



Anglo-Eastern Group

“Ship Manager’s Role in Coping with Administrative Burden”

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Administrative Burden

“Administrative work which in the opinion of the employee does not add value proportionate to the resources that the person will have put into the work to comply with specific rules and requirements”.

A BURDEN IS THUS WORK AFFECTING BOTH EFFICIENCY AND JOB SATISFACTION IN A “NEGATIVE” WAY.

Source: Danish Maritime authority – Survey of Administrative Burden among International seafarers and Ship owners

PAPERWORK!



COUNT OF PAGES OF THE ESSENTIAL CONVENTIONS AND CODES

Publication	Pages
SOLAS	520
MARPOL	447
Load line	249
MLC	105
ISM code	73
IMSBC	506
ISPS	141
COSWP	600
STCW	277



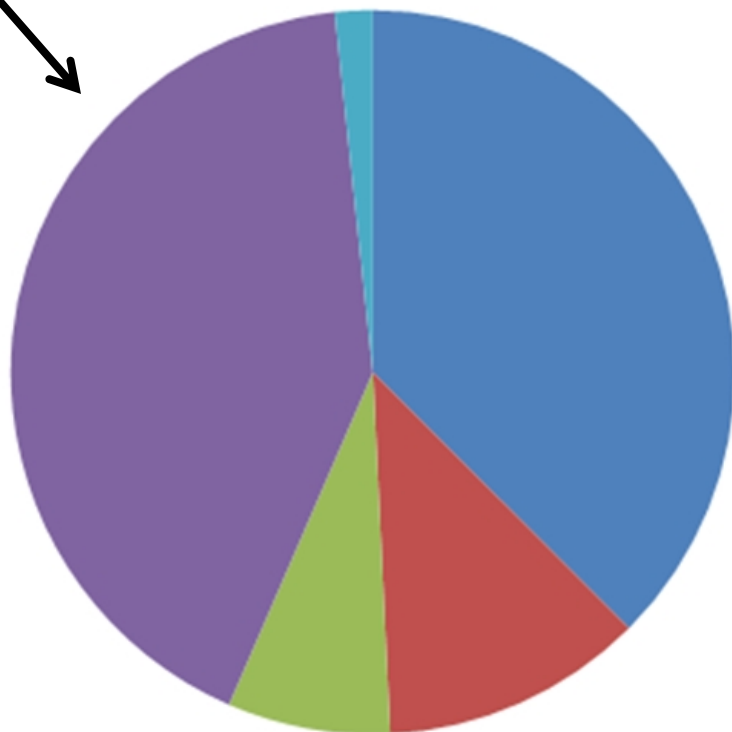
COUNT OF PAGES OF THE ESSENTIAL CONVENTIONS AND CODES

Publication	Pages
Port state control procedures book	148
IGC	166
COLREGS	45
TONNAGE CONVENTION	19
IBC	259
IMDG	414
INT'L CODE OF SIGNALS	190
UNCLOS	275
ILO – 189 conventions	1769



Over 590 administrative requirements under various conventions/codes, addressing a variety of stakeholders

SHIPMANAGEMENT



- GOVERNMENTS/ADMINISTRATIONS
- IMO SECRETARY-GENERAL/SECRETARIAT
- NOMINATED SURVEYORS/RECOGNIZED ORGANIZATIONS
- SHIP'S MANAGEMENT (COMPANY/OWNER/MASTER/SHIP'S CREW)
- OTHER STAKEHOLDERS



MANNING SCALES

YEAR	TYPICAL MANNING LEVELS	NUMBER OF IMO CONVENTION
1982	50 Crew members	30
2014	18-20 Crew members	Over 60



Main areas of Administrative Burden study by DMA

- ❖ Preparation of and participation in PSC, Vetting or Class inspections. ❌
- ❖ Handling of ISPS requirements. ✔️
- ❖ Planning and execution, of exercises and drills according to ISM/ ISPS codes. ❌
- ❖ Using and maintaining internal management systems(e.g. QMS, ISM ,etc). ❌
- ❖ Completion of various journals (e.g. garbage journal, ORB, etc). ✔️
- ❖ Completion of port and pre-arrival documents –
This counts crew lists, passenger lists, crew effects declarations, bonded stores
vaccination lists ,WHO health declarations, special local declarations, etc. ✔️
- ❖ Signing on/off of crew, medical examination and certificates. ❌



Similar ship condition inspection activities

- ❖ Underwriters condition Assessment inspection (P&I / H&M)
- ❖ Cargo Owner`s / Charterer's and Certificate inspections and surveys.
- ❖ Port State Control
- ❖ Flag State inspection
- ❖ Vetting's (OCIMF & CDI) and ISM & ISPS audits (external & internal)
- ❖ Classification Society surveys (regular & occasional)



Percentage of working time spent on perceived administrative burdens

Seafarer



20%

Land Offices



9%

Source: Danish Maritime authority – Survey of Administrative Burden among International seafarers



TASKS ADDED OVER THE YEARS

❖ Garbage log book entries – 3-4 entries per week

Name of Ship: _____ Distinctive Number or Letters: _____ IMO No: _____

Cat A	Plastics	Cat B	Food wastes	Cat C	Domestic wastes (e.g. paper products, rags, glass, metal, bottles, crockery, etc)
Cat D	Cooking oil	Cat E	Incinerator ashes	Cat F	Operational wastes
Cat G	Cargo residues	Cat H	Animal carcass(es)	Cat I	Fishing gear

Date/Time	Position of the Ship/Remarks (e.g. accidental loss)	Category	Estimated Amount Discharged or Incinerated
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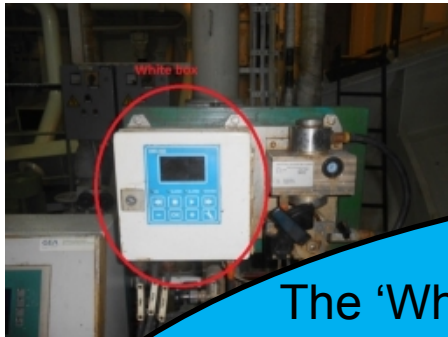
- (b) **When garbage is discharged to reception facilities:**
 - (i) Date and time of discharge
 - (ii) Port or facility, or name of ship
 - (iii) Categories of garbage discharged
 - (iv) Estimated amount discharged for each category
 - (v) Signature of officer in charge of the operation
- (c) **When garbage is incinerated:**
 - (i) Date and time of start and stop of incineration
 - (ii) Position of the ship (latitude and longitude)
 - (iii) Categories of garbage incinerated
 - (iv) Estimated amount incinerated in cubic metres
 - (v) Signature of the officer in charge of the operation
- (d) **Accidental or other exceptional discharges of garbage in contravention of 7 of Annex V of MARPOL:**
 - (i) Date and time of occurrence
 - (ii) Port or position of the ship at time of occurrence (latitude, longitude)
 - (iii) Categories of garbage discharged or lost
 - (iv) Estimated amount for each category in cubic metres
 - (v) The reason for the discharge or loss and general remarks.

❖ REVIEW THE REGULATIONS AND ELIMINATE/SIMPLIFY ENTRIES. IS IT IMPORTANT TO NOTE CBM OF GARBAGE? WHY CAN'T THERE BE AN ENTRY ONLY FOR LAT/LONG WHERE THE GARBAGE WAS DISCHARGED



TASKS ADDED OVER THE YEARS

- ❖ Oil record book entries – 4-5 entries per week while vessel is at sea



MACHINERY SPACE OPERATIONS			
Date	Code (letter)	Item Number	Record of operations/signature of officer in charge
10 NOV 2012	C	H.1	LO PURIFIER SLUDGE TANK
		H.2	3.0 M ³
			By GPS, ACHER / GPS SIDE WARNING
			2012 018
			[Signature]

The 'White Box' is a fail-safe and tamper-proof arrangement fitted in conjunction with the OWS.

The flow through the flow meter, the PPM of bilge water, the position of the 3 way valve (whether in overboard mode or in recirculation mode), the status of the system (on/off) and the position of the ship – latitude/longitude - through GPS (optional).

WHY CANT THE FLOW METERS BE MADE MANDATORY FOR ALL TANKS WITH RECORDING FEATURE INCLUDED IN A WHITE BOX



TASKS ADDED OVER THE YEARS

- ❖ **Ballast water management** - Each tank ballast exchange details are to be entered on a separate page to maintain the history of tank Ballast reporting form, Ballast log book entries for each exchange, ballasting and deballasting operation.

NAME OF SHIP: M.V. Example				IMO NUMBER: 1234567	
DATE	CODE	ITEM			
22/04/04	A	--	Ballast		
		1	21 st /		
		2	Amaz		
		3	Forep		
			(400		
			DB3S		
		4	28 m	08/05/04	B
		5	N.A.		
		6	3813		
			020		

NAME OF SHIP: m.v. Example				IMO NUMBER: 1234567	
DATE	CODE	ITEM	RECORD OF OPERATION	SIGNATURE	
		12	DB4(P&S) (604 m ³). Ballast water in this tank was exchanged on 14/04/04 as required by The Ballast Water Management plan		
			Discharge of ballast water into the sea		
		1	07 th May, 2004 / 0815 hrs.		
		2	Berth no: 5, Vitoria		
		3	Forepeak, DB1 , DB2 (P&S), DB3 (P&S), DB4 (P&S)		
		4	N.A.		
		5	N.A.		
		6	4383 m ³		
		7	216 m ³		
		8	08 th May 2004 / 1530 hrs.		
		9	Atlantic Ocean – to positions between those mentioned in Code C above		
		10	After Peak tank		
			Cleaning of tanks and discharge of sediments		
		1	10 th July 2004 /0800 hrs.		
		2	DB2 (P&S)		
		3	Sediments handed over to ABCD dry-dock for disposal. Receipt retained in the file.		
		4	N.A.		
		5	N.A.		
		6	12 th July, 2004/ 1620 hrs.		
		7	ABCD dry-dock, Noport		

- ❖ THE REGULATIONS MADE SHOULD BE MORE REALISTIC AND IMPACT ON THE SEAFARER'S TASKS MUST BE CONSIDERED.
- ❖ BALLAST WATER TREATMENT SYSTEM



TASKS ADDED OVER THE YEARS

- ❖ **NPDES / VGP** – Basis a typical US voyage each discharge has to be documented separately with detail of the reasons for discharge.
 - ▶ Applicable discharges (out of **27+2**)
 - 1 Deck Runoff & above waterline hull cleaning
 - 2 Bilge Water / Oily Water Separator Effluent
 - 3 Ballast Water
 - 4 Anti-fouling Leachate from Anti-Fouling Hull Coatings/Hull Coating Leachate,
 - 5 Aqueous Film Forming Foam (AFFF)
 - 6 Boiler/Economizer Blow down
 - 7 Cathodic Protection
 - 8 Chain Locker Effluent
 - 9 CP Propeller, Thruster, Stern Tube, Thruster bearings, Stabilizers, Rudder Bearings, Azimuth Thrusters & Pod Propulsion where Hydraulic Fluid and other oil – sea interfaces; wire rope & mechanical equipment subject to immersion.
 - 10 Distillation and Reverse Osmosis Brine



TASKS ADDED OVER THE YEARS

- ❖ **OPA 90** – Drills – Collision, Grounding, Hull rupture, Machinery failure, Steering failure. AIM IS TO PREVENT OIL FROM GOING OVERBOARD!
- ❖ **ISPS** – Multiple searches of the vessel on departure with an average search of 3-4 hours, 8-10 entries per week in the security log book while vessel is at sea (daily checks of vessel and security equipment)



TASKS ADDED OVER THE YEARS

- ❖ **Annex VI - ECA/SECA entries** – Multiple entries for the changeover of fuel oil

SECTION 4: Low Sulphur Fuel (LSF) Oil Change Over Record for Regulated areas.

Begin C/O to LSF. Date/ Time /Position	Complete C/O to LSF Date/Time /Position	Grade /Volume of LSF in each tank (m ³)	Regulated Area Entry Date/Time /Position	Duty Eng. sign	C/E sign	Regulated Area Exit Date/Time /Position	Begin C/O to HSF Date/Time /Position	Complete C/O to HSF Date/Time /Position	Grade /Volume of LSF in each tank (m ³)	Duty Eng. sign	C/E sign
EXAMPLE (A) N/A	02/07/09 0800						03/07/09 2215	N/A	(See Note 3 below)		
EXAMPLE (B)							02/07/09		(See		

NOTE: 1. EXA
2. EXA
on
3. Va
ch
4. EX

- ❖ WHY CAN'T THERE BE JUST ONE SULPHUR CONTENT ACROSS ALL JURISDICTIONS WHILE THE VESSEL IS COASTING ?

change over Calculator at the end of this book
over / beginning and end of



TASKS ADDED OVER THE YEARS -- contd

- ❖ Port papers / arrival document –
 - ETA notices to port authorities/ CG /Charterers
 - Notice of arrivals – Usually various countries have there own formats and software – eNOAD, ePANS
 - Pre arrival questioner runs into multiple formats
 - Average documents required per country varies from 5-10 pages
 - Declarations of stores and cargo
 - Declaration/ Currency declaration/ –
 - UK – 8-10 pages**
 - CHINA – 35-40 pages**
 - ❖ **ALIGN PORT FORMS IN ALL COUNTRIES**
 - ❖ **VESSEL ARRIVAL AND MOVEMENT POLLED BY SAT-C AND AIS**
- Not to count the multiple copies of documents which must be signed by the crew





FAL Convention

58 IMO Member States are not part of FAL yet.

Objectives:

- ❖ Prevent unnecessary delays in maritime traffic: simplifying and minimising formalities, documents and procedures.
- ❖ Promote co - operation between Contracting governments.
- ❖ Uniformity in formalities (documents) and procedures (clearance).
- ❖ Reduce to a (maximum) of 7 the number of declarations which can be required by public authorities.



Seafarer's perception

"Safety is always good because it will help the seafarer, but paperwork does not help us. So less time spent on paperwork the more time we could spend on safety itself and maintenance of our safety equipment"

"There is too much paperwork - some crews will falsify paperwork to save time. This is not safety and can lead to disaster"

"Work at sea is dangerous - I see no reason to complicate it further with unnecessary paperwork"





Consequences / impact of administrative burdens?

- ❖ Less attention to the primary task – the safe conduct of the ship.
- ❖ Unattractive working environment
- ❖ Fatigue
- ❖ Criminalization of seafarers
- ❖ Bureaucracy
- ❖ Recruitment challenges for ship managers
- ❖ Waste of time and money



Solutions

- ❖ Increased cooperation and partnership between the IMO and oil companies to reduce the demand for documentation and paperwork and focus more on actual safety and quality.
- ❖ Better coordination and pooling of resources between classification societies, authorities and vetting companies.
- ❖ Introduction of one certificate which approves that all other certificates are valid and approved.
- ❖ Digital solutions – how digital systems could be better suited for work-smart solutions for ship-owners reporting and interacting with authorities.
- ❖ Standardization and alignment of interpretation and enforcement of national and international rules, not least the elimination of country-specific rules.



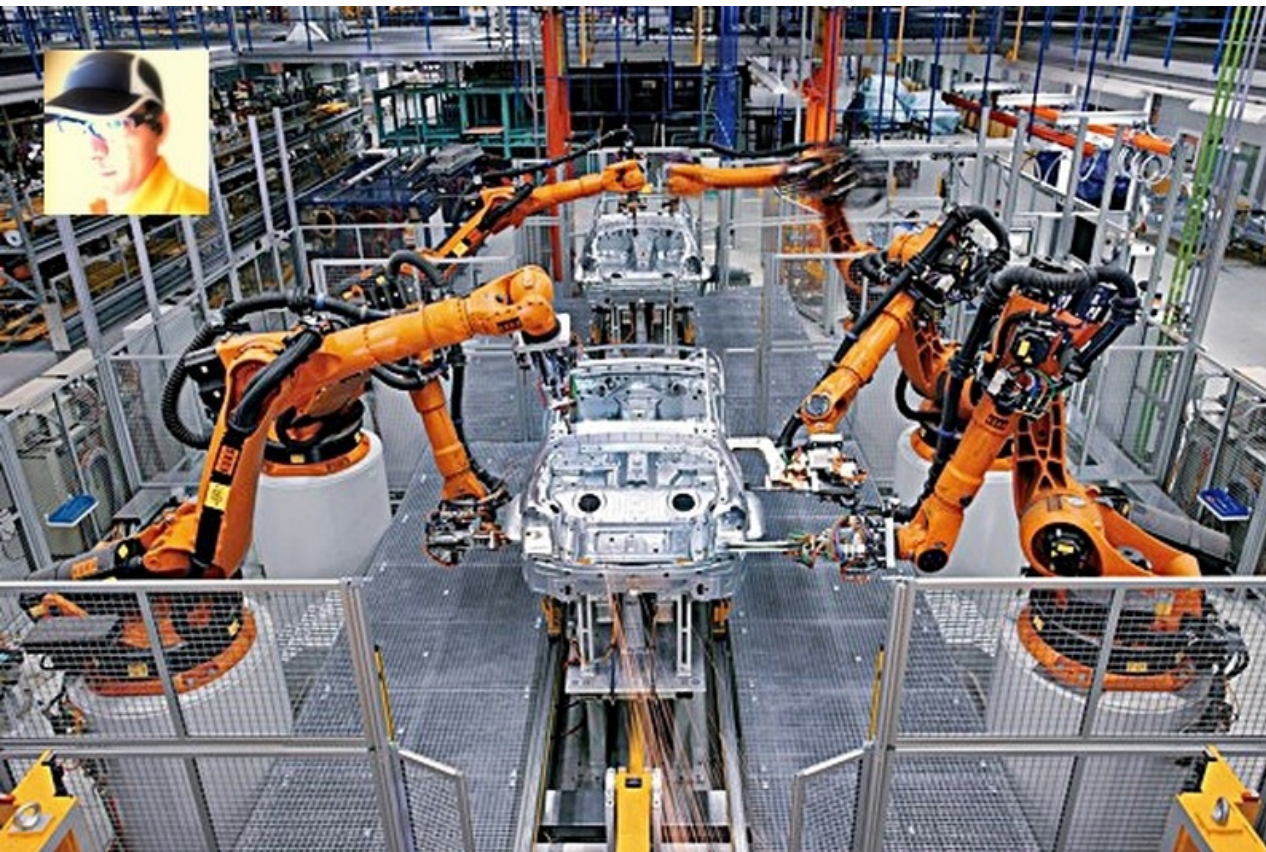
SOME REASONS FOR THIS PAPERWORK CULTURE



THE PLIGHT OF THE SEAFARER IS NOT HEARD IN THE CORRIDORS OF THE REGULATORS.
YES, THERE ARE MANY ASSOCIATIONS WITH NGO STATUS BUT THE DISCUSSIONS ARE NOT AT THE LEVEL OF DETAIL THAT THE EFFECT ON THE SEAFARER'S WORKLOAD IS DISCUSSED IN DETAIL!



SOME REASONS FOR THIS PAPERWORK CULTURE



INDUSTRY DOES NOT SPONSOR STUDIES INTO THE WORKLOADS OF THE SEAFARER, AND DOES NOT LIKE TO AGREE TO ANY SOLUTION THAT MAY BE MORE EXPENSIVE IN TERMS OF HARDWARE BUT WILL REDUCE THE WORKLOAD OF THE SEAFARER. COMPARISON OF AUTOMATION CAN BE MADE WITH OTHER INDUSTRIES



Sum up the solutions

- ❖ ALIGN PORT FORMS IN ALL COUNTRIES.
- ❖ REVIEW ALL REGULATIONS AND ELIMINATE/SIMPLIFY ENTRIES INTO THE NUMEROUS LOG BOOKS E.G IS IT IMPORTANT TO NOTE CBM OF GARBAGE?
- ❖ REVIEW ALL REGULATIONS AND FIND HARDWARE SOLUTIONS THAT REDUCE THE WORKLOAD ON SEAFARERS.E.G OWS WITH FLOW METER,CONNECTED TO GPS TO RECORD DATE,TIME QUANTITY OF BILGE WATER PUMPED OUT
- ❖ MAKE REALISTIC REGULATIONS—E.G; BALLAST WATER REGS
- ❖ MAKE REGULATIONS THAT ARE EASY TO FOLLOW– E.G SULPHUR CONTENT/ECA/



Solutions

❖ **INCREASE MANNING SCALES!**





Thank You!