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## **INTERNATIONAL LABOUR ORGANIZATION WORK IN FISHING CONVENTION (ILO 188) Safe Manning**

**Notice to all fishing vessel owners, operators and managers; employers of fishermen; skippers, officers and fishermen on fishing vessels**

*This notice should be read with MSN 1884(F).*

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### **Summary**

- Fishing vessels must be sufficiently and safely manned for safe navigation and operation of the vessel, and fishermen must be given adequate rest as set out in MSN 1884(F).
- This notice describes ways of documenting safe manning of a fishing vessel as an alternative to daily records of hours of rest.

### **1. Introduction**

- 1.1 Fishing vessels must be sufficiently and safely manned for the safe navigation and operation of the vessel and under the control of a competent skipper. Fishermen must be given regular periods of rest of sufficient length to ensure their safety and health (ILO 188 Article 13).
- 1.2 Minimum hours of rest and a Code of Practice agreed with the industry, compliance with which is accepted as equivalent to the minimum hours of rest, are set out in MSN 1884(F). Adequate records must be kept in order to demonstrate that fishermen are receiving adequate rest.
- 1.3 MSN 1884(F) on Working Time regulations advises that, as an alternative to daily records of hours of rest, fishing vessel owners who have one of the following in place may record breaches of hours of rest on an exception basis (see section 3.3.3)
- (1) a safe manning document for the vessel,  
OR
  - (2) A safety management system for the vessel in accordance with MGN 596(F), including at section 6.7 an explanation of how the manning levels for the vessel



encompass all operations while complying with the hours of work and hours of rest limits as set out in section 3.1 of this notice, or the authorised exception at Annex 1 and Attachment B.

OR

(3) A schedule or other explanation of the expected pattern of work and available times for rest, demonstrating compliance with the hours of work and hours of rest limits as set out in section 3.1 of this notice, or the authorised exception at Annex 1 and Attachment B.

## **2. Application for safe manning document for a fishing vessel**

2.1 Form MSF 3902 has now been published at

<https://www.gov.uk/government/publications/how-to-apply-for-a-fishing-safe-manning-document> .

2.2 The form can be downloaded and completed electronically. In order to enter text in the boxes you may need to select TOOLS, then FILL and SIGN.

2.3 If the fishing vessel owner wishes to apply for a safe manning document, form MSF 3902 must be completed with as much detail as possible to allow assessment, and sent, with the required fee, to:

Seafarer Training and Certification  
Maritime and Coastguard and Agency  
Bay 2/09, Spring Place  
105, Commercial Road  
Southampton SO15 1EG

2.4 You may subsequently be contacted by either Seafarer Training and Certification or an MCA surveyor to discuss your application. Once the manning is agreed, a safe manning document will be issued.

## **3. Safety Management Code**

3.1 Form MSF 3902 does not have to be completed for this. However, in accordance with section 6 of MGN 596(F), you may find the supplementary information section of MSF 3902 (pages 2 to 5) useful when drawing up your explanation of how the manning levels for the vessel encompass all operations. This section runs through different aspects of the operation of a fishing vessel.

## **4. Schedule of work and rest**

4.1 Form MSF 3902 does not have to be completed for this. However, the supplementary information section of MSF 3902 (pages 2 to 5) may help you to consider all aspects of the operation of the vessel when drawing up a schedule of work and rest for the crew.

## **5. Exception recording**

5.1 Once your safe manning document has been issued, or you have recorded the pattern of work on the vessel in accordance with either paragraph 3 or paragraph 4 above, the vessel will only need to record exceptions to the agreed pattern of working. For example, if the vessel is delayed due to bad weather and crew are therefore required to work during what would normally have been their rest period, or for emergencies etc., this should be recorded. The steps taken to ensure that the crew are not therefore fatigued must also be recorded.



5.2 This record can be kept as part of the vessel's safety folder, or entered in the official logbook or in another record, written or electronic, provided that it is available for inspection. Records of exceptions should be retained for one year.

## 6. Working Time

6.1 MSN 1884(M) sets out the requirements for minimum daily and weekly rest for fishermen, but also includes a Code of Practice which recognizes that strict compliance with these requirements is not possible for certain fishing vessels and operations. The Code of Practice gives alternative patterns of work where longer or more frequent leave periods can be considered to provide an equivalent to strict compliance with the minimum rest periods in the Regulations.

6.2 Operations complying with the Code of Practice are considered to be authorised exceptions to the Regulations. Any other patterns of work, not in line with the provisions of the Code are required to be submitted to the MCA for authorisation. This is a separate process to the application for a safe manning document, which will only be issued if the patterns of work comply either with the minimum rest periods, or the Code of Practice, or a separate authorised exception.

## More Information

Seafarer Safety and Health Branch  
Maritime and Coastguard Agency  
Bay 2/17  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG

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e-mail: [workinfishing.convention@mcga.gov.uk](mailto:workinfishing.convention@mcga.gov.uk)

Website Address: [www.gov.uk/government/organisations/maritime-and-coastguard-agency](http://www.gov.uk/government/organisations/maritime-and-coastguard-agency)

General Enquiries: [infoline@mcga.gov.uk](mailto:infoline@mcga.gov.uk)

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