



İstanbul :

28.01.2015

Sayı  
Our Reference: 468Konu  
Subject : Paris ve Tokyo Memorandumu (MoU)  
Tarafından Birlikte Yürütülen STCW 2010 Dinlenme Saatleri  
Hususundaki Denetim Kampanyası Ön Sonuçları Hk.

Sirküler No: 79 / 2015

Sayın Üyemiz,

**İlgi:** Uluslararası Deniz Ticaret Odası'ndan (ICS) alınan 22.01.2015 tarih ve MT(15)03 sayılı yazı ve Eki Paris MoU Sekreteryası Basın Bildirisi

İlgi yazıda, Liman Devleti Kontrolü Memorandumlarından; Paris Memorandumu ve Tokyo Memorandumu tarafından STCW 2010 Dinlenme Saatleri hususundaki Yoğunlaştırılmış Denetim Kampanyası'na göre yürütülen ve Eylül-Kasım 2014 tarihleri arasında yapılan yoğunlaştırılmış denetim kampanyasının ön sonuçları bildirilmektedir.

İlgi yazı Eki Basın Bildirisinde, kampanyanın 4,041 denetleme ile tamamlandığı, toplamda 912 Yoğunlaştırılmış Denetim Kampanyası (CIC) ile bağlantılı eksiklik kaydedildiği ve 16 geminin kampanyanın doğrudan bir sonucu olarak tutulduğu belirtilmiştir.

Basın Bildirisinin Odamızda yapılan Türkçe çevirisi (Ek-1) ve İlgi yazı ve Eki (Ek-2) ilişikte sunulmaktadır.

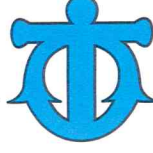
Bilgilerinizi arz ve rica ederiz.

Saygılarımızla,

Murat TUNCER  
Genel Sekreter**EKLER:**

Ek-1: Paris MoU Sekreteryası Basın Bildirisinin Türkçe çevirisi

Ek-2: İlgi yazı ve Eki Paris MoU Basın Bildirisi



İstanbul :

Sayı  
Our Reference :

Konu  
Subject :

**DAĞITIM:**

**Gereği:**

- Tüm Üyelerimiz (Web Sayfasında)
- Türk Armatörler Birliği
- S/S Gemi Armatörleri Motorlu Taş. Koop.
- Vapur Donatanları ve Acenteleri Derneği
- İMEAK DTO Şubeleri
- Türk Loydu
- Türk Uzakyol Gemi Kaptanları Derneği
- Gemi Sahibi Firmalar

**Bilgi:**

- Ulaştırma, Denizcilik ve Haberleşme Bakanlığı  
Deniz ve İçsular Düzenleme Genel Müdürlüğü
- Sn. Sefer KALKAVAN  
TOBB DTO'ları Konsey Başkanı
- Meclis Başkanlık Divanı
- Yönetim Kurulu Başkanı ve Üyeleri
- Sn. Erol YÜCEL  
TOBB Türkiye Denizcilik Meclisi Bşk.
- İMEAK DTO Şube YK Başkanları
- Piri Reis Üniversitesi

28 Ocak 2015

Paris MoU Sekreteryası

## BASIN BİLDİRİSİ

## DİNLENME SAATLERİNE YETERSİZ UYGUNLUK

1 Eylül 2014 – 30 Kasım 2014 tarihleri arasında Paris MoU Bölgesinde gerçekleştirilen STCW Dinlenme Saatleri 2014 hususundaki Yoğunlaştırılmış Denetim Kampanyası (CIC) ön sonuçları aşağıdaki şekilde belirtilmektedir:

16 gemi (CIC esnasında olan alikonmaların %14'ü) STCW Dinlenme Saatleri hususundaki yetersizliğe ilişkin olarak alıkonuldu. Asıl sorun dinlenme saatlerinin düzgün olarak kayıt edilmemesi ve vardiya tutanların yeterli istirahat etmemesidir.

Son zamanlarda vardiya tutan personelin dinlenme saatleri ile ilgili olarak meydana gelen kazaların sayısındaki artış, Paris ve Tokyo MoU'ların birlikte bu organizasyona karar vermelerinde önemli bir etken olmuş ve 10 seçilmiş madde ile ortak kampanya başlatılmıştır.

CIC soruşturması 4,041 denetleme ile tamamlandı. Toplamda 912 Yoğunlaştırılmış Denetim Kampanyası (CIC) ile bağlantılı eksiklik kaydedildi ve 16 gemi (tutuklamaların %16'sı) kampanyanın doğrudan bir sonucu olarak tutuldu.

Genel Sekreter Richard Schiferli ciddi endişeleri şu şekilde belirtmektedir: "Geçmiş yıllarda vardiya tutanların yetersiz istirahat etmeleri birçok kazaya neden olmuştur. Bu güvenlik ve çevre için büyük sonuçlar ile iki vardiya sisteminden kaynaklanan yorgunluğun sebebi olabilir."

Kampanya boyunca yapılan denetlemeler, 1,207 (%30) denetleme ile karışık yük (general cargo) gemileri/çok amaçlı gemilerle ilgili olup, 948 (%23) dökme yük gemisi denetlemesi, daha sonra 407 (%11) konteyner gemisi denetlemesi, 375 (%9) kimyasal tanker denetlemesi ve 325 (%8) petrol tankeri denetlemesi yapılmıştır.

Tutulan gemilerden 11 gemi (%70) karışık yük/çok amaçlı olup, 3 gemi (%19) dökme yük gemisi, 1'i konteyner gemisi ve 1'i ise diğer gemi sınıfındadır.

Kaydedilmiş eksikliklerin analizleri; eksikliklerin 449 vakada (%11) dinlenme saatlerinin uygun biçimde kayıt edilmemesiyle, 203 vakada (%5) vardiya tutan personelin yeterli biçimde istirahat etmemesiyle ve 101 vakada (%3) köprü gözcüsünün bulundurulmamasıyla ilişkili olduğunu ortaya koymuştur. Toplamda 21 denetleme, personel seviyesinin Minimum Güvenli Personel Tedariki Dokümanı ile uyumlu olmadığını açığa çıkarmıştır.

Yoğunlaştırılmış Denetim Kampanyası ile bağlantılı en çok tutulma, Moldova'ya aittir.

Denetlemeler toplamda 1268 geminin seyir vardiyasının 2 vardiya sistemiyle işletildiğini göstermiştir ve bu gemilerden 13'ü tutulmuştur.

Yoğunlaştırılmış Denetim Kampanyası Tokyo MoU ile birlikte yürütülmüştür. Diğer birlikte çalışan MoU'lar da kampanya boyunca aynı rutin uygulamayı izlemişlerdir.

Kampanyanın sonuçları detaylı şekilde analiz edilecek, tespitler Mayıs 2015'te 48. Liman Devleti Kontrol Komitesi toplantısında sunulacaktır ve daha sonra rapor Uluslararası Denizcilik Örgütü'ne teslim edilecektir.

İrtibat Noktası:

Mr. Richard W.J. Schiferli

Limn Devleti Kontrolünde Paris MoU Genel Sekreteri

PO Box 16191

2500 BD The Hague

The Netherlands

Tel: +31 (0)70 456 1509

Fax: +31 (0)70 456 1599

E-mail: [Richard.Schiferli@parismou.org](mailto:Richard.Schiferli@parismou.org)

Web-site: [www.parismou.org](http://www.parismou.org)

Çeviren: Yağmur TULGA



## International Chamber of Shipping

38 St Mary Axe London EC3A 8BH

Tel +44 20 7090 1460

Fax +44 20 7090 1484

[info@ics-shipping.org](mailto:info@ics-shipping.org) [www.ics-shipping.org](http://www.ics-shipping.org) [www.shipping-facts.com](http://www.shipping-facts.com)



This Circular and its attachments (if any) are confidential to the intended recipient and may be privileged. If you are not the intended recipient you should contact ICS and must not make any use of it.

22 January 2015

To: **MANNING AND TRAINING SUB-COMMITTEE**

MT(15)03

Copy: **Marine Committee**  
**All Full and Associate Members (for information)**

### PRELIMINARY RESULTS OF THE CONCENTRATED INSPECTION CAMPAIGN (CIC) ON STCW 2010 HOURS OF REST JOINTLY CONDUCTED BY THE PARIS AND TOKYO MOUS IN 2014

*Action required: Members are invited to note the attached preliminary results of the concentrated inspection campaign (CIC) conducted by the Paris MoU, jointly with the Tokyo MoU, focussing on compliance with hours of rest requirements under the STCW 2010, held from September to November 2014.*

The Paris Memorandum of Understanding (MoU) on Port State Control conducted a three-month concentrated inspection campaign (CIC), jointly with the Tokyo MoU, focussing on compliance with the hours of rest requirements under the STCW 2010 from September to November 2014.

A press release issued by the Paris MoU provides preliminary results of the CIC. During the course of the CIC, the member authorities carried out a total of 4041 inspections of ships based on a standardized questionnaire: 16 ships were detained for CIC-related deficiencies and a total of 912 CIC-related deficiencies were recorded. A further summary of the preliminary results by ship type, deficiency, and flag is included in the press release. The press release is attached at **Annex A**.

Whilst the detention of any ship is regrettable, the number of detentions (16) as a proportion of the total number of inspections (4041) demonstrates extensive compliance with the STCW 2010 rest hour requirements on ships calling at ports in the Paris MoU region. It also demonstrates that appropriate measures have been taken by shipowners and operators to satisfy PSC officers' of hours of rest records.

Having examined the preliminary results, the manner of presentation by the Paris MoU seems rather surprising as do some of the conclusions. Members are invited to note following provisional observations:

- The title of the press release appears misleading since only 16 ships were detained as a result of CIC-related deficiencies out of the 4041 ships inspected

over the three-month period. It is not clear whether this total is just in the Paris MoU region or in both the Paris and Tokyo MoU regions.

- The presentation of the headline figures also appear misleading; reference is made to the 16 ships detained followed by, '14% of the detentions'. Unless the reader is paying close attention, he/she might think this is referring to the percentage of ships inspected on the CIC that were detained; whereas it is believed that this is the percentage of the total of ships *detained* in the Paris MoU region during the three-month period for only CIC-related (rest hour) deficiencies.
- The key number that is more representative of the impact of rest hour related deficiencies is that only 0.39% of ships inspected were detained as a result of a number of STCW rest hour deficiencies. This clearly demonstrates the considerable success of Masters and shipowners in assuring their compliance with the international rest hour requirements, and arguably this point should have been welcomed by the Paris MoU. ICS considers the results to be clear evidence of yet another step forward in this era of improved maritime safety, especially on such a traditionally difficult issue as rest hours.
- The conclusions on the two-watch system may be premature and they do not appear to be underpinned by data supplied in the press release. Regardless that 13 of the 16 detained were two-watch system ships, these 16 ships represented 0.39% of the ships inspected and the 13 two-watch ships detained are just over 1% of the two-watch ships inspected (or 0.32% of the total number of ships inspected). Noting that two-watch ships account for about 31% of the ships in the CIC, ICS believes it is not surprising that there were some non-conformities amongst them.
- The lessons learned during the CIC will not be fed into the upcoming discussions of the draft *Guidelines for port State control officers on rest hours and manning requirements of the flag State* being discussed at IMO's Human Element, Training and Watchkeeping Sub-Committee (2-6 February 2014). However, Paris MoU will submit a final report of the CIC to the the IMO's Implementation of IMO Instruments (III) Sub-Committee being held 13-17 July 2015.

In light of the Paris MoU press release, the ICS Secretariat has followed-up with the MoU to seek clarification of the results and interpretations of the outcome of the CIC. Members will be advised of any additional information or clarity emerging from this engagement with the Paris MoU.

Stewart Inglis  
Manning and Training Adviser



22 January 2014

## **Unsatisfactory compliance with hours of rest**

Preliminary results from the Concentrated Inspection Campaign (CIC) on STCW Hours of Rest, carried out between 1 September 2014 and 30 November 2014 in the Paris MoU region show that:

**16 ships (14% of detentions during CIC) were detained over the 3 month period as a direct result of the CIC for deficiencies related to hours of rest. Main areas of concern are hours of rest not being recorded properly and watchkeeping personnel without sufficient rest.**

In recent years there has been a growing concern regarding hours of rest for watchkeeping personnel. Supported by PSC inspection results and a number of incidents, the Paris and Tokyo MoU, as well as other MoUs, decided to organize a joint campaign to verify a list of 10 selected items against the STCW requirements.

The CIC questionnaire was completed during 4,041 inspections. A total of 912 CIC-related deficiencies were recorded and 16 ships (14% of the detentions) were detained as a direct result of the CIC during the 3 month period.

Secretary General Richard Schiferli expressed serious concerns: *"Insufficient rest of watchkeeping personnel has already caused several incidents over the past years. It may be the cause of fatigue, which can have major consequences for safety and the environment. 2 watch systems are particularly vulnerable in this respect"*.

During the campaign most inspections concerned general cargo/multi-purpose ships with 1,207 (30%) inspections, followed by bulk carriers with 948 (23%) inspections, container ships with 407 (11%) inspections, chemical tankers with 375 (9%) inspections and oil tankers with 325 (8%) inspections.

11 (70%) of the detained ships were general cargo/multipurpose ships, 3 (19%) were bulk carriers, 1 container ship and 1 other ship type.

Analysis of the recorded deficiencies shows that most deficiencies relate to hours of rest not being recorded correctly in 449 cases (11%), watchkeeping personnel

did not have sufficient rest in 203 cases (5%) and bridge lookout not maintained in 101 cases (3%). A total of 21 inspections revealed that the manning level was not in accordance with the Minimum Safe Manning Document.

The flag with the highest number of CIC-topic related detentions was Moldova with 3 CIC-topic related detentions.

The inspections showed that a total of 1268 ships were operating with a 2 watch system for the navigational watch and 13 of these ships were detained..

The CIC was a joint campaign with the Tokyo MoU. Others co-operating MoUs have followed the same routine during the campaign.

The detailed results of the campaign will be further analysed and findings will be presented to the 48th meeting of the Port State Control Committee in May 2015, after which the report will be submitted to the International Maritime Organization.



## Contact

Mr. Richard W.J. Schiferli  
Secretary General Paris MoU  
on Port State Control

PO Box 16191  
2500 BD The Hague  
The Netherlands

Tel: +31 (0)70 456 1509  
Fax: +31 (0)70 456 1599  
E-mail: [Richard.Schiferli@parismou.org](mailto:Richard.Schiferli@parismou.org)  
Web-site: [www.parismou.org](http://www.parismou.org)

## Notes to editors:

Regional Port State Control was initiated in 1982 when fourteen European countries agreed to coordinate their port State inspection effort under a voluntary agreement known as the Paris Memorandum of Understanding on Port State Control (Paris MOU). Currently 27 countries are member of the Paris MOU. The European Commission, although not a signatory to the Paris MOU, is also a member of the Committee.

The Paris MoU is supported by a central database THETIS hosted and operated by the European Maritime Safety Agency in Lisbon. Inspection results are available for search and daily updating by MoU Members. Inspection results can be consulted on the Paris MoU public website and are published on the Equasis public website.

The Secretariat of the MoU is provided by the Netherlands Ministry of Infrastructure and the Environment and located in The Hague.

Port State Control is a check on visiting foreign ships to verify their compliance with international rules on safety, pollution prevention and seafarers living and working conditions. It is a means of enforcing compliance in cases where the owner and flag State have failed in their responsibility to implement or ensure compliance. The port State can require defects to be put right, and detain the ship for this purpose if necessary. It is therefore also a port State's defence against visiting substandard shipping.