

# ReportISM



The ISM Code Magazine...  
by experts for professionals.

INSIDE ISSUE 10

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# Dr Phil's Diagnosis

Apologies for the slight delay in getting Issue 10 of ReportISM to you – we have been waiting for the Paris MOU to issue some feedback on the Concentrated Inspection Campaign (CIC) which took place at the back end of last year – when ISM compliance again came under the microscope. Unfortunately the resulting press release did not contain too much detail, and the complete report will not be presented to the Port State Control Committee until their meeting in May in Athens. We will provide a more detailed review and analysis once we have had an opportunity to study the full report.

According to the press statement issued:

- **From 1 September to 30 November 2007 a total of 5427 inspections were carried out**
- **1 out of 5 inspections showed ISM deficiencies (non-conformities),**
- **In total 1868 ISM non-conformities were recorded.**
- **Despite some serious problems the port State authorities felt, “the CIC shows that the ISM system is starting to work onboard ships”.**
- **The best performing ships, with a detention rate of 0%, were flying the flag of: Azerbaijan, Belgium, Bermuda, China, Denmark, Faroe Islands, Finland, France, India, Ireland, Latvia, Luxembourg, Isle of Man, Philippines, Spain, Thailand, and United States of America.**
- **The worst performing ships, with a detention rate of 16,2% (three times the average) or higher, were flying the flag of: Albania, Comoros, Cook Islands, DPR Korea, Sierra Leone, Slovakia, St Vincent and the Grenadines and Syrian Arab Republic.**

In this issue of ReportISM we include a special and detailed focus on the new requirements for DPA qualifications and training. Regular readers of ReportISM may recall that we highlighted the fact that IMO Marine Environmental Pollution Committee (MEPC) and the Maritime Safety Committee (MSC) had approved proposals with regard to an additional Annex to Resolution A.913(22) – Revised Guidelines on Implementation of the ISM Code by Administrations – setting out requirements relating to the experience, qualifications and training for the role of Designated Persons under the ISM Code. IMO Circular MSC-MEPC.7/Circ.6 was issued on 19th October 2007 under Ref. T2-hes/4.2 T5-MEPC/1.01 and titled: ‘Guidelines on the Qualifications Training and Experience necessary for undertaking the Role of the Designated Person under the provisions of the International Safety Management (ISM) Code’. A copy of the circular can be found on our ISM educational website InformISM at [www.ismcode.net](http://www.ismcode.net)

In response to questions put to us at ConsultISM, we will endeavour to explain what training requirements are required and also suggest reasons why it was necessary to introduce these guidelines. I am also delighted to provide in this issue a solution to the Company's and the DPA's training needs, which will allow them to meet the training requirements through a new Professional Development Course (PDC) for ISM Designated Persons being offered by the World Maritime University and a Computer Based Training Course soon to be offered by Videotel. I was delighted to have been involved in the development of both courses – which are closely interlinked through cooperation between the two bodies. Please see pages 4-6 of this issue for full details.

In addition this issue of ReportISM includes topical, informative and I hope interesting articles addressing the Management of Collisions, Bridge Team Management and the Pilot, Manning and Problems with Compliance as well as some important guidance on The U.S. Coast Guard's New Environmental Crimes Voluntary Disclosure Policy: Incentive for Compliance.

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The Nautical Institute (NI) recently published a new guide, "Managing Collision Avoidance at Sea". At first glance one might think this subject has been dealt with adequately before, but lest we forget, collisions simply keep happening. As the NI rightly states, "Despite years of progress across many areas of ship operations it seems that there is one major danger still lurking out at sea...other ships".

While shipping might argue in the face of increasingly onerous legislative demands it is regrettable to note that across increasingly busy sea-lanes and waterways the problem of collisions is simply not going away. In fact according to Dr YF Chang, Chairman of the Evergreen Group, "statistics demonstrate that collisions are actually on the increase, with significantly greater and more damaging consequences".

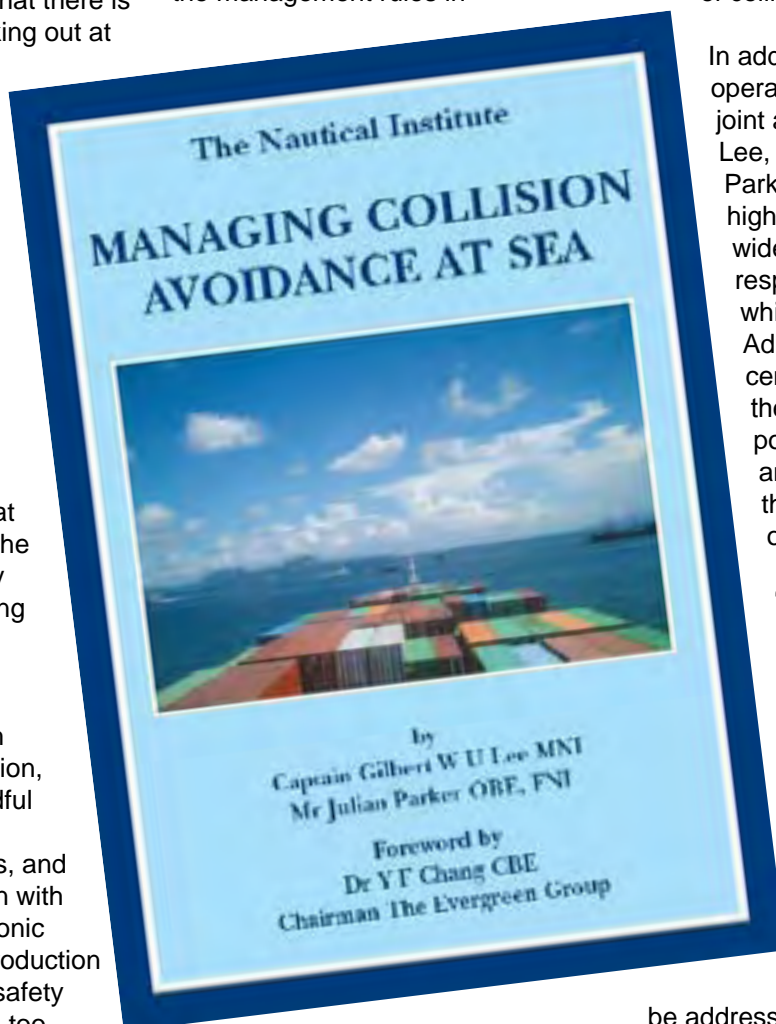
With larger ships carrying ever more cargo, and with severe penalties for pollution, a collision can have dreadful consequences for life, the environment and business, and the sad fact remains, even with the development of electronic aids to navigation, the introduction of AIS and with reams of safety management instructions, too many vessels are coming into contact with each other.

"Managing Collision Avoidance at Sea" is not simply another textbook on the rules, and while it does review best practice, this publication takes a more measured overview, producing an analytical and challenging view of what is going wrong when vessels come into close proximity.

Collisions do not just happen – there is a clear chain of events, and this can easily build into a catalogue of errors when an incident is investigated.

Naturally the authority to navigate safely is invested in the Master, who then delegates responsibility to the Officer of the Watch and this relationship is examined in some depth in the book. What is also covered is the role of not just the COLREGS and their interpretation, but an examination of the management rules in

to seek improvement". This eminently sensible philosophy, reminds us that in establishing clear procedures and management instructions we must match the demands of the rules to the confines of sensible seamanship, and we need to develop an appreciation of each party's role in keeping clear. Only then can the risks of collision be better managed.



In addition to the concept of operational "cooperation", joint authors Captain Gilbert Lee, MNI, and Mr Julian Parker, OBE, FNI, set about highlighting and developing a wider industry concept of "joint responsibility". A concept which examines the role of Administrations, training centres, ship managers and the wider industry in defining policies, setting standards, and effectively managing this vitally important aspect of ship operations.

"Managing Collision Avoidance at Sea" is a valuable illustrated guide, and is further enhanced by case studies taken from incidents and MARS reports, with analysis of incidents and near misses to establish whether changes to planning, procedures or methods of execution need to

be addressed.

place. Procedures laid down within the vessel's SMS that if followed should protect and guard against the accumulation of errors, and which can effectively stem the inexorable movement of one vessel into another.

One important element the book focuses on is the positive contribution that cooperation can bring, whether between the company and vessel, or vessel-to-vessel. In his foreword, Dr YF Chang points out that, "while shipping is competitive, collision avoidance is a cooperative responsibility and all parties both ashore and afloat must work together

Co-author, Julian Parker said of the book, "the shipping industry needs to reinforce the point that collision avoidance is a communal duty, one shared by all parties ashore and afloat. Avoiding a collision is not simply about the right reaction on the spot, it takes more than that and is about the right actions throughout the entire navigational process and management chain".

**Managing Collision Avoidance at Sea by Parker and Lee (ISBN: 1 8700 77 865) is available to purchase through The Nautical Institute, price: £27.50, (30% discount for NI members)**



When the ISM Code was first being drafted, in the early 1990's, there was little by way of helpful guidance as to who this new character – the “Designated Person” should be, what qualifications or experience he or she should have, what their job role would be or what training they would require. Indeed the final draft of the Code which was made mandatory through a new Chapter IX of the SOLAS Convention and which took effect on 1st July 1998 for Phase One vessels provided little help in resolving these questions. The excellent publication by the ICS / ISF – ‘Guidelines on the Application of the ISM Code’ – which became the internationally accepted Commentary on the Code provided some help but that guidance was not widely followed.

Of course we are provided with information in Section 4 of the Code about the role of the DPA in that they should:

- provide a link between the Company and those on board;
- have direct access to the highest levels of management,
- monitor the safety and pollution prevention aspects of the

- operation of each ship, and ensure that adequate resources and shore-based support are applied, as required.

However, these requirements of the Code do not really help in identifying who the ideal DPA should be.

In our experience of looking at the ISM systems of many ship operating companies we have seen a wide spectrum of individuals who are performing the role of the DPA. There are certainly some who are enthusiastic ex Masters or Chief Engineers who have come out of the company fleet and who have received relevant training – these are probably quite close to the ideal. However, we have come across one Company who had recruited a young Arts graduate – with no seagoing or shipping industry experience – who wanted to make a success of the job but was utterly frustrated because of lack of support from the senior managers and because no-one would take her seriously. We have encountered many ex Masters and Chief Engineers who appear to have been given the DPA job as a retirement job or because they were not suitable to continue with a seagoing career. Often this category of DPA has received very little by way of training

into their new role – it seems to have been assumed that an ex-Master or ex-Chief will automatically know



how to run a safety management system – this is a serious mistake. Frequently this category of DPA has little understanding of what a safety management system is or how it should work and, not surprisingly, there is little or no understanding of what is required throughout the Company. Invariably the Company is achieving no positive benefits from such a SMS which tend to generate large volumes of paper and the SMS is reduced to not much more than ensuring that all the boxes are ticked on all the forms and filed away neatly to keep the auditor happy. Other Companies have assigned the role to a very senior manager – even at Managing Director level. Such an individual whilst perhaps having the necessary qualifications and experience, and certainly having ‘access to the highest levels of management’ are, in our experience, probably unsuitable since they are so busy with other managerial and operational matters that they have little or no quality time to devote



to their DPA role, they rarely have direct contact with the ships or visit the ships - certainly not wearing their DPA's hat.

The bottom line is that many Safety Management Systems have stagnated because the DPA has not received relevant training in management systems and safety management in particular. Often the DPA is not aware that he or she is lacking the knowledge – unfortunately the first time these deficiencies come to light is following a major incident when an external consultant or lawyer puts the Company SMS under the microscope.

So what qualifications, training and experience does a DPA require which will allow him / her to do their job properly? These are the requirements as set out in IMO MSC-MEPC.7/Circ.6:

## 2 Qualifications

*2.1 Designated Person should have a minimum of formal education as follows:*

*.1 qualifications from a tertiary institution recognized by the Administration or by the recognized organization, within a relevant field of management, engineering or physical science, or*

*.2 qualifications and seagoing experience as a certified ship officer pursuant to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, as*

*amended, or  
.3 other formal education combined with not less than three years practical senior level experience in ship management operations.*

## 3 Training

*3.1 Designated Person should have undergone training relating to safety management elements in compliance with the requirements of the ISM Code, particularly with regard to:*

- .1 knowledge and understanding of the ISM Code;*
- .2 mandatory rules and regulations;*
- .3 applicable codes, guidelines and standards as appropriate;*
- .4 assessment techniques of examining, questioning, evaluating and reporting;*
- .5 technical or operational aspects of safety management;*
- .6 appropriate knowledge of shipping and shipboard operations;*
- .7 participation in at least one marine-related management system audit; and*
- .8 effective communications with shipboard staff and senior management.*

## 4 Experience

*4.1 Designated Person should have experience to:*

- .1 present ISM matters to the highest level of management and gain sustained support for safety management system improvements;*
- .2 determine whether the safety management system elements meet the requirements of the ISM Code;*
- .3 determine the effectiveness of the safety management system within the Company and the ship by using established principles of internal audit and management review to ensure compliance with rules and regulations;*
- .4 assess the effectiveness*



*of the safety management system in ensuring compliance with other rules and regulations which are not covered by statutory and classification surveys and enabling verification of compliance with these rules and regulations;*

*.5 assess whether the safe practices recommended by the Organization, Administrations, classification societies, other international bodies and maritime industry organizations to promote a safety culture had been taken into account; and*

*.6 gather and analyse data from hazardous occurrences, hazardous situations, near misses, incidents and accidents and apply the lessons learnt to improve the safety management system within the Company and its ships.*

At ConsultISM we would have preferred the guidelines to have gone further and provided more specific detail of training requirements – however this is a very good start and a positive move in the right direction.

Of course by following these Guidelines a Company stands to improve the way in which they manage safety with the positive benefits that will bring. Companies who may be tempted to ignore the Guidelines or feel that their own DPA does not need any training should take note of Section 5 which reads:

## 5 Company Requirements and Records

*5.1 The Company should provide training courses covering qualification, training and experience and the appropriate procedures*



*connected to compliance with the ISM Code including practical training and continuous updating. The Company should also provide documentary evidence that the Designated Person has the relevant qualification, training and experience to undertake the duties under the provisions of the ISM Code.*

One significance of this is that when the External Auditor from the Flag State Administration or Recognised Organisation comes along for the verification audit for the DOC he / she is very likely to ask to see objective evidence that the DPA is properly qualified and that the Company has provided the DPA with the proper training – which will be on a ongoing basis. A Company who cannot produce such evidence is very likely to have a number of Non-Conformities raised against it. Similarly if the Company experiences a major incident with one of its ships then the investigators and lawyers are very likely to require sight of the evidence to show that the DPA was properly qualified and experienced and had been receiving proper and appropriate training. This could very easily be in respect of establishing whether a ship operator had exercised the necessary degree of 'due diligence' for if that due diligence has not been achieved the ship operator may lose its defences under Hague Visby Rules, for example, or under their Hull and Machinery Contract – with very expensive and unwanted consequences.

At ConsultISM we believe ISM training should not be limited to the DPA's but, rather, the Company and a whole range of individuals would benefit if training was provided to:

- Senior, Middle and Junior managers ashore;
- Superintendents and Port Captains;
- Internal Auditors;
- Masters, Senior and Junior Officers on board ship;
- Nautical College Lecturers;
- Auditors from Flag State Administrations, Recognised

- Organisations;
- Port State Control Inspectors, and
- Others who may have an involvement in ISM implementation or monitoring.

Where can the relevant training be obtained?

We are delighted to advise that a taught course has already been designed and structured and is being offered by the World Maritime University as an official 'Professional Development Course' (PDC).

The WMU inaugural session of the DP Course will run for 5 days – commencing 10 March 2008 at the University in Malmo Sweden. It is understood that the course will consist of six modules:

- **Module 1: Background: "Setting the Scene"**
- **Module 2: Legislation & the Regulatory Framework,**
- **Module 3: Risk Assessment**
- **Module 4: Legal And Insurance issues.**
- **Module 5: Auditing**
- **Module 6: Communications**

Full details are set out in the Brochure of the WMU which can be downloaded from the WMU website [www.wmu.se](http://www.wmu.se)

ConsultISM M.D., Dr. Phil Anderson, has been delighted to have been involved in the development of this PDC with the World Maritime University since inception and is honoured to be involved as a visiting lecturer on the course.

The preparation of a Computer Based Training Course (CBT) covering the relevant training requirements for ISM Designated Persons is also close to completion and should be available in the near future. The CBT is not only being produced by the worlds leading provider of such programmes – Videotel but is being produced in close cooperation with the World Maritime University. This cooperation is an excellent initiative which

will help ensure consistency in presenting a high standard of training as well as the material content itself.

Dr Anderson is also delighted to be working on the Videotel steering group in the development of the CBT material.

- Links:
- [www.imo.org](http://www.imo.org)
  - [www.wmu.se](http://www.wmu.se)
  - [www.consultism.co.uk](http://www.consultism.co.uk)
  - [www.videotel.co.uk](http://www.videotel.co.uk)
  - [www.ismcode.net](http://www.ismcode.net)





# Teamwork

## Master and Pilot

There is only one type of incident more likely than an oil spill to cause a knee jerk reaction to shipping, and that is an oil spill in US Waters...even more so in an area such as San Francisco Bay.

When “Cosco Busan” struck the Bay Bridge, and spilt 58,000 gallons of fuel, it was obvious that very close attention would be given to not just the conduct of those on board, but also the performance of equipment, and of the management system operating on the vessel.

In the initial fallout of the incident there was the usual back and forth of claim and counter claim. Allegations were thrown about, such as the radar “conked out”, the Pilot ignored VTS advice and the crew were not “up to speed” with their electronic chart system as they laboured on through dense fog.

Whatever the truth, the very fact the Bay Bridge was struck points to the fact that mistakes were made, and the systems to manage the interaction between the Pilot and the shipboard personnel must have failed to some degree.

With locals in the area scrabbling to clean the beaches and wildlife habitat, and with a state of emergency declared, it is worth re-examining and stressing the true importance of Bridge Team Management, the Master/Pilot relationship, and of how the Safety Management System (SMS) can act as a barrier to mistakes and complacency.

Maintaining an effective working relationship between the pilot and the bridge team in both routine and

emergency conditions is a key to safe vessel conduct, and should be covered in training, and reflected within the SMS.

The International Maritime Organization (IMO) recognises that a proper working relationship between the pilot, the master and the officer in charge of a navigational watch, is important in ensuring the safety of shipping. The duties of Master, bridge officers and pilot are set out in IMO Resolution A.960 ‘Recommendations on Training and Certification and Operational procedures for maritime pilots other than deep-sea pilots’.

### ***This states:***

***2.1 Despite the duties and obligations of a pilot, the pilot’s presence on board does not relieve the master or officer in charge of the navigational watch from their duties and obligations for the safety of the ship. It is important that, upon the pilot boarding the ship and before the pilotage commences, the pilot, the master and the bridge personnel are aware of their respective roles in the safe passage of the ship.***

***2.2 The master, bridge officers and pilot share a responsibility for good communications and understanding of each other’s role for the safe conduct of the vessel in pilotage waters.***

***2.3 Masters and bridge officers have a duty to support the pilot and to ensure that his/her actions are monitored at all times.***

Pilots are generally engaged in places where they will have an advantage over the ship’s bridge

team, namely in the confined waters of port approach, berthing and departure. It is important to remember that although the Pilot is more familiar with their own port and its facilities and pilotage navigation, the ship’s team is more familiar with the vessel’s characteristics.

Both sides need to work together to ensure a safe passage, and good communication is essential in the Master/Pilot relationship. This extends to each respective party remaining aware that the pilot may be unfamiliar with the vessel, and the Master unfamiliar with the passage.

It is about teamwork, integration of the pilot and of effective “Bridge Resource Management”. While a good Master/pilot relationship is the indeed the best basis for a safe passage through busy, confined and perhaps hazardous waters, there are other considerations. In order to demonstrate the appreciation and importance of this vital and specialist part of ship operations it must be stated clearly within the SMS the roles and responsibilities of the ship’s personnel – and of the means to record the steps taken by the bridge team.

The issue of liability is something which shipping has simply had to come to terms with, and if something does go wrong the courts and lawyers will lay the management systems bare under intense scrutiny, so it is important to say the right thing, to do the right thing and to prove what you have done.





# Environmental Compliance Management

November 2007, saw the United States Coast Guard (USCG) issue its Environmental Crimes Voluntary Disclosure Policy (the 'Policy'). The Policy, patterned on the existing policies of the Department of Justice ('DOJ') and the Environmental Protection Agency, may provide a mechanism to avoid prosecution by establishing a dynamic 'compliance management system' and fostering a proactive atmosphere of discovery and reporting of non-compliances. Specifically, if the conditions are met, the USCG can award 'Disclosure Credit' and exercise its enforcement discretion and forego reporting the violation to the DOJ for prosecution. While the Policy is a positive development, it is not a panacea – the DOJ can still choose to prosecute environmental crimes cases without a referral from the USCG. In addition, the USCG may still recommend the prosecution of individual managers or employees.

## **Compliance Management Systems**

The first step to qualification is for a company to establish a compliance management system ('CMS') to encourage employees to prevent, detect and correct violations of non-compliance. There is no set format for a CMS, however, the USCG will take several factors into account when assessing a particular company. Generally, the CMS must reflect a company's due diligence in preventing, detecting and correcting violations. In accordance with the Policy this is demonstrated by a CMS that contains:

- Policies and standards that will assist employees in meeting requirements under environmental laws, regulations, and other enforceable agreements;
- An assignment of overall responsibility for compliance with policies and standards onboard each vessel;
- A system of monitoring and auditing designed to correct violations and a procedure for employees to report violations without fear of retaliation;
- A requirement for periodic evaluation of the CMS;
- A training program that effectively

conveys the company's standards and procedures to all employees;

- Incentives to managers and employees to act in accordance with the compliance policies, standards and procedures, including enforcement through disciplinary mechanisms; and
- Procedures to promptly correct any violation and to modify the system to prevent future violations.

## **Awarding Disclosure Credit**

Initially, violations must be discovered through either an environmental audit or an acceptable CMS to qualify. The USCG will then consider eight separate factors in its enforcement discretion and will award Disclosure Credit, the amount of which will determine the USCG's final action in a particular situation. These factors are summarised below:

**Voluntary Discovery** – The violation must have been discovered voluntarily and not through legally mandated monitoring or sampling requirements, regulation, judicial or administrative order, or consent agreement.

**Prompt Disclosure** – Violations must be reported within 21 calendar days. This time limit is inapplicable if a statute or regulation requires that a report be made within a particular time limit. The 21 day limit is triggered when an officer or employee of the company 'believes' that a violation may have occurred. This time can be expanded in situations where multiple vessels may have the same issue or when complex circumstances exist on a case-by-case basis.

## **Discovery and Disclosure Independent of Government of third Party Plaintiff**

– The violation must be discovered and disclosed to the USCG before the commencement of the federal, state or local agency inspection or investigation; notice by a third party; the reporting of the violations to the USCG or other governmental agency by a 'whistleblower', rather than by one authorised to speak on behalf of the company; or imminent discovery of the violation by a regulatory agency.

**Correction & Remediation** – The violation must be corrected within 60 calendar days from the date of discovery, or as expeditiously as possible. In certain circumstance, the company may be required to enter into a written agreement, administrative consent order, or judicial consent decree where compliance or remedial measures are complex or a lengthy.

**Prevent Recurrence** – The company must agree to take steps to prevent recurrence of the violation after it has been disclosed. Preventive steps may include, but are not limited to, improvements to the company's environmental auditing efforts or CMS.

**No Pattern of Violation** – If the specific violation has occurred in the previous three years involving the same vessel or within the previous five years as part of a pattern involving multiple vessels, the company is barred from receiving Disclosure Credit.

**Other Violations Excluded** – If the violation resulted in serious actual harm, or may have presented an imminent and substantial endangerment to human health or the environment, then the company will be unable to qualify.

**Cooperation** – As with all interactions with governmental agencies, full cooperation is essential to receiving discretionary treatment.

**Conclusion** - The formal establishment of the Environmental Crimes Voluntary Disclosure Policy is significant in that companies that value compliance, and have a stringent compliance program in place, are now at an advantage. Advice of counsel should be sought to verify that the CMS meets the requirements of the Policy, and in advance of a disclosure, to confirm meeting the requirements of the Policy. This will help ensure that the company and its employees are protected to the maximum extent possible when disclosing potential environmental crimes to the USCG.

Thanks to New York Attorneys Blank Rome LLP for their kind permission to reproduce this article which first appeared as No 9 of their Maritime Developments Advisory newsletter in November 2007. Other editions of their newsletter can be viewed at [www.BlankRome.com](http://www.BlankRome.com)

# MISSING



# REWARD

The ISM

Code is often referred to as the “umbrella Convention”, as it is the overarching model governing the management of all other marine legislative requirements.

This pivotal role for ISM means that whenever something goes wrong, the causal chain can be traced back to failures lurking somewhere within the Management Systems in place.

A case in point was the hi-jacking of the vessel “Danica White” off Somalia in 2007. This was perhaps an extreme illustration of what can happen when seemingly ill prepared vessels are taken into the wrong place at the wrong time.

It subsequently emerged that the extremely low manning levels on board “Danica White” meant that she was effectively unguarded and unable to muster an adequate security watch, or response. In essence the security plans, which her Administration had seemingly approved, were rendered impotent in the face of attack.

This is not simply a problem relating to security, and with crew numbers so low on many vessels it seems that many of the rules and guidelines emerging from ashore are being rendered useless because there are simply too few people onboard ship to properly implement them.

It has been recognised as a matter of concern for some time, that the relationship between the principles of

safe manning, safety and of company/Flag responsibilities all need re-examining. The IMO’s Human Element Working Group and Sub-Committee on Standards of Training and Watchkeeping (STW) have taken the matter further, as they have sought clarification on the need for greater balance between the demands on ships and the human resources placed

actual onboard.

The IMO Human Element Working Group has considered the report of the Group of Independent Experts (GIE) established to analyse the impact of the ISM Code and its effectiveness in the enhancement of safety of life at sea and protection of the marine environment.

ConsultISM Managing Director, Dr Phil Anderson is a member of the GIE, and the group recommended that: guidelines for Administrations should be revised to make them more effective and user-friendly; and guidelines and associated training should be developed to assist companies and seafarers in improving the implementation of the Code.

As a response to these concerns, The IMO’s Sub-Committee on Standards of Training and Watchkeeping (STW) recently commissioned a “Review of the principles for establishing the safe manning levels of ships”. A correspondence group was established to review resolution “A.890(21) Principles of Safe Manning”, as amended, to identify possible needs for revision and to prepare a comprehensive report for submission to STW 39, which is due to meet in March 2008.

The review is set to examine issues including:

- **verification of actual hours worked**
- **realistic minimum manning requirement,**
- **interdepartmental flexibility; and**
- **the ability of crew to respond to equipment failure or emergency situations.**

The issue of manning levels brings us back, not simply to the question of “whether” and “how” shipboard personnel can apply the letter and spirit of legislation, but of the management of the requirements – and all with the spectre of “fatigue” and accidents if we fail.

There are criticisms that in some companies the paperwork generated in complying with the SMS is a real burden, one that exacerbates the people problems onboard. The IMO therefore agreed that the paperwork that supports ISM compliance should be proportionate to the size, type and operation of the company; concise and user-friendly; and relevant to the operations related to safety and environmental protection.

To avoid fatigue, and undue burdens on personnel the requirements laid down within the SMS must be realistic, and must represent the reality onboard the vessel – not simply some ideal, dream world scenario. Only when the instructions and the demands on crew are reasonable and credible is it possible to assess if and where additional resources are required.

We do not have to burden our vessels with paperwork – we just need to make sure things are done right and are documented...if we use our imagination, or invest adequately, we must be able to streamline and improve our systems. It is for these reasons that the SMS must be a sensible arrangement, which reflects properly the ship and crew, and which does not add unnecessary paperwork just to make the system look better, or to fill hundreds of neat ring binders.

Issue 11 of ReportISM is out May 2008 - for back copies see our website

[www.consultism.co.uk](http://www.consultism.co.uk)

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