations, procedures and practices
- Classification rules for hull structures and machinery

These Rules and Regulations are all developed with the intention of making the maritime industry, and the workers in it more safe, responsible and dependable. However, in putting Rules and Regulations into practice in the wide range of organisational types and cultures that make up the international maritime industry, we find that the Human Element plays a part, and unexpected and unwanted side effects emerge.

These side effects are usually due to lack of understanding of the intent and benefits of the Regulation or lack of commitment in performance of necessary duties. The side effects are frequently at variance with the intent of the Regulation and in the worst cases damage the reputation of the Regulation and even the industry as a whole.

The message is that the Regulator and other parties involved in the implementation of Rules and Regulations must take account of realistic human behaviour when faced with new requirements and design to minimise the unwanted, but likely, side effects.





Roland Ives, MBA, CEng, MRINA
Lloyd's Register

Intent versus implementation

Many in the marine industry perceive that the gulf between the intent of regulations and their practical implementation is getting wider. In certain cases this is creating an environment ripe for errors and uncertainty and therefore for even more regulations.

Take the ISM and the ISPS Codes as examples. Although these have an essential and positive role to play in our industry, how many of us can quantify the benefits of either of these regulations, particularly the ISM Code? We can certainly quantify the amount of paperwork and time and effort the implementation of these Codes has created. From the publicised statistics on Port State Control we see ISM as an increasingly important issue to get to grips with.

So what has gone wrong? Why have some regulations been more effectively implemented than others?

Is it because as in the case of the ISM and ISPS Codes they are both management

system orientated, and thus by their nature are imprecise and open to variance and differing interpretations compared with the prescriptive nature of some other statutory regulations? Alternatively, perhaps one or more parties involved in the ISM supply chain apply the Code too subjectively, leading various interested parties to perceive the Code differently.

I suggest that putting this regulation back on track will involve placing increased focus on human factors integration. For example, if a crewmember or indeed, an ISM auditor or a Port State Control inspector, is conscientious about the implementation of the Safety Management System, how can he walk past a set of inoperative fire dampers or a poorly maintained piece of safety equipment without making some comment? This has happened in the past and by all accounts still does happen.

I believe the IMO has started to make real progress by introducing the Human

Element initiative into its legislation, but the practical interpretation and implementation is in need of much development. The ISM Code, because of its subjective nature, generates a multitude of procedures, which in turn need to be presented in a more comprehensive, simplistic 'human' manner to make the management system more effective.

There are a number of tools available to achieve this, including process mapping, task analysis, mind mapping, work flowcharts and even checklists to name but a few. Each tool can offer a constructive mechanism to bridge the gap between practical implementation and the subjective nature of legislation. Perhaps by bridging this gap the industry can achieve a quantifiable benefit.

Maybe this view is too simplistic, but without doubt we need to take action. If we fail to effectively implement existing regulation, we will only get more of the same.

An administrator's view

Captain Mohamad Halim Ahmed, Seafarer Development Unit, Malaysia Marine Department

Safety has always been the major factor for the development of regulations. This has now been expanded to the protection of the marine environment and, more recently, maritime security. These developments, however, have raised concerns about whether or not they are having the right effect on the shipping industry.

There will always be 'pros and cons', but it is the shipping industry, and especially the seafarers, who are burdened with all the requirements. Some regulations that affect the ship and the seafarer are quite imbalanced, because the shipowners will try to operate their ships as economically as they can and with a large profit margin. The burden therefore falls to the Maritime Administration to find a balance between regulation and economic constraints.

Although safety may have had the utmost priority, this has not been well

interpreted by some Administrations. Lack of enforcement, updating of new legislation and proper planning in terms of long-term investment have hampered some Administrations. One example is the implementation of the GMDSS equipments on the ships. Support for the system was not well implemented although it has been there for almost 20 years. Most of the shore stations however, are not well equipped and very few have been registered with their Maritime Identification Digits (MID). Hence, the spirit of the technology to reduce the voice communication in the tradition 'call and reply' between two stations has not been achieved.

However, a number of regulations do have a positive effect on the shipping industry. The seafarers will undoubtedly welcome the upcoming Consolidated Maritime Labour Convention. Hopefully,

those seafarers who have in the past been neglected, will be better off and will be well taken care of in the near future.

Administrations need to be more prudent and focus on any regulations that have been newly proposed or amended. The enhancement of human resources in an Administration is vital, to ensure that any regulations are properly studied and are acceptable to the local shipping industry.

Transparency and communications between the industry and the Administration can have a major effect on the regulations that need to be put forward or amended. This however can only be achieved when the related parties in the industry have a close relationship and work together for the benefit of the industry.

Note: The views expressed in this article are those of the author and are not necessarily those of the Malaysia Maritime Department.

The effects of Regulation

7

'a remorseless and never ending escalation in time and paperwork'



Captain Nicholas Cooper, FNI
Shipmaster

The most obvious, and reported comment on the effect of Regulation on the Human Element is the massive increase in on-board administration, resulting in a remorseless and never ending escalation in time and resource-consuming paperwork and record keeping.

The master and chief engineer are now ship managers and administrators, who are spending far too much time completing paperwork and administrative tasks to satisfy the avalanche of legislation and regulations that have fallen on them in the past decade. This detracts from the time they should be spending with the officers and ratings, and getting out and about the ship and engine room.

The 'human' element is being lost because of this isolation of the master and chief engineer from the hands-on running of the ship, in that they get less and less time to mix with, talk to and generally get to know their officers and ratings. There is a very real danger that the officers will view the master or the chief engineer as someone who just visits the bridge or engine room occasionally.

I am guilty of this during periods of heavy administrative work, and I have to make a conscious and deliberate effort to break off and visit the bridge and chat to the duty officer at least once during each watch. You can lose touch with what is going on around you if you don't. This is particularly important on a vessel where the officers are always changing, so that you have to get to know them, and their capabilities and limitations, in a short space of time. Ignore this at your peril – otherwise your chances of forming a close-knit and successful bridge team will be greatly diminished!

It seems that so much Regulation has been dumped on the ship without consultation, on the assumption that we will absorb it all and just get on with it, as we have always done. The Human Element seems to be conspicuous by its absence when it comes to Owners, Government, Administrations or the IMO seeking opinion on any aspect of the volumes of regulations that have been heaped on our heads; and yet we, as shipboard managers and administrators, have to use our considerable human resource talents and skills to make sure that the whole lot is complied with.

One of the most recent examples of Regulation that has been overwhelmingly negative from a Human Element perspective has been the introduction

of the ISPS Code, which has resulted in a huge increase in denial of shore leave. The same Code has ensured that in a lot of cases, officers and crew cannot take shore leave anyway because watches have had to be doubled to comply with certain elements of the Code, such as gangway security and deck patrols.

Furthermore, the social life on board a busy commercial vessel has gone out of the window, with smaller and smaller crews, shorter turn-round times, and the fact that bulk carrier, tanker and modern container terminals are by their very nature situated far from population centres, making us virtual prisoners by their very isolation.

There is, however, a positive note to all of this, which maybe has resulted in safer ships and a safer working environment: all the humans in the chain have had to meet, discuss, plan, organise and otherwise interact with each other to make sure that all the Regulations have been complied with. This has of course been achieved at the expense of greatly increased workloads for everyone on board.

Parkinson's First Law, which states that 'work expands to fill the time available', should perhaps be rewritten for seafarers to read 'time expands to fill the work available'!

What's new...

The 32nd session of the IMO Facilitation Committee (FAL)

Minimum training and education for shore-side mooring personnel

The Committee approved a circular on *Guidelines on minimum training and education for mooring personnel*.

The guidelines provide guidance on recommended training and education for shore-side mooring personnel, the application of which aims to assure the shipping industry and the public at large that there is an adequate level of competence available in ports, to enable ships to enter, stay and leave a port safely, secure and efficiently.

The circular, which contains the guidelines, can be downloaded from:

www.imo.org/en/OurWork/Facilitation/docs/FAL%20related%20nonmandatory%20instruments/FAL.6-Circ.11.pdf

The 58th World Health Assembly

International Health Regulations 2005 (IHR 2005)

The World Health Assembly has approved a new set of International Health Regulations to manage public health emergencies of international concern. The new rules, which are expected to come into force in 2007, will 'prevent, protect against, control and provide a public health response to the international spread of disease.'

Of particular relevance to mariners are the introduction of a Ship Sanitation Control Exemption Certificate and Ship Sanitation Control Certificate - replacing the Deratting Exemption Certificate and Deratting Certificate - (Annex 3) and a revised Maritime Declaration of Health (Annex 8).

The new regulations can be downloaded from: <http://www.who.int/ihr/publications/9789241596664/en/>

The 94th (Maritime) session of the International Labour Conference

Proposed Consolidated Maritime Convention

The 94th (Maritime) Session of the International Labour Conference will convene at Geneva in February 2006 to adopt a comprehensive international labour Convention to consolidate almost all ILO maritime labour Conventions and Recommendations currently in force – over 60 texts – and set out the conditions for decent work in the increasingly globalized maritime sector.

This new Convention has been designed to become a global instrument known as the "fourth pillar" of the international regulatory regime for quality shipping, complementing the key conventions of the IMO.

Note: The Convention entered force in August 2013: www.ilo.org/global/standards/maritime-labour-convention/lang-en/index.htm

Collision between a car transporter and a container ship

This report concerns the collision between a 49,792gt car transporter and a 20,829gt container ship at the intersection of two busy Traffic Separation Schemes, causing the car transporter to capsize and sink. On subsequent occasions, a 2,998gt general cargo vessel and then a 43,487gt combi-ore/bulk/oil carrier (OBO) ran into the wreck. During the course of the next few months, some 100 near misses were observed in the area around the wreck - in spite of a multitude of measures taken concerning buoyage, information and surveillance.

This comprehensive report not only analyses the causes of the various accidents, but also it exposes a number of Regulatory violations, not least that STCW 95 in respect of bridge watchkeeping, is poorly applied. It comments that too few watchkeepers on the bridge, excessively heavy work loads, poor organization on board and insufficient crew numbers all lead to inefficient watchkeeping, partial or even non-existent processing

of nautical information and reduced situational awareness.

The report suggests that while the correct application of the International Safety Management Code (ISM Code) should make it possible to remedy the situation, this is not necessarily the case. This is because audits carried out to verify compliance with the Safety Management Code often neglect the area concerning conditions of work, and place emphasis on checks of technical standards or formal procedures which, says the report, "are easier to implement."

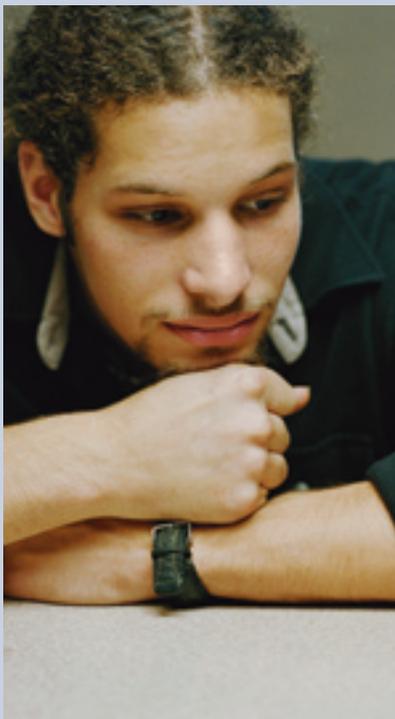
It adds that watchkeeping standards on many ships are disgraceful, often accompanied by an inability to communicate in a satisfactory manner by VHF radiotelephony. It further suggests that it would be worthwhile opening discussions with the relevant organizations about the format of navigational messages and the way they are broadcast and about the way navigational documents, especially

electronic charts (ECDIS), are updated.

It concludes that real progress in reducing the risk of accidents will only be made by imposing better qualifications, better organization on board, increasing crew numbers and by stricter control of safety management and full compliance with international conventions. To this end, it recommends that the International Maritime Organization and the International Labour Organization raise the awareness level of their member states as to the necessity of making sure that the proposed manning gives adequately-sized, competent crews; and that ISM auditors be made aware of, and receive further training in the importance of checking manning levels and crew competency.

This is a very comprehensive report, which must be essential reading not only for masters and bridge watchkeepers but also for regulators, managers and trainers. It can be downloaded from: www.bea-mer.developpement-durable.gouv.fr/IMG/pdf/RET_TRICOLOR_-_KARIBA_En_Site.pdf

Reports & Studies



THE INFLUENCE OF REGULATIONS ON THE SAFETY RECORD OF THE AFRAMAX TANKERS

S Delautre, E Eliopoulou, N Mikelis,
POP&C Project

An analysis carried out on the incidents/accidents experienced by the Aframax fleet of tankers (80,000 to 120,000 DWT tonnes) for the period 1978 to 2003. Part of a European Commission project on Pollution Prevention & Control (POP&C) this study identifies the introduction of key regulations that may explain the declining trends of accident/incident rates.

Downloadable from:
www.he-alert.org (Ref: HE00470)

ISM – WHAT HAS BEEN LEARNED FROM MARINE ACCIDENT INVESTIGATION?

Stuart Withington,
Marine Accident Investigation Branch (UK)

Good operational management can reduce shipping accidents. But serious operational failings continue to contribute to a majority of accidents. Accident investigation has exposed some specific problem areas. This paper examines some of the lessons learned from marine accident investigations.

Downloadable from:
www.he-alert.org (Ref: HE00475)

HOW LONG CAN THE ALLURE OF THE SEA HOLD OUT AGAINST BUREAUCRACY?

Carly Fields of Lloyd's List reporting on her first real seagoing experience, finds that seafarers need to be even more tenacious than ever to overcome the growing burden of paperwork and time spent at sea.

Lloyd's List 'Opinion' downloadable from:
www.he-alert.org (Ref: HE00480)

MISSING THE POINT - THE FAILURE OF REGULATION

Jon Gray,
Inserve Ltd

ISM has stagnated; ISPS is a dangerous knee jerk reaction; Class has lost its way; Flags are more interested in revenue; increased multi-cultured/national crews; IMO toothless; Charterers a lost cause, etc. There is an increasing widening gap between what is fact on board and what is necessary. This paper shows the problem areas and suggests that the practical risk assessment approach should be the way forward for all.

Downloadable from:
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w: www.he-alert.org
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