



**香港海事科技學會**  
**THE HONG KONG INSTITUTE OF**  
**MARINE TECHNOLOGY**

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HKIMT is a learned institute of marine professionals. The objective and purposes for which the Institute is hereby constituted are to promote scientific development of Marine Technology including Naval Architecture, Marine Engineering and subjects related to maritime activities in all its branches and in the furtherance of such objectives

**HKIMT's Submission to Panel on Economic Development Meeting**  
**on 17 Sept. 2013**

**A The Improvement Measures to be implemented during the First Phase**  
**(p. 2 of the discussion paper CB(1)1522/12-13(01))**

**As a learned institute and of Marine professionals, we support Improvement Measures to enhance the safety. We have the following views regarding to the discussion paper.**

- A-1 Para 4 (a) Medical conditions of Seamen are subjected to change from time to time. Eyesight deteriorates quickly at middle age such as with cataracts, etc., especially the seamen normally work under the sun and more incline to UV exposure. Eyesight test at intervals not exceeding two years (minimum) instead of five years should be considered acceptable.**
- A-2 Para 4 (b) Apart from the Muster List (Example to be provided by HKMD), a regular simple drill shall be performed in regular interval (monthly / quarterly) to test the adequacy & alertness.**
- A-3 Para 4(c) A full scale ship / shore emergency drill with MD participation can assist MD and vessel company to determine the manning requirements during the initial certification. It can also identify room for improvement (such as where to store the lifejackets). A bi-annually full scale ship / shore emergency drill per ship type with MD participation can review the continuous adequacy & alertness.**
- A-4 Para 4(d) A full scale ship / shore emergency drill with MD participation can assist MD and vessel company to determine whether the lifejackets be placed beneath/above the seat with some**

**in the Muster Station.**

- A-5 Para 4(e) A clear definition of the type and location of watertight doors to fit with alarms to the wheelhouse be required in order to avoid the unnecessary work. It is assumed that watertight door has the same integrity and strength as watertight bulkhead.**
- A-6 It is noted that there is a shortage of local seamen in Hong Kong and this is affecting training of seamen. This issue should be addressed and the short term remedial action to avoid further deterioration should be explored, including how to attract / maintain the high quality coxswain to be employed with reasonable employment terms and conditions.**
- A-7 Para 5, COI report recommends "to act and act NOW". Incentive scheme can promote and encourage the industry to comply with the requirements as early as possible.**

## **B Medium and Longer Term Measures (p3 - 5)**

- B-1 Para 6, It is debatable whether two compartments rule should be applied to make vessel safer, particularly to vessels carrying less than 100 passengers. Also there is method to stay afloat for a damaged vessel other than sub-divisions, such as positive floatation. Damage stability standard for Hong Kong ferry with consideration of operating speed and structure should be studied and decided. It can be done by a professional working group and university / research consultant.  
Meantime, one compartment rule to pleasure craft may also be reviewed.**
- B-2 Para 7(a) - AIS would not help directly to avoid accident, but it would assist traffic control and post-accident investigation. AIS can act as a deterrent for the hit and run seamen if close observation and law enforcement be exercised by the authority.  
Law enforcement should be empowered to impose restriction / fine to the Operators in case of defective /inoperative AIS being discovered.**
- Collision Avoidance Radar may be too bulky/difficult to install on the existing wheelhouse and also a proper training be required for the Coxswain . It would be better to maintain a good lookout and employ a properly trained/good working attitude Coxswain.**
  - VHF Radio can assist the Coxswain to communicate each other**

during the close encounter and clarify the situation and action, but at least one of crew member onboard has license to use it. License is difficult to obtain or by attending approved course which is not available readily in Hong Kong.

**B-3** Para 7(b) Incentive scheme for vessel operator / coxswain / existing education institute, such as Vocational Training Council (VTC), should be in place for participating / organizing any refresher / training courses for new recruit / existing coxswain.

**B-4** Para 7(c) The crew should have adequate rest between the voyage or two consecutive voyages. The proposed break requirement should be discussed with the industries and seamen unions to conclude the final requirement.

**C** Independent Audit Review and Benchmark Survey (P5 - 11)

**C-1** The study for damage stability standard for Hong Kong ferry can also consider whether it is necessary to impose speed limitation after dark or certain weather conditions. The certificate of survey should specify the speed limit conditions if necessary.

**C-2** There was emphasize on quality control on Authorized Surveyor (AS) (AO and RA were omitted in LRS Report) who had nothing to do with the Lamma IV Accident whatsoever, but there was no mention of quality control or management on inspection, survey and plan approval by Officers of MD, which was put in the bad light in the Report of Inquiry Commission. Enough time and resource should be assigned to the Inspector to perform a quality inspection.

Also suggest to improve communication among and between MD ship inspectors and surveyors and promote safety culture towards work/duty. Measures to sustain competence and professional knowledge of staff members. Also require continuous improvement in the form of ongoing training as well as appropriate mentoring.

**C-3** Checking and vetting plan approval system should be implemented to eliminate the accident.

**C-4** Good management system depends on resources availability. There is no mention of resource requirements in MD to match the required improvements, particularly on shortage of qualified

**Officers. MD may consider investing on computerized Web Base Management System to improve the efficiency and information flow across the MD and the end users (i.e. Operators etc.) , so as to reduce the paper works and enhancing the safety and productivity, similar to the Classification Societies and the Renown 3rd Party Ship Managers.**

**C-5 Prior any change / adding passenger vessel schedule during special events, the vessel operators should carry out an risk assessment or consult Vessel Traffic Control Centre (VTCC) regarding to this additional traffic. VTCC may pay more attention / monitoring that additional traffic.**

**C-6 There were lot of resistance for enforcing the Safety Regulations in the past, partly due to the objections from owners and operators on the ground on cost. Suggestions of improvement on safety met with the same opposition. It is the time to throw out this excuse and spend money to improve the safety, to regain public confidence. At the same time, they can adjust the fare to cover their cost. Public should be made aware of that the cost of improved safety does not come cheaply and choice of safer journey is in their hand.**

**As a learned institute of Marine professionals, our expertise will be able and willing to help to improve safety of local vessels and activities in Hong Kong Waters. We are also here to help the community to solve the professional issues if required.**

**Prepared by HKIMT  
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