



Marine Notice No. 16 of 2010

NOTICE TO ALL SEAFARERS

Safe Manning, Hours of Work and Watchkeeping

Fatigue has been identified as an important contributing factor to maritime casualties and to health problems of seafarers. One of its sources is excessive hours of work or insufficient rest. Convention No. 180 (Seafarers' Hours of Work and the Manning of Ships Convention) aims to limit the maximum hours of work or to provide minimum rest periods for seafarers.

All ships must be sufficiently manned to ensure that seafarers working on board are allowed at least the minimum rest periods required by the law and to ensure that watch systems are so arranged that the efficiency of all watchkeeping personnel is not impaired by fatigue. Additionally, duties should be organized so that the first watch at the commencement of a voyage and subsequent relieving watches are sufficiently rested and fit for duty.

Ireland has set limits for minimum rest periods⁽¹⁾ for seafarers on ships registered in the State wherever they may be and foreign ships when in a port in the State and these are set out in Annex I.

The limits specified in this Marine Notice apply only to ships operated commercially, they do not apply to fishing vessels and pleasure vessels. Hours of work and rest on fishing vessels are governed by separate legislation⁽²⁾.

Schedules of service at sea and in port (including minimum periods of rest per day) are to be posted on board where all seafarers may see them and records of hours of rest periods are to be maintained. Both should be in the formats shown in Annex II.

If the records or other evidence indicate infringement of provisions governing hours of rest, the competent authority of the State may require that measures are taken so as to avoid future infringement. Record keeping and routine analysis of the hours of rest should form part of the International Safety Management System (ISM) on board.

⁽¹⁾ [S.I. No 532 of 2003](#) European Communities (Merchant Shipping)(Organisation of Working Time) Regulations 2003

⁽²⁾ [S.I. No 709 of 2003](#) European Communities (Workers on Board Sea-going Fishing Vessels)(Organisation of Working Time) Regulations 2003

Annex III gives further guidance on recording and calculating rest periods for compliance with the legislation.

Director General,
Maritime Safety Directorate,
Department of Transport,
Leeson Lane,
Dublin 2.

29th June 2010.

For any technical assistance in relation to this Marine Notice, please contact:
The Marine Survey Office, Leeson Lane, Dublin 2, tel: +353-(0)1-678 3400.
For general enquiries, please contact the Maritime Safety Policy Division, tel: +353-(0)1-678 3418.
Written enquiries concerning Marine Notices should be addressed to:
Maritime Safety Directorate, Department of Transport, Leeson Lane, Dublin 2, Ireland,
email: marinenotices@transport.ie or visit us at: www.transport.ie.

Annex I

A seafarer is entitled to minimum hours of rest that are not less than:

- (a) 10 hours in any 24 hour period; and
- (b) 77 hours in any 7 day period.

The minimum hours of rest may be divided into not more than two periods, one of which shall be at least 6 hours in length and the interval between consecutive periods of rest shall not exceed 14 hours.

Musters, fire drills and abandon ship drills are required to be conducted in a manner that minimises the disturbance of hours of rest and does not induce fatigue.

A seafarer who is on call on board ship is to be given adequate compensatory rest if his scheduled hours of rest are disturbed by call-outs to work.

The Master of a ship may require a seafarer to perform any hours of work necessary for the immediate safety of the ship, persons on board, cargo or for the safety of another ship or people in distress at sea.

As soon as the normal situation is restored seafarers that worked during normal rest periods should be given adequate compensatory rest.

Annex II

A schedule of service should be posted in an easily accessible place, such as a mess room or common alleyway with the shipboard working arrangements, which must contain for every position at least:

- (a) the schedule of service at sea and service in port; and
- (b) the minimum hours of rest required by the legislation.

The schedule of service should be in the format shown below and be in English.

Shipboard working arrangement

Name of Ship		Flag of Ship		IMO Number		Latest update of Table:	
The minimum hours of rest are applicable in accordance with SI 532 of 2003 European Communities (Merchant Shipping) (Organisation of Working Time) Regulations 2003 issued in conformity with ILO Seafarers Hours of Work and the Manning of Ships Convention 1996 (No 180) and Council Directive 1999/63/EC as amended.							
Every seafarer is entitled to minimum hours of rest that are not less than 10 hours in any 24 hour period and 77 hours in any 7 day period.							
Position/rank	Scheduled daily work hours at sea		Scheduled daily work hours in port		Comments	Total daily work hours	
	Watchkeeping (from/to)	Non-watchkeeping duties (from/to)	Watchkeeping (from/to)	Non-watchkeeping duties (from/to)		At sea	In port

Signature of the Master:

SELECTED TEXTS FROM ILO CONVENTION No 180 AND THE STCW CONVENTIONS

ILO Convention No 180

Article 5

1. The limits on hours of work or rest shall be as follows: (a) maximum hours of work shall not exceed: (i) 14 hours in any 24-hour period; and (ii) 72 hours in any seven-day period, or (b) minimum hours of rest shall not be less than: (i) 10 hours in any 24-hour period, and (ii) 77 hours in any seven-day period.
2. Hours of rest may be divided into no more than two periods, one of which shall be at least six hours in length, and the interval between consecutive periods of rest shall not exceed 14 hours.
6. Nothing in paragraphs 1 and 2 shall prevent the Member from having national laws or regulations or a procedure for the competent authority to authorise or register collective agreements permitting exceptions to the limits set out. Such exceptions shall, as far as possible, follow the standards set out but may take account of more frequent or longer leave periods or the granting of compensatory leave for watchkeeping seafarers or seafarers working on board ships on short voyages.

Article 7

1. Nothing in this Convention shall be deemed to impair the right of the master of a ship to require a seafarer to perform any hours of work necessary for the immediate safety of the ship, persons on board or cargo, or for the purpose of giving assistance to other ships or persons in distress at sea.
3. As soon as practicable after the normal situation has been restored, the master shall ensure that any seafarers who have performed work in a scheduled rest period are provided with an adequate period of rest.

STCW Convention

Section A-VIII/1 of the STCW Code (Mandatory)

1. All persons who are assigned duty as officer in charge of a watch or seafarer on watch shall be provided with a minimum of 10 hours' rest in any 24-hour period.
2. The hours of rest may be divided into no more than two periods, one of which shall be at least six hours in length.
3. The requirements for rest periods laid down in paragraphs 1 and 2 need not be maintained in the case of an emergency or drill or in other overriding operational conditions.
4. Notwithstanding the provisions of paragraphs 1 and 2, the minimum period of 10 hours may be reduced to not less than 6 consecutive hours provided that any such reduction shall not extend beyond two days and not less than 70 hours of rest are provided each seven-day period.
5. Administrations shall require that watch schedules be posted where they are easily accessible.

Section B-VIII/1 of the STCW Code (Guidance)

3. In applying Regulation VIII/1, the following should be taken into account:
 1. provisions made to prevent fatigue should ensure that excessive or unreasonable overall working hours are not undertaken. In particular, the minimum rest periods specified in Section A-VIII/1 should not be interpreted as implying that all other hours may be devoted to watchkeeping or other duties;
 2. that the frequency and length of leave periods, and the granting of compensatory leave, are material factors in preventing fatigue from building up over a period of time;
 3. the provision may be varied for ships on short sea voyages, provided special safety arrangements are put in place.

The records of rest hours should be maintained in the format shown below and be in English.

Format for Record of Hours of Rest of Seafarers

Name of Ship IMO Number:..... Flag of Ship:.....

Seafarer full name Position or rank

Month and year

Records of rest hours - mark periods of rest with an X or continuous line.

SI 532 of 2003 European Communities (Merchant Shipping) (Organisation of Working Time) Regulations 2003 issued in conformity with ILO Seafarers Hours of Work and the Manning of Ships Convention 1996 (No 180) and Council Directive 1999/63/EC as amended apply to this ship.

Complete the table on the reverse side.

I agree that this is an accurate reflection of the hours of rest of the seafarer concerned:

Printed name of Master or person authorised by the master to sign this record

Signature of Master or authorised person Signature of seafarer

A copy of this record is to be given to the seafarer and the original is to be retained on board for inspection by authorised officers for a period of not less than one year. This form is subject to examination by port and flag State officers. Records should be maintained on a daily basis but should never extend more than 2 days without completion.

Please mark periods of rest with an X or continuous line																								Hours of rest in any 24 hour period	Comments	Not to be completed by the seafarer		
Hours	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22			23	24	Hours of rest in any 24 hour period
Date																												
Hours	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24			

Name of Seafarer Position or rank

Annex III

Guidance on recording and calculating rest periods for compliance with the legislation.

When calculating the hours of rest the regulations refer to minimum hours of rest in **any 24 hour period**. This should be taken to mean the minimum time for rest in a 24 hour period taken from a point in time one day to the same point in time the next day. The rest requirements apply within 'any 24 hour period' and not necessarily midnight to midnight. Working from 1000 on Monday to 1400 on Tuesday (28 hours) is not acceptable despite the 10 hours rest on each day.

If the minimum of 10 hours rest in 24 is complied with there is no need to check that the interval between consecutive periods of rest does not exceed 14 hours, since this automatically follows.

When calculating the hours of rest of a seafarer in a 24 hour period for compliance with the legislation the 24 hour period should be started from the end of the last longest continuous rest period and only the two longest breaks in that 24 hour period should be counted. Additional short breaks and meal breaks that may have been given should not be tallied to arrive at the total daily hours for compliance. Breaches of the hours of rest requirements should be explained by entries in the 'comments' section of the record sheet.

The regulations say that the total minimum daily hours of rest may be divided into not more than two periods but this should not preclude seafarers from being given additional rest breaks. These additional rest breaks should not be added up into the daily total rest of the two longest periods of rest.

Where a seafarer has more than 2 periods of rest (eg because they are given a break part-way through a period of work) only the two longest periods can contribute towards the minimum period of daily rest. So one period must be at least 6 hours, and the two longest periods of rest must add up to at least 10 hours rest.

Additional periods of rest (other than short breaks and regular meal breaks) may be included in the weekly rest calculation.

Short breaks and meal breaks (less than an hour) should be counted as hours of work.

The hours of work/rest schedule may be suspended by the master when emergencies arise. Examples of emergency situations where the hours of rest schedule may be suspended are; fire, collision, grounding, pollution control, damage due to heavy weather, dragging of anchors or parting of mooring lines, major machinery breakdowns which affect the safety of the ship. Compensatory rest periods should be granted once normal working patterns have resumed.