

KPI Information Update IU-45-2013 **(Administrative burdens on board ships)**

The following report has been extracted from the research findings by the "Danish Maritime Authority" concerning the various administrative & bureaucratic burdens which affect the seafarers as well as ship owners & operators.

Administrative burdens are defined as "administrative work which in the opinion of the stakeholder is not adding value proportionate to the resources the stakeholder will have put in to the work to comply with specific rules and requirements".

The summary conclusion is that the amount of administrative tasks is decisive rather than the individual task. Seafarers have a perception that they spend 20 per cent of their working hours on tasks that do not add value corresponding to the effort made, i.e. administrative burdens.

► Main findings:

Over the last 20 years the maritime system and all the stakeholders involved in the maritime sector have aimed to continually improve safety and efficiency at sea. The efforts have mainly focused on the creation of formal standardised procedures and requirements to create safety and efficiency. This approach has had a positive effect on safety up to this point. On the other hand; gradually the documentation and control requirements have grown larger, more complex and more time consuming.

In the international seafarers' survey, 30 % of seafarers feel that they spend too much time on tasks that can be considered administrative burdens. These burdens primarily stem from unnecessary repetition of tasks and demands for too much paperwork and documentation to be handled.

A cautious conclusion could be that the substantial level of administrative burdens, which seafarers and ship-owners

experience, reflects a significant potential to reallocate time to more fruitful tasks within the sector. This could possibly lead to increased efficiency and quality.

It is essential to underline that the seafarers and ship-owners understand the rationale underlying most procedures and requirements even though these may lead to administrative burdens. They acknowledge that such procedures are not implemented with the aim of being 'a burden', but that they in principle serve higher-end objectives like personal safety and environmental protection. However, many are worried that the marginal utility of more procedures and requirements could now be negative: That procedures and requirements introduced with the intention of protecting people and the environment can in fact obstruct that aim.



► **Specific observations:**

1. Seafarers of all nationalities perceive administrative burdens in the maritime sector as frustrating and burdensome.

The international survey indicates that the perception of administrative burdens among seafarers is more or less universal. In comparing nationalities and possible cultural influences on the perception of administrative burdens, the perceptions from seafarers from 59 countries are relatively similar in terms of what work tasks are considered an administrative burden and why that is the case.

2. Seafarers are concerned about ship safety and take great professional pride in their jobs. Many requirements and procedures are thus understood and accepted as a natural part of working routines.

Many seafarers say that they consider drills to be meaningful because both their own safety and that of the ship is at stake. Realistic scenarios are rehearsed so that all staff knows what to do in the event of e.g. a fire, man over board or other serious incidents.

3. Seafarers and ship-owners experience that there are significant potentials for standardisation and optimisation concerning port and pre-arrival documents and processes.

The surveys show that the procedures concerning port and pre-arrival documents are considered a burden.

4. The seafarers find ISPS rules to be somewhat burdensome and do not always acknowledge that they lead to a reduction of the risk of terror actions in ports.

The seafarers do not find the ISPS rules more time-consuming than most other areas of work.

5. The seafarers and ship-owners consider possibilities for the exchange and sharing of inspection data among those responsible to be underutilised.

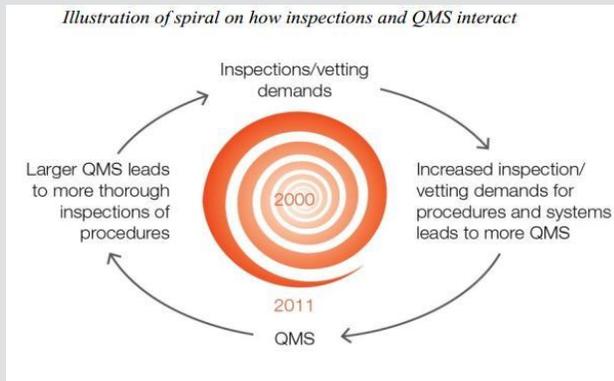
There are substantial burdens associated with inspections and vetting. Two-thirds of international seafarers feel that tasks in this relation are being performed too often and almost 75 % feel that there is too much paperwork involved. Seafarers especially from tanker ships consider vetting inspections to be highly time consuming and very annoying.

6. The seafarers experience that various incentive schemes in place for those performing inspections lead to increased burdens for well-performing ships and have a detrimental effect on the ability of the inspections to actually serve their purpose.

During the studies, many seafarers have mentioned issues associated with inappropriate incentives. For example, at port state control inspections, many seafarers have the impression that some countries measure their performance in relation to PSC by the number of ships inspected. This in some places leads to a practise of selecting well-performing ships for inspection.

7. Despite a general acceptance of the need for inspections, seafarers and ship-owners perceive the inspection regime to have grown to a disproportionate level where inspections focus on unnecessary detail.

Inspections take place when the ship is in port and has many other tasks. This makes inspections a very stressful procedure that sometimes takes so much attention that safety in e.g. cargo operations can be jeopardised. Some seafarers describe the development over the last 10 years as a vicious circle in which increasing demands from inspections and vetting leads to an increased level of detail and documentation in the internal QMS systems. This again leads to focus on more detail in the inspections.



8. The seafarers acknowledge that QMS is installed for a reason but there is a perception among seafarers that QMS procedures are becoming more and more burdensome. On the other hand, ship-owners find it frustrating to implement new rules with various national interpretation or implementation forcing them to produce large QMS to encompass all the national differences.

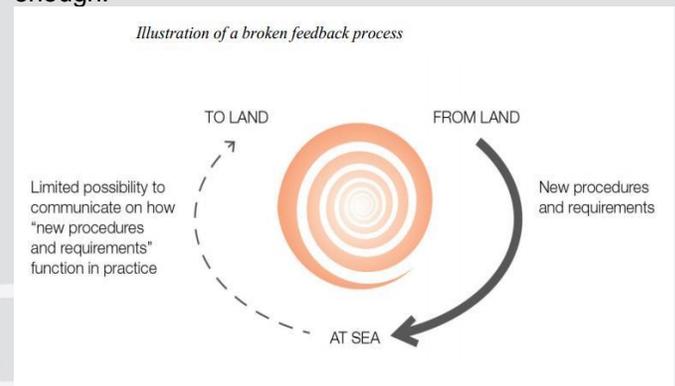
Handling of the QMS is also perceived as a heavy burden by many seafarers. One example is when journal entries have to be repeated and entered into QMS as well as one or many other nearly the same log-books.

The seafarers understand the reasons behind most of the procedures, but at the same time complain about the amount of paperwork. They find that it is sometimes more important to document correct behaviour on paper than to actually follow through on efficient environment-friendly or safe-ship operations.

9. Seafarers find that there is a lack of responsiveness to look into the consequences of new procedures and paperwork introduced to the vessels.

Not only do many seafarers describe that they are to implement rules and procedures at a growing pace, they also ask for better communication channels between land and sea to enable them to submit their ideas and suggestions related to procedures. They often feel as the last link of the chain with limited feedback opportunities. An example of this disturbing finding is the fact that 33 % of

international seafarers have not during the last three years been approached by a ship manager, a senior officer, a ship-owner or a DPA (designated person ashore) to give feedback. Also, many captains/masters have experienced the annual master's review as a mechanism that does not function well enough.



10. Some ship-owners mention a range of special requirements and conditions that produce unnecessary administrative burdens for the ship-owners' offices.

The ship-owners point to a number of human resource-related issues that all require administrative tasks on behalf of the ship-owners' offices. According to the ship-owners, the administrative burdens associated with these issues could be eased by introducing digital solutions and, in the case of tax, establishing a separate team with knowledge and competencies about the specific conditions characterising the maritime sector.

11. It is the sum of burdens that matters. Many seafarers and ship-owners indicate that it is not a specific burden which causes frustration. Instead, it is the sheer sum of burdens which has accumulated over the years. Seafarers and ship-owners indicate that rules and procedures have accumulated over the last 5-10 years to an extent where it is now becoming counter-productive.

The seafarers and ship-owners understand the reasons behind most procedures, but at the same time they complain about the level of and

amount of paperwork. The seafarers' experience that document handling, rules, inspections and quality systems are gradually creating an accumulation of paperwork and procedures at sea which removes focus from operational tasks. Some seafarers go as far as to point out that increased burdens have reached a level where it actually might reduce safety and security because filling in papers tend to remove focus from the primary concerns of safety, environment and security in a stressful and busy working environment.

► **A way forward>>>:**

Having presented the main findings and observations, a preliminary agenda for addressing the issue of administrative burdens and continual safety and efficiency improvements in the maritime sector can be suggested as follows:

1. A revived focus on seamanship and safety culture with a view to reducing the number of procedures and burdens.
2. Increased cooperation and dialogue between stakeholders in all areas of the sector: seafarers, ship-owners, classification societies and customers, e.g. oil majors.
3. Development of harmonious 'work smart easy to use' digital solutions to reduce paperwork and time consuming manual workflows.

► **Focus on culture, competences and work smart solutions:**

Improving the feedback mechanism is a way to strengthen the quality of systems by giving seafarers a higher degree of responsibility to apply their skills and knowledge into the improvement of the systems. The issue of poor and time consuming feedback mechanisms may be addressed by:

1-Assessment of consequences: When new systems, procedures and rules are introduced, they should be accompanied by an assessment of consequences for time and resources to implement and maintain these new changes.

2-Best practice sharing: Despite the particularities of the maritime sector, it is possible to find other sectors that share some of the features of the maritime sector, and to analyse efforts undertaken to reduce burdens in these sectors.

3-Monitoring the administrative procedures: and systems to assess whether they fulfil their intended purpose, thus allowing seafarers to spend less time on less critical issues of which they cannot understand the purpose.

4-Reducing administrative burdens in inspections: Regarding inspections, seafarers and ship-owners find that there is a lack of coordination between classification societies, vetting companies and authorities. By increasing the access to and usage of common data this could be improved significantly.

5-Reducing administrative burdens in QMS: Too many meaningless Key Performance Indicators (KPIs) sometimes prevent sensible and efficient prioritisation and management on vessels. Choosing the most important success criteria and rewarding the seafarers for fulfilling them makes it possible to lower the micro management that the current administrative procedures and systems create.

6-Reducing administrative burdens in port documents: Port documents create many frustrations to seafarers when different ports ask for different papers and formats of basically identical data.

