



Rev. 0

**REPUBLIC of SAN MARINO**  
**MARITIME AUTHORITY**

***MAIN CONTACT: SAN MARINO SHIP REGISTER***

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**San Marino Policy Letter**

**SMPL – 2022-TEC-005**

**06 October 2022**

**San Marino Ship Register SMSR**

**Principles of Minimum Safe Manning**

TO: Recognised Organisations, Shipowners, Managers, Masters, Seafarers, SMSR partners, SMSR brokers, Surveyors, and the general public.



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**Principles of Minimum Safe Manning**

**1. Introduction**

The Administration applies the provisions of IMO res. A.1047(27) “Principles of Minimum Safe Manning” to all ships flying the San Marino Flag, to which article III of the 1978 STCW Convention, as amended, and chapter XI-2 of the 1974 SOLAS Convention, as amended, apply.

These Guidelines complement the provisions set forth in the San Marino Small Yacht Safety Code and Large Yacht Safety Code.

The Company shall propose to the Administration Minimum Safe Manning Documents in line with the provisions of this Policy Letter, as well as SMPL Hours of work and rest.

**2. Principles of Safe Manning**

San Marino-flagged vessels shall be sufficiently, effectively, and efficiently manned to provide safety and security, safe navigation and operations at sea, safe operations in port, prevention of human injury or loss of life, the avoidance of damage to the marine environment and to property, and to ensure the welfare and health of seafarers through the avoidance of fatigue.

The following principles should be observed in determining the minimum safe manning of a ship.

2.1 The ship shall have the capability to:

- a) 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.
- b) moor and unmoor the ship safely.
- c) manage the safety functions of the ship when employed in a stationary or near-stationary mode at sea.
- d) perform operations, as appropriate, for the prevention of damage to the marine environment
- e) maintain the safety arrangements and the cleanliness of all accessible spaces to minimize the risk of fire.
- f) provide for medical care on board ship.



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- g) ensure safe carriage of cargo during transit.
- h) inspect and maintain, as appropriate, the structural integrity of the ship; and
- i) operate in accordance with the approved Ship's Security Plan.

2.2 The ship shall have the ability to:

- a) operate all watertight closing arrangements and maintain them in effective condition, and also deploy a competent damage control party.
- b) 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 on board; and
- c) operate the main propulsion 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.

2.3 Ongoing training shall be scheduled regularly for all personnel, including the operation and use of fire-fighting and emergency equipment, life-saving appliances, and watertight closing arrangements. Specialized training requirements shall be taken into consideration for specific types of ships and in instances where crew members are engaged in shipboard tasks that cross departmental boundaries. New entrant seafarer training shall be scheduled to gain the necessary skills and experience.

2.4 In addition, provisions shall be made for the following requirements:

- a) Proper food and drinking water supply.
- b) Assignment of emergency duties and responsibilities.

**3. Guidelines for the determination of safe manning**

3.1 The minimum safe manning of a ship should be established taking into account all relevant *factors*, including but not limited to

- a) size and type of ship
- b) number, size, and type of main propulsion units and auxiliaries



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- c) level of ship automation
- d) construction and equipment of the ship
- e) method of maintenance used
- f) cargo to be carried
- g) frequency of port calls, length, and nature of voyages to be undertaken
- h) trading area(s), waters, and operations in which the ship is involved
- i) the extent to which training activities are conducted on board
- j) degree of shoreside support provided to the ship by the company
- k) applicable working hours limits and/or rest requirements
- l) the provisions of the approved Ship's Security Plan

3.2 The determination of the minimum safe manning of a ship should be based on the performance of *functions* at the appropriate level(s) of responsibility, as specified in the STCW Code, including the following

- a) navigation, comprising the tasks, duties and responsibilities required to:
  - plan and conduct safe navigation
  - maintain a safe navigational watch in accordance with the requirements of the STCW Code
  - maneuver and handle the ship in all conditions
  - moor and unmoor the ship safely
- b) cargo handling and stowage, comprising the tasks, duties and responsibilities required to plan, monitor and ensure safe loading, stowage, securing, care during the voyage and unloading of cargo to be carried on the ship.
- c) Operation of the ship and care for persons on board, comprising the tasks, duties, and responsibilities required to:
  - maintain the safety and security of all persons on board and keep life-saving, fire-fighting and other safety systems in operational condition
  - operate and maintain all watertight closing arrangements
  - perform operations, as appropriate, to muster and disembark all persons on board



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- perform operations, as appropriate, to ensure protection of the marine environment
- provide for medical care on board the ship
- undertake administrative tasks required for the safe operation and the security of the ship
- d) marine engineering, comprising 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
  - maintain safety of the ship's engine equipment, systems and services
- e) electrical, electronic, and control engineering, comprising the tasks, duties and responsibilities required to
  - operate the ship's electrical and electronic equipment
  - maintain the safety of the ship's electrical and electronic systems
- f) radiocommunications, comprising the tasks, duties and responsibilities required to
  - transmit and receive information using the radio equipment of the ship
  - maintain a safe radio watch in accordance with the requirements of the ITU Radio Regulations and the 1974 SOLAS Convention, as amended
  - provide radio services in emergencies
- g) maintenance and repair, comprising the tasks, duties and responsibilities required to carry out maintenance and repair work to the ship and its machinery, equipment and systems, as appropriate to the method of maintenance and repair used.

3.3 In addition to the *factors* and *functions* listed above, the determination of the minimum safe manning should also take into account:

- 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.



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- b) the number of qualified and other personnel required to meet peak workload situations and conditions, with due regard to the number of hours of shipboard duties and rest periods assigned to seafarers.
- c) except in ships of limited size, the provision of qualified deck officers to ensure that it is not necessary for the master to keep regular watches by adopting a three-watch system; in particular, except for ships of 3,000 GT or less, the Master should not keep a regular navigation or engineering watch.
- d) except in ships of limited propulsion power or operating under provisions for unattended machinery spaces, the provision of qualified engineer officers to ensure that it is not necessary for the chief engineer to keep regular watches by adopting a three-watch system; in particular, except for ships of less than 3,000 kW the Chief Engineer should not keep a regular navigation or engineering watch.
- e) Except in ships of 3,000 GT or less or 3,000 kW or less, as applicable, or vessels on limited voyages or engaged in special occupations, a three-watch system should be adopted for both navigational and engine room watches (unless the vessel is certified for unattended machinery operations).
- f) the maintenance of applicable occupational health and hygiene standards on board.
- g) the provision of proper food and drinking water requirements for all persons on board.
- h) Training schedules and the provision of appropriate training opportunities to seafarers.

**4. Additional Considerations**

**4.1 Unattended Machinery Spaces (UMS)**

Specifications on the vessel's mode of operation, whether in UMS mode or with a manned engine room, shall be contained in the Minimum Safe Manning Document issued by the Administration.

To operate in UMS mode, the vessel must be certified for periodically unattended engine room operation in accordance with the vessel's Classification Society requirements.



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In vessels certified for unattended or periodically unattended machinery operations, a sufficient number of qualified personnel must be carried to provide manual control of machinery in an emergency, to enable the vessel to reach port.

In the event of a failure of the UMS system, the Company shall inform the Administration immediately. The Administration may require amendments in the number of engine room personnel if deemed inadequate.

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.

#### **4.2 Cook**

A qualified ship's cook is required for vessels operating with a prescribed manning of 10 or more seafarers on voyages of more than 3 days or more than 36 hours from a safe port.

#### **4.3 ISPS Code**

On board all ships to which the ISPS Code applies, seafarers' security duties at all security levels must be taken into account. A ship security officer must be nominated, who is qualified in accordance with STCW Reg. VI/5. and all seafarers must be qualified in accordance with STCW Reg. VI/6.

#### **4.4 GMDSS**

Every person performing radio duties on a ship which operates with a GMDSS radio system shall hold an appropriate certificate for GMDSS radio operators.

If there is no duplication of the GMDSS equipment on board and no shore-based maintenance employed by the vessel owner/operator, a dedicated radio maintainer must be on board who holds either a GMDSS-1<sup>st</sup> Class or GMDSS-2<sup>nd</sup> Class Radio Electronic Operator and Maintainer Certificate and is designated as having primary responsibility for radio communications during distress incidents.





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For vessels sailing without a radio maintainer on board, at least two deck officers are required to hold the GMDSS-General Operator Certificate. One (1) of the operators shall be designated as having primary responsibility for radio communications during distress incidents. Under these circumstances, there shall be duplicate GMDSS equipment on board, and shorebased maintenance service of the equipment contracted by the vessel owner/operator.

**4.5 ECDIS**

Officers involved in navigation on ECDIS-equipped vessels shall be certified as meeting training requirements as identified in STCW Table A-II/1. The type specific ECDIS familiarization training shall be included in the officers' onboard training record.

**4.6 Electro technical officers or ratings**

The Minimum Safe Manning Certificate may include Electro-Technical Officers STCW III/6 and/or Electro-Technical Ratings STCW III/7 if the company has assigned duties to satisfy the requirements of:

- The maintenance of a safe engineering watch,
- Emergency as specified in the Muster List, and/or
- The maintenance of the ship's electrical, electronic, and control systems.

After 1 January 2017, Engineering Officers, and Electro Technical Officers serving on board vessels with power plants rated over 1000 volts must show completion of a high voltage course, or national certification indicating compliance with the high voltage training requirements.

**4.7 Frequent STS operation**

In the case of ships engaged in frequent ship-to-ship cargo transfer operations, particular attention must be paid to the factor of bridge watch during cargo operations. Special consideration must be given to the employment of additional dedicated personnel for cargo operation, who are not involved in ship maneuvering and bridge watch.

**4.8 Lifeboat operation**

- a) Two survival craft/rescue boat crewmen are required for each lifeboat on ships in accordance with SOLAS chapter III, reg. 10. One person shall be designated the person -in-charge and another designated the second-in-command. In addition to the certified survival craft/rescue



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boat crewmen assigned to each motor lifeboat, there shall be a certified engineer or rating capable of starting the lifeboat engine and troubleshooting minor engine problems.

- b) A survival craft/rescue boat crewman shall be carried for each liferaft on board a vessel, and one additional certified survival craft/rescue boat crewman shall be assigned to each davit-launched liferaft and rescue chute boarding station to supervise the launching and boarding activities.
- c) Fast rescue boats shall be crewed by at least two survival craft/rescue boat crewmen specially trained and additionally certified in accordance with STCW Code Section A-VI/2, "Proficiency in Fast Rescue Boats."

**4.9 Lifeboat operation on passenger ships**

- a) On passenger ships, survival craft/rescue boat crewmen are required for lifeboats in accordance with the scale given below as a standard for general guidance. Where more than two survival craft/rescue boat crewmen are required for a motor lifeboat, one of the survival craft/rescue boat crewmen may be the required certified engineer or engine rating capable of starting the lifeboat engine and troubleshooting minor engine problems.

Complements of Lifeboat survival	Number of certified Craftsmen	Other assigned Crewmembers
40 or less persons	2	-
41 to 61 persons	3	-
62 to 85 persons	3	2
86 or more persons	3	4

- b) On passenger ships, the other assigned crewmembers who are not certified survival craft/rescue boat crewmen should be selected on the basis of their ability to remain calm, help others during a period of stress, and follow the directions of the certified survival



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craft/rescue boat crewman in charge of the lifeboat. Their documented training should include at least:

- the proper way to put on the Personal Flootation Devices (PFDs) and how to instruct others.
  - where applicable, how to put on Thermal Protective Aids (TPAs) and how to instruct others.
  - where the fire extinguisher is and how to use it.
  - where the pyrotechnics are and how to use them.
  - where the provisions are and how to open them.
  - where the bailers, buckets and bilge pump are and how to use them.
  - where the first aid kit is.
  - how to load and seat people safely in the boat
  - how to safely embark and disembark disabled persons and persons in need of assistance.
  - where the muster list is located and how to use it.
- c) Personnel serving on passenger ships, trained in accordance with Regulation V/2.3, Section A-V/2, paragraph 1, of STCW 1978, as amended, are required to be nominated on the muster list in sufficient number to assist the total number of passengers who may be on board at any one time in emergency situations and shall be included in the ship's Minimum Safe Manning complement.

**4.10 Committees and representatives**

When determining the minimum safe manning of a ship, particular attention should be given to the manning requirement for safety committees, safety representatives, and safety officers.

**5. Procedures for determining Minimum Safe Manning**

**5.1 Submission of a proposal by the Company**

The Administration may require the Company to prepare and submit a proposal for the minimum safe manning of a ship, as per Annex II to this Policy Letter.



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In preparing a proposal for the minimum safe manning of a ship, the Company should apply the principles, recommendations, and guidelines contained in IMO res. A.1047(27), Principles of Safe Manning.

The proposed ship's complement shall contain 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.

The master, officers, and other members of the ship's complement should not be required to work more hours than is safe in relation to the performance of their duties and the safety of the ship. The requirements for work and rest hours, in accordance with applicable national regulations, shall be complied with.

In proposing the ship's complement, the Company will take proper account of existing IMO, ILO, ITU and WHO instruments in force which deal with:

- watchkeeping
- hours of work or rest
- safety management
- certification of seafarers
- training of seafarers
- occupational health, safety, and hygiene
- crew accommodation and food
- security
- radiocommunications

**5.2 Approval by the Administration**

The Administration will require a company to amend a proposal for the minimum safe manning of a ship if, after evaluation of the original proposal submitted by the company, the Administration is unable to approve the proposed composition of the ship's complement.



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The Administration shall 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 established in accordance with the principles, recommendations, and guidelines contained in this Policy Letter, and is adequate in all respects for the safe operation and the security of the ship and for the protection of the marine environment.

The Administration will consider the circumstances very carefully before allowing a minimum safe manning document to contain provisions for less than three qualified officers in charge of a navigational watch, while taking into account all the principles for establishing safe manning.

The Administration shall approve the submission of the Company against relevant national and international regulatory requirements and guidelines. Having evaluated and approved the proposal this Administration shall issue a minimum safe manning document including special requirements and conditions.

The following information will be included in the minimum safe manning document issued by the Administration specifying the minimum safe manning:

- a clear statement of the ship's name, port of registry, distinctive number or letters, IMO number, gross tonnage, main propulsion power, type and trading area, whether or not the machinery space is unattended and company as defined in the ISM Code.
- a table showing the number and grades/capacities of the personnel required to be carried, together with any special conditions or other remarks.
- a formal statement by the Administration that, in accordance with the principles and guidelines set out in this Policy Letter, the ship named in the document is considered to be safely manned if, whenever it proceeds to sea, it carries not less than the number and grades/capacities of personnel shown in the document, subject to any special conditions stated therein.
- a statement as to any limitations on the validity of the document by reference to particulars of the individual ship and the nature of service upon which it is engaged.
- the date of issue and any expiry date as applicable of the document together with a signature of the Administration



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The Minimum Safe Manning Document language will be English.

The minimum safe manning document may be issued with an unlimited or limited trading area. The Administration may consider a different minimum safe manning level according to the nature of the vessel's voyages. A vessel which operates part of the time within a limited operational area and part of the time on more extensive voyages may be eligible for 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 minimum safe manning document for each mode.

**5.3 Monitoring by the Flag State**

The Company shall notify the Administration of any changes affecting the minimum safe manning of the vessel, and in such circumstances prepare and submit a new proposal taking into account the provisions of this Policy Letter.

This Administration may periodically review the minimum safe manning arrangements.

The Administration may withdraw the minimum safe manning document of a ship if

- a) the company fails to submit a new proposal for the ship's minimum safe manning when changes in trading area, construction, machinery, equipment, or operation and maintenance of the ship have taken place which affect the minimum safe manning.
- b) The ship persistently fails to be in compliance with work or rest hours requirements.
- c) There are issues concerning construction, machinery, equipment, or operation and maintenance that have taken place which affect the minimum safe manning level
- d) there are clear grounds for believing that the standards or the ability of the seafarers of the ship to maintain watchkeeping standards as required by STCW 1978, as amended, are not being maintained because of any of the following having occurred
  - the ship has been involved in a collision, grounding, or stranding.
  - there has been a discharge of substances from the ship when underway, at anchor, or at berth which is illegal under any international convention.
  - the ship is otherwise being operated in such a manner as to pose a danger to persons, property.
  - the environment or the ship's security has been compromised.



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- the safety inspection and audit record for the vessel indicates that the manning level is not sufficient.

In addition, Regulation I/4 of SCTW 1978, as amended, enables Port State authorities to verify conditions on any ship, particularly to the qualifications and ability of personnel on board. In accordance with section A-I/4 of the STCW Code, Port State authorities may also assess the ability of the seafarers of the vessel to maintain watchkeeping standards as required by STCW 1978, as amended, if there are clear grounds for believing that such standards are not being maintained.

**6. Temporary dispensation**

In exceptional circumstances, the Administration 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 Administration will make an assessment of the vessel's manning levels and a temporary dispensation may be issued to the vessel to sail for limited time as prescribed with fewer persons than stated on the minimum safe manning document.







Additional survival craft crewmen requirements for passenger vessels

Survival Craft <40 Persons	2
Survival Craft 41-61 persons	3
Survival Craft 62-85 persons	3
Survival Craft >86 persons	3

\*Where more than two (2) survival craft crewmen are required per craft, one of the crewmen may be the required certified engineer or engine rating capable of starting the lifeboat engine and correcting minor engine problems.

- 1 Watchkeeping arrangements shall be at the discretion of the Master but shall never be of lesser standards than those prescribed by the STCW, 1978, as amended thereafter and IMO Resolution A.1047(27), as amended.
- 2 All officers and ratings shall be licensed or rated in the grade listed or a grade above.
- 3 A rating with Basic Safety Training and training by the company as a lookout can replace one of the two required Ratings forming Part of a Navigational Watch (STCW II/4). **Not applicable when only 1 Rating forming part of a Navigational Watch is required.**
4. Classed for Periodically Unattended Machinery Operation: Unless there is a record of a satisfactory periodic Automation Notation survey completed by Class on board the vessel, two additional Engineering Watch Officers and one Additional Able Seafarer Engine are required



*COMPANY NAME:	Company IMO NO:
ADDRESS:	SHIP'S NAME:
	Ship's IMO Number:
Email:	TRADING AREA:
Phone:	
Fax:	

\*(shall be the company responsible for Safety Management in accordance with the ISM Code when applicable)

CLASS SOCIETY:

**PARTICULARS**

TYPE OF MAIN ENGINES:	<input type="checkbox"/> TEAM, <input type="checkbox"/> MOTOR, <input type="checkbox"/> OTHER	
KW EACH MAIN:	TOTAL PROPELLING POWER [KW]:	NO. OF GENERATORS:
AUTOMATED MACHINERY: <input type="checkbox"/> YES OR <input type="checkbox"/> NO		
INDICATE CLASS NOTATIONS FOR UNATTENDED, OR PARTIALLY UNATTENDED MACHINERY OPERATION IF ANY:		
INDICATE CLASS NOTATION FOR INTEGRATED BRIDGE SYSTEMS, IF ANY:		

**OWNERS MINIMUM MANNING PROPOSAL**

<input type="checkbox"/> Master	<input type="checkbox"/> Able Seafarer Deck (II/5)	<input type="checkbox"/> Chief Engineer	<input type="checkbox"/> Able Seafarer Eng.(III/5)
<input type="checkbox"/> Chief Mate	<input type="checkbox"/> Ordinary Seafarer Deck (II/4)	<input type="checkbox"/> Second Engineer	<input type="checkbox"/> Rating with (III/4)
<input type="checkbox"/> Officer In Charge of a Navigation Watch	<input type="checkbox"/> Other (describe):	<input type="checkbox"/> Engineering Watch Officer	<input type="checkbox"/> ET Rating (III/7)
<input type="checkbox"/> Other (describe):		<input type="checkbox"/> Electrical Technical Officer	<input type="checkbox"/> Other (describe):
<input type="checkbox"/> Cook	Passenger vessels:	<input type="checkbox"/> Other (describe):	
	<input type="checkbox"/> Survival Craft (VI-2)		
	<input type="checkbox"/> Assisting/ directing passengers (V2)		

Owners should feel free to attach whatever additional information owner feels supports his proposal for reduced Manning. Catering Department personnel are not included in minimum safe manning unless they are trained general purpose personnel. Application will be reviewed by San Marino Maritime Authority and a Minimum Safe Manning Certificate will be issued, provided all necessary information requested of owner has been provided to this Administration to ensure compliance with IMO resolution A.1047(27).

Signature of Submitter:

Print Name of Submitter:

Title of Submitter:

DATE:

(Note: Submitter should be a nominated Decision Maker, or Designated Person Ashore for the above Vessel.)

MAIL APPLICATION TO: SAN MARINO SHIP REGISTER : [flagstate@smsr.sm](mailto:flagstate@smsr.sm)

Every Company applying for a MSM-with a manning different from the standard provided in the Policy Letter “Minimum Safe Manning” must provide written justification (via email) to support the revised MSM and shall include the following set of documents:

- the **general arrangement plan**, with details of the navigational bridge, engine rooms and accommodations details;
- the **safety plan**;
- the **muster list**;
- the **navigation and engineering watch lists**,
- the **table showing the working /rest hours for the crew**
- a **Description of tasks conducted by other groups to support the crew, such as riding crews for maintenance and cargo teams to manage the loading and unloading of the ship.**

**Evaluation by the Administration:** The Administration will evaluate the submission of the company against relevant national and international regulatory requirements using the guidelines found in the Policy Letter “Minimum Safe Manning”.