

St. Kitts & Nevis International Ship Registry

*Flying the flag of the
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Maritime Circular to Maritime Registrars, Ship-owners, Masters, Managers & Operators of St. Kitts & Nevis Ships, Classification Societies, Recognised Organisations, Recognised Security Organisations, Surveyors of Ships & Flag State Inspectors to this Administration, Seafarers & IMO Member States

Maritime Circular No: MC/45/12

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IMPLEMENTATION OF THE WORK AND REST HOURS AND PREVENTION OF ALCOHOL ABUSE UNDER THE MANILA-2010 AMENDMENTS TO THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION AND WATCHKEEPING FOR SEAFARERS, 1978 (STCW CONVENTION)

These below requirements should be implemented from 1 Jan 2012.

INSTRUCTIONS & GUIDANCE FOR SHIPOWNERS, MANAGERS, MASTERS, ST KITTS & NEVIS RECOGNISED ORGANISATIONS AND ST KITTS & NEVIS APPROVED INSPECTORS

The purpose of this Maritime Circular is to advise on new regulations coming into force to maintain records of Work and Rest hours and new regulation A-VIII/1 concerning the Prevention of Alcohol Abuse under the Manila-2010 Amendments of STCW'78 Convention.

Hours of Work and Rest

All persons assigned duty as an officer in charge of a navigational or engine room watch, or a rating forming part of a navigational or engine room watch, or any seafarer whose duties involve designated safety, prevention of pollution and security duties have to be provided with rest periods as follows:

- a) A minimum of 10 hours rest in any 24 hour period;
- b) 77 hours rest in any 7 day period; and
- c) The hours of rest may be divided into no more than two periods, one of which shall be at least 6 hours in length and the intervals between consecutive periods of rest shall not exceed 14 hours.
- d) Reduction of rest hours to 70 hours in any 7-day period is allowed for not more than two consecutive weeks.

Masters shall post a table of shipboard working arrangements (i.e. information on scheduled daily hours of work/rest at sea and in port) in an easily accessible location in the working language(s) of the ship and in English, for the benefit of all crew members.

Records of seafarers' daily rest hours shall be properly recorded and be duly authenticated by the Master or an officer designated by the Master. A copy of the records of rest hours and schedules pertaining to seafarers, duly endorsed by the master or a person authorised by the Master, shall be made available to the seafarer.

A PSC Officer(s) may check:

- The records of seafarers' hours of work or their hours of rest
- If the records comply with the Convention

- If the records are reasonably up-dated
- If the records are signed by the Master or his representative and by the seafarers
- If the records account for all hours in each 24-hours period

A non-compliance with one or more of the above mentioned points will be considered a deficiency under ILO Convention 180 and Manila-2010 Amendments of STCW'78 Convention.

The PSC Officer may ask to interview the crew members, in private. Should there be a **DEFICIENCY**; the PSC Officer may require its rectification prior the ship's departure. Should evidence of false records be shown, the ship may be **DETAINED** until a proper system of record keeping is put into place and the Master demonstrates that the crew is sufficiently rested to continue the voyage.

Companies are advised to use the IMO/ILO Guidelines Annex-II of MSC Circular 1014 attached to this maritime circular, when preparing the duty schedules and rest hours records and these records (which may be computerised) shall be retained on board for at least two years to enable monitoring and verification of compliance in accordance with the provisions of Section A-VIII/1. Companies should incorporate the procedures for preparing the watch schedules and recording of daily hours of rest in the ship's safety management system.

Breach of Rest Hours in an Emergency

Seafarers may have performed hours of work necessary for the immediate safety of the ship. In this situation the evidence of the situation of emergency in the log book, including the necessary hours of work should be maintained. Other proofs such as print out of logs should be kept as evidence, including necessary incident or accident reports.

As soon as the normal situation has been restored, the Master should ensure that any seafarer who has performed work in a scheduled rest period is provided with adequate period of rest. This should be reported in the record of the hours of work or rest.

Age of seafarers

No person under 16 years of age shall work on a ship. Special regulations apply to the working hours of seafarers under the age of 18.

If there are seafarers under 18 year's age, the PSC Officer may check the records of daily hours of work and rest to ensure that the seafarer did not work at night.

("night" is, according to Convention, a period of at least 9 consecutive hours, including the interval from midnight to five a.m.).

If the seafarer under the age of 18 is found as working at night, the PSC Officer will determine if the seafarer is at least 16.

Prevention of Alcohol Abuse

STCW Chapter A-VIII/1 requires all Masters, officers and other seafarers, while performing bridge or engine room watch, designated safety, security and prevention of pollution duties should not consume alcohol that would result in a limit greater than 0.05% blood alcohol level (BAC) or 0.25 mg/l alcohol in the breath. Companies should establish procedures under the ship's safety management system to prevent alcohol and drug abuse on board.

If you have any questions about this Maritime Circular, please contact us.

Yours truly,



Nigel E Smith
International Registrar of Shipping and Seamen