

# Isle of Man Ship Registry

## **CONSULTATION:**

### **Amendments to Minimum Safe Manning & STCW Regulations**

**Opening Date: 29 June 2022**

**Closing Date: 10 August 2022**



## **Department for Enterprise**

### **Isle of Man Ship Registry Consultation: Proposed update to Minimum Safe Manning & STCW Regulations**

Following feedback on the Isle of Man Ship Registry's legislation at the IMO Instruments Implementation Code (III Code) Audit in 2021, we have undertaken a review of our regulations which apply SOLAS Chapter V Regulation 14 (Ships' Manning). The relevant regulations are the Merchant Shipping (Manning and STCW) Regulations 2014, hereafter referred to as 'the Regulations'.

Whilst updating these Regulations, we will also take the opportunity to apply some routine updates to apply the latest versions of STCW 1978 and the STCW Code.

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**When responding, please consider whether you are willing to have your response published and indicate your preference from the following options:**

- **Response can be published together with your name/organisation**
- **Response can be published anonymously**
- **Response can not be published**

**This consultation will close at 17:00 on 10 August 2022.**

This consultation contains the following sections:

Section 1 – III Code Finding

Section 2 – Updates to STCW 1978 & STCW Code

## **SECTION 1 – III CODE FINDING**

During our 2021 III Code Audit, the Isle of Man Ship Registry, received an audit finding that we had not fully applied SOLAS Chapter V Regulation 14.2.2 as the Merchant Shipping (Manning and STCW) Regulations 2014 did not require Passenger Ships under 500gt to hold a minimum safe manning document.

Following on from this, we have undertaken a review of all of SOLAS Chapter V Regulation 14 and accordingly we propose some minor amendments to the Regulations. These are detailed below.

### **PROPOSED AMENDMENTS**

SOLAS Chapter V Regulation 14.1 requires that 'for each of our national ships, we maintain, or if it is necessary, adopt, measures for the purpose of ensuring that, from the point of view of safety of life at sea, all ships shall be sufficiently manned.'

At present, the Regulations regulate minimum manning for the following vessels:

- a) Manx ships which are commercial vessels (except fishing vessels or commercial yachts which comply with the Large Yacht Code), engaged in international voyages or operating from a port or between ports in another country, that are 200gt or above; and
- b) Manx ships which are pleasure vessels are of 24m or over in load line length.

The definition of Manx Ship includes vessels registered under Part 3 of the Harbours Act 2010 (pleasure craft and certain other vessels).

We propose to amend the application as follows in order to more completely discharge Regulation 14.1:

- the tonnage threshold for Manx ships which are commercial vessels (200gt) is removed.
- The requirement for commercial vessels to be operating on international voyages or operating from a port or between ports in another country in order to fall within the scope of the Regulations will be removed.

The effect of this is that all commercial vessels of any size on Parts I-IV on the register (except for fishing vessels; commercial yachts, wooden ships of primitive build, warships, naval auxiliaries or other ships owned or operated by a State and engaged only on governmental non-commercial service; or ships not propelled by mechanical means) will be regulated with respect to minimum safe manning. This will be done by requiring all such vessels to have a minimum safe manning document and be manned accordingly. For commercial vessels under 500gt this document will be (except for passenger ships) a Manx minimum safe manning document. Passenger ships under 500gt will require a minimum safe

manning document since they are subject to SOLAS Chapter I – this will discharge the III audit finding mentioned above.

The definition of Manx Ship will then be amended to exclude vessels registered under Part 3 of the Harbours Act 2010 (pleasure craft and certain other vessels). It is intended that the minimum manning of commercial vessels registered with harbours will be regulated in the future by a new code for small commercial vessels.

Minimum Safe Manning guidance is to be given within MSN 052 and will be updated to reflect these changes.

## **SECTION 2 – UPDATES TO STCW 1978 & STCW CODE**

Whilst updating the Merchant Shipping (Manning and STCW) Regulations 2014, we will also take the opportunity to make some routine updates to apply the latest versions of STCW 1978 and the STCW Code. The updates will be as follows:

<b>Resolution Number</b>	<b>Description</b>
<a href="#">MSC.486(103)</a>	An amendment to STCW 1978 to add a new definition for 'high-voltage'
<a href="#">MSC.487(103)</a>	An amendment to the STCW Code to amend the definition of 'operational level' in Section A-I/1 to include 'electro-technical officer'

The above amendments will take effect internationally from 1 January 2023, assuming they pass IMO's tacit acceptance procedure.