Sjøfartsdirektoratet
Norwegian Maritime Authority

# Circular - Series V

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- ☐ Sdir: Norwegian Maritime Authority
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## *Safety and environmental work when safety representatives are not elected*

The Regulations of 1 January 2005 No. 8 on the working environment, health and safety of workers on board ship (HSE Regulations) set requirements for safety work on board vessels.

A well-functioning safety service is essential for maintaining safety. Safety representatives and the working environment committee (AMU) play key roles in creating a safe workplace on board through systematic health, safety and environmental (HSE) work.

The safety service has many tasks, rights and obligations related to monitoring, influencing and improving the working environment.

**When must a safety representative be elected?**
On vessels with eight or more persons on board, at least one safety representative must always be elected.

If a shipping company operates several vessels in local trade, such as ferries and high-speed craft, one safety representative must be elected per vessel, even if only three to seven persons work on board.

On vessels with three to seven persons working on board, the crew may agree that safety and environmental work will be managed without a dedicated safety representative. This decision must be made by majority vote. On vessels with fewer than three persons, there is no requirement to elect a safety representative.

The election of a safety representative must take place annually or whenever a majority of the crew is replaced.

If the crew has opted not to elect a safety representative, or if there is no requirement to do so, the master is responsible for ensuring safety and environmental work. This must be carried out in accordance with the HSE Regulations and the company's safety management system.
The Norwegian Maritime Authority (NMA) always recommends electing a dedicated safety representative.

**Who can be elected as a safety representative?**
Safety representatives must be elected from among those who work on board, meaning individuals who physically perform their duties on the vessel. On vessels with a small crew – often operating with a shift arrangement, such as daily or weekly crew changes – this can be challenging.

In such cases, all those included in the shift arrangement may be considered to "work on board". This means that the safety representative does not necessarily have to be on board at all times but must be available for contact when needed. Such an arrangement must be documented and comply with working hour rules.

**Documentation requirements**
The election or decision not to elect a safety representative must be recorded in the deck log book. The log book must include information about the decision and the duration of the arrangement.

An annual report on safety and environmental work on board must be prepared. This requirement applies even if the vessel does not have a safety representative or a working environment committee (AMU). On vessels without a safety representative, the master must submit the annual report.

For all vessels, both the annual report and documentation must be available for inspection upon request and during audits by the NMA.

**Training**
Section 5-14 of the HSE Regulations sets requirements for the training of safety representatives and members of the working environment committee.

The matrix below ships the required knowledge and competence, and the shipping company must ensure that elected safety representatives and AMU members receive adequate training.

Section 1-3 states that the company shall see to that the personnel of the company's land-based organisation responsible for ensuring the compliance with the provisions of these Regulations on board, has the necessary competency, including a minimum amount of training as described in section 5-14.

**Responsibility of the master**
The master is the shipping company's representative on board and must ensure that the HSE work runs smoothly. This includes following up on safety, setting a good example and reporting back to the company.

## Matrix: 40-hour training in accordance with the HSE Regulations section 5-14

Safety representatives and members of the working environment committee (AMU), and those responsible in the company's land-based organisation must complete 40 hours of training in safety and environmental work.

| Training: | Knowledge of | Resource |
|---|---|---|
| **Introduction to safety and environmental work** | The role of the company<br>The role of the master<br>The role of the safety representative<br>Senior safety representative<br>Working environment committee (AMU)<br>Right to lodge complaints and whistleblowing | ○ Regulations on the working environment, health and safety of persons working on board ship<br>Chapter 5<br>○ Right to lodge complaints |
| **Knowledge of ergonomics, noise, lighting, climate and welfare-related measures** | Physical working environment<br>Interpersonal relations<br>Psychosocial factors | ○ Regulations on the working environment, health and safety of persons working on board ship<br>Chapters 10–16 |
| **Knowledge of accident prevention, including preventive measures, the use of personal protective equipment, etc.** | Risk assessment<br>Procedures<br>Personal protective equipment<br>Measures | ○ Regulations on the working environment, health and safety of persons working on board ship<br>Chapters 2–4 |
| **Knowledge of risk assessment of work operations as an essential part of accident prevention** | Participation<br>Liability<br>Consequences | ○ Regulations on the working environment, health and safety of persons working on board ship<br>Chapters 6, 7, 8, 9 + annexes 1–5 |
| **Introduction and orientation on the Ship Safety and Security Act, the Ship Labour Act and these Regulations** | Knowledge of acts, regulations, circulars, safety messages | ○ Ship Safety and Security Act<br>**Chapter 4. Working environment and personal safety**<br>○ Shipr Labour Act<br>**Chapter 10. Protection against discrimination**<br>○ Regulations on the working environment, health and safety of persons working on board ship |
| **Introduction to the structure and role of the Norwegian Maritime Authority, also in relation to other authorities concerned** | NAV<br>DSB<br>Norwegian Safety Investigation Authority<br>The Norwegian Police | ○ The Norwegian Maritime Authority<br>○ Investigation of accidents<br>○ Safety<br>○ Lessons learned<br>○ Vision Zero (in Norwegian only)<br>○ “Maritime safety” survey (in Norwegian only) |

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| | | ○ Your essential guide to employee rights and legislation on Norwegian ships |
| **The training must last for at least 40 hours**.<br>It is possible to agree on a shorter training period if both parties consent and it is considered appropriate based on an assessment of the nature and scope of the issues.<br>**The training must be documented**. | | |

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