

Department of Economic Development

Isle of Man Ship Registry

Consultation Paper:

Proposed Minimum Safe Manning Regulations

This consultation paper sets out the Isle of Man Government's proposals to implement new Regulations in order to give effect to a recent amendment to SOLAS Chapter V Regulation 14 – Ships' Manning which entered into force internationally on 01 January 2014.

Please examine this consultation paper and if you have any comments please send them (preferably by email) to -

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This consultation will close at 5.00pm on 6th May 2014.

A summary of the responses received to the consultation will be made available to the public via the Isle of Man Ship Registry website (<u>www.iomshipregistry.com</u>) within 3 months of the closing of the consultation.

Section 1 Introduction

1. The Isle of Man Ship Registry intends to make new Regulations to implement regulation 14 of SOLAS V - Ship's Manning. This consultation sets out the measures the Ship Registry proposes to use for ensuring all ships are sufficiently and efficiently manned.

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

- a. warships, naval auxiliaries and other ships owned or operated by a Contracting Government and used only on Government non-commercial services;
- b. ships operating solely in Isle of Man territorial waters;
- c. commercial yachts (a separate consultation paper will be issued explaining the minimum safe manning requirements applicable to commercial yachts);
- d. fishing vessels;
- e. ships not propelled by mechanical means; and
- f. wooden ships of primitive build.

2. Pleasure vessels

The Regulations will require pleasure vessels registered with the Isle of Man to comply with the manning requirements as stated in MSN 033 (shown in the Appendix to this consultation paper). These vessels are not subject to a survey and inspection regime and they do not require a minimum safe manning document. However if any of these vessels are involved in an accident and it is subsequently shown that the manning levels do not meet the requirements stated in MSN 033, the owner could be prosecuted. Please note: when the new manning Regulations enter into force the existing Merchant Shipping (Pleasure vessel) (manning) regulations 1989 (GC 121.89) will be revoked.

3. Minimum Safe Manning Document

All Isle of Man registered commercial ships engaged on international voyages are required to be issued with a minimum safe manning document. The Regulations will require the following requirements which have been produced taking into account IMO Resolution A.1047(27) Principles of Minimum Safe Manning -

It will be an offence for the ship's operator and the ship's Master for a vessel to 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 less than 500GT this will be called a Manx Minimum Safe Manning Document.

In order to obtain a minimum safe manning document the ship's operator shall apply for a minimum safe manning document by taking into account the guidelines stated in Section 2 and the procedures stated in Section 3 of this consultation paper. Once received the Ship Registry will evaluate the application and if satisfied the proposal meets the requirements (stated in Section 4) a minimum safe manning document will be issued valid for a maximum period of 5 years.

Ships already registered with the Isle of Man will not have to re-apply for a minimum safe manning document.

Changes that affect the ship's manning

Following any changes which may affect the ship's safe manning (refer to Section 3) the ship's operator must prepare and submit a new proposal for the ship's minimum safe manning.

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 (see Section 4).

Withdrawal of minimum safe manning document

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

- a. the ship's operator 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.

4. Port State Control

Foreign (non-Isle of Man registered) commercial vessels of 500GT or over 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 the vessel is not manned in compliance with the vessel's minimum safe manning document, this may result in the vessel being detained until any deficiency has been rectified and the ship's operator may be prosecuted.

5. Ship's Operator

For the purpose of this consultation paper "operator" in relation to a ship means the owner or any other person who has assumed responsibility for the operation of the ship from the owner and who on assuming that responsibility has agreed to take over all the duties and responsibilities that will be imposed by the minimum safe manning regulations.

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

The following guidelines have been developed to assist companies 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 operator 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 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 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 safe manning document for each mode.

3. Watchkeeping

a. Master and 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 certain 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. Such an application must state –

- the number of cabins available on the vessel;
- the tour of duty and leave ratio of the seafarers on the vessel; and
- the average length of voyages and time spent in port.

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

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

Table 1 Master and deck department - Guidance for minimum manning

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 under the provisions for unattended machinery spaces, the chief engineer should not be required to keep regular watches and a three-watch system should be adopted. However under certain circumstances the Ship Registry may consider a minimum safe manning application for vessels with propulsion power of less than 3000kW which would require the Chief Engineer to keep a regular watch. Such an application must state –

- the number of cabins available on the vessel;
- the tour of duty and leave ratio of the seafarers on the vessel; and
- the average length of voyages and time spent in port.

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

Vessel category	Manning scale
Vessels with	Chief Engineer (STCW Reg. III/2)
propulsion power	Second Engineer (STCW Reg. III/2)
of 3000kW or more	Officer in charge of an engineering watch (STCW Reg. III/1)
classed for UMS	1 Engine room rating (STCW Reg. III/4 or III/5)
Vessels with	Chief Engineer (STCW Reg. III/2)
propulsion power	Second Engineer (STCW Reg. III.2)
of 3000kW or more	2 Officers in charge of an engineering watch (STCW Reg. III/1)
not classed for	3 Engine room ratings (STCW Reg. III/4 or III/5)
UMS	
Vessels of 750kW	Chief Engineer (STCW Reg. III/3)
or over but less	Second Engineer (STCW Reg. III/3)
than 3000kW	1 Engine room ratings (STCW Reg. III/4 or III/5)
classed for UMS	
Vessels of 750 kW	Chief Engineer (STCW Reg. III/3)
or over but less	Second Engineer (STCW Reg. III/1)
than 3000kW not	2* Officer in charge of an engineering watch (STCW Reg. III/1)
classed for UMS	2 Engine room ratings (STCW Reg. III/4 or III/5)
	* Under certain circumstances this may be reduced (see
	paragraph 3b).

Table 2 Engine room – Guidance for minimum manning

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.

e. Engineers on vessels of less than 750kW propulsion power

The Ship Registry may stipulate on a case by case basis that an engineer qualified to 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 MS (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 4.3). 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 046 STCW Convention regulation VI 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 training and experience needed should also be taken into account.

10. 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, firefighting 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; and
- undertake administrative tasks required for the safe operation and the security of the ship.

Section 3 Responsibility of the ship's operator

For all ships registering with the Isle of Man the ship's operator 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 operator should apply the objectives and principles of safe manning as stated in Section 5 and take into account the guidelines in Section 2 of this consultation paper and the ship's operator 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 Section 3.1 (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.

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 operator 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 Regulations implementing 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 consultation paper; 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 operator 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. 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

This 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 nearstationary 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.

APPENDIX

MANX SHIPPING NOTICE MSN 033 Rev 1 Date XXX



DEPARTMENT OF ECONOMIC DEVELOPMENT

Pleasure Vessel Manning

The objective of this MSN is to clarify the Isle of Man Ship Registry's position regarding safe manning of pleasure vessels.

Documents referred to in this notice:

- SOLAS Chapter V Regulation14; and
- The Large Commercial Yacht Code.

Most regulations and notices are available on the Isle of Man Government website: <u>www.iomshipregistry.com</u> or by contacting <u>marine.survey@gov.im</u>

SOLAS V Regulation 14 is applicable to all ships including pleasure vessels. This Regulation requires that a vessel's flag Administration maintain or adopt measures for the purpose of ensuring that all ships are sufficiently and efficiently manned.

This Administration requires that pleasure vessels of 24m in Load Line length and above registered with the Isle of Man comply with minimum manning requirements specified for vessels compliant with the Large Commercial Yacht Code. Although the manning of Manx pleasure vessels is not monitored and controlled by this Administration, and while pleasure vessels are not required to be issued with a minimum safe manning document, it may be noted that, should any vessel be involved in an accident in which manning not in compliance with flag requirements was deemed a contributory factor, the vessel's owner may be placed at risk of prosecution.

Manning requirements specified in the Large Commercial Yacht Code are reproduced in the tables and related notes below. Any request for deviation from the requirements shown must be submitted to the Isle of Man Ship Registry for consideration and agreement.

COMMERCIAL AND PLEASURE MOTOR YACHTS UNDER 500 GT and <3000kW

Miles from a Safe Haven	≥24 metres < 200GT	200 – 500GT
Up to 60	YM Offshore	Master (Y)
	Coastal Skipper (sailing yachts only)	Coastal Skipper
	Engineer (AEC)	Chief Engineer (Y4)
		Engineer (AEC)
	One Yacht Rating	Two Yacht Ratings

Miles from a Safe Haven	≥24 metres < 200GT	200 – 500GT
Up to 150	YM Offshore	Master (Y)
-	Coastal Skipper	YM Offshore
	Engineer (MEOL (Y))	Chief Engineer (Y3)
		Engineer (MEOL (Y))
	One Yacht Rating	Two Yacht Ratings

Miles from a Safe Haven	≥24 metres < 200GT	200 – 500GT
Over 150	YM Ocean	Master (Y)
	YM Offshore	OOW (Y)
		YM Offshore
	Chief Engineer (Y4)	Chief Engineer (Y3)
		Chief Engineer (Y4)
	Engineer (MEOL (Y))	
	Two Yacht Ratings	Two Yacht Ratings

COMMERCIAL AND PLEASURE MOTOR YACHTS OVER 500GT

Miles	500 – 3000GT	500 – 3000GT	500 – 3000GT
from a	< 3000 kW	3000 kW to	6000 kW to
Safe Haven		< 6000 kW	< 9000 kW
Up to 60	Master (Y)	Master (Y)	Master (Y)
	00W (Y)	00W (Y)	00W (Y)
	Chief Engineer (Y3)	Chief Engineer (Y2)	Chief Engineer (Y1)
	Chief Engineer (Y4)	Chief Engineer (Y3)	Chief Engineer (Y3)
	Two Yacht Ratings	Two Yacht Ratings	Two Yacht Ratings

Miles from a Safe Haven	500 – 3000 GRT < 3000 kW	500 – 3000 GRT 3000 kW to < 6000 kW	500 – 3000 GRT 6000 kW to < 9000 kW
Up to 150	Master (Y)	Master (Y)	Master (Y)
	Chief Mate (Y)	Chief Mate (Y)	Chief Mate (Y)
	Chief Engineer (Y2)	Chief Engineer (Y2)	Chief Engineer (Y1)
	Chief Engineer (Y3)	Chief Engineer (Y3)	Chief Engineer (Y2)
L	Two Yacht Ratings	Two Yacht Ratings	Two Yacht Ratings

Miles from a Safe Haven	500 – 3000 GRT < 3000 kW	500 – 3000 GRT 3000 kW to < 6000 kW	500 – 3000 GRT 6000 kW to < 9000 kW
Over 150	Master (Y)	Master (Y)	Master (Y)
	Chief Mate (Y)	Chief Mate (Y)	Chief Mate (Y)
	00W (Y)	00W (Y)	00W (Y)
	Chief Engineer (Y2)	Chief Engineer (Y1)	Chief Engineer (Y1)
	Chief Engineer (Y3)	Chief Engineer (Y3)	Chief Engineer (Y1)
	Two Yacht Ratings	Two Yacht Ratings	Two Yacht Ratings

Additional information

- a. On a case-by-case basis, consideration will be given to the acceptance by this Administration for a limited period of second engineers who are working towards obtaining the certification stipulated. Any such acceptance will take into consideration the engineer's previous experience.
- b. Yachts fitted with two or more engines:
 - Yachts under 500GT: on application, the Ship Registry may consider accepting officers certified to act as chief/second engineer on propulsion plants of less than the vessel's total installed power, provided the output power of a single engine does not exceed the engineer's certified maximum competency.
 - Yachts over 500GT: total (combined) propulsion power is the deciding factor.
- c. Engineer officers in possession of (Merchant Navy) STCW certificates of competency, or issued with commercially endorsed certificates of competency issued by the UK RYA, or the IYT are not required to be additionally issued with endorsements attesting to the acceptance of their certificates of competency by this Administration. Engineers in possession of certificates of competency issued by recognised countries other than the UK, and by organisations other than the UK RYA and the IYT, will need to apply to the Isle of Man Ship Registry for the issue of an endorsement.
- d. The definition of Y1 Y4 are as stated on the Certificates of Competencies issued by the UK MCA as follows -
 - Y4: yachts <200GT and <1500kW propulsion power. The certificate of competence will not state 'Y4' but will confirm competence as 'chief engineer III/3' with relevant limitations.
 - Y3: yachts <500GT and <3000kW propulsion power. The certificate of competence will not state 'Y3' but will confirm competence as 'chief engineer III/2' with relevant limitations.
 - Y2: yachts <3000GT and <3000kW propulsion power. The certificate of competence will not state 'Y2' but will confirm competence as 'chief engineer III/2' with relevant limitations.
 - Y1: yachts <3000GT and <9000kW propulsion power. The certificate of competence will not state 'Y1' but will confirm competence as 'chief engineer III/2' with relevant limitations.
- e. Chief engineers on vessels issued with Merchant Navy CoCs which do not state 'III/2 chief engineer', or 'III/3 chief engineer' should ensure they are in possession of a letter from this Administration confirming our agreement to their acting as chief engineer onboard in order to resolve questions from port state officials.
- f. A deck officer with an AEC or MEOL qualification will be accepted for an engineering post requiring that qualification provided he or she is not the Master and provided the minimum safe manning numbers are maintained.
- g. The requirements for engineers on yachts under 500GT with propulsion power greater than 3000kW may be accepted on a case-by-case basis, provided they have a simple engine room layout and engine configuration. Where engine power is over 3000kW and the engine room layout or engine configuration is complicated, these requirements may be re-assessed.
- h. **Sailing yachts** Manning requirements for sailing yachts are as shown on the above tables. On application, consideration will however be given, on a case-by-case basis, to accepting engineers with lesser qualifications.

For sailing yachts over 500GT, generally an additional yacht rating is required giving a minimum of three. For a sailing yacht equipped with a system permitting simple centralised sail operation, consideration will be given to reducing this number to two.