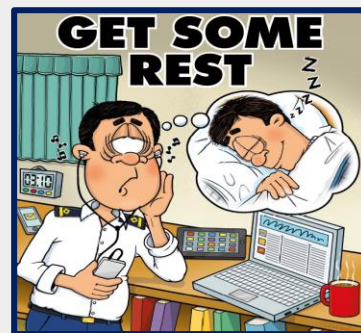


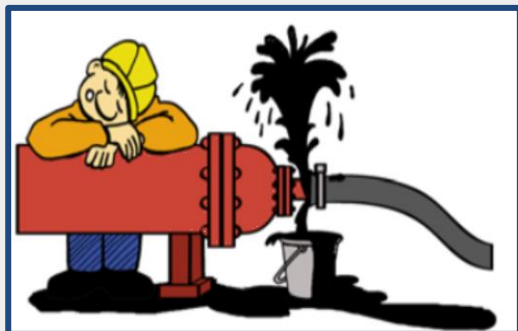
Subject: "Work/Rest Hours monitoring & Cross - check operations – An important issue!"

Nowadays, despite the seafarers' familiarization with the work/rest hours recording process and the applicable regulations, violations of rest hours are still observed. Many cases have been reported worldwide where the work/rest hours were found inconsistent with the recorded events in the log books.

Furthermore, **'the hours of rest are not properly recorded'** is the most frequently reported deficiency, imposed by third parties i.e. PSC Officers, vetting inspectors and Flag Administrations.



West of England P&I Club 'Think Poster' No.



The American Club – Silver bell Maritime Forum

In connection to the above, **'Prevention at Sea'** would like to highlight that as per the **STCW 2010 Section A-VIII/1(4) & (6)**;

"(4) Musters, fire – fighting and lifeboat drill, and drills prescribed by national laws and regulations and by international instruments, shall be conducted in a manner that minimizes the disturbance of rest periods and does not induce fatigue.

(6) When a seafarer is on call, such as when machinery space is unattended, the seafarer shall have an adequate compensatory rest period if the normal period of rest is distributed by call – outs to work."

In addition, the **ITF STCW 'A Guide for seafarers' reads**;

"The minimum rest period is not obligatory in the case of emergencies, drills or overriding operational conditions."

Furthermore, the **US Coast Guard CVC Policy Letter No. 12 – 05/ 5c (3) reads**;

"(3) The requirements of paragraphs (c) (1) and (c) (2)¹ need not be maintained in the case of an emergency or drill or in other overriding operational conditions [STCW AVIII/1.4]"

Referring to the above, our Marine Risk Assessments on board revealed that some Ship Operators do not require from their fleet to record drills as work since they are not considered work hours whilst others instruct their ships to take drills into consideration, thus recording them as work, during the work/rest hours recording/calculations.

In order to avoid complications during third parties inspections, 'Prevention at Sea' suggests that the aforementioned requirements and guidelines should be taken into consideration for the accurate recording of work/ rest hours and particular attention should be paid when drills are conducted onboard. For those who choose not to record the drills as work hours, the crew must be in a position to present adequate evidence proving that drills have been conducted in such a manner that no or minimal disturbance to the rest hours occurred as well as no fatigue was induced. On the other hand, those who record the drills as work and such a recording may violate the requirements for the minimum rest period, must also provide similar evidence as described before.

In order to assist our Clients to avoid potential complications regarding the monitoring and recording of the hours of work/rest, we have prepared a **sample of vessel's operations where the seafarers' work/ rest hours remain subject to cross-checking by third party inspections**;

¹ c. In accordance with the 2010 amendments to the STCW Convention and Code, section AVIII/1, the following minimum hours of rest requirements should be implemented onboard vessels subject to STCW, unless already exempted in 46 CFR 15.103(e) and (f): (1) Every person assigned duty as officer in charge of a navigational or engineering watch, or duty as a ratings forming part of a navigational or engineering watch, or designated safety, prevention of pollution, and security duties onboard any vessel that operates beyond the boundary line, as described in 46 CFR Part 7, should receive: (i) a minimum of 10 hours of rest in any 24-hour period; [46 CFR 15.1111(a)], and (ii) 77 hours of rest in any 7-day period. [STCW A-VIII/1.2.2]. (2) The hours of rest, required under paragraph (c)(1), may be divided into no more than two periods in any 24-hour period, one of which should be at least 6 hours in length, 46 CFR 15.1111(b), and the interval between consecutive periods of rest should not exceed 14 hours. [STCW A-VIII/1.3.]

Prevention at Sea		Work/Rest Hours Crosschecking		Rev.:
				Issue:
				Date:
Operation	Books	Description	Forms	
Drills	Official Log Book	Drill: Fire Drill(Galley) carried out on 15/09/16 from: 10:00 to 12:00	See Company's relevant forms: • Antipollution Drill • Boat Drill Record • Emergency Steering Drill Record • Enclosed space rescue-Resuscitation • Escape Drill Record • Fire Drill Record • Helicopter Operation • Man Overboard-Search & Rescue-Exercise record • Weekly Emergency Fire Pump Test Record	
	Bridge Log Book	Drill: Fire Drill(Galley) carried out on 15/09/16 from: 10:00 to 12:00		
Permit	Relevant Company's forms	• Permits to be cross checked with responsible Officers and all personnel involved. For the Master of the vessel, the time that the permit is signed should be recorded as work hour. • For the person in charge, the applicable time interval indicated in the permit, should be recorded as work hour.	See Company's relevant forms: • Contractor Work Permit • Electric Circuit Work Permit • Enclosed Space Entry Permit • Hot Work Permit - Class B • Lockout-Tagout Work Permit • Permit to Work Aloft - Over water • Permit to Work on Pipelines or Vessels • Under Water Work Permit	

With a view to assist the Shipping Industry, in June 2014, **‘Prevention at Sea’** launched an innovative Maritime Software for the effective and efficient monitoring and recording of the work/ rest hours on board ships. The **‘RH Manager’** was designed in accordance with the STCW and MLC 2006 requirements and aims to assist the seafarers in monitoring, calculating and implementing properly the applicable regulated requirements. The **‘RH Manager’** Maritime Software is currently installed on board 800 ships travelling worldwide and it was found to be, by the PSC Officers and Oil Majors, one of the most accurate softwares in relation to the work/rest hours’ calculations in accordance with the MLC 2006 and STCW conventions. The **‘RH Manager’** is an extremely valuable tool in the seafarer’s hands on board and also allows monitoring of work/rest hours from the Office!

In this instance, in order to notify the Industry further, we would like to highlight the fact that there are currently different patterns/formulas implemented for the calculation of the rest hours ‘in any 24-hour’ period or any ‘7-day’ period but only 2 of them take into consideration all the possible scenarios for the accurate calculation and detection of potential violations. The below is an example that may lead to different conclusions which are dependent on the pattern/formula used for the calculations.

Day/Time	00:00	01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00	00:00	Hours of rest in 24-hour period	Comments	Hours of rest in any 24-hour period	Hours of rest in any 7-day period	Hours of rest in any 3-day period
29 Jan 2017																										24		24	168	72
30 Jan 2017																										24		24	168	72
31 Jan 2017								W	W	W	W		W	W	W	W	W	W	W	W	W	W	W	W	W	8		8	153	57
01 Feb 2017										W	W	W														22		22	151	55
02 Feb 2017																										24		22	151	55
03 Feb 2017																										24		24	151	55

For more information regarding the above example, our Maritime Software ‘RH Manager’ and its features, do not hesitate to contact us!

We remain at your disposal,

Prevention at Sea