ITF CRUISE SHIP SAFETY POLICY

INTRODUCTION

The ITF Cruise Ship Safety Policy reflects the additional measures required as a result of the great number of passengers and crew carried and builds upon the other ITF policies addressing maritime safety issues. The policy document should be regarded as a living document and lays down the demands of the seafarers' trade unions in regard to what they consider to be essential minimum standards for the protection of the safety of life at sea and the marine environment. In addition to a number of design and equipment issues, the human element aspects are of particular concern since there is a need to adopt a holistic approach. The human element aspects are integral to the safety of ships and vessels which are deficient in these aspects should also be considered as being unseaworthy. Therefore, there should be an adequate number of suitably qualified and medically fit seafarers who are familiar with their duties and the layout of the particular vessel, who share a common working language and are adequately rested and not impaired by fatigue. The seafarers should also be able to communicate with the passengers and be able to assist them in emergency situations. The seafarers should be familiar with the company's safety management policy.

The ITF defines the term seafarers as every person employed or engaged in any capacity on board a ship. This definition is complementary to the definition of a passenger which is contained in Regulation 2 of Chapter I of the SOLAS Convention; it states that a passenger is every person other than the master and the members of the crew or other persons employed or engaged in any capacity on board a ship on the business of that ship.

The trade union demands are determined on the basis of the requirements which should be applied to new cruise ships and those which should also be applied retroactively to existing vessels, it being clearly understood that all human element and operational issues apply equally to both new and existing passenger vessels.

CONCERNS

New Ships

The current trend within the industry is for new cruise ships to be larger and to carry an increasing number of passengers, with a larger ship's compliment to cater for their needs. The 1995 SOLAS Conference suggested that the recommendatory time for the evacuation of a ro-ro passenger vessel should be within 60 minutes of the abandoned ship signal being given (Conference Resolution No. 4). It is suggested that 30 minutes is more realistic and that a similar standard should be adopted for all passenger vessels with a requirement that the design of new passenger ship ensures that such a requirement can realistically be met.

Even if all the passengers and seafarers are evacuated from the ship and accommodated in lifeboats, there is still a need to ensure that search and rescue facilities and other vessels that come to their aid are able to assist them. It is therefore suggested that there is a need to establish a maximum number of persons who can be carried on a ship at anyone time, including passengers and crew, and that the maximum number should depend on operational area and the available search and rescue facilities.

For some time it has been understood that life boats should not be placed more than 14 metres above the water. Most cruises ships delivered in the last few years have been designed in that way. The problems associated with high sided vessels are well known and were graphically demonstrated during the ESTONIA disaster. Therefore, a SOLAS Regulation prohibiting the installation of life boats at a height of more than 14 metres above the water should be adopted.

Experience has cast doubt on the adequacy of existing life saving appliances. The current equipment, especially life boats and life rafts, has proved to be inadequate when confronted with high sea states and attention should be given to investigating how modern technology and new designs could improve the survivability of those forced to abandon ship in all sea states.

New novel designs for cruise ships are being contemplated on an ongoing basis. Vessels are being designed with internal plazas or streets, with open spaces far exceeding the 40 (48) metre limit. The current requirement that a fire zone on a cruise ship may not exceed 40 (48) metres is evaded through the addition of large fire doors. However, such doors might not close if the ship is listing more than a few degrees or in adverse weather conditions. Therefore, it is essential that such novel designs are prohibited or a mechanism is provided which will ensure that the fire doors can be closed in all circumstances, including during a loss of electrical power and when the vessel is subject to considerable degrees of list.

The current rules regarding the survivability of a cruise ship require that it should remain afloat with any two of its watertight compartments flooded. Perhaps it is time that consideration is given to requiring future cruise ships to be built with double hulls and to ensure that they will remain afloat with three to five flooded compartments.

The cruise lines have not found it visually pleasing or of economic benefit to equip their vessels with helicopter landing platforms. The ITF regrets the fact that IMO has decided to revoke the SOLAS requirement adopted in 1995 to make a helicopter landing area a mandatory requirement for new passenger ships over 130 metres. Indeed, the ITF considers that such a requirement should have been applied retroactively to existing vessels.

Existing Ships

One of the greatest concerns for the safety of cruise ships is the risk of fire and with so many passengers and seafarers on board there is a considerable risk that the fire could start in one of the cabins. The smoke that is likely to be generated could considerably hamper the ability of the passengers and seafarers to escape. Therefore, smoke detectors should be fitted in all passenger and crew cabins. In order to ensure prompt action is taken, the signals from the smoke detectors should enable the ships crew to activate the local automatic sprinkler system.

Experience has also shown that many ship fires start within the engine room and that they may break out of the containment provided. Therefore, greater attention should be given to preventing the occurrence of fires within the machinery spaces, which will required heightened degrees of maintenance, and that great attention is also given to ensuring that any fires which may break out are contained. Other incidents have shown that the configuration of the ship may limit the capacity of crew to effectively fight the fire and such structural impediments should be removed.

Most cruise ships do not have facilities enabling a helicopter to land on board and therefore they must hoist passengers and seafarers from the ship during a medical evacuation or other emergencies.

Human Element and Operational Issues

For assisting passengers with special needs in an emergency situation, an adequate number of seafarers should be specially trained and provided with suitable documentary evidence to attest to the fact that they have been adequately trained in the evacuation of passengers with special needs. As the ITF considers all the personnel employed or engaged on cruise ships as seafarers, it goes without saying that they should receive appropriate training. The ITF is also mindful that when the IMO adopted the 1997 amendments to the STCW Convention it was on the understanding that the basic safety training requirements in Chapter VI of the STCW Convention already applied to personnel on passenger ships who are nominated or designated to assist passengers in emergencies, particularly with regard to the hotel department personnel. Therefore, the new regulations must be read as reflecting additional training for personnel with special duties on passenger ships. Given the large number of passengers it is self evident that all the personnel and not just the maritime contingent will have both duties and a crucial role to play in emergency situations. It is therefore essential that they received adequate training, including in crisis management.

At least two seafarers should be assigned to each cabin where passengers are considered to require or have themselves informed the ship's management that they would require special assistance in order to evacuate the vessels safely in an emergency situation. Passengers with special needs should include elderly and disabled persons and families with young children. Passenger ships should carry a certificate stating the number of passengers with special needs which the ship is allowed to carry. Furthermore, an entry should be made in the log book, of the

numbers of passengers having declared or being deemed to require special assistance in an emergency situation, and of the number of seafarers who hold the necessary documentary evidence attesting their special training.

One of the current problems within the cruise ship industry is the high turnover of seafarers. It is not uncommon for the average turnover rate to be between 25% and 35% per year and this has considerable implications for the implementation of the ISM Code and the safety of the vessel. Consideration should therefore be given to measures which will make the industry more attractive and thereby reduce such unacceptably high turnover rates. One such measure would undoubtedly be to professionalise many of the positions and functions through the adoption of formal qualifications and certification requirements.

ILO Convention No. 164 (Health Protection and Medical Care for Seafarers) provides that vessels carrying 100 or more seafarers and ordinarily engaged on international voyages of more than three days duration, shall carry a medical doctor (Article 8). However, the large number of persons carried on cruise and ro-ro passenger vessels indicates the crucial role they can play in the evacuation of survivors from other maritime casualties and incidents clearly shows the need for the adoption of an international minimum standard on the carriage of medical personnel and the medical facilities which should be available. Technological developments have considerably enhanced communications and have led to significant developments within the area of telemedic facilities. The carriage of such facilities by cruise vessels should considerably enhance the ability of the ship's medical personnel to deal with medical emergencies.

The inherent difficulties of evacuating a large cruise ship in case of an emergency should be looked at. An international standard regarding the safe evacuation of passengers and crew from a cruise vessel to the shore should be developed. The rule should require all cruise ships to file an emergency response plan indicating how they will work with local and international authorities to evacuate the ship safely and speedily in an emergency.

A significant number of maritime casualties have demonstrated the risk of fire on passengers ships and measures to prevent fires starting in the first place would compliment technical solutions. To this end there is a need to establish within international minimum standards a regulation which will set out the functions, knowledge and competencies of a specially designated person who should be responsible for fire prevention and fire fighting.

The ILO Code of Practice for Accident Prevention On Board Ship at Sea and in Port provides practical recommendations for those who have responsibility for safety and health on board ship and provides useful guidance for seafarers. It also calls for the establishment of a safety and health committee with well defined powers and responsibilities on all ships. Integral to such a committee are the appointment of elected seafarers' safety representatives.

The ITF and its affiliated unions should have as a policy that we should work to establish a rule in all relevant international instruments eliminating all grandfather clauses and establishing a very short transition period for existing ships when the standards change.

Environment aspects

The Cruise Ship Safety Policy should be read in conjunction with the ITF Maritime Environmental Policy, central to which is that a competent, well-educated and responsible crew should also be concerned with environmental matters and, while it is a prerequisite for environmental equipment to be installed on ships, it must also be used in an effective manner. Therefore, professional and vocational training should also seek to raise environmental consciousness.

The ITF believes that all international minimum standards should be fully complied with and it is the ITF's objective to promote good environmental practices and to promote the achievement of higher standards that those currently provided by the present requirements established by applicable international instruments.