

P&O Ferries – Safety Briefing



Introduction

In a safety critical industry such as shipping, the importance of a competent, well trained, experienced crew cannot be overstated. This is even more the case in a company such as P&O Ferries where in addition to the risks that are present in all shipping operations, there exists the additional pressures inherent in operating vessels to extremely tight schedules, with rapid turnarounds in the busiest shipping lanes in the world.

Carrying up to 2,000 passengers at a time, the potential consequences of any incident caused by crew inexperience or lack of training do not bear thinking about. In fact, anyone who is in any doubt as to the potential outcome when commercial pressure takes precedence over safety concerns in the ferry sector need only refer to report of the 1987 Herald of Free Enterprise Disaster which killed 193 passengers and crew and contributed directly or indirectly to the development of many of the safety measures that are discussed below.

Training and Familiarisation

It is vital that any new crewmember joining a ship is aware of their obligations regarding safety procedures, the actions to take during an emergency, the location and operation of life-saving and firefighting appliances, correct use of ships machinery and equipment and of course, their own specific duties onboard. There are a number of mandatory instruments which set out the minimum standards expected for training and familiarisation and ships are routinely inspected to ensure compliance with these however, it should be borne in mind that these protocols were not written with the extraordinary situation at P&O Ferries in mind and assume that an individual joining a vessel will have the benefit of crew already experienced on that vessel to deliver the required training.



Nautilus general secretary
Mark Dickinson at a protest in front of
DP World HQ in London

The International Management Code for the Safe Management of Ships (ISM Code)

The ISM Code was developed in the wake of the Herald of Free Enterprise disaster to address the lax safety culture which led to the accident. One of the key obligations introduced by the code is the requirement for the company to develop a Safety Management System (SMS) which must include, amongst other things, a safety and environmental protection policy, instructions and procedures covering all aspects of the ships operation to ensure safety and protection of the marine environment in compliance with relevant legislation, procedures for reporting accidents and non-conformities and, procedures to prepare for and respond to emergency situations.

The ISM Code places several duties on a company in relation to familiarisation and training which include:

- Ensuring that the Master is fully conversant with the company's SMS.
- Establishing procedures to ensure new personnel are given proper familiarisation with their duties.
- Ensuring that all personnel involved in the SMS have an adequate understanding of relevant rules, regulations, codes and guidelines.
- Establishing and maintaining procedures for identifying training that may be required in relation to the SMS and ensuring that such training is provided.
- Ensuring that the crew are able to communicate effectively in the execution of their duties related to the SMS.
- Identifying potential emergency shipboard situations, establishing programmes of drills and exercises to prepare for emergency actions and, ensuring that the organisation as a whole is prepared to act at any time to any hazards, accidents or emergencies involving its ships.
- Ensuring that all personnel have the qualifications, training and experience that may be required in support of the SMS.

The STCW Convention 1978 (as amended)

The STCW Code sets out the minimum qualification standards for seafarers to be allowed to work onboard vessels. In addition to setting out the minimum qualifications required it also contains provision relating to training and familiarisation which include:

- Ensuring that each crew member is able to make a knowledgeable and informed contribution to the safe operation of the ship.
- Ensuring that all seafarers who are newly employed onboard are given the opportunity to become familiar with shipboard equipment, operating procedures and other arrangements needed for the proper performance of their duties before being assigned to those duties.
- Ensuring that each seafarer is given a reasonable period of time to become acquainted with ship specific equipment, safety and emergency procedures and that a knowledgeable crew member is provided to ensure that each newly employed seafarer receives this information in a language that they understand.

We have serious doubts as to how a company that has replaced its entire crew with no handover would be able to demonstrate compliance with the above-mentioned requirements unless they had undergone an extensive training programme that would take weeks if not months to carry out properly.

Vehicle Deck Safety

It is widely acknowledged that the vehicle deck of a Ro-Ro ferry is one of the most dangerous places on a ship – one where workers are sadly killed on a regular basis. The unacceptably high number of accidents on vehicle decks in recent years has led the UK Chamber of Shipping in collaboration with the maritime unions to develop detailed guidance on vehicle deck safety. This guidance, which represents a united industry view, gives particular emphasis on ensuring effective communication and teamwork and of ensuring that crew receive appropriate training and familiarisation in safe work procedures.

It would be particularly concerning if inexperienced crew were assigned to work in these areas.

Fatigue

Fatigue is commonly reported by our members as one of the most pressing issues they face on a day-to-day basis. This is unsurprising when you consider the excessive working hours permitted by international regulations (up to 14 hours per day or 91 hours per week), unnatural shift patterns, fast port turnarounds and long tours of duty.

There is a plethora of evidence available which demonstrates the detrimental effect that seafarer fatigue has on safety. This includes the 2012 Cardiff University Report which found that the number of port visits and the speed of port turnarounds was a major contributory factor, the EU sponsored Horizon Project which found that a significant number of seafarers working common shift patterns experienced periods of sleep while on duty, and, the Martha Project which found that seafarer fatigue can cause long-term physical and mental health issues and that longer voyages were more likely to cause problems.

The body of research indicates that certain types of operation are more likely to lead to seafarer fatigue, in particular those that involve, frequent port calls, fast turnarounds, high job demands and high stress. The nature of operations at P&O ferries most certainly falls into this category with vessels sailing around the clock, completing up to 10 crossings a day of the busiest shipping lane in the world and seafarers working 12-hour shifts. P&O Ferries itself recognised that the unique nature of its operations necessitated the taking of additional precautions to guard against seafarer fatigue when it commissioned an independent study into its working patterns which found that due to the high demands placed on seafarers, that it would be potentially unsafe to require seafarers to work tours longer than six days.



P&O Ferries showed contempt for its workforce by making them redundant over Zoom



Workers and unions protesting against P&O Ferries in Hull

With this in mind we are shocked to hear that the company is intending to employ agency workers working tours of up to eight weeks.

Each vessel is required to hold a safe manning document which sets out the minimum of crew that a vessel is permitted to operate with. This document is issued to a shipowner following a proposal to their Flag State which is agreed based on the vessel's trading area and operational pattern.

The IMO Resolution A.1047(27) gives a Flag State the right to withdraw a safe manning document if a company fails to submit a new proposal for a safe manning document when changes in the trading area, construction, machinery, equipment or operation and maintenance of the ship have taken place.

We consider that the proposed increase in tour lengths combined with the sudden and drastic detrimental change to the experience level of the crew would be a clear change in the operation of a vessel and would necessitate a new proposal for a safe manning document.

Conclusion

We consider that it is extremely unlikely that any company that has replaced its entire crew overnight would be able to demonstrate compliance with the mandatory requirements relating to crew training and familiarisation. This is particularly so considering the extremely short period of time elapsed between the company sacking its entire seafaring workforce and its suggested date for resumption of sailings.

We have written to the Maritime and Coastguard Agency (MCA) setting out our concerns in this regard and they have confirmed that all eight affected ships will undergo a full Port State Control inspection focussing on operational drills and ensuring that crew have received appropriate training and familiarisation and training prior to sailings resuming.

We welcome this move but must stress that this must be a full and proper inspection and if there is any doubt whatsoever as to the suitability of the crew to safely carry out their duties, then the vessels must not be allowed to sail.

We are appalled at reports that the company are planning to implement tours of up to eight weeks in length. The company's own study clearly states that this is not a safe working arrangement. The proposed working patterns, combined with the decision to replace experienced crews with overseas seafarers recruited by an agency registered in Malta only a month ago, clearly represents a change in the operations of the vessel necessitating a new proposal for a safe manning document.

The Flag States of the affected vessels i.e. Cyprus, Bermuda and the Bahamas should immediately withdraw the vessels' safe manning documents whilst they await revised proposals from the company based on their proposed operating patterns.

Nautilus International
24 March 2022



Dumped personal belongings

ABOUT NAUTILUS INTERNATIONAL

Nautilus International is the trade union and professional organisation for maritime professionals at sea and ashore. We represent 20,000 maritime professionals including ship masters (captains), officers, officer trainees (cadets) and shipping industry personnel, such as ship pilots, inland navigation workers, vessel traffic services operators (similar to air traffic control), harbourmasters, seafarers in the oil and gas industry, and shore-based staff.



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