

# (Sea) dog-tired

by Capt. Pradeep Chawla, CEO, MarinePALS

**Fatigue remains one of the biggest safety concerns in shipping. Its impact on judgement, concentration, and decision-making is well understood, and no one questions the importance of work and rest hour regulations. Yet, despite years of discussion, guidance, and research, the problem refuses to go away. That should prompt us to ask a simple question: are we trying to solve the right thing?**

**A**ccording to World Maritime University’s (WMU) *Quantifying an inconvenient truth: revisiting a culture of adjustment on work/rest hours* survey-based study of 9,000 responses, a seafarer on average works for 11.5 hours a day, with 8.5% working beyond 14 hours. Sleep averages seven hours per 24-hour period – but 37.5% report six hours or less. As much as 93.4% agreed that fatigue is the most common safety-related challenge on board, with 88.3% admitting they exceeded the working time limits at least once a month (and 16.5% – more than 10 times per month).

“Fatigue is a well-recognised contributor to human error in maritime operations, yet its presence is consistently underreported in official accident investigations,” reads the *Fatigue as a latent risk factor in maritime safety systems* analysis from March 2026. Only in 29 cases out of 1,011 marine casualty reports (2017-25) was fatigue cited. WMU’s paper explains: 64.3% of seafarers reported adjusting their work/rest records; 80.2% said adjustments were to avoid any findings during inspections, and 75% shared adjustments were made to avoid problems with the shipping company. Whereas 50.3% reported notifying their company of non-compliance with work and rest hours, 46.7% of these seafarers received no response. As such, fatigue is not only individual – it’s systemic. And it is fatal.

Much of the industry’s response has focused on awareness, monitoring, and compliance. These measures are important and have helped improve understanding of the issue, but they do not explain

why so many seafarers struggle to comply with the regulations in the first place. Before we offer additional guidance or expect crews to improve their management of the situation, it’s important to first determine why it consistently emerges on today’s vessels.

## An impossible balance

The answer is not that seafarers fail to understand the importance of proper rest. They do. Every officer knows tired people are more likely to make mistakes. The difficulty is that the work still has to be done. When the workload expected of the crew exceeds the time available to complete it, fatigue becomes an inevitable consequence. That is why fatigue cannot be discussed in isolation from safe manning.

Safe manning isn’t simply about headcount. It is about ensuring that the crew available can safely complete the work expected of them while still having sufficient opportunity for rest. If the workload continues to grow while the resources available remain unchanged, it should not surprise us when compliance with work and rest hour regulations becomes increasingly difficult. We should ask whether the workload can realistically be completed with the people available, before asking why seafarers exceed limits.

Today, ships operate on demanding commercial schedules. Port stays continue to shorten, and cargo operations are expected to complete without delay. Alongside this come maintenance, inspections, drills, reporting requirements, and constant communication between ship and shore. None of these responsibilities disappear simply

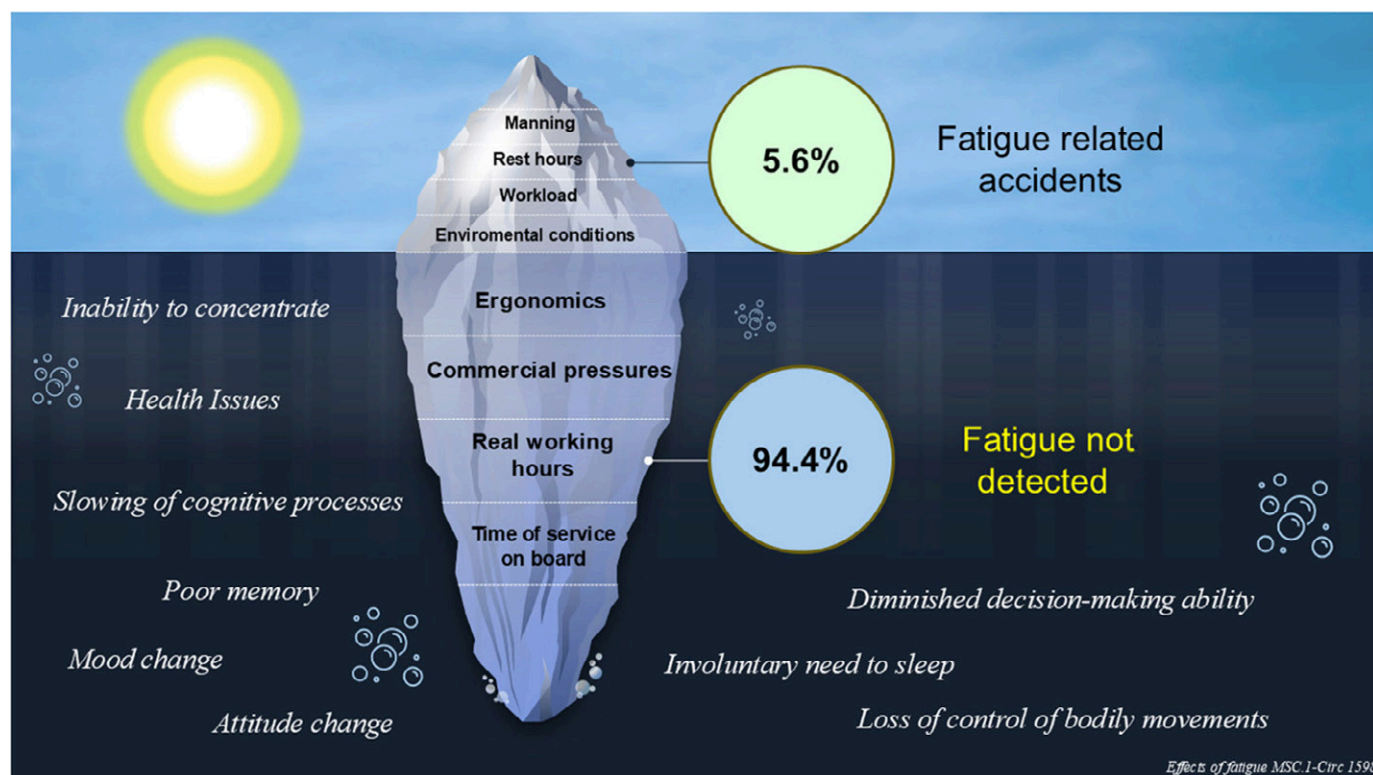
because regulations say someone should be resting.

For many crews, this creates an impossible balance. They are expected to navigate safely, take care of cargo, maintain the vessel, prepare for inspections, and meet commercial commitments within the same limited number of hours. When the workload exceeds the time available, something has to give. In those circumstances, exceeding work and rest hour limits is often not a deliberate decision to ignore the regulations. It is simply the result of trying to complete the work expected of the crew.

That distinction matters because it changes where we should be looking for solutions. Viewed only through a compliance lens, the obvious response is more training, closer monitoring, or stricter enforcement. Those measures have their place, but they do not reduce the amount of work that has to be done. Unless we recognise that reality, we will continue treating the symptoms while leaving the underlying cause untouched.

## Regulations – and the conditions of their application

Shipping has changed significantly over the past few decades. Environmental regulations have expanded, security requirements have increased, and inspection regimes have become more demanding. Digital technology has transformed the way ships operate and improved ship-to-shore communication. These developments have delivered real benefits, making ships safer and improving environmental performance. At the same time, however, they have brought additional responsibilities for the people on board.



Modern seafarers are expected to comply with a growing number of regulations, respond to continuous requests for information from shore, and complete more administrative tasks than ever before – all while continuing to operate and maintain increasingly sophisticated ships. Technology has undoubtedly made many activities more efficient, but it has not removed responsibility. Equipment still has to be maintained, inspections still require preparation, reports still need to be completed, and the ship must still operate safely regardless of weather, schedules, or commercial pressures. The nature of the work has changed, but it has not become less demanding.

This is why safe manning deserves far greater attention in the fatigue debate. Shipping is too diverse for a single approach to crew numbers; it is no argument that every vessel simply requires more people. On-board workload depends on many factors, including ship type, the trade it serves, port call frequency, cargo handling complexity, and operational patterns. A vessel berthing several times each week faces very different demands from one engaged on long ocean passages. Likewise, the workload on a chemical tanker cannot be compared directly with that of a bulk carrier. Safe manning should reflect these operational differences rather than rely solely on minimum numbers.

The Principles of Safe Manning already recognise that operational factors should be considered when determining crew requirements. The International Maritime Organization is currently reviewing fatigue, work and rest hours, along with proposed amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers and the International Safety Management Code. This presents an opportunity to look beyond compliance alone and ask whether the Principles of Safe Manning still reflect the realities of modern shipping. If crews are consistently unable to complete the work expected of them while remaining fully compliant with work and rest hour requirements, then we need to examine not only the regulations but also the conditions under which they are expected to be applied.

Commercial schedules have become more demanding, regulatory obligations have increased, and the role of today's seafarer has expanded considerably. It is difficult to argue that the workload has remained the same, so it's equally valid to ask whether our approach to safe manning has evolved to reflect those changes. This is not simply

a discussion about numbers on a manning certificate. It is about ensuring that the people on board have the capacity to carry out the responsibilities placed upon them safely, professionally, and without being forced into impossible compromises between completing the work and complying with the regulations.

### Inseparable issues

The industry has spent many years discussing fatigue, yet much of the conversation continues to focus on the symptoms rather than the conditions that create it. If we are serious about reducing the problem, we also need to examine whether today's approach to safe manning reflects the operational realities faced by modern crews. That discussion should sit alongside the current review of fatigue and work and rest hours – the two issues cannot be separated.

Fatigue is not created by regulations. It develops when the workload exceeds the capacity of the people expected to deliver it. Until we are prepared to address that reality, we will continue discussing one of shipping's most visible safety challenges without tackling one of its most significant causes. ■

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