

Discovery Bay Transportation Services Limited

Proposal for Working Hour Guidelines

With regards to the HK Marine Department's proposal to revise the working hour guidelines for crew working on the local passenger ferries, we are expressing our disappointment on this issue as the board did not fully understand the basis of how the local ferries are operated and recommended the adoption of IMO regulated working hour guidelines used by the HK/Macao Turbojet/Cotai fast ferries as well as ferries being operated in Singapore and Australia.

In HK, most of the local operators are running on a 24 hours shift roster with at least 6 hours or more continuous rest time given, not considering other periods of rest like lunch and dinner breaks, time off between scheduled services and so on. This one day on and next day off rotation system was the working norm in this trade and there was never any problem.

With the adoption of the new guidelines, operators are now only allow to roster a maximum accumulated sailing duties of not more than 13 hours. When asked on numerous occasions to clarify this part, Marine department has avoided answering this question on the basis how this 13 working hours limit came about.

Following on this subject, we hoped the HK government can take a holistic approach and consider the following issues before parachuting a new policy that can drastically affect the survivability of the local ferry industry!

1. To increase the supply and training of crew and sea going staff for the local ferries.
2. Address the shortage of manpower in the market as the new working guidelines require more crew to operate per ferry across the industry.

3. The gap between the fare prices of local HK ferries versus HK/Macao, Singapore and Australian ferry operators.
4. With rising operating cost, the sustainability of the local ferry operators and the affordability of the passengers to bear the increase in cost to maintain the level of service.
5. Marine Department to work closely with the Transport ministry to support the local ferry industry with practical and useful guidelines in maintaining the high safety standards in HK.

Since the very first working meeting, the local ferry industry has urge both Marine department and Transport ministry to address the industrial shortfall in crew, training of qualified operators and the turnover of ferry staff due to retirement and outflow of talent to other sectors. However, the authorities has never seriously discuss the matter with the relevant bodies.

Separately, the Maritime Services Training Institute has always focused the training of sea going staff for foreign going vessels. Laterally, there are no available training resources catered for the local ferry trade. However, the authorities has always used other countries like Singapore for example to benchmark the training standard but failed to invest sufficient focus and resources to bring up the overall crew training required in HK.

Based on the present norm in the industry, it takes at least 5 years to train up a Ferry Master with the basic qualifications required to operate local ferries in HK. To be a full-fledged Master with the relevant sea time, it will take up to 8 years to train someone from scratch! If the government don't start thinking about this issue soon, in 2 to 3 years' time, the local ferry industry will be faced with an acute shortage of personnel need to sustain the ferry services!

Besides developing training locally, the authorities will also need to consider importing foreign talent to sustain the industry as it will take about 2-3 years to attain the same level of qualifications in order to work in the HK maritime sector.

Thank you.