



Standards of Training, Certification & Watchkeeping Convention: UK Requirements for Safe Manning and Watchkeeping

Notice to all Shipowners, Companies, Managers, Masters, Deck and Engineering Officers and all seafarers on Merchant Ships

This MSN should be read with the Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2015 (M), MSN 1856 (M), MSN 1857(M) and MSN 1842. It replaces MSN 1767 (M).

Summary

This Merchant Shipping Notice sets out and explains the safe manning requirements contained in the Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2015 and the STCW Convention and Code and incorporates International Maritime Organization Resolution A1047(27) on the Principles of Safe Manning.

This MSN covers:

1. Introduction
2. Responsibilities of Owners and Operators : General Principles
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1. Introduction

- 1.1 The Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2015 implement the requirements of the International Convention and Code on Standards of Training, Certification and Watch-keeping (STCW) 1978, as amended (referred to in this MSN as the 'STCW Convention' and 'STCW Code' respectively), placing clear responsibilities on companies owning or operating UK registered seagoing ships, port-based craft requiring inshore craft certificated personnel and any ships entering or operating in UK national waters, to ensure that their vessels are manned with personnel of appropriate grades who have been properly trained and are certified.
- 1.2 The Regulations require all United Kingdom (UK) seagoing vessels of 500 GT or more to hold a Safe Manning Document specifying the minimum manning levels. Owners and operators of ships below 500 GT may also find it advantageous to hold a Safe Manning Document.
- 1.3 All vessels must be adequately manned for their safe operation, with due regard for the nature of their operation and their location.

2. Responsibilities of Owners and Operators: General Principles

- 2.1 It is the responsibility of the owner or operator to ensure that ships are safely and adequately manned.
- 2.2 In preparing a proposal for the minimum safe manning level of a ship, the owner or operator must:
 - Make an assessment of the tasks, duties and responsibilities of the ship's complement as required for its safe operation, for the protection of the marine environment and for dealing with emergency situations;
 - Prepare and submit a proposal for the minimum safe manning level based upon an assessment of the numbers and grades/capacities in the ship's complement required for the safe operation and for the protection of the marine environment, justifying the proposal by explaining how the proposed ship's complement will deal with emergency situations, including the evacuation of passengers where applicable;
 - Ensure that the minimum safe manning level is adequate at all times and in all respects, including meeting peak workload situations, conditions and requirements, and is in accordance with the principles, recommendations and guidelines contained in this MSN;
 - In case of changes in trading area(s), operations, construction, machinery, equipment or operation and maintenance of the ship, which may affect the safe manning level, prepare and submit a new proposal for the minimum safe manning level.



2.3 In conjunction with these factors, and to ensure that personnel do not work more hours than is safe, the owner or operator must:

- Identify all the functions to be undertaken onboard during a representative voyage or operational period, including determination of the number of personnel required to undertake the relevant tasks and duties under both peak and routine workload conditions;
- Identify those functions that constitute normal operations and determine the minimum numbers of personnel required to undertake the concurrent tasks and duties safely;
- Identify the skills and experience required to perform those functions;
- Establish working arrangements (including, on passenger ships, the establishment of a working language - in accordance with regulation 14 of Chapter V of the Safety of Life at Sea Convention (SOLAS) and The Merchant Shipping International Safety Management (ISM) Code Regulations 2014, S.I. 2014/15120) to ensure that the Master and crew are capable of undertaking concurrent and continuing operations at the appropriate level of responsibility, as specified, with respect to their skills and training; and
- Ensure that the working arrangements allow for sufficient rest periods to avoid fatigue, drawing up work schedules accordingly.

2.4 In applying these principles, proper account must be taken of the International Maritime Organization (IMO) Resolution A.890 (XII), and amended by A 1047 (27), Principles of minimum Safe Manning. In addition, you must take into account the International Labour Organisation (ILO), International Trade Union (ITU) and World Health Organisation (WHO) instruments with respect to:

- Watchkeeping;
- Hours of work or rest;
- Safety management;
- Certification of seafarers;
- Training of seafarers;
- Occupational health and hygiene;
- Crew accommodation.

3. Establishing Safe Manning Requirements

3.1 The MCA requires all ships to be sufficiently manned for their safe operation according to the nature of their work. To make that assessment the minimum safe manning level must take into account all relevant factors, including:

- (a) Frequency of port calls, length and nature of the voyage;
- (b) Trading area(s), waters and type of operations in which the ship or vessel is involved and any special requirements of the trade or operation;
- (c) Number, size (kW) and type of main propulsion units and auxiliaries;
- (d) Size, type of ship, equipment and layout;
- (e) Construction and technical equipment of the ship;
- (f) Cargo to be carried or operational requirements;
- (g) Method of maintenance;
- (h) Extent to which training activities are conducted onboard; and



- (i) How the proposed complement will deal with the various emergency situations that may arise;
- (j) Navigational duties and responsibilities as required by the STCW Convention, including the following:
 - i. plan and conduct safe navigation;
 - ii. maintain a safe navigational watch;
 - iii. manoeuvre and handle the ship in all conditions and during all operations;
 - iv. safely moor and unmoor the ship;
 - v. maintain safety while in port;
- (k) Cargo handling and stowage: Plan and monitor the safe loading, stowage, securing, carriage and unloading of cargo;
- (l) Ship specific operations: the nature and duration of the operation(s) the ship undertakes and local environmental conditions;
- (m) Ship's operations and care for persons onboard, and, maintaining life-saving, fire-fighting and other safety systems in operational condition:
 - i. maintain the safety and security of all persons onboard and keep lifesaving, firefighting and other safety systems in operational condition, including the ability to muster and disembark passengers and non-essential personnel;
 - ii. operate and maintain watertight closing arrangements;
 - iii. perform operations necessary to protect the marine environment;
 - iv. provide medical care onboard;
 - v. undertake administrative tasks required for the safe operation of the ship;
- (n) Marine engineering tasks and duties:
 - i. operate and monitor the ship's main propulsion and auxiliary machinery;
 - ii. maintain a safe engineering watch;
 - iii. manage and perform fuel and ballast operations;
- (o) Maintain the ship's engine equipment, system and services;
- (p) Electrical, electronic and control engineering duties:
 - I. operate ship's electrical and electronic equipment; and
 - II. maintain ship's electrical and electronic systems;
- (q) Radio communications:
 - i. transmit and receive information using ship communication equipment;
 - ii. maintain a safe radio watch;



- iii. provide communications in emergencies;
- (r) Maintenance and repair: carry out maintenance and repair work to the ship and its machinery, equipment and systems, as appropriate to the method of maintenance and the repair system used.

3.2 In addition, the level of safe manning must also take into consideration:

- I. the management of safety functions of a ship underway, not underway or operating in near stationary mode;
- II. except in ships of limited size, the provision of qualified deck officers to ensure that it is not necessary for the Master to keep regular watches;
- III. except in ships of limited propulsion power or operating under provisions for unattended machinery spaces, the provision of qualified engineering officers to ensure that it is not necessary for the Chief Engineer to keep regular watches;
- IV. the maintenance of applicable occupational health and hygiene standards onboard; and
- V. the provision of proper food and drinking water for all persons onboard.

4. Guidance on Appropriate Manning Levels

- 4.1 In determining what constitutes a minimum safe manning level, useful guidance may also be obtained by the use of risk and hazard management tools, such as formal safety assessment.
- 4.2 The minimum safe manning levels referred to in this MSN are those required for all reasonably foreseeable circumstances and working conditions to permit the safe operation of the ship under normal operational conditions.
- 4.3 The tables at Annex A and B provide guidance on the numbers of certified deck and engineer officers appropriate to different sizes of ships, tonnages and trading areas. As the watchkeeping arrangements for the engineering department and the demands placed on personnel vary significantly according to the level of automation, these tables only provide guidance; owners and operators must take all relevant factors into account before finalising their manning proposals.
- 4.4 The number of ratings required will be determined by the factors summarised in section 2 of this MSN.

5. Nationality Restrictions

- 5.1 The Merchant Shipping (Officer Nationality) Regulations 1995 do not permit foreign nationals (other than Commonwealth citizens, EEA nationals or a national of a State other than an EEA State which is a member of the North Atlantic Treaty Organization) to serve as Master of a strategic ship. This is defined as a UK ship of 500 GT or more which is a cruise ship, a product tanker or a ro-ro ship. There are no other nationality restrictions applying to the manning of UK-registered ships. However, all officers must hold a valid Certificate of Competency or Certificate of Equivalent Competency.



6. Consultation and Schedule

- 6.1 In order to avoid potential problems, it is recommended that when new ships are at the design stage and in advance of registering existing ships in the UK, owners and operators consult with the Master, seafarers, seafarers' representatives (where applicable) and the MCA on their proposed manning levels and draw up a schedule accordingly. The schedule must take into account all the factors described in paragraphs 2 to 5 above.
- 6.2 If agreement cannot be reached between the owners or operator and Master, seafarers or seafarers' representatives regarding manning levels, the MCA will consider the views put forward and, if appropriate, require the manning levels to be revised. When disagreement occurs, it may be necessary to arrange a practical demonstration of the crew's ability to carry out the essential tasks in the context of the principles of safe manning.
- 6.3 In the event of any change in equipment, construction or use of the ship, which may affect the safe manning level, the owner or operator must make an application for the issue of a new Safe Manning Document.
- 6.4 A manning schedule need not be rewritten for each voyage or operational cycle, provided it is applicable to the voyage or cycle in question and the composition of the crew for whom it was originally intended has not changed.
- 6.5 Changes must not be made to the schedule unless they can be justified by substantially altered work patterns made necessary, for example, by a change in trading pattern, operation or other significant factor. Where a vessel is known to engage in an irregular trading pattern or have working hours that are unlikely to be uniform, this must be taken into account and recorded in the schedule.
- 6.6 The schedule and safe manning level must also take into consideration the number of qualified and other personnel required to meet peak workload situations and conditions, with regards to the number of hours of shipboard duties and rest periods
- 6.7 Once agreed, the owner or operator is obliged to ensure that, as far as reasonably practicable, the minimum safe manning level is maintained and that operations are in compliance with the Hours of Work Regulations. A copy of the agreed schedule must be displayed prominently in the crew accommodation onboard the vessel.

7. Documentation and Record Keeping

- 7.1 When the proposal for the safe manning of a vessel has been approved by the MCA, a record of the consultation process must be maintained by the owner or operator, together with a document outlining the agreed minimum manning level.
- 7.2 Records of seafarers' daily hours of rest must be maintained as described in MSN 1842(M) and procedures must be in place for keeping such records. This record must be in an appropriate format and available for MCA inspection. If, on inspection, the records or other evidence indicates that manning levels are so low as to require the working of hours which exceed the permitted levels or the taking of insufficient hours of rest, the MCA will require that manning levels be adjusted so that the ship can be operated safely within the permitted hours available.
- 7.3 Checking of a ship's documentation will be carried out by the MCA as part of the normal routine of inspecting vessels and will include a check that records are being maintained and that the appropriate schedules are posted. Following examination, the records will be endorsed as part of the examination process.



7.4 The record must be retained for 5 years.

8. Specialist ship types

8.1 Offshore support vessels - These present special problems because of the diverse nature of their operations and the conditions under which they are required to operate. Owners and operators are particularly reminded of the restrictions placed on working hours under the as amended and must set manning levels accordingly.

8.2 Inshore craft, including harbour craft and harbour tugs – given the diverse working patterns and operational cycle of these vessels, owners and operators must take into account the working pattern, rota and/or work schedules of crews, the particular operational requirements of a ship or group of ships and any call-out requirements of a port, harbour or other organisation.

8.3 Tankers - Owners and operators must ensure that the Master, officers and ratings on tankers have completed the training required by the Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2015, specified in MSN 1866.

8.4 High Speed Craft (HSC) - All crewmembers on HSC must have completed the training required under the SOLAS HSC Code. Masters and officers having an operational role on HSC must hold a Type Rating Certificate as required by the HSC Code.

8.5 All Passenger and Ro-Ro Ships - The need to handle large numbers of passengers unfamiliar with the marine environment must be taken into account in determining manning levels. Personnel must be appropriately trained and certificated and owners and operators must give attention to the requirements for minimum numbers of trained crew to take charge of survival craft. Owners and operators must ensure that the Masters, officers, ratings and other personnel have completed the training required by the Merchant Shipping (Training, Certification and Watchkeeping) Regulations 2015, specified MSN 1866.

9. Application for a Safe Manning Document

9.1 Any application for a Safe Manning Document must be made by the owner, or a person authorised to act on their behalf, on form MSF 4227; this can be obtained from any MCA Marine Office or the Seafarer Training and Certification Branch. All applications, together with the appropriate fee, must be sent to the Seafarer Training and Certification Branch at the address specified at the end of this MSN.

9.2 When applying to the MCA for a Safe Manning Document, owners or operators must submit a clear and concise explanation of how:

- The proposed manning level has been determined;
- It takes account of the guidance of this MSN;
- It takes account of the hours of work provisions in the Regulations.

10. Approval of a Safe Manning Document by the MCA

10.1 A proposal will only be approved and a safe manning document issued provided the manning level fully satisfies the principles, recommendations and guidelines outlined in this MSN. The MCA may require an owner or operator to amend a proposal if, after evaluation, the proposal is considered inadequate.

10.2 When the MCA has agreed a proposal regarding manning of a particular ship, a Safe Manning Document will be issued for that ship in a format which complies with the



requirements of SOLAS. It must be retained onboard and be available for inspection by an authorised person whenever required.

10.3 A Safe Manning Document of a ship may be withdrawn if an owner or operator fails to submit a new proposal where a ship changes trading area(s), construction, machinery or equipment, operation and/or method of maintenance, or, a ship persistently fails to comply with the rest hours requirements.

11. Notification of Changes

11.1 Since 1 February 2002, owners have been required to man ships with officers holding valid UK Certificates of Competency or Certificates of Equivalent Competency, issued under the STCW Convention.

11.2 A Safe Manning Document issued under the Merchant Shipping (Safe Manning, Hours of Work and Watchkeeping) Regulations 1997 will remain valid, notwithstanding that those Regulations have been revoked by the 2015 Regulations, provided that all the circumstances relating to that document remain unaltered. If there are any changes in circumstances, companies will need to apply to the MCA for approval of a new Safe Manning Document under the 2015 Regulations.

11.3 Ship owners must also inform the MCA of any change in circumstances which are relevant to a Safe Manning Document. The MCA will then review the document's continuing validity or approve fresh proposals from the owner or operator.

12. General

12.1 The principles applying to the keeping of a safe watch are given in section A-VIII/2 of the STCW Code and must be followed in order to comply with the Regulations.

12.2 The Regulations require the Master of any ship to be responsible for the overall safety of the ship. He must also ensure that the watchkeeping arrangements are adequate for maintaining safe navigational watches at all times, including the provision of a lookout as required under the International Regulations for the Prevention of Collisions at Sea 1972, as amended. Masters, owners and operators are reminded that the UK does not consider it safe for the officer in charge of the navigational watch to act as sole look-out during periods of darkness or restricted visibility.

12.3 The Chief Engineer officer of any ship is required to ensure that arrangements are adequate at all times for maintaining a safe engineering watch

13. Further Information

13.1 Safe Manning enquiries should be made to the Seafarer Training and Certification branch:

Tel: 023 80 329254 (please refer to our website for the latest phone number).

Email: safemanning@mca.gov.uk

13.2 For further information and guidance please search www.gov.uk for "Safe Manning".



More Information

Seafarer Training and Certification
Maritime and Coastguard Agency
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105 Commercial Road
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Guidance on appropriate Manning Levels – Deck Officers

Trading Area	Size of Ship (GT)	Number of STCW Certificated Officers to be carried				
		Master (II/2)	Chief Mate (II/2)	OOW (II/1)	Master (II/3)	OOW (II/3)
Unlimited	3000 or more	1	1	2	-	-
Unlimited	500 or more but less than 3000	1	1	1	-	-
Unlimited	Less than 500	1	-	2(a)	-	-
Near Coastal	3000 or more	1	1	1	-	-
Near Coastal	500 or more but less than 3000	1	1	1(b)	-	-
Near Coastal	Less than 500	-	-	-	1	1

Key:

- (a) May be 1 if the Master keeps watch;
- (b) Need not be carried if the Master keeps watch.

Note:

- (i) All Navigation Watch Ratings must hold watch rating certificates (STCW Reg II/4 certification),
- (ii) The manning levels are subject to meeting the requirements of this MSN.



Trading Area	Registered Power (kW)	Chief Engineer Requirements	Second Engineer Requirements	Engineer OOW Requirements	Total
Unlimited	3000 or more	C/E, STCW III/2, unlimited	2/E, STCW III/2, unlimited	EOOW, STCW III/1	3
Unlimited	750 or more but less than 3000	C/E, STCW III/3, < 3000 kW	2/E, STCW III/3, < 3000 kW	EOOW, STCW III/1	3
Unlimited	350 or more but less than 750	2/E, STCW III/3, < 3000 kW or SMEOL*	MEOL* (a)	-	2
Near-coastal	9000 or more	C/E, STCW III/2, unlimited	2/E, STCW III/2, unlimited	-	2
Near-coastal	3000 or more but less than 9000	C/E, STCW III/2, < 9000 kW NC	2/E, STCW III/2, < 9000 kW NC	-	2
Near-coastal	750 or more but less than 3000	C/E, STCW III/3, < 3000 kW	2/E, STCW III/3, < 3000 kW NC	-	2
Near-coastal	350 or more but less than 750	MEOL*	-	-	1

The above table assumes that the ship is classed as U.M.S.

Key: (a) The holder may serve in a dual capacity, deck and engine room, provided the ship is not a tanker and the deck service is not as an essential watch-keeper or master.

Notes: (i) All Engine Room Watch Ratings must hold watch rating certificates (STCW III/4 certification), except on vessels of less than 750kW,
(ii) The manning levels are subject to meeting the requirements of this MSN.

***You should always check with the relevant government administration that the MEOL or SMEOL can be used within their trading areas.**

The following factors will be considered in varying the requirements given in the above table:

- (a) Restriction of the vessel's area of operation,
- (b) The trading pattern of the vessel,
- (c) The complexity of the machinery spaces,
- (d) The vessel not operating under U.M.S. conditions,
- (e) Technical complexity of the machinery including its control and monitoring systems,
- (f) Redundancy of the essential machinery,
- (g) The maintenance regime employed in the upkeep of the machinery and its control systems,
- (h) The level and availability of technical shore support.

