Federal and International Rules Governing Work, Rest and Duty for Mariners

The American Pilots Association (APA), local APA-member pilot groups, pilot oversight organizations, and individual pilots have been focused on fatigue and its potential dangers for many years. Although there has been, and should continue to be, collaboration between and among local pilot associations, oversight bodies and the APA regarding fatigue mitigation approaches, including pilot work and rest schedules, those familiar with piloting understand that there cannot be a one-size-fits-all approach. As with most aspects of a professional piloting operation, work rules must conform to the nature, timing, routes, and flow of ship traffic in a particular piloting area. What is an effective and appropriate work schedule for one port may not be the best approach in another.

There are various federal and international rules governing the work and rest schedules of mariners, but the U.S. Coast Guard has made clear that these rules (except for the pilot rest period regulations for U.S. Registered Pilots on the Great Lakes) do not apply to maritime pilots who are not assigned as part of a ship’s crew. Nonetheless, these federal rules and international guidance can be instructive references for local efforts aimed at reviewing and improving work rules and guidelines to meet the needs of particular piloting areas. Key portions of this federal and international guidance are summarized below and the full text of the specific statutes, regulations, and guidance are attached.

1. Crewmembers on Vessels Subject to U.S. Manning Requirements.
   a. Hours of Rest - Each person assigned as an officer in charge of a navigational watch and any rated person forming part of this watch must receive a minimum of 10 hours rest in any 24-hour period. This 10 hour rest period can be divided into no more than two periods, of which one must be at least 6 hours in length. 46 C.F.R. § 15.1111.
   b. Hours of Work - A licensed individual in the deck department may not be required to work more than 8 hours in one day. 46 U.S.C. 8104(d).

2. Crewmembers on Tank Vessels Subject to U.S. Jurisdiction. On a tanker, a licensed crewmember may not be permitted to work more than 15 hours in any 24-hour period, or more than 36 hours in any 72-hour period, except in an emergency or drill. In this context, “work” includes administrative duties associated with the vessel, whether performed onboard the vessel or ashore. 46 U.S.C. 8104(n).

3. Mariners Subject to the STCW Code. Generally, under the International Maritime Organization’s STCW Code’s work and rest requirements, officers in charge of a navigational watch and rated crewmembers forming part of the watch must have a minimum of 10 hours of rest in any 24-hour period and 77 hours of rest in any 7-day period. Hours of rest may be divided into no more than two periods, one of which must be at least 6 hours long, and the interval between consecutive periods of rest shall not exceed 14 hours. STCW Code, as amended, Part A, Chapter VIII, Section A-VIII/1.

4. U.S. Registered Pilots Operating on the Great Lakes. U.S. Registered Pilots operating on the Great Lakes, upon completing an assignment at certain designated change points or a series of assignments totaling more than 10 hours with no more than 2 hours rest between assignments, shall not perform piloting services for at least 10 hours. In the event of an emergency or other compelling circumstance, a Registered Pilot may be assigned for service before his or her 10-hour rest period is completed. 46 C.F.R. § 401.451.

January 2012
Crewmembers on Vessels Subject to United States Manning Requirements

46 CFR § 15.1111 - Work hours and rest periods.

(a) Each person assigned duty as officer in charge of a navigational or engineering watch, or duty as a rating forming part of a navigational or engineering watch, on board any vessel that operates beyond the Boundary Line shall receive a minimum of 10 hours of rest in any 24-hour period.

(b) The hours of rest required under paragraph (a) of this section may be divided into no more than two periods, of which one must be at least 6 hours in length.

(c) The requirements of paragraphs (a) and (b) of this section need not be maintained in the case of an emergency or drill or in other overriding operational conditions.

(d) The minimum period of 10 hours of rest required under paragraph (a) of this section may be reduced to not less than 6 consecutive hours as long as—

1. No reduction extends beyond 2 days; and

2. Not less than 70 hours of rest are provided each 7-day period.

(e) The minimum period of rest required under paragraph (a) of this section may not be devoted to watchkeeping or other duties.

(f) Watchkeeping personnel remain subject to the work-hour limits in 46 U.S.C. 8104 and to the conditions when crew members may be required to work.

(g) The Master shall post watch schedules where they are easily accessible. They must cover each affected member of the crew and must take into account the rest requirements of this section as well as port rotations and changes in the vessel’s itinerary.


46 U.S.C. 8104(d) – Watches.

(d) On a merchant vessel of more than 100 gross tons as measured under section 14502 of this title, or an alternate tonnage measured under section 14302 of this title as prescribed by the Secretary under section 14104 of this title (except a vessel only operating on rivers, harbors, lakes (except the Great Lakes), bays, sounds, bayous, and canals, a fishing, fish tender, or whaling vessel, a fish processing vessel of not more than 5,000 gross tons as measured under section 14502 of this title, or an alternate tonnage measured under section 14302 of this title as prescribed by the Secretary under section 14104 of this title, yacht, or vessel engaged in salvage operations), the licensed individuals, sailors, coal passers, firemen, oilers, and water tenders shall be divided, when at sea, into at least 3 watches, and shall be kept on duty successively to perform ordinary work incident to the operation and management of the vessel. The requirement of this subsection applies to radio officers only when at least 3 radio officers are employed. A licensed individual or seaman in the deck or engine department may not be required to work more than 8 hours in one day.
Crewmembers on Tank Vessels Under the Jurisdiction of the United States


(n) On a tanker, a licensed individual or seaman may not be permitted to work more than 15 hours in any 24-hour period, or more than 36 hours in any 72-hour period, except in an emergency or a drill. In this subsection, "work" includes any administrative duties associated with the vessel whether performed on board the vessel or onshore.
Chapter VIII
Standards regarding watchkeeping

Section A-VIII/1
Fitness for duty

1. Administrations shall take account of the danger posed by fatigue of seafarers, especially those whose duties involve the safe and secure operation of a ship.

2. All persons who are assigned duty as officer in charge of a watch or as a rating forming part of a watch and those whose duties involve designated safety, prevention of pollution and security duties shall be provided with a rest period of not less than:

   .1 a minimum of 10 hours of rest in any 24-hour period; and
   .2 77 hours in any 7-day period.

3. The hours of rest may be divided into no more than two periods, one of which shall be at least 6 hours in length, and the intervals between consecutive periods of rest shall not exceed 14 hours.

4. The requirements for rest periods laid down in paragraphs 2 and 3 need not be maintained in the case of an emergency or in other overriding operational conditions. Musters, fire-fighting and lifeboat drills, and drills prescribed by national laws and regulations and by international instruments, shall be conducted in a manner that minimizes the disturbance of rest periods and does not induce fatigue.

5. Administrations shall require that watch schedules be posted where they are easily accessible. The schedules shall be established in a standardized format in the working language or languages of the ship and in English.

6. When a seafarer is on call, such as when a machinery space is unattended, the seafarer shall have an adequate compensatory rest period if the normal period of rest is disturbed by call-outs to work.

7. Administrations shall require that records of daily hours of rest of seafarers be maintained in a standardized format in the working language or languages of the ship and in English, to allow monitoring and verification of compliance with the provisions of this section. The seafarers shall receive a copy of the records pertaining to them, which shall be endorsed by the master or by a person authorized by the master and by the seafarers.

8. Nothing in this section shall be deemed to impair the right of the master of a ship to require a seafarer to perform any hours of work necessary for the immediate safety of the ship, persons on board or cargo, or for the purpose of giving assistance to other ships or persons in distress at sea. Accordingly, the master may suspend the schedule of hours of rest and require a seafarer to perform any hours of work necessary until the normal situation has been restored. As soon as practicable after the normal situation has been restored, the master shall ensure that any seafarers who have performed work in a scheduled rest period are provided with an adequate period of rest.

9. Parties may allow exceptions from the required hours of rest in paragraphs 2.2 and 3 above provided that the rest period is not less than 70 hours in any 7-day period.

*The IMO/ILO Guidelines for the development of tables of seafarers' shipboard working arrangements and formats of records of seafarers' hours of work or hours of rest may be used.*
Exceptions from the weekly rest period provided for in paragraph 2.2 shall not be allowed for more than two consecutive weeks. The intervals between two periods of exceptions on board shall not be less than twice the duration of the exception.

The hours of rest provided for in paragraph 2.1 may be divided into no more than three periods, one of which shall be at least 6 hours in length, and neither of the other two periods shall be less than one hour in length. The intervals between consecutive periods of rest shall not exceed 14 hours. Exceptions shall not extend beyond two 24-hour periods in any 7-day period.

Exceptions shall, as far as possible, take into account the guidance regarding prevention of fatigue in section B-VIII/1.

10 Each Administration shall establish, for the purpose of preventing alcohol abuse, a limit of not greater than 0.05% blood alcohol level (BAC) or 0.25 mg/l alcohol in the breath or a quantity of alcohol leading to such alcohol concentration for masters, officers and other seafarers while performing designated safety, security and marine environmental duties.
United States Registered Pilots Operating on the Great Lakes

46 CFR § 401.451 - Pilot rest periods.

(a) Except as provided in paragraph (b) of this section:

(1) Each Registered Pilot upon completing an assignment at a change point designated in § 401.450, and

(2) Each Registered Pilot upon completing a series of assignments totaling more than 10 hours with no more than 2 hours rest between assignments, shall not perform pilotage services for at least 10 hours.

(b) In the event of an emergency or other compelling circumstances a pilotage pool may assign a Registered Pilot for service before his 10-hour rest period required under paragraph (a) of this section is completed. Pilotage pools shall advise the Director of each assignment made under this paragraph.