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Bulletin 011 - Safe manning Requirements

Notice to:
Shipowners, Operators, Officers, Flag State Inspectors and Recognised Organisations

1. References

- a) Barbados Merchant Shipping Act (CAP 296).
- b) Barbados S.I 2001 No. 44 - Shipping (Safe Manning, Watchkeeping and Hours of Work) Regulations, 2001.
- c) SOLAS, International Convention for the Safety of Life at Sea.
- d) IMO Assembly [Resolution A.1047\(27\)](#), Principles of minimum safe manning, adopted 30 November 2011.
- e) Maritime Labour Convention 2006 (MLC).
- f) The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, (STCW Convention).
- g) The Seafarers' Training, Certification and Watchkeeping (STCW) Code.
- h) International Safety Management (ISM) Code.

2. Purpose

- 2.1 This Bulletin sets out the measures adopted by the Barbados Maritime Ship Registry (BMSR) to ensure Barbadian ships comply with Barbados CAP296 Section 211, Barbados S.I 2001 No. 44, SOLAS Regulation V/14, IMO Resolution A.1047(27), MLC Regulation 2.7, STCW Convention Regulation VIII/2 and STCW Code Section A-VIII/2.
- 2.2 The requirements of this Bulletin are to ensure that Barbadian ships are sufficiently, effectively, and efficiently manned to provide safety and security of the ship, safe navigation and operations at sea, safe operations in port, prevention of human injury or loss of life, the avoidance of damage to the marine environment and to property, and to ensure the welfare and health of seafarers through the avoidance of fatigue.

3. Application

- 3.1 The safe manning requirements of Section 4 and the Barbados shipboard working arrangements requirements of Section 5, apply to all Barbadian ships.
- 3.2 The requirements for a Safe Manning Document (SMD) of Section 5 apply to ships and commercial yachts of 500 GT and greater.

4. Safe Manning Requirements

- 4.1 The Company and the master shall ensure that all persons joining a ship or unit are immediately given appropriate familiarization training with respect to the ship for emergency, safety and if applicable security in addition to their respective duties and functions.
- 4.2 The Company and the master of a ship shall ensure that watch standards and arrangements as outlined in STCW Convention Chapter VIII are always maintained.

- 4.3 The Company and the master shall meet the relevant requirements of MLC 2006 and STCW Convention Chapter VIII with respect to periods of rest and prevention of alcohol abuse for any person assigned or performing designated safety, prevention of pollution and security duties.
- 4.4 Ship's Cook
- .1 In all cases where the total manning consists of more than 10 persons, there shall be a dedicated certified cook.
- .2 As per MLC A3.2.5 On ships operating with a prescribed manning of less than 10 the company should have one person designated as the Cook. If the appointed person does not hold a ship's cook certificate, then the person is to be trained or instructed in areas including food and personal hygiene as well as handling and storage of food on board ship.
- 4.5 Ship Security Officer (SSO)
- .1 All persons, onboard ships to which the International Code for the Security of Ships and Port Facilities (ISPS Code) applies, shall have received security training in accordance with STCW Convention Regulation VI/6. One appropriately trained person shall be designated as the Ship Security Officer (SSO) as required under the (ISPS Code).
- .2 The SSO maybe the master or any other person designated by the Company. The officer so designated shall meet the training requirement in accordance with the provisions of STCW Regulation VI/5 and shall be directly responsible to the master (if the SSO is not the master) and the Company Security Officer (CSO) in compliance with ship's SMS.
- .3 The Company shall ensure that one of the capacities proposed to be included on the SMD is also able to carry out the duties of the SSO.
- 4.6 Persons Assigned Electronic and Electrical Duties
- .1 A ship powered by main propulsion machinery of 750 kW propulsion power or more may carry persons who are specifically assigned the specific duties, tasks and responsibilities relating to electrical and electronic tasks. If required to be carried, these persons should be certified as Electro-Technical Officers or Electro-Technical Ratings and satisfy the requirements of STCW Regulations III/6 or III/7 respectively.
- .2 The SMD need only include these persons if they are additional to the Engineering Officers and they have been assigned shipboard duties to satisfy the requirements of the maintenance of a safe engineering watch, emergency as specified in the Muster List or operation and maintenance of the ship's electrical, electronic and control systems.
- 4.7 Person Designated for Safety
- .1 All ships shall have a person, who may be the Master, who has responsibility for implementation of and compliance with the ship's occupational safety and health policy and programme.
- 4.8 Manning During Hours of Darkness and Restricted Visibility
- .1 Companies shall ensure that the ships have sufficient trained navigational watch-keeping personnel to ensure that the navigation control room/bridge is manned by at least 2 watch keepers during hours of darkness and conditions of restricted visibility. One of these watch keepers shall be a Deck Officer.
- 4.9 Manning Onboard Specific Ship
- .1 Ships with propulsion power of less than 750 kW

- i) Ships with propulsion power of less than 750 kW are not required to have an engineer certificated in accordance with STCW. However, such ships must have at least one person, other than the master, who is trained and certified to operate the machinery onboard the ship. If the training is not in accordance with STCW then the person should have documentary evidence of his training and capability to perform the assigned tasks.

.2 Ships with Unattended Machinery Space (UMS)

- i) The UMS notation assigned by a Classification Society shall be considered when determining whether the machinery space can be unattended.
- ii) If the manning of a ship with propulsion power of more than 3000kW is based on UMS notation then the ship shall carry an additional watch-keeping engineer officer if the UMS systems are inoperative for more than seven days. The Company shall notify affected Classification Society and the BMSR of the related equipment failure affecting the UMS notation.

.3 Tankers

- i) Company operating tankers shall ensure that all officers, ratings, and persons involved in cargo operation hold a basic training in accordance with the provisions of STCW requirements relating to the type of tanker on which the person is serving.
- ii) Officer shall have the Certificate of Proficiency STCW V/1-1 and V/1-2 endorsed by the BMSR.

.4 Ships Fitted with ECDIS

- i) The Company should ensure that if the ship is fitted with ECDIS, the master and navigating officers have appropriate ECDIS training.
- ii) The Master shall ensure that all affected officers have documentary evidence ECDIS training prior to be assigned their shipboard navigational duties.

4.10 Employment of Additional Seafarers by the Company.

- .1 A Company may decide to employ more seafarers than stipulated in the SMD. These seafarers shall be trained to a level appropriate to their duties in addition to having the minimum basic training for emergency, safety, and survival. The statutory certificates will detail the maximum number of persons on board and there must be sufficient accommodation satisfying the MLC 2006 (as amended) standards for that number.
- .2 There are a number of capacities that are not identified in STCW and accordingly the SMD may not refer to them. The Company should decide on their qualification or experience in accordance with the objectives of their Safety Management System but if the persons are employed and assigned shipboard safety, security, environmental protection, cargo operations or watch-keeping duties, the person must complete STCW basic training before joining the ship and receive shipboard familiarization training before being assigned their shipboard tasks/duties.

5. Watchkeeping

- 5.1 The company responsible for the operation of the ship shall ensure that all watch standers on board its ships adhere to the minimum limits of hours of rest in accordance with international regulations.
- 5.2 For ships of 3000 GT and above and propulsion power of 3000 KW and above the master and chief engineer shall not be part of the ship watches and a three-watch system shall be adopted for both the deck and engine watches.
- 5.3 For ships of less than 3000 GT and with propulsion power of less than 3000 KW two-watch system may be adopted provided that the requirements for work and rest hours shall be met.
- 5.4 For deck watches that are normally limited in numbers, a routine for providing additional assistance without delay shall be established and standby personnel shall be identified and immediately contactable.
- 5.5 On ships with periodically unattended machinery spaces (UMS) notation and of less than 2000 KW propulsion power and in case of limited number of cabins and bunks a watch with only the Chief engineer may be adopted during the daytime (0800-2000) provided that the requirements for work and rest hours shall be met and that additional assistance without delay is established.
- 5.6 When the engine watch is only with the Chief engineer, the Company shall anticipate the number of hours of the Chief engineer to be devoted to unscheduled work in case of emergency. As soon as practicable after the normal situation has been restored, the Chief engineer shall have adequate period of rest.

6. The Barbados Shipboard Working Arrangements

- 6.1 In compliance with the Barbados S.I 2001 No. 44, the company shall produce a shipboard working arrangements (SWA) of duties and hours of work for all the seafarer on board includes regular watchkeeping duties or ship handling and the ship's chief engineer, chief officer and second engineer officer.
- 6.2 The SWA shall also specify:
 - .1 the maximum period of continuous watchkeeping
 - .2 the hours of anticipated number of hours to be devoted to unscheduled work;
 - .3 the minimum rest period between watches;
 - .4 the total daily, weekly, and monthly hours of work; and
 - .5 a minimum of 10 hours of rest in any 24-hour period, which may be divided into no more than 2 periods, one of which shall be at least 6 hours in length.
 - .6 Notwithstanding section .5 above, the minimum period of 10 hours may be reduced to not less than 6 consecutive hours on condition that any such reduction shall not extend beyond 2 days and not less than 70 hours of rest are provided in each 7-day period
- 6.3 The Barbados shipboard working arrangement ([Form 159](#)), which is available for download on the BMSR website, shall be signed by the Master and a Copy shall be submitted to BMSR in order to verify the ship is safely manned.

6.4 The SWA shall be posted or maintained to be easily accessible and capable of being verified by Barbados Appointed Nautical Inspectors. Any exceptions or suspension of the periods of rest shall be recorded in the Official Logbook.

7. Safe Manning Document - Requirements

7.1 The Company shall make an application for a SMD following an assessment that takes into consideration Sections 7.2, 7.3 and 7.4 of this Bulletin.

7.2 The minimum safe manning of a ship should be established taking into account all relevant factors, including the following:

- .1 size and type of ship;
- .2 number, size and type of main propulsion units and auxiliaries;
- .3 level of ship automation;
- .4 construction and equipment of the ship;
- .5 method of maintenance used;
- .6 cargo to be carried;
- .7 frequency of port calls, length, and nature of voyages to be undertaken;
- .8 trading area(s), waters, and operations in which the ship is involved;
- .9 extent to which training activities are conducted on board;
- .10 degree of shoreside support provided to the ship by the company;
- .11 applicable work hour limits and/or rest requirements; and
- .12 the provisions of the approved Ship's Security Plan.

7.3 In determining the minimum safe manning of a ship following principles should be observed.

- .1 The capability to:
 - i) Maintain safe navigational, port, engineering, and radio watches in accordance with regulation VIII/2 of the STCW Convention, as amended, and also maintain general surveillance of the ship;
 - ii) moor and unmoor the ship safely;
 - iii) manage the safety functions of the ship when employed in a stationary or near-stationary mode at sea;
 - iv) perform operations, as appropriate, for the prevention of damage to the marine environment;
 - v) maintain the safety arrangements and the cleanliness of all accessible spaces to minimize the risk of fire;
 - vi) provide for medical care on board ship;
 - vii) ensure safe carriage of cargo during transit;
 - viii) inspect and maintain, as appropriate, the structural integrity of the ship;
 - ix) operate in accordance with the approved Ship's Security Plan;
- .2 The ability to:
 - i) operate all watertight closing arrangements and maintain them in effective condition, and also deploy a competent damage control party;

- ii) operate all onboard firefighting and emergency equipment and life-saving appliances, carry out such maintenance of this equipment as is required to be done at sea, and muster and disembark all persons on board;
- iii) operate the main propulsion and auxiliary machinery including pollution prevention equipment and maintain them in a safe condition to enable the ship to overcome the foreseeable perils of the voyage.

7.4 The following onboard functions, when applicable, should also be taken into account:

- .1 ongoing training requirements for all personnel, including the operation and use of fire-fighting and emergency equipment, life-saving appliances, and watertight closing arrangements;
- .2 specialized training requirements for particular types of ships and in instances where crew members are engaged in shipboard tasks that cross departmental boundaries;
- .3 provision of proper food and drinking water;
- .4 need to undertake emergency duties and responsibilities; and
- .5 need to provide training opportunities for entrant seafarers to allow them to gain the training and experience needed.

8. Safe Manning Document - Temporary Exemption

- 8.1 In cases of Force Majeure, where the manning level falls below that of the SMD e.g., due to crew illness, unexpected repatriation on compassionate grounds etc., the ship may as a temporary measure, sail with one person less than that stipulated in the SMD and in exemption of SOLAS V/14 provisions. This does not apply to the capacities of master and chief engineer.
- 8.2 In all such cases the master, in consultation with the chief engineer where the shortage relates to an engineer officer, should ensure that there is continuity of watches by duly qualified persons without affecting the statutory minimum period of rest.
- 8.3 The shortage must be filled at the earliest opportunity and in any case not later than fourteen (14) days or at the next port if the intended voyage is more than fourteen (14) days.
- 8.4 In circumstances of exceptional necessity, as per MLC Standard A3.2.6, where a Company is unable to achieve the minimum manning due to the lack of a duly certificated Cook, a temporary exemption from the provision of MLC Regulation 3.2.3 may be granted and permitting a non-fully qualified cook to serve in a specified ship for a specified limited period, until the next convenient port of call or for a period not exceeding 1 month, provided that the person to whom the dispensation is issued is trained or instructed in areas including food and personal hygiene as well as handling and storage of food on board ship.
- 8.5 The BMSR must be notified and provided with the following information, which must also be duly recorded in the Official Logbook:
 - Name and IMO Number of the ship
 - Capacity and rank of the officer
 - Reason for exemption
 - No. of crew onboard, excluding the affected officer
 - The Port of departure and arrival with the shortage
 - Date of departure and ETD

9. Safe Manning Document – Application

- 9.1 The Company shall submit of a proposal for minimum safe manning defining the nature of the operation of the ship take into account the requirements of Section 7 of this Bulletin.
- 9.2 The minimum SMD can be issued with an “**Unlimited**” or trading areas and “**Limited**” trading areas for those vessels which have operations to a limited geographical area.
- 9.3 “**Limited**” trading areas are when:
- .1 The voyages do not exceed 24 hours between ports of calls; or
 - .2 Voyages are within 200 nm from the nearest shore; or
 - .3 Enclosed areas.
- 9.4 **Enclosed areas**, may include, but are not limited to:
- .1 Mediterranean Sea;
 - .2 Caribbean (restricted areas 1, II, and/or III, as defined in CCSS Code);
 - .3 Red Sea;
 - .4 Caspian Sea;
 - .5 Black Sea;
 - .6 Azov Sea;
 - .7 North Sea;
 - .8 Gulf of Aden;
 - .9 Baltic Sea;
 - .10 Persian Gulf.
- 9.5 A vessel which operates part of the time within a limited areas and part of the time on more extensive voyages may elect to have two (2) SMD.
- 9.6 The Company shall submit an SMD application ([Form 012](#)), which is available for download on the BMSR website.
- 9.7 The fields of the SMD application Form are to be completed with accurate information. If an item does not apply to the ship, “N/A” is to be placed in the space. The application is to be completed and signed by a person appointed by the Company.
- 9.8 A guideline of the minimum manning levels required by the BMSR for unlimited and limited trading areas is provided in Appendix A of this Bulletin.
- 9.9 If there are special considerations that may affect manning levels, they should be included on the form at the bottom of the second box where it says “Comments/Special Considerations or ship configurations that may affect manning.” This could include operations such as coastal or domestic trade, number of cabins and/or bunks on the ship, the ship’s intended port schedule, etc.
- 9.10 In assessing minimum deck manning, the BMSR shall consider the ship’s dimensions, layout of crew accommodation, and internal communications systems, all of which affect crew capabilities and response reactions, the ship’s propulsion power, the engine room layout and proximity to boiler rooms, etc.

9.11 In this respect the BMSR may increase the scale of manning from that proposed by the Company. The BMSR will not normally reduce the manning level from that proposed by the Company unless it considers certain references in the SMD application proposed by the Company are unnecessary or inconsistent with standard practices.

10. Safe Manning Document – Validity

10.1 In compliance with the requirements of Annex 5 of the IMO Resolutions A.1047(27) an SMD issued to a ship shall have a validity of 5 years from the date of issue.

10.2 A new SMD is also required to be issued when:

- i) there is a change of ship's name; or
- ii) there is a change of trading area; or
- iii) change of ISM Managers; or
- iv) any other changes/alterations to the ship, its crew, construction, machinery, equipment, operation, maintenance, or management that affects the manning level required to continue safe operations.

11. Port State Control

11.1 The STCW Convention, Regulation I/4, enables port State authorities to verify conditions on any ship, particularly as to the qualifications and ability of personnel on board. Port State authorities may pay particular attention to the following:

- .1 that all seafarers on board who are required to be certificated hold an appropriate Barbados certificate or provide documentary proof that an application for an endorsement has been submitted to the BMSR; and/or
- .2 the numbers and certificates of the seafarers serving on board conform to the applicable safe manning requirements of the BMSR.

11.2 In accordance with section A-I/4 of the STCW Code, port State authorities may assess the ability of the seafarers of the ship to maintain watchkeeping standards as required by the STCW Convention if there are clear grounds for believing that such standards are not being maintained because of any of the following having occurred:

- .1 the ship has been involved in a collision, grounding, or stranding;
- .2 there has been a discharge of substances from the ship when underway, at anchor or at berth, which is illegal under any international convention;
- .3 the ship has been maneuvered in an erratic or unsafe manner whereby routing measures adopted by the IMO or safe navigation practices and procedures have not been followed; or
- .4 the ship is otherwise being operated in such a manner as to pose a danger to persons, property, or the environment.

11.3 Regulation 2.7 of the MLC requires ships to have a sufficient number of seafarers employed on board to ensure that they are operated safely, efficiently, and with due regard to security under all conditions, taking into account concerns about seafarer fatigue and the particular nature and conditions of the voyage. Port State Control (PSC) officers are entitled to verify that this is the case when there are grounds for carrying out a more detailed inspection.

Appendix A

The tables given below are provided for guidance/reference and are samples only, to assist Owners/Managers when making a proposal for minimum safe manning levels.

Deck Department

Ship Size	Capacity	STCW Reg.	N. of Persons Unlimited	N. of Persons Limited ¹
≥ 10,000 GT	Master	II/2	1	1
	Chief Mate	II/2	1	1
	Officer of the Navigational Watch	II/1	2	1 ²
	Navigational Watch Rating	II/4	3	2
	Able Seafarer Deck	II/5	2	2
Total			9	7
≥ 3,000 GT < 10,000 GT	Master	II/2	1	1
	Chief Mate	II/2	1	1
	Officer of the Navigational Watch	II/1	1	1
	Navigational Watch Rating	II/4	3	3
	Able Seafarer Deck	II/5	1	0
Total			7	6
≥ 1000 GT < 3,000 GT	Master	II/2	1	1
	Chief Mate	II/2	1	1
	Officer of the Navigational Watch	II/1	1	0 ²
	Navigational Watch Rating	II/4	3	2
	Able Seafarer Deck	II/5	0	0
Total			6	4
≥ 500 GT < 1,000 GT	Master	II/2	1	1
	Chief Mate	II/2	1	0
	Officer of the Navigational Watch	II/1	0 ²	1 ²
	Navigational Watch Rating	II/4	2	2
	Able Seafarer Deck	II/5	0	0
Total			4	4
<500 GT	Master	II/3	1	1
	Chief Mate	II/3	0	0
	Officer of the Navigational Watch	II/1	1	1
	Navigational Watch Rating	II/4	2	1
	Able Seafarer Deck	II/5	1	0

¹ See Sec. 9.3

² BMSR may request one ONW be added, following review of vessel's operational area and type of ship.

Engine Department

Propulsion power	Capacity	STCW Reg.	N. of Persons Unlimited	N. of Persons Limited ³
≥ 3,000 kW NOT UMS	Chief Engineer	III/2	1	1
	Second Engineer	III/2	1	1
	Officer in charge of the Engineering Watch	III/1	1 ⁴	0 ⁵
	Engineering Watch Rating	III/4	2 ^{4,6}	2 ^{4,6}
	Able Seafarer Engine	III/5	1	1
Total			6	5
≥ 750 kW < 3,000 kW	Chief Engineer	III/3	1	1
	Second Engineer	III/3	1 ⁴	0 ⁵
	Officer in charge of the Engineering Watch	III/1	0 ⁵	1 ⁴
	Engineering Watch Rating	III/4	2 ^{4,6,7}	1 ^{6,7}
	Able Seafarer Engine	III/5	0	0
Total			4	3
< 750 kW ⁸	Chief Engineer	III/3	1 ⁹	1 ⁹
	Second Engineer	III/3	0	0
	Officer in charge of the Engineering Watch	III/1	1 ^{4,7}	1 ^{4,7}
	Engineering Watch Rating	III/4	0 ⁶	0
	Able Seafarer Engine	III/5	0	0
Total			2	2

³ See Sec. 9.3

⁴ Manning may be reduced by one at this rank, if vessel classed with UMS

⁵ BMSR may request one additional one at this rank

⁶ Tankers of 1000 GT or more shall add one additional Engineering Watch Rating

⁷ Manning may be reduced by one see Sec. 5.5

⁸ See Sec. 4.7.1

⁹ C.E. may be covered by an OEW

Revision History

Version	Description of Revision
1.0	First Issue
1.1	Amended hyperlinks and bulletin format