

THE SIRC COLUMN

# How well does the safety code really work?



It is important for seafarers that the impact of the ISM code is properly

assessed says **Syamantak Bhattacharya**, a post-graduate research fellow at the Seafarers' International Research Centre

It seems that the debate about the International Safety Management code is here to stay. In the eight years since it came into force, it has been the subject of countless articles in the maritime press as well as extensive discussions at International Maritime Organisation (IMO) meetings. In addition, in 2003, a range of viewpoints from seafarers and office personnel was published from a survey conducted by Dr Phil Anderson. All these discussions and debates have shown genuine concerns of flag states, industry stakeholders and seafarers about the purpose behind the ISM code and its eventual outcome. The debates featured many arguments and included claims that it benefits only larger companies, it is only a paperwork generating system,

it has potential to benefit through reduced insurance premiums, and many more. Some even called proper compliance "common sense".

In May, a group of experts appointed by IMO concluded another study based on a survey questionnaire to assess the impact and effectiveness of the code's implementation. It concluded that the ISM experience is an overwhelmingly positive one for those who reap the benefit from it. However, the experts also made a number of recommendations and singled out excessive paperwork as the biggest impediment. Further, they suggested that seafarers must be motivated in using the reporting and monitoring systems in the code and they should also be trained and actively involved in reviewing the company SMS. But the group of experts also pointed out an interesting limitation in conducting any such study with statistical data. It identified that the accident and incident statistics are very hard to compare on a global scale due to the lack of any homogeneous standard, and it is even harder to obtain such data in the first place.

It is very important to assess the impact and effectiveness of implementation of the

ISM code and it is true that the ideal way of doing it is by comparing the number of accidents, incidents, near misses and pollution incidents over a length of time, more specifically between the periods before and after the introduction of the code. Such a study on a worldwide scale could have provided us with just the thing needed to reach conclusions. Detailed and comparative result on the performance of the ISM code on different types of ships, ships' flag, crew nationality and so on, is what the industry needs. But as the May study rightly identified, obtaining adequate amount of data from ships and offices and making conclusive findings based on such data was rather tentative.

Major accidents on ships, major pollution incidents and fatalities are generally reported with more certainty. However, under-reporting gets progressively more prevalent as we move from fatal accidents and large-scale pollution to near-misses and seafarers' occupational health-related problems. Reporting such cases is very often considered optional as many remain sceptical about the purpose and consequences of it. Research has shown that social and economic prejudices

preclude people from making such reports. We are not only talking about reports from an AB, bosun, motorman or second engineer, but from the master to the company office, or from the company office to the flag state. Apprehension about reporting takes many forms: fear of being identified with a negative incident such as slipping in the galley, dropping a hammer from a height or even encountering a close quarter situation during navigation. Also, reporting non-conformity or bringing to light deficiencies such as a faulty oily water separator or damaged walkie-talkie set is often associated with slowing down shipboard operation and making things "official". In many situations, seafarers may consider making such reporting unmanly and unprofessional, or associate it with fear of being judged negatively or even being reprimanded. Similarly, certain safety incentive schemes, such as the number of no accident days, are often misconstrued onboard as the minimum accepted level of performance. This silently encourages under-reporting as many jobs get completed on time and without a problem. In these and in a number of other ways, non-reporting has the

potential to become the norm.

Because of these limitations, another method of uncovering the impact and effectiveness of implementation of the ISM code has been through questionnaires. Using this method researchers have attempted to elicit the

opinion. The questionnaires answered and returned in the recent IMO survey were from only those who identified the benefits of the code and supported it, so it was not a true representation of the whole industry. Also, many researchers have found that questionnaire surveys have

in the conclusion of the 2003 questionnaire study. Thus, this form of study has its own drawback and is likely to fail in revealing the real state of the performance of the ISM code.

However, there is a third option: studying how the code works in practice inside

the intricate details of the operations of the code. It would likely expose probable conflicts between what supports and what obstructs proper compliance in the offices as well as onboard ships. This method, which has been successfully used in similar studies in other industries, has the potential to identify a number of factors including the social and economic aspects influencing seafarers in complying with the ISM code.

I am currently conducting research concerning the code's operational effectiveness using this third option. Besides being a research student I have also been in the industry for a very long time. Starting from a deck cadet I progressed to become a master and subsequently a ship manager. During my 15 years in the industry, I have experienced a wide diversity of safety practices both onboard and in the office which has motivated me to embark on this study. My aim is to produce research that will add to the understanding of the practice and operation of the ISM code in a way that will be of value to companies and maritime policy-makers, but most importantly to seafarers.



Cartoon: Susmita and Syamantak Bhattacharya

perception of seafarers and others in the industry about the impacts of the code. But very often such surveys fail to tease out an industry-wide

the potential to draw out the ideal and model answers rather than the true answers to the questions. Interestingly, this theory was also supported

company offices and onboard their ships in greater detail. Such a thorough study involving in-depth interviews and observations would reveal