

# Seamanship, the Forgotten Factor

## How Ships' Officers Think about It

**Administrative work: there appears to be a great unbalance between what ships' officers find acceptable and what is actually required in the day to day practice on board. Should ships then have an administrative officer on board? IMO published the results of a public consultation on administrative burdens imposed by its mandatory instruments and one of its suggestions was to create a Facebook for ships.**

Our November 2014 edition contained an article written by Captain Kanellopoulos on the subject of "Seamanship, the Forgotten Factor". Interesting comments have been received on that article, which will be summarised in this edition, together with opinions expressed on this subject in recent publications and conferences of the Nautical Institute. Reference will also be made to a recent IMO report.

### Comments and Responses

In the article we published last November, Captain Kanellopoulos defined seamanship as the practical art of operating a ship based on a combination of experience, knowledge, professionalism, safety culture and performance ability, transferred from one generation of seafarers to the next. He argues that due to the immense volume of bureaucracy ships' officers are now pestered with, seamanship as defined above tends to be obsolete. This mass of paperwork and the associated regulations, in his opinion, could well lead to negative effects on ship maintenance and safe operation and increased fatigue on board. He suggests shipping would be improved by embracing and restoring the lost traditional ideals of being simple, safe, straightforward and above all: practical. This would require a reduction of the bureaucracy and the associated "paper kingdom". As editors of this magazine, we asked our readers for comments and were glad to receive a number of reactions which we will try to summarise. The full contents of these comments may be found on our website. Moreover, we found interesting information and opinions on this subject in recent publications from the Nautical Institute. And even more recently, we read about an initiative from IMO and the report resulting from that initiative. From seagoing readers of our magazine we received the following comments. Erik, an engineer on board of tankers, agrees almost totally with

Captain Kanellopoulos. He mentions that ship's staff are forced to do a lot of paperwork and if you do not do this, you are seen as a bad seaman. This situation leads to an attitude of "as long as the paperwork tallies". He refers to a "computer screen culture" both in the wheelhouse and in the engine room. Familiarisation with the ship and the ship's installations does not take place or is insufficient. If there is a problem, a service engineer is called in. He fears that experienced people will more and more disappear to shore and that it will be increasingly difficult to get and keep youngsters at sea. Captain Van Zadel also agrees with Kanellopoulos and mentions the loss of seamanship and the amount of paperwork is daily discussed on board, also when sailing with officers of different cultures and backgrounds. He states much paperwork, although very easy to standardise, in most countries is still being kept at the discretion of their own authorities and therefore different in size and layout from one port to the other: a lot of avoidable extra work. He mentions the importance of good training of young officers and in this respect refers to STCW 95 as being too basic. He takes the opportunity to complain about problems he experiences when asking harbour authorities for permission to lower lifeboats for testing. He emphasises the master is the only law on board and that he should appreciate this when making decisions concerning crew and vessel safety. Marcus Jan van den Berg fully supports the position of Captain Kanellopoulos and suggests that most officers only know a little of all the regulations they are confronted with and that this is not a problem because most of these are not contributing anyhow to the safety of the ship. Too many rules and regulations distract from those rules that are really important for operating a ship safely. He adds that in his opinion many requirements are only complied with on paper, to satisfy clients and authorities.

Captain Dalemans feels more regulations lead to less motivation and more accidents or to more breaches and in turn to less motivation again. And the more regulations there are, the bigger are the sticks of the (corrupt?) Port State Control inspectors. He gives examples of accidents blamed on insufficient knowledge of for instance Ecdis installations, but were in fact caused by poor seamanship (see Mars 201505, p 30). Another associated problem he refers to, is the lack of time available for handing over procedures when exchanging crew members. This leads to ship's officers and crew being insufficiently informed of the ship specific systems when leaving port. Frits Stakelbeek, a maritime psychologist and not seagoing, looks differently at the problems described in the article from Captain Kanellopoulos. He refers to the world around us that is constantly

changing with these modern instruments is now essential. We have also received comments out of a completely different angle. Dr.ir. John Stoop sent us a contribution in the form of a theoretical study regarding the normal and predictable behaviour of operators in complex infrastructural and transport systems, such as ships and more in particular aeroplanes. The study discusses the problem of qualifications of operators in such high-tech environments. He wrote the document together with ir. Eric van Kleef and it will be published in a special issue of the International Journal of Performance Engineering on Transport System Safety, Risk and Asset Management. The title will be "Reliable or Resilient: Recovery from the Unanticipated".

IMO's thirteen recommendations to reduce the administrative burden on board.

**OUR RECOMMENDATIONS**

- RECOMMENDATION 1 USE ELECTRONIC MEANS FOR REPORTING**  
IMO should ensure that requirements to provide information to and from IMO could be fulfilled by electronic means.
- RECOMMENDATION 2 ESTABLISH IMO WEB-BASED INFORMATION PORTAL**  
A web-based, secure information portal to fulfil reporting requirements should be established by IMO.
- RECOMMENDATION 3 RECOGNIZE ELECTRONIC CERTIFICATES**  
Electronic certificates should be recognized as equivalent to original paper certificates and similar documents.
- RECOMMENDATION 4 ACCEPT ELECTRONIC RECORD-KEEPING**  
Electronic recording of information should be accepted as a full alternative to paper versions.
- RECOMMENDATION 5 RECOGNIZE ELECTRONIC DOCUMENTS (OTHER THAN CERTIFICATES)**  
Electronic versions of documents required to be carried on board should be recognized as equivalent to original paper documents.
- RECOMMENDATION 6 AVOID MULTIPLE REPORTING**  
Reporting to a single entity should be introduced to avoid the need to report the same information to multiple entities, in particular in cases of accidents.
- RECOMMENDATION 7 ACCEPT OTHER ELECTRONIC SOLUTIONS**  
Particularly burdensome administrative requirements should be reviewed to ensure universal acceptance of electronic or software solutions.
- RECOMMENDATION 8 IMPROVE MARITIME SECURITY AWARENESS**  
More work needs to be done to explain the reasons that led IMO to adopt the security provisions in SOLAS Chapter XI-2 and the International Ship and Port Facility Security Code (ISPS Code), as these are perceived as burdensome and disproportionate.
- RECOMMENDATION 9 AVOID ACCUMULATION OF ADMINISTRATIVE REQUIREMENTS**  
When developing regulatory proposals, it is important to pay attention to the burden that can arise from the combined effect of two or more administrative requirements, which may not be burdensome on their own.
- RECOMMENDATION 10 AVOID BURDENS FROM NON-MANDATORY INSTRUMENTS**  
Fulfilling guidelines and other non-binding instruments often involves administrative tasks that add to the burden associated with mandatory administrative requirements. Such potentially adverse consequences must be taken into consideration when introducing non-binding instruments.
- RECOMMENDATION 11 ADOPT IMO RESOLUTION ON EFFICIENT REGULATION**  
The IMO Assembly should adopt a resolution reaffirming the Organization's commitment to efficient regulation and ensure that the regulatory process systematically addresses the problems of duplication, complexity, and lack of coherence and transparency.
- RECOMMENDATION 12 MONITOR AND REVIEW EXISTING REGULATIONS**  
No piece of legislation should be written in stone. It is important to keep an open mind on the continuous relevance, adequacy and effectiveness of existing regulations. Regulations that have become out-of-date, superfluous, inappropriate or ineffective should be removed, based on the changing needs of the shipping industry and technological advances.
- RECOMMENDATION 13 INCREASE EFFORTS TO AVOID FUTURE ADMINISTRATIVE BURDENS**  
Every effort should be made to identify possible burdens before approving proposals for developing new regulations or amendments to existing regulations. It is recommended that the IMO Council amends procedures to ensure that the checklist for identifying administrative requirements and burdens is strictly applied and also identifies possible electronic solutions.

changing at an ever increasing pace. Not only in shipping rules and paperwork grow, this is generally the case in all work situations. It is expected that everybody is within reach the whole day and can provide answers to questions. But one should look for the right balance. A lot of paperwork, for example the required port documents, can be done by the company headquarters. He also refers to the fact that certain skills of seagoing staff are no longer necessary because of the modern instruments and that, on the other hand, profi-

### Administrative Mountains

In addition to the above "Letters to the Editor" there have been a number of seminars, conferences and discussions across the maritime world in the past year addressing the various subjects that involve "reducing the administrative burden on master and crew". The Nautical Institute's magazine Seaways reported on these. In February 2014, for instance, in the biennial China Maritime Exhibition where Mr Wei Gao, Technical Support Manager with DNV/GL

outlined the likely tightening of regulations up to 2030. Such as tighter rules on NO<sub>x</sub>, SO<sub>x</sub> and greenhouse gas emissions, ballast water and recycling. None of these rules are particularly comforting in terms of reducing the administrative burden.

Another speaker, Captain Pradeep Chawla, the Managing Director for QHSE at Anglo-Eastern warned that the present avalanche of paperwork results in less attention being paid to the vessel's conduct, an unattractive working environment, fatigue, criminalisation, bureaucracy, recruitment challenges, wasted time and wasted money. He pointed out that there are now eighteen mandatory conventions and codes totalling 6203 pages which mariners must adhere to. These include 590 administrative requirements. Why can these regulations not be reviewed to eliminate duplication and simplify reporting procedures?

To solve these problems there should be more cooperation between IMO and shipping companies. Furthermore, better coordination and pooling of resources between classification societies, administrations and vetting companies is needed.

The mariner's view was given by a seafaring captain who pointed out that there are at least fifty books in the ship's library that mariners are expected to be familiar with, roughly 1000 pages of QMS (quality, management and safety) documentation, and at least 300 check lists for safe operations. He also criticised the ISM code ('just a paperwork exercise'). He claimed that senior officers have been reduced to the role of clerks, so vessel supervision is suffering, and in an age where everyone is talking about mentoring, there is little time for the support and guidance of junior officers. His plea was for more user-friendly systems and the placement of an administrative officer on board every ship. The overwhelming conclusion of the seminar was that administration on board has run out of control. This conclusion was also drawn by Philip Wake, Chief Executive of the Nautical Institute, in the leading article of the December 2014 issue of *Seaways*. In that article he states: 'Action must be taken to reduce the administrative mountain that masters have to climb every day. Ideally, this will be moved ashore, but a sensible first step, particularly for the company, is to assess whether all the demands for reports and other documentation are really necessary.'

### Greater Use of Electronic Record-Keeping

The IMO made a webpage available for six months in 2013 to gather the opinions of industry stakeholders on the administrative burden imposed by its instruments. The results of this consultation were published in January of this year and showed that about sixty per cent of the responses came from ship masters, officers and crew. Comments were invited on the 563 of the administrative requirements associated with IMO regulations such as Solas, Marpol and STCW. The study found that 351 out of the 563, some 66 per cent, were not perceived as being burdensome on their own by any respondents. One respondent even said that IMO requirements were minimal compared to the voluminous paperwork imposed by charterers, ship management companies, P&I Clubs and port agencies. However, the combined volume of IMO requirements caused ship crews to spend considerable time on paperwork rather than operat-

ing the ship, and this may compromise safety. IMO notes that it could be indicative of a litigious culture where there is the tendency to "smother everything with paper". The results noted that for inspectors, much of their time is spent on checking conformity through checklists and reports, making their actions "control of control". This results in a tendency to evaluate the quality of the oversight system rather than the quality of the ship and crew. In more simple terms: why do inspectors spend more time pouring over certificates than physically looking over the ship?

Key amongst the study's conclusions was the need for greater use of electronic record-keeping and a need to recognise electronic certificates. In this respect, the suggestion was made to create a Facebook for ships. The infographic on the previous page shows the thirteen recommendations which resulted from the analysis of the IMO consultation.

Arthur Bowring, Managing Director of the Hong Kong Shipowners Association, commented very positively on the report, but also pointed out that most of the administrative burden does not come from IMO's work, but from other parties and authorities. David Tongue, Secretary General of Intercargo highlights that the consultation process only covered mandatory instruments while the majority of ship owners also have to comply with other requirements, such as resulting from ISM, flag state and port state. He believes that these should also be evaluated.

### Long and Difficult Process Ahead

It is evident from the comments we received on our November 2014 article, from the information published in recent *Seaways* editions and from the consultation carried out by IMO that the administrative burden on board of most ships has completely run out of control. The present situation is such that one cannot avoid the conclusion that there exists a large unbalance between what masters, officers and crew have to do and what they think is acceptable and manageable without running the risk of jeopardising safety, operational efficiency and necessary maintenance. Which in turn leads to the conclusion that either the administrative burden has to be seriously reduced or ships have to be operated differently. The second option would require more support from shore and/or an administrative officer on board.

It is also clear that the action is not only required to reduce the administrative workload on board, but also because apparently the present shipboard bureaucracy has led to less efficient inspections and surveys.

It is very good that IMO has taken the initiative with its consultation and hopefully has started a serious and broad discussion on this issue. But it should be appreciated that it will be a long and difficult process in which many parties will have to get involved.

The full contents of the comments we received may be found on our website, [www.swzonline.nl](http://www.swzonline.nl).