

# Isle of Man Ship Registry Manx Shipping Notice

## Minimum Safe Manning Requirements

Ref. MSN 052  
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### Introduction

This MSN sets out the measures adopted by the Ship Registry to ensure Isle of Man registered vessels are sufficiently and efficiently manned in accordance with the Isle of Man Merchant Shipping (Manning and STCW) Regulations 2014. The Regulations and this MSN have been produced by taking into account IMO Resolution [A.1047\(27\)](#) Principles of Minimum Safe Manning.

The Regulations apply to all Isle of Man registered ships except for -

- a. fishing vessels;
- b. wooden ship of primitive build;
- c. warship, naval auxiliary or other ship owned or operated by a State and engaged only on governmental non-commercial service;
- d. ships not propelled by mechanical means; or
- e. commercial yachts (refer to Isle of Man commercial yacht code National Annex).

### **Section 1 - Minimum Safe Manning Document**

#### **1. Minimum safe manning document requirement**

All Isle of Man registered commercial ships are required to apply for and be issued with a minimum safe manning document as part of the process of registering with the Isle of Man. The minimum safe manning document will be issued to the vessel when it registers with the Isle of Man and the ship must not proceed to sea unless it –

- a. carries a valid minimum safe manning document issued by the Ship Registry\*; and
- b. is manned in accordance with the requirements of the minimum safe manning document.

*\*Note – for vessels (excluding passenger ships) of less than 500GT this is called a "Manx Minimum Safe Manning Document".*

In order to obtain a minimum safe manning document the ship's Company shall apply to the Ship Registry taking into account the guidance in Section 2 and 3 of this MSN. Upon receipt of this application the Ship Registry will evaluate the application and if satisfied the proposal meets the requirements a minimum safe manning document will be issued valid for a maximum period of 5 years and synchronised with the vessels Flag State General Inspection cycle.

Once issued the minimum safe manning document will only be valid -



- a. for the operational areas stated on it;
- b. for the period stated on it; and
- c. if any conditions stated on it are complied with.

#### Changes that affect the ship's manning

When there are any changes which may affect the ship's minimum safe manning, the ship's Company must prepare and submit a new proposal for the ship's minimum safe manning (refer to Section 3 for further information).

#### Temporary dispensations

In exceptional circumstances the Ship Registry must be contacted to request permission for a vessel to sail with fewer seafarers than stated on the minimum safe manning document. Whenever this circumstance arises, the Ship Registry will make an assessment of the vessel's manning levels and permission may be given for the vessel to sail for up to 21 days with less persons than stated on the minimum safe manning document.

#### Withdrawal of minimum safe manning document

The Ship Registry may withdraw the vessel's minimum safe manning document if:

- a. the ship's Company fails to submit a new proposal for the ship's minimum safe manning when changes in the trading area(s), construction, machinery, equipment or operation and maintenance of the ship have taken place which affect the minimum safe manning; or
- b. the ship persistently fails to be in compliance with the minimum hours of rest requirements.

#### Ship's Company

"Company" in relation to a ship means the owner of the ship, or any other organisation or person such as the manager, or the bareboat charterer, who has assumed responsibility for operation of the ship from the shipowner and who, on assuming such responsibility, has agreed to take over the duties and responsibilities imposed on the Company by the SOLAS Convention and the STCW Convention.

## **2. Pleasure vessels**

Pleasure vessels registered with the Isle of Man must comply with the manning requirements as stated in [MSN 033](#). These vessels are not subject to a survey and inspection regime and do not require a minimum safe manning document. However if a pleasure vessel is involved in an accident and it is subsequently shown that the manning levels do not meet the requirements stated in [MSN 033](#), the ship's Company could be prosecuted.

## **3. Port State control**

Foreign (non-Isle of Man registered) commercial vessels visiting an Isle of Man port may be subject to a port State control inspection by an Isle of Man surveyor. If as part of this inspection it is found that the vessel fails to comply with the applicable safe manning requirements of the ship's flag State, the vessel may be detained until any deficiency has been rectified.



## **Section 2 - Guidelines for determining a ship's minimum safe manning**

The following guidelines have been developed to assist the ship's Company in determining the minimum safe manning for Isle of Man registered ships. These guidelines have been developed taking into account Resolution [A.1047\(27\)](#) Annex 2 - Guidelines for determination of minimum safe manning.

In determining the minimum safe manning the ship's Company must take into account the following -

### **1. Sufficient number of qualified persons**

There must always be sufficient numbers of STCW qualified seafarers onboard to meet peak workload situations and conditions. This shall be determined with due regard to the statutory minimum hours of rest requirements (see paragraph 4 below).

Consideration must also be given to -

- a. the capability of the Master and the ship's complement to coordinate the activities necessary for the safe operation and for the security of the ship and for the protection of the marine environment;
- b. cargo handling and stowage, comprising the tasks, duties and responsibilities required to plan, monitor and ensure safe loading, stowage, security, care during the voyage and unloading of cargo to be carried on the ship; and
- c. maintaining the safety arrangements and the cleanliness of all accessible spaces to minimise the risk of fire.

### **2. Trading areas**

The minimum safe manning document can be issued with an "unlimited" trading area. However, there is the possibility of defining a "limited operational area", to cater for vessels which may be confined in their operations to a limited geographical area. The vessel's voyages will be limited in distance from a safe port, within which back up services are available. The Ship Registry may consider a different minimum safe manning level taking into account the nature of the vessel's voyages in that area.

A vessel which operates part of the time within a limited operational area and part of the time on more extensive voyages may elect to have more than one minimum safe manning document. Similarly passenger ships which have the capability to operate in more than one mode may have a separate minimum safe manning document for each mode.

### **Watchkeeping**

- a. Deck department

There should always be sufficient navigational officers onboard a ship to –

- plan and conduct safe navigation;
- maintain a safe navigational watch in accordance with the requirements of the STCW Code;
- manoeuvre and handle the ship in all conditions; and



- moor and unmoor the ship safely.

In most cases the vessel's Master should not be required to keep regular watches and a three-watch system should be adopted. However, under the following circumstances the Ship Registry may consider a minimum safe manning application for vessels of less than 3000GT which would require the Master to keep a regular watch.

These circumstances must be stated on the minimum safe manning application form and may include, but not be limited to –

- limited cabin numbers on the vessel; or
- vessels on short voyages which spend time in port in addition to cargo duties.

Table 1 can be used as guidance for the ship's Company when determining the minimum safe manning requirements for the number of deck officers on a vessel.

Table 1 Deck department - Guidance for minimum manning

<b>Vessel category</b>	<b>Manning scale</b>
Vessels of 3000GT and over	Master (STCW Reg. II/2) Chief Mate (STCW Reg. II/2) 2 Officers in charge of a navigational watch (STCW Reg. II/1) 3 Navigational watch ratings (STCW Reg. II/4 or II/5)
Vessels of 500GT and over and less than 3000GT	Master (STCW Reg. II/2) Chief Mate (STCW Reg. II/2) 2* Officers in charge of a navigational watch (STCW Reg. II/1) 3 Navigational watch ratings (STCW Reg. II/4 or II/5) <i>*under certain circumstances this may be reduced by 1</i>
Vessels less than 500GT	Master (STCW Reg. II/3) Chief Mate (STCW Reg. II/3) 2 Navigational watch ratings (STCW Reg. II/4 or II/5)

b. Engine department

There should always be sufficient engineers onboard to undertake the tasks, duties and responsibilities required to –

- operate and monitor the ship's main propulsion and auxiliary machinery and evaluate the performance of such machinery;
- maintain a safe engineering watch in accordance with the requirements of the STCW Code;
- manage and perform fuel and ballast operations; and
- maintain safety of the ship's engine equipment, systems and services.

Except in ships operating with unattended machinery spaces, the chief engineer should not normally be required to keep regular watches and a three-watch system should be adopted. However, under the following circumstances the Ship Registry may consider a minimum safe



manning application for vessels not classed for UMS operation of less than 3000kW propulsion power with one less Engineering Officer in charge of an Engineering watch.

These circumstances must be stated on the minimum safe manning application form and may include, but not be limited to –

- limited cabin numbers on the vessel; or
- vessel's on short voyages which spend time in port in addition to cargo duties

Table 2 can be used as guidance for the ship's Company when determining the minimum safe manning requirements for the vessel's engine room department.

Table 2 Engine room – Guidance for minimum manning

<b>Vessel category</b>	<b>Manning scale</b>
Vessels with propulsion power of 3000kW or more classed for UMS	Chief Engineer (STCW Reg. III/2) Second Engineer (STCW Reg. III/2) Officer in charge of an engineering watch (STCW Reg. III/1) 1 Engine room rating (STCW Reg. III/4 or III/5)
Vessels with propulsion power of 3000kW or more <b>not</b> classed for UMS	Chief Engineer (STCW Reg. III/2) Second Engineer (STCW Reg. III/2) 2 Officers in charge of an engineering watch (STCW Reg. III/1) 3 Engine room ratings (STCW Reg. III/4 or III/5)
Vessels of 750kW or over but less than 3000kW classed for UMS	Chief Engineer (STCW Reg. III/3) Second Engineer (STCW Reg. III/3)* 1 Engine room rating (STCW Reg. III/4 or III/5) * an STCW Reg. III/1 Certificate is acceptable if it states "valid as second engineer on vessels <3000kW"
Vessels of 750 kW or over but less than 3000kW <b>not</b> classed for UMS	Chief Engineer (STCW Reg. III/3) Second Engineer (STCW Reg. III/3) 2* Officers in charge of an engineering watch (STCW Reg. III/1) 2 Engine room ratings (STCW Reg. III/4 or III/5) **under certain circumstances this may be reduced by 1

### C. Exceptional circumstances

Under exceptional circumstances the Ship Registry may permit a minimum safe manning document for any vessel with fewer persons than stated in Tables 1 & 2. These applications will only be considered when a company requests a specific variation from the requirements on the minimum safe manning application form.

Currently, the circumstances where the Ship Registry will consider an application for a reduction of the safe manning onboard include –

- where the company already operates at least one sister vessel on the Isle of Man register with that safe manning level; and



- the company provides evidence that the vessel has been operating in compliance with the minimum hours of rest requirements and the vessel's flag State and port State control inspection records are considered to be acceptable by the Ship Registry.

The Ship Registry will not consider an application for reduced manning under exceptional circumstances where that vessel is not an 'existing' vessel, i.e. where the vessel keel was laid after the application date of the Regulations.

#### c. Electrical engineering

Sufficient engineers or an electro-technical officer should be onboard to undertake the tasks, duties and responsibilities required to –

- operate the ship's electrical and electronic equipment; and
- maintain the safety of the ship's electrical and electronic systems.

#### d. Unattended Machinery Spaces (UMS)

The minimum safe manning document states whether the vessel is operating in UMS mode or with a manned engine room. To operate in UMS mode, the vessel will have to be classed for periodically unattended engine room operation in accordance with the vessel's Classification Society requirements. A vessel operating in UMS mode requires less engine room personnel than a permanently manned engine room.

In the event of a failure of the UMS system, the Ship Registry must be advised in order for the engine room manning levels to be re-assessed. Following the assessment, there may be a requirement for additional engine room personnel and a short term minimum safe manning document will be issued reflecting this increase in personnel. This will state the vessel is operating with a manned engine room. When the engine room is being operated in a non-UMS mode the engine room should be manned by at least 2 persons.

#### f. Engineers on vessels of less than 750kW propulsion power

The Ship Registry may stipulate on a case-by-case basis that an engineer with the qualifications specified in STCW Reg. III/I is carried onboard a vessel with a propulsion power of less than 750kW. If the vessel's propulsion power is less than 350kW an engineer may not be required, however one of the senior officers will be required to be fully familiar with the operation of the main engine and auxiliary systems.

### **4. Minimum rest hours**

Part 6 of the Merchant Shipping (Maritime Labour Convention) Regulations 2013, states the Isle of Man requirements for the minimum hours of rest, and these Regulations must be taken into account when determining the vessel's minimum safe manning. Further information is available in [MLN 2.3](#) Hours of work and hours of rest.

### **5. Safety management, occupational safety, health and hygiene**

When determining the minimum safe manning the Isle of Man health and safety policies and programmes must be taken into consideration (as stated in [MLN 4.3a](#)). Particular attention should be given to the manning requirement for safety committees, safety representatives and safety officers.



## 6. Ship's cook

A qualified ship's cook is required for vessels operating with a prescribed manning of 6 or more seafarers on voyages of more than 3 days or more than 36 hours from a safe port. Further information is available in [MLN 3.2](#) Food and Catering.

## 7. Security

For vessels subject to the ISPS Code the seafarers' security duties at all security levels must be taken into account. The vessel must carry a ship security officer qualified in accordance with STCW Reg. VI/5 and all seafarers must be qualified in accordance with STCW Reg. VI/6. Further information is available in [MSN 050](#) STCW Convention regulation VI-6 Security Training.

## 8. Radiocommunications

Every person performing radio duties on a ship which operates with a GMDSS radio system shall hold an appropriate certificate for GMDSS radio operators.

## 9. Training of seafarers

The need to provide training opportunities for entrant seafarers to allow them to gain the necessary training and experience should also be taken into account.

## 10. Terminology

It has been noted that there are occasional discrepancies in terminology between ranks stated on the MSMD, Certificate of Competency and the Seafarers Employment Agreement. For example, a MSMD may require an Electro-Technical Rating (ETR) while a Seafarer's Employment Agreement may refer to the same position as an Electrician. It is recommended that such a situation is avoided and in all cases terminology is aligned.

## 11. Operation of the ship and care for person on board

There should be sufficient persons for the operation of the ship and care for persons onboard, comprising the tasks, duties and responsibilities required to –

- maintain the safety and security of all persons onboard and keep life-saving, fire-fighting and other safety systems in operational condition;
- operate and maintain all watertight closing arrangements;
- perform operations, as appropriate, to muster and disembark all persons onboard;
- perform operations, as appropriate, to ensure protection of the marine environment;
- undertake administrative tasks required for the safe operation and the security of the ship; and
- provide medical care on board ships (further information is stated in [MLN 4.1](#)).11.



### **Section 3 - Responsibility of the ship's Company**

For all ships registering with the Isle of Man, the ship's Company must prepare and submit its proposal for the ship's minimum safe manning by completing the [minimum safe manning application form](#) which is available on the Ship Registry website.

In preparing a proposal for the minimum safe manning, the ship's Company should apply the objectives and principles of safe manning as stated in Section 5 and take into account the guidelines in Section 2.

The ship's Company must -

1. make an assessment of the tasks, duties and responsibilities of the ship's complement required for its safe operation, for its security, for protection of the marine environment and for dealing with emergency situations;
2. ensure that fitness for duty provisions and record of hours are implemented;
3. make an assessment of numbers and grades/capacities in the ship's complement required for its safe operation, for its security, for protection of the marine environment and for dealing with emergency situations;
4. prepare and submit the minimum safe manning application form to the Ship Registry which must be based upon the assessment stated in paragraph 1.(above). This proposal shall be justified by explaining how the proposed ship's complement will deal with emergency situations, including the evacuation of passengers, where necessary;
5. ensure that the minimum safe manning 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 IMO Resolution [A.1047\(27\)](#); and
6. prepare and submit to the Ship Registry a new proposal for the minimum safe manning of a ship in the case of any of the following changes which may affect the ship's minimum safe manning –
  - trading area(s);
  - construction;
  - machinery;
  - equipment;
  - operation; and
  - maintenance or management of the ship.

The Ship Registry will then evaluate the new proposal and if it is considered acceptable a new minimum safe manning document will be issued.





#### **Section 4 - Approval by the Isle of Man Ship Registry**

The Isle of Man Ship Registry will evaluate the minimum safe manning application submitted by the ship's Company to ensure that –

- a) the proposed ship's complement contains the number and grades/capacities of personnel to fulfil the tasks, duties and responsibilities required for the safe operation of the ship, for its security, for protection of the marine environment and for dealing with emergency situations; and
- b) the Master, officers and other members of the ship's complement are not required to work more hours than is safe in relation to the performance of their duties and the safety of the ship and that the Isle of Man (Maritime Labour Convention) Regulations which implement minimum hours of rest can be complied with.

The Ship Registry will only approve a proposal for the minimum safe manning of a ship and issue a minimum safe manning document if it is fully satisfied that the proposed ship's complement is-

- a) established in accordance with the principles and guidelines contained in this MSN; and
- b) is adequate in all respects for the safe operation and the security of the ship and for the protection of the marine environment.

If the Ship Registry does not consider the proposal complies with this criteria the ship's Company will be required to amend the proposal.

Once the Ship Registry has approved the minimum safe manning of a ship, a minimum safe manning document will be issued valid for a maximum period of 5 years and synchronised with the vessels Flag State General Inspection cycle. The Isle of Man minimum safe manning document has been produced in the same format as the model form in the Appendix to IMO Resolution [A.1047\(27\)](#).



## **Section 5 - Objectives and Principles of Minimum Safe Manning**

The following has been reproduced from Annex 1 of IMO Resolution [A.1047\(27\)](#) Principles of Minimum Safe Manning.

### **Objectives**

The objective of these Guidelines are to ensure that a ship is sufficiently, effectively and efficiently manned to provide -

- a. safety and security of the ship;
- b. safe navigation and operations at sea;
- c. safe operations in port;
- d. prevention of human injury or loss of life;
- e. the avoidance of damage to the marine environment and to property; and
- f. to ensure the welfare and health of seafarers through the avoidance of fatigue.

These objectives are achieved through the following:

- a. the adoption of a goal-based approach;
- b. standard procedures for effective implementation; and
- c. effective enforcement.

### **Principles of minimum safe manning**

1. The following principles must always be observed in determining the minimum safe manning of a ship:
  1. The capability to –
    1. maintain safe navigational, port, engineering and radio watches in accordance with regulation VIII/2 of the 1978 STCW Convention, as amended, and also maintain general surveillance of the ship;
    2. moor and unmoor the ship safely;
    3. manage the safety functions of the ship when employed in a stationary or near-stationary mode at sea;
    4. perform operations, as appropriate, for the prevention of damage to the marine environment;
    5. maintain the safety arrangements and the cleanliness of all accessible spaces to minimize the risk of fire;
    6. provide for medical care onboard ship;
    7. ensure safe carriage of cargo during transit;
    8. inspect and maintain, as appropriate, the structural integrity of the ship; and



9. operate in accordance with the approved Ship's Security Plan; and
2. The ability to -
    1. operate all watertight closing arrangements and maintain them in effective condition, and also deploy a competent damage control party;
    2. operate all onboard fire-fighting and emergency equipment and life-saving appliances, carry out such maintenance of this equipment as is required to be done at sea, and muster and disembark all persons onboard; and
    3. operate the main propulsions and auxiliary machinery including pollution prevention equipment and maintain them in a safe condition to enable the ship to overcome the foreseeable perils of the voyage.
2. The following onboard functions, when applicable, should also be taken into account-
    1. ongoing training requirements for all personnel, including the operation and use of fire-fighting and emergency equipment, life-saving appliances and watertight closing arrangements;
    2. specialized training requirements for particular types of ships and in instances where crew members are engaged in shipboard tasks that cross departmental boundaries;
    3. provision of proper food and drinking water;
    4. the need to undertake emergency duties and responsibilities; and
    5. the need to provide training opportunities for entrant seafarers to allow them to gain the training and experience needed.

**Reference Material:**

- IMO Resolution A.1047(27) Principles of Minimum Safe Manning
- International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, up to and including the 2010 Manila Amendments (STCW Convention)
- Seafarers' Training, Certification and Watchkeeping Code, as amended (STCW Code)
- Merchant Shipping (Manning and STCW) Regulations 2014 (SD 2014/0238)
- Merchant Shipping (Maritime Labour Convention) Regulations 2013 (SD 0234/13)
- MLN 2.3 Hours of work and hours of rest
- MLN 3.2 Food and Catering
- MLN 4.1 Medical care on board ships and ashore;
- MLN 4.3a Health and Safety Policies
- MSN 033 - Pleasure Vessel Manning
- MSN 050 - STCW Convention regulation VI-6 Security Training
- Merchant Shipping (Manning and STCW) Regulations 2014

*Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from ship to ship. You should consider seeking independent legal advice if you are unsure of your own legal position.*

