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SAFETY CIRCULAR

05th Feb 2019

To: Fleet

SUBJECT: Rest Hours Management

Dear Captain,

In order to ensure compliance with rest hour requirements please find below recommendations towards planning and management of rest hours on board. This is a pilot project and Masters should use their discretion in implementing these measures on board and are encouraged to provide feedback on their effectiveness. Additionally, in view of amendments to ISM code which came in force on 1st Jan 2015 concerning Resources and Personnel, this pilot project is one of the measures taken to ensure that company vessels are appropriately manned in order to encompass all aspects of maintaining safe operations on board.

General:

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- 1) Master is overall responsible for ensuring that all the staff on board are meeting the Rest Hours requirements as required. Office is required to be advised of same on monthly basis however if any problem faced in meeting these requirements office to be advised immediately.
- 2) Master and Chief Engineer to ensure that Work and Rest hours are well planned as per prevailing schedule and operational requirements. These to be posted and known to all concerned on board.

If shipboard management foresees that an upcoming operation will result in rest hour violations, they should contact their Vessel manager with a request for additional crew. Any request must be detailed and should include how the operation is planned to be carried out.

- 3) If any operations like STS operations warrant additional manpower, shipboard management should plan same well in advance and ensure that all required hands are well rested in time.

Similarly If several services are being arranged at the same port and planning foresee rest hour violations, shipboard management should contact the vessel manager to review if certain service can be deferred or arranged otherwise.

- 4) Company ISM form for Work & Rest hours should be used as a recording tool as well as a planning tool and updated on a daily basis. Work schedules to be prepared identify potential non conformities. Department heads should be informed and remedial action taken using alternate planning where possible. Rest hour records to be maintained as closely as possible to real situation on daily basis so as to ensure that they tally with all other logs like Log Books and permit to work systems.
- 5) It is the responsibility of individual crew members to keep their work rest hour records updated on a daily basis. And departmental heads are responsible for regular checks and ensuring records are maintained correctly. If violations are noted and foreseen, crew should be encouraged to report these to their department head and discuss a resolution.
- 6) Inter departmental co-operation should be considered depending on the work load and work rest hours violations in any department.
- 7) Depending on vessel's schedule, a weekly day off should be considered by Masters and Chief Engineers. Work to be restricted to weekly routines and watches on these days. Only pre arrivals checks and preparations should be carried out the day before Arrival / berthing. Similarly, post departure work should be limited to securing. Maintenance work should be kept to minimum on these days.
- 8) Drills and training Sessions timings to be well planned after considering all departments' operational requirements. Consideration should be given to conducting drills / training at around 1100 LT or similar, as the normal 1530 LT can break rest periods to less than 6 hours.
- 9) Any Short breaks from rest no matter how small even about 15 minutes should be recorded as work times. Always attempt to give at least single 8 hours rest instead of two 6 hours rests.

Below are some suggestions to Master and Chief Engineers so as to assist in planning of on board operations so as to use the staff best and meet rest hours: -

- 1) Where crew is available, preference should be given to 4 on/8 off watches (Instead of 6 on/6 off) with additional crew being called during periods of high activity (stripping/topping off).
- 2) For LSA / FFA equipment in engine room, 3rd Officer to be given suitable assistance by ER staff for regular checks and PMS routines.

Masters can relieve 3rd Officer for 1 to 2 hours at sea so as to enable him to devote same time LSA / FFA regular checks and PMS routines.

- 3) Inter departmental co-operation should be considered for stores handling e.g. Deck and engine watch keepers to assist Galley crew in handling other stores.
- 4) During periods of heavy workload in CCR during cargo operations, Master or duty officer to relieve Chief Officer for a period of about 6 hours except during critical operational stages like topping off, stripping etc.
- 5) After necessary safety briefing and training, strongly consider the possibility of using ER ratings (who are not part of ER watch) on deck for mooring stations, cargo arm connection / disconnection, standby forward during pilotage, stores etc).
- 6) Where necessary / possible Master or Chief Officer to relieve 2nd Officer during cargo operations, to complete passage planning for next voyage. Off duty deck officer should not be called to answer questions about distance / ETA / Port papers. This should be done by other available personnel.
- 7) Master should consider, based on his assessment, utilizing 2nd / 3rd Officers for anchor stations, pre arrival planning etc. Training of officers in cargo operations so as to cooperate and assist Chief Officer during cargo operations by sharing work load of Ch Officer.
- 8) When bunkering is planned, the ER staff involved should be given time off by being substituted by other ER watch keepers.
- 9) For manifold watch during bunkering, if manifold is already manned by deck ratings consider using them instead of ER ratings.
- 10) In UMS Ships If there have been several alarms during the night, the duty engineer should not hesitate to take extra rest before commencing work on the following day. Proper records of ER rounds and alarms should be maintained so that other engineers manning ER can take over responsibility without disturbing duty engineer.
- 11) In UMS Ships outside normal working hours ER should be unmanned at all times (except during rounds). In case of any concerns not allowing UMS

operation, these should be brought to the attention of Vessel Management for speedy resolution of defects.

- 12) In UMS Ships the evening UMS round should ideally be carried out after 6 hours of rest, for which duty engineer may be relieved at 15:00 LT, if the work load permits.
- 13) For prolonged periods of manned ER (pilotage etc.), consider using 4on/8off system for the duty engineers. During HRA transit, risk assessment needs to be done in consultation with CSO. Whether ER should be manned or unmanned.
- 14) If the 2nd Engineer is called out frequently during the night time, he should not hesitate to take extra rest before commencing work on the following day.
- 15) UMS round should be carried out by the Duty Engineer only.

This Circular to be discussed in the next meeting with all crew members

**QHSE
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