

Commonwealth of Dominica



Office of the Maritime Administrator

Policy Letter: 04-15 – Principles of Watchkeeping

Applicability: All Commonwealth of Dominica flagged vessels and Commonwealth of Dominica certified or documented seafarers.

REQUIREMENTS:

1.0 Standards Regarding Watchkeeping

The *International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended* (“STCW”), the *International Regulations for Preventing Collisions at Sea, 1972* (“COLREGS”), and the *International Convention on Safety of Life at Sea, 1974* (“SOLAS”) have a direct impact on watchkeeping practices in all merchant ships and the manning requirements for vessels. The following outlines the requirements of STCW.

1.1 Watchkeeping at Sea

- 1.1.1 The Master of every ship is bound to ensure that watchkeeping arrangements are adequate for maintaining safe navigational watches.
- 1.1.2 Under the master's general direction, the officers of the watch are responsible for navigating the ship safely during their periods of duty, when they will be particularly concerned with avoiding collision and stranding.
- 1.1.3 The officer in charge of the watch is the master's representative and is primarily responsible at all times for the safe navigation of the ship and for complying with COLREGS.
- 1.1.4 The chief engineer of every ship is bound, in consultation with the master, to ensure that watchkeeping arrangements adequately maintain safe engineering watches.

1.2 Fitness for Duty

- 1.2.1 All persons who are assigned duty as officer in charge of a watch or as a rating forming part of a watch and those whose duties involve designated safety, security and prevention of pollution duties shall be provided a minimum of ten (10) hours of rest in any 24-hour period and a minimum of seventy-seven (77) hours of rest in any 7-day period.
- 1.2.2 The hours of rest may be divided into no more than two (2) periods, one (1) of which shall be at least six (6) hours in length, and the intervals between consecutive periods of rest shall not exceed fourteen (14) hours.
- 1.2.3 During overriding operational conditions, the minimum period of ten (10) hours may be reduced to not less than six (6) consecutive hours; provided that, any such reduction shall not extend beyond two (2) days, and not less than seventy (70) hours of rest shall be provided in each seven (7) day period. Required safety drills shall be conducted with minimal disruption of rest periods.
- 1.2.4 When a seafarer is on call, the seafarer shall have an adequate compensatory rest period if the normal period of rest is disturbed by call-outs to work.
- 1.2.5 The master of every ship may 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. Once a normal situation is restored, the master shall ensure that any seafarers who worked through a scheduled rest period receive the appropriate period of rest.

1.3 Oil Pollution Act of 1990 (OPA 90)

- 1.3.1 For vessels operating within United States waters to which OPA 90 requirements apply, as the limit specified in paragraph 1.2.1 is more stringent than the OPA 90 limitation of no more than fifteen (15) hours work in any 24-hour period, adherence to the minimum limit of ten (10) hours of rest in any 24-hour period would be in compliance with both STCW, ILO Consolidated Maritime Labour Convention, 2006 (MLC), and OPA 90 requirements.
- 1.3.2 However, the OPA 90 restriction of no more than thirty-six (36) hours of work in any 72-hour period is unique and distinct from the limits prescribed under STCW and MLC. Therefore, adherence to the limit specified in paragraph 1.2.2 may not ensure compliance with this unique 72-hour period limit. Accordingly, shipowners and operators shall take measures which ensure that the most onerous limits for all periods (24-hour, 72-hour, and 7-day periods) are met while operating under OPA 90 regulations.
- 1.3.3 Due to the differences among the OPA 90 and with both STCW and MLC on this issue, the restrictions under OPA 90 above shall not be utilized unless permitted under the seafarers' collective agreement where applicable.

1.4 Protection of the Marine Environment

The master, officers and ratings shall be aware of the serious effects of operational or accidental pollution of the marine environment and shall take all possible precautions to prevent such pollution, particularly within the framework of relevant international and port regulations.

1.5 Look-Outs

A proper look-out shall be maintained at all times in compliance with Rule 5 of the COLREGS and shall serve the purpose of:

- .1 maintaining a continuous state of vigilance by sight and hearing as well as by all other available means, with regard to any significant change in the operating environment;
- .2 fully appraising the situation and the risk of collision, stranding and other dangers to navigation; and
- .3 detecting ships or aircraft in distress, shipwrecked persons, wrecks, debris and other hazards to safe navigation.

2.0 Standards Regarding Number of Ratings Required on Watch

STCW is not specific as to how many ratings should be included in a navigational or engine room watch. **Therefore, for Dominica vessels, the following determinations are made:**

2.1 Navigational Watch

When only one (1) rating forms part of a navigational watch, the watchstander shall be qualified as an Able Seaman or GP-1. When more than one (1) rating is included in a navigational watch only one (1) need be qualified as an Able Seaman. All watchstanders shall be qualified and hold certification prescribed for navigational rating watchstanders to the standards prescribed in A-II/4 or 5 of STCW according to the duties they are required to perform.

2.2 Engine Room Watch

- 2.2.1 When only one (1) rating forms part of an engine room watch, the watchstander shall be qualified to the standards and hold certification prescribed in Table A-III/4 or 5 of STCW, according to the duties required to be performed. When more than one (1) rating is included in an engine room watch, each rating must be qualified in accordance with this paragraph.
- 2.2.2. No member of the engine room watch shall be required to enter the engine room alone, except under controlled conditions.

- 2.2.3 In cases where personnel not defined in publication CDP-300 *Merchant Marine Personnel Certification Requirements* (“CDP-300”), such as electricians, fitters, mechanics, are carried on the crew list in lieu of Able Seaman Engine, all watchstanders shall comply with the standards and hold the certification prescribed for engine room rating watchstanders in A-III/4 or 5 of STCW, according to the duties they are required to perform.

3.0 Training and Qualifications for Persons on Tankers

3.1 Minimum Training and Qualification Levels

- 3.1.1 Chapter V, Section A-V/1, of STCW specifies minimum training and qualification levels for persons on tankers. It requires in oil tankers, chemical tankers and liquefied gas tankers that the master, chief mate, chief engineer and first assistant engineer possess training and experience appropriate to their duties. On tankers where a specialist cargo officer is carried, they too shall be qualified. Each of those officers shall prove competency by means of a tankerman endorsement as provided for in publication CDP-300.
- 3.1.2 Owners and masters should ensure that all officers on tankers who are in charge of cargo operations or who have immediate responsibility for cargo handling operations are qualified as tankerman, Person in Charge in order to comply with STCW and to avoid possible port State interventions.
- 3.1.3 Ratings who perform cargo handling duties and responsibilities, should be qualified as tankerman, Person Assisting.

3.2 Crude Oil Washing

The International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 (“MARPOL Convention”) specifies that certain crewmembers must be appropriately qualified on tankers, which conduct crude oil washing (COW) operations. The master, chief mate, chief engineer, first assistant engineer, cargo officer (where carried), and any ratings that have responsibilities defined in the COW Operations and Equipment Manual, must possess the appropriate certification of qualification. The Administration will provide, upon application and satisfactory proof of experience, an endorsement of competency in COW with the tanker certificate referred to in section 3.1 above.

4.0 STCW

For additional standards regarding Watchkeeping, refer to STCW Chapter VIII, Sections A-VIII/1 and A-VIII/2 Part 1, Part 2 as supplemented by IMO Resolution A.893(21), Part 3 and 4.

Any questions can be directed to:
Technical Department
Tel: + 1 508 992 7170
e-mail: technical@Dominica-Registry.com