

COUNCIL  
113th session  
Agenda item 11

C 113/INF.2  
26 September 2014  
ENGLISH ONLY

**PERIODIC REVIEW OF ADMINISTRATIVE REQUIREMENTS  
IN MANDATORY IMO INSTRUMENTS**

**Selection of illustrative general comments on reduction of administrative burdens**

**Note by the Secretariat**

**SUMMARY**

*Executive summary:* The annex to this document contains a selection of illustrative general comments received during the public consultation on reduction of administrative burdens

*Strategic direction:* 8

*High-level action:* 8.0.4

*Planned output:* 8.0.4.1

*Action to be taken:* Paragraph 4

*Related document:* C 113/11

1 The final report of the Ad Hoc Steering Group for Reducing Administrative Requirements (annex to C 113/11) reports on the Group's general findings from an analysis and assessment of the responses received during the public consultation held over the period from May to November 2013.

2 The responses to the consultation included 3,229 completed consultation documents, commenting on specific administrative requirements and 86 general comments on the subject of reducing administrative burdens.

3 By way of illustration the annex to this document presents a selection of illustrative general comments. For reasons of brevity, the comments have been edited; texts in quotations are literal citations.

**Action requested of the Council**

4 The Council is invited to note the information contained in the annex to this document.

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## ANNEX

### SELECTION OF ILLUSTRATIVE GENERAL COMMENTS ON REDUCTION OF ADMINISTRATIVE BURDENS

#### Reduction of crew members

1 A nominated surveyor, commenting on the reduction of crew members and its impact on administrative burdens, noted that "while there used to be a purser on board that handled most of the paperwork for administrative on board, a chief steward to deal with stores and a radio officer for communications" [which] allowed the master to deal with bridge matters and run the vessel... now the master is doing all three jobs as well as trying to run the vessel".

2 An unidentified stakeholder reported that "downsizing crew and minimum safe manning" has had a severe effect on crew well-being and safety: "It may be adequate in numbers for arrival/departure stations, in case of any emergencies – but not for ships' maintenance". The stakeholder also reported that rest hours are impossible to achieve, as crew have to work "for minimum 16 hours to 18 hours to get the work done" and "very often... get hardly 4 to 6 hours real rest".

3 An owner recommended involving shore-based staff on reporting in order to free up ship crew time: "I wish it was shoreside people who had to take on these burdens, however, it falls upon the crew on board the majority of the time increasing the fatigue factor".

#### Increase in number of requirements

4 A Master reported that "paperwork required aboard vessels is very burdensome" [as there are] too many forms to fill out and papers to keep year after year for audits. The burden is not just on the masters alone, as they pass down projects to the rest of the officers... It wasn't that long ago that we were able to get the ship from A to B without 20 checklists to fill out and 3 binders full of paperwork".

5 An owner added that "the vast amount of administrative requirements, seen as a whole, together represents a huge administrative burden for the company and crew on board; a burden, which in itself may risk compromising safety, etc., because attention and focus are increasingly drawn to complying with administrative procedures, etc. Obviously, these procedures are aimed at improving safety standards, etc., but the fact that there is a seemingly ever-growing number of requirements, even when many of these are justified, means that the crew in particular is spending an increasing amount of time on administrative tasks rather than actual manning and operation of the ship. If this development continues, it is bound to become a problem also from the perspective of safe manning and available resources".

#### Duplication in record keeping

6 An owner reported that despite the introduction of computers and promises of reducing workload, "not only did each and every paper form remain, they added the computerized forms which often lead to things being produced in quadruplicate". "The worst part is the redundant paperwork where you are answering the same questions in many different forms", another owner added. "This needs to stop or we would need another person aboard just for the paperwork".

7 Another stakeholder mentioned that "the burden on ships' masters to comply with both international and national legislation in record keeping is well known... But what is worse is (keeping) multiple records covering the same event or subject. How many ships are

keeping records of safety inspections in planned maintenance systems, safety officer record book, deck logbook and official logbooks. Anyone who cares to be on board a ship for any kind of external inspection or audit cannot help but notice just how long inspectors spend pouring over ships certificates. Is this really necessary in 2013? Why could they not be posted on a website with access provided to accredited authorities? Imagine a Facebook for ships – with all the certificates available for observation. This would free up the Master for at least 3 hours every time the certificate file comes out".

### **Port calls**

8 A master reported that the biggest administrative burden he is facing is "port papers, sent before arrival to the local agent/port authorities". The master recommended that the burden could easily be reduced by creating three simple databases "with all information" which would be accessed by, or sent to the arrival port ("1 database with crew information, 1 database with ships information and 1 database with cargo information"). The master explained that "it would then be up to the receivers to print the information on whatever local form or paper type that they require" and noted that "a solution with these 3 databases would reduce the administrative burden with several hours each day".

9 Some stakeholders specified that the problem is particularly acute in the Far East. It was also noted that this is a national authority issue. A company added that "ship's crew often find that the procedures concerning port calls and pre-arrival documents in particular are" [burdensome, as] many ports have developed own procedures and forms with no consistency and common standard in place".

### **ISM/Inspections**

10 A stakeholder who did not specify his role reported that "because of ISM we have to do lot of paperwork, so at the end of the day we really don't have time to practically do the safe practice". An Owner furthermore noted that "owners and crew find it particularly frustrating that inspections seemingly focus to a large extent on correct paperwork and procedures. Inspections thereby become "control of control" with a tendency to evaluate the quality of the control system rather than the quality of the ship and crew. In other words, there seems to be a tendency towards the need for documenting the correct behaviour on paper rather than to actually follow through on efficient environment-friendly or safe-ship operations. Furthermore, as some IMO regulations can be interpreted in many ways, crews are very keen on avoiding wrong entries to the various journals and reports, especially as the attention by control authorities is high on these subjects. In some regulations (e.g. the ISM Code) it is required that the owner or master has to prove that procedures are properly followed. This task can only be done by means of other procedures, checklists, reports, risk assessments and the like. In that regard it is not the specific requirements originating from the ISM Code which create the increase in bureaucracy; rather, it is the indirect impact of reporting which aims at documenting the daily routines".

### **Document languages**

11 A stakeholder reported that "one of the biggest problems with all of the new administrative requirements is the sense of doom that must be present in a member of a ship's complement, from master on down, when they are faced with filing a report or completing a new document with limited instructions in a language other than their own".

### **Litigious culture**

12 A company reported that "while some reports are required to run the company effectively... others are required only by the regulatory bodies...and those are in response to errors in judgment or the incompetence of the minority within the industry". The stakeholder

brought up a hypothetical scenario as a means of providing an example of what is happening in the industry: "Imagine if we had to submit a monthly report stating that we had not made an illegal turn, or exceeded the speed limit, or spit on the sidewalk, and had to send it to multiple agencies...and the only reason we had to send in these reports was so our insurance companies felt comfortable with the rates they provided". He reported that "we have become an over-regulated industry in an attempt to "prevent" mistakes and misadventures...when we should focus on punishing the guilty when they do something wrong. We attempt to protect ourselves from "legal" action by smothering what we do with paper as a [...] tactic to show everything has been done to remove any liability by those who would be held legally accountable or responsible. Until we find a way to restrain the legal system and stop the legal-lottery incentives that result from people unwilling to accept personal responsibility and choose to blame everyone else for not preventing their stupidity, we will continue this paper-chase called regulation".

### **Other sources of administrative burdens**

13 A master reported that "administrative burdens due to IMO instruments are very minimum compared to the voluminous load of paper work imposed by charterers, ship management companies, P&I clubs and Port agencies". Therefore, he recommended that the Organization work with these agencies to remove the "red tape" prevalent in the shipping industry, making a difference "for companies, ship's officers and seafarers".

### **Ship certificates**

14 An owner provided feedback on new building procedures, whereby "vessels have to receive a lot of documents at delivery. All that paperwork needs maintenance. We see that at each delivery, the document codes of the certificates are changed, any delivery-document checklist is outdated the moment it is produced. On each certificate, very specific data have to be filled in. In the meantime, I forgot how many different definitions of ship's length are used". The owner recommended that "in the future we should work with a minimum amount of minimalistic certificates – whether from Flag State or Class – and an intelligent database. Separate Tonnage, Load line, Safety construction, Safety equipment, Radio certificates, etc. should be replaced by one Seaworthiness Certificate. Specific certificates have to be issued based on ship specific matters (i.e. the carriage of dangerous goods). Also, a class certificate has to be issued. It will be very useful to unify the text and the data on the certificates".

15 The owner specified that "each certificate should have only (a) Name of Certificate, (b) Name of Government or Class, (c) Name of ship, (d) IMO number, (e) Reference to a numbered database, and (f) Date, Place and Signature(s). On the class certificate (only) the class notations have to be mentioned... Relevant data, which are needed to describe the vessel, will be stored in the database".

16 With regard to the database, the owner indicated that "the database should have a chapter with flag State information, a chapter with Class information, a chapter with port State control information and a chapter with operational information. The first two chapters contain ships parameters, equipment parameters and expiry dates. The port State control Chapter is accessible for port State control officers, who can report about their inspections and detentions. The operational chapter, accessible for the Master, might replace individual records such as the oil record book, the cargo record book, the garbage record book etc. This will thus create a ship's "history book"".