



**TECHNICAL AND COMPLIANCE COMMITTEE**  
**Tenth Regular Session**  
25 - 30 September 2014  
Pohnpei, Federated States of Micronesia

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**CODE OF CONDUCT FOR RESPONSIBLE OBSERVER PROGRAMMES – OBSERVER  
HEALTH AND SAFETY (CCROP-HS)**

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**WCPFC-TCC10-2014-OP06**  
**9 September 2014**

Paper submitted by WWF

# CODE OF CONDUCT FOR RESPONSIBLE OBSERVER PROGRAMMES – OBSERVER HEALTH AND SAFETY (CCROP-HS)

## Introduction

Observer programmes are tasked with monitoring aquatic resources which provide a vital source of food, employment, recreation, trade and economic well-being for people throughout the world, both for present and future generations and should therefore be conducted in a responsible manner. This document is global in scope but does not intend to supersede any existing international, regional, national, state / provincial or local law or observer programme requirements which may be more extensive or restrictive.

Recognising that fishing is considered to be the world's most dangerous occupation, with more than 24,000 casualties per year (International Labour Organisation 1999) and observers are deployed to a wide range of entities, the intent of this document is to provide regulatory authorities and observer programmes with a set of international standards for responsible practices with a view toward minimising the health and safety risks to observers during their employment. The concept of this document draws from previous guidelines for the development of observer programmes (van Helvoort 1986; Davies and Reynolds 2002) and was further developed by the Observer Safety Working group in 2006 at the 5<sup>th</sup> International Fisheries Observer Conference (McVea and Kennelly 2007; National Marine Fisheries Service 2007a, b). Observer programmes are encouraged to apply this CCROP-HS to the maximum extent in order to advance health and safety training and increase health and safety awareness to the extent practicable thereby minimising risks.

This document supplements and complements the provisions in the International Observer Bill of Rights (IOBR) and Code of Conduct for Responsible Observer Programs - Stakeholder Responsibilities (CCROP-SR). A standard list of definitions is used for referencing these documents (CCROP-SR, Glossary). These documents were distributed for public comment to over 1200 stakeholders internationally from February 2013 until August 2013. Venues for outreach were the Association for Professional Observers (APO) Mail List, APO Facebook Group, the 7th International Fisheries Observer and Monitoring Conference (IFOMC) Steering Committee, and targeted mail lists of additional public stakeholders.

The APO has agreed to be custodian of this document<sup>1</sup> and associated IOBR and CCROP-SR. These documents will be modified from time to time with stakeholder input<sup>2</sup>. For enquiries, comments, contributions and updates, please contact the IOBR Team: E-mail: [iobr@apo-observers.org](mailto:iobr@apo-observers.org); Web: <http://www.apo-observers.org/billofrights>.

## Section I – Medical and Physical Employment Criteria<sup>3</sup>

### 1. Medical certificates<sup>4</sup>

- A. Observer shall possess a valid medical certificate issued by a qualified medical examiner stating the observer is physically fit for duty (CCROP-SR Section III(11) and Section V(1)).
- B. Medical certificates shall automatically expire after one year or as required by national standards.
- C. Observer programme shall provide medical examiner with written guidance on the procedures for the conduct of observer medical examinations; including applicable job description, description of living / working conditions and psychological stressors at the various work sites, an estimate of time it would take for observer to seek

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<sup>1</sup> Suggested citation: Code of Conduct for Responsible Observer Programmes – Observer Health and Safety (CCROP-HS) [Internet]. Association for Professional Observers (APO): The International Observer Bill of Rights and Codes of Conduct for Responsible Observer Programmes. Version 1.0. September 2013. Available from: <http://www.apo-observers.org/billofrights>.

<sup>2</sup> The next revision will begin by September 2015.

<sup>3</sup> Based on elements of (Transport Canada 2007, 2008, ILO 2011)

<sup>4</sup> A medical certificate may be an official document or an informal summary of a physical examination as long as it states the observer is physically fit for duty.

medical attention, and list of physical expectations as defined by the programme. At a minimum, the physical expectations shall include:

- i. Vision shall be correctable to 20/30;
- ii. Hearing capacity for shall be at least 30 dB (unaided) in the better ear and 40 dB (unaided) in the less good ear within the frequencies 500, 1,000, 2,000 and 3,000 Hz (approximately equivalent to speech-hearing distances of 3 meters and 2 meters, respectively);
- iii. Ability to repeatedly lift a minimum of 25 kg;
- iv. Ability to fit through passageways of a size appropriate to assignment.

- D. Medical examiners should understand their ethical position as examining medical practitioners acting on behalf of the observer programme, ensuring that any conflicts with this are recognised and resolved, and should obtain informed consent from the observer prior to any communication with others about clinical aspects of the observer's health.
- E. Medical examiners should enjoy absolute professional independence from the monitored industry, observers, and their representatives in exercising their medical judgment in terms of the medical examination procedures.

## 2. Preventive Measures

- A. Observers shall be vaccinated for tetanus and other communicable diseases as appropriate and determined by the observer programme. The World Health Organisation (WHO) International Travel and Health website [[www.who.int/ith/en/](http://www.who.int/ith/en/)] should be consulted for regional recommendations.
- B. Observers shall submit to an annual mental health evaluation or questionnaire. Results of this evaluation will be held confidential according to the laws of the country of the hiring or administrating observer programme.
- C. Observer programmes shall allow break time between deployments and work-leave options that allow observers to recover mentally and physically, including clear protocols with established time frames.
- D. Observers shall have basic swimming skills. Ability to swim 500 meters and tread water for 30 minutes is highly recommended.

## Section II – Medical Training

1. Observers shall possess certification for:
  - A. Elementary/Basic First Aid. NMFS (2007a) provides a thorough list of competencies for First Aid training;
  - B. CPR (cardiopulmonary resuscitation);
  - C. Preventing Disease Transmission (PDT; incl. Methicillin-resistant *Staphylococcus aureus* (MRSA), hepatitis, tuberculosis, sexually transmitted diseases (STDs)).
2. Recognising observers are sometimes the most well trained person to provide medical treatment at a deployment site, observers are encouraged to seek the following additional certifications:
  - A. First Aid - Offshore/Wilderness/Marine;
  - B. CPR & AED (automated external defibrillator).

## Section III – Health and Safety Training

1. **Training length** - The minimum recommended time allotted for the initial health and safety training (excluding medical training described in Article II) for new observers is 24 hours; however, it may take up to 48 hours to adequately cover the full list of topics. Observers should complete an annual refresher course (16-32 hours).

2. **Minimum Health and Safety Training Topics (IMO 1978)<sup>5</sup>** - The following topics shall be included in observer training:

**A. General Health and Safety Topics**

- i. Appropriate clothing
- ii. Nutrition
- iii. Hydration and dehydration
- iv. Fatigue / sleep deprivation
- v. Seasickness
- vi. Sanitation
- vii. Infections / communicable disease
- viii. Personal medications
- ix. Sampling safety (ergonomics, proper location, safe lifting technique)
- x. Psychological health
- xi. Conflict resolution - definition, recognition, de-escalation, and documentation
- xii. Harassment (incl. assault, interference, bribery, sexual harassment)
- xiii. Drug /alcohol use, abuse and hazards
- xiv. Cultural awareness
- xv. Communicating personal and worksite health & safety concerns to programme
- xvi. Assignment refusal policy for safety or other reasons (see IOBR Article IV(2) and CCROP-SR Section III(13))

**B. Vessel/Shore-based Facility/Offshore Installation Hazard Topics**

- i. Embark/disembark
- ii. Transfers at sea
- iii. Vessel, deck & rigging hazards
- iv. Falls and slips
- v. One hand for the boat (deck safety)
- vi. Stability - basic terminology, risk factors associated with different fisheries, stability reports & guidelines and general rules of thumb (large and small vessel issues), importance of fire/weather-tight and watertight doors
- vii. Hazardous materials (e.g. CO, hydrogen sulphide, ammonia)
- viii. Small boat handling & outboard motor operation (programme dependent)
- ix. Gear hazards (fishery, worksite specific)
- x. Hazardous marine organisms
- xi. *[recommended] Helicopter safety, transport operations and rescue*

**C. Safety Equipment Topics**

- i. Personal floatation devices (PFD) - proper donning, inspect for wear, proper storage, lights (check batteries) and maintenance
- ii. Immersion suits (colder water fisheries) - proper donning, inspect for wear, proper storage, strobes/PFD lights (check batteries) and maintenance
- iii. Other floatation and rescue devices - life ring, life sling
- iv. Radio/Communication equipment - location, emergency instructions, how to use

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<sup>5</sup> Many of these topics overlap modules of the STCW95 Personal Survival Techniques (PST) and Personal Safety and Social Responsibilities (PSSR), as well as the Offshore Petroleum Industry Training Organisation (OPITO) Basic offshore survival induction emergency training (BOSIET), Helicopter underwater escape training (HUET) and basic survival training (BST) courses.

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- v. Positioning equipment - location, how to read a GPS
- vi. Alarms (general, emergency, radar/watch, engine)
- vii. Survival craft – proper installation, location, capacity, expiration and required equipment
- viii. Hydrostatic release unit on raft – proper installation, expiration
- ix. EPIRBS – models/designs, battery expiration dates, hydrostatic release expiration dates, registration decal information, testing by vessel personnel
- x. Fire extinguishers - different styles, reading labels, which type to use depending on type of fire, locations and maintenance
- xi. Signalling devices (passive and active)
- xii. Pyrotechnics (flares)
- xiii. Survival kits - SOLAS approved
- xiv. Survival kits - personal & vessel
- xv. Man Overboard (MOB) devices
- xvi. Flood control kit
- xvii. Other personal protective equipment (e.g. hardhats, ear protection)
- xviii. Dewatering pump assembly and operation

*Optional:*

- xix. *USCG Damage Control Trailer*
- xx. *Helicopter rescue/transport*

**D. Survival Training Topics**

- i. Seven Steps to Survival (Recognition, Inventory, Shelter, Signals, Water, Food, Play)
- ii. Station bills
- iii. May Day
- iv. Man overboard (MOB)
- v. Life ring or buoys – number on board and location
- vi. Observer overboard (stay rules)
- vii. Escape plan (egress - getting to the muster station)
- viii. Abandon ship (getting from muster station to life raft)
- ix. Flooding
- x. Fire and fire fighting
- xi. Hypothermia / hyperthermia (location dependent)
- xii. Cold water near drowning (location dependent)
- xiii. Drills

**E. Regulatory Topics**

- i. International Convention for the Safety of Life at Sea (SOLAS)
- ii. Safety regulations pertaining to monitored entity (country specific)
- iii. Regulations/rules pertaining to the health, safety & welfare of observers (e.g. accommodation requirements, assault, harassment, interference and bribery)
- iv. Boarding by enforcement entity
- v. Compliance reporting procedures and enforcement follow-up expectations
- vi. How to complete the pre-deployment safety checklist

*Optional:*

- vii. HACCP regulations for working with seafood

3. **Required Competencies**<sup>6</sup> – The following competencies shall be included as part of observer health and safety training:

- A. Participate in role play demonstrating ability to resolve a conflict situation;
  - B. Demonstrate proper lifting techniques<sup>\*7</sup>;
  - C. Complete a pre-boarding safety checklist on board a vessel (or simulate completion of a checklist if a vessel is not available) which includes identifying the location and service status of critical lifesaving equipment;
  - D. Perform and/or participate in a vessel (or simulated) orientation including identification of muster and embarkation stations and emergency escape routes;
  - E. Demonstrate ability communicate with other persons on board on elementary safety matters and understand safety information symbols, signs and alarm signals;
  - F. Recite Seven Steps to Survival and describe what each step means;
  - G. Demonstrate the correct use and adjust the fit of a PFD;
  - H. Demonstrate how to inflate a Type V PFD;
  - I. Demonstrate proper donning of an immersion suit within 60 seconds\*including the inflation of the flotation bladder and turning on light;
  - J. Demonstrate proper jumping techniques for entry into the water wearing a PFD or immersion suit;
  - K. Demonstrate the HELP position with a PFD on in the water;
  - L. Demonstrate the HUDDLE position with a PFD on in the water;
  - M. Demonstrate the chain swim with a PFD or immersion suit on in the water;
  - N. Demonstrate the proper securing and release of the hammer type hydrostatic release;
  - O. Describe steps to safely deploy a life raft;
  - P. Board a life raft from the vessel (or dock/pool side) (with or without assistance);
  - Q. Board a life raft from the water (with or without assistance);
  - R. Demonstrate righting of a capsized a life raft ;
  - S. Demonstrate the function of at least one piece of equipment in a SOLAS A kit;
  - T. Demonstrate the proper technique for testing an EPIRB;
  - U. Describe (or if possible demonstrate) the five steps in the proper use of portable fire extinguishers to fight a fire\*;
  - V. Demonstrate the five most important components of a proper MAYDAY call;
  - W. Demonstrate ability to use signal mirror & whistles;
  - X. Demonstrate proper technique for deploying at least one type of pyrotechnic device;
  - Y. Assemble personal survival kit and explain components to classmates;
  - Z. Demonstrate communication and writing skills necessary to properly document and report potential violations that jeopardise observer health or safety;
  - AA. Describe appropriate steps to take if a person falls overboard, fire or smoke is detected, or the fire or abandon ship alarm is sounded;
  - BB. Demonstrate ability to take immediate action upon encountering an accident or other medical emergency before seeking further medical assistance onboard;
- Optional:*
- CC. *Demonstrate ability to assemble and start a dewatering pump*
  - DD. *Demonstrate basic navigation skills, ability to start an outboard motor, and manoeuvre a small boat/skiff.*

4. **Safety during Hands-on Component of Training** – Each programme will develop protocols to ensure the safety of observers during safety training such as requirements to be met during pool or open water exercises, flare exercises and fire fighting exercises<sup>8</sup>.

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<sup>6</sup> See NMFS (2007a) and Davies and Reynolds (2002) for more detailed lists of competencies.

<sup>7</sup> \*See Ajango et al. (2004), Appendix G, for more detailed steps for these items.

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## Section IV – Worksite Health and Safety (See CCROP-SR Section II and III)

Observer programme and/or employer shall:

### 1. Legal and programmatic policy framework

- A. Establish policies, based on laws made by the regulatory authority, to report incidents concerning the observer's ability to conduct their duties free of assault, harassment, interference and bribery to the appropriate enforcement entity.
- B. Recognise an observer's right to refuse an assignment and develop guidelines to assist observers in making decisions regarding their health, safety and welfare.

### 2. Transportation Safety

- A. Develop guidelines to be followed if observer is expected to utilise motor vehicles (e.g. cars, motorbikes), aircraft or transport vessels in the course of completing duties. Specialised training may also be required.
- B. Pre-deployment Safety Checklist - Develop a pre-deployment safety checklist appropriate to the class of vessels or worksites to be monitored and establish minimum requirements for assignment refusal. The purpose of the checklist is to aid in familiarising observers with safety procedures and equipment prior to deployment (see Box 1 for sample list). The checklist shall be completed and submitted to the observer programme or employer prior to each observer deployment. If the minimum requirements of the checklist are not met, the observer may not embark until they have contacted and reported these to their observer programme or employer. Observers are not official safety inspectors; therefore, the minimum requirements (see boxes below) consist of determining the presence/absence of certain pieces of safety equipment.

### 3. Embarkation/Disembarkation/Transfer Protocols—Observer programmes or employers shall develop embarkation/disembarkation/ transfer protocols to minimise risk which require the observer to:

- A. Not embark/disembark/transfer to a monitored entity if observer deems embarking/disembarking to be unsafe (based on training and experience);
- B. Not be intoxicated (according to state or international law) when embarking/disembarking;
- C. Ensure at least one person is aware the observer is embarking/disembarking a monitored entity during bad weather scenarios and can see the observer well enough to respond to an emergency. Other scenarios are at the discretion of the observer programme<sup>9</sup>;
- D. Where possible, observer embarkation/disembarkation directly onto vessels shall take place in port by the quayside in order to ensure the safest means of transferring observers to/from vessels;
- E. Adhere to the following general protocols during at-sea vessel transfers:
  - i. Transfers in daylight are preferred or with suitable lighting in areas without daylight (e.g. polar regions);
  - ii. The two vessels must be within a reasonable distance from each other (few hundred METERS, not kilometres);
  - iii. The observer shall wear a PFD and hard hat (safety helmet);
  - iv. Jumping from vessel to vessel is not allowed;
  - v. If a life boat, rescue craft or other inflatable craft is used in the transfer, the operators and equipment shall possess the appropriate certifications for those activities. The vessel shall provide a pilot ladder in good condition - when appropriate (smaller to larger vessels);

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<sup>8</sup> See NMFS (2007b) for sample training checklists on each of these topics.

<sup>9</sup> For the purposes of this document, "bad weather scenarios" are defined as Beaufort Sea State 7 (28-33 knot, "near gale" winds) and above ([http://en.wikipedia.org/wiki/Beaufort\\_scale](http://en.wikipedia.org/wiki/Beaufort_scale)).

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- vi. If a cargo net or basket is used, make sure a line is attached to both points for greater control and to reduce swinging. Crouch down as low as possible to lower your centre of gravity. Keep your fingers and elbows inside the basket or net.
4. **Accommodation** - Establish minimum standards for adequate accommodation for an observer deployment appropriate to the size of the monitored entity and equivalent to that of the officers of the monitored entity. Accommodation (with programme supplementation, if necessary) includes but is not limited to:
    - A. Safe drinking water and safe and nutritious food for the observer;
    - B. Dry, relatively quiet, unshared bunk space for the observer;
    - C. Accommodation free of harmful pests (especially biting insects or mites) and a plan for their control. Accommodation shall also be free from harmful pesticide exposure related to insect control.
  5. **Access** - Unhindered access to emergency equipment (e.g. radios, immersion suits).
  6. **Adequate assignment notice** - Provide adequate notice and allow observers time to prepare for and arrive at the assignment port, especially in programmes that require extensive driving or flying to arrive at the assignment.
  7. **Communication** - Develop communication protocols and emergency action plan between the appropriate maritime safety or marine enforcement entity and observer programmes (if separate) that:
    - A. Clearly outlines the hierarchy of authority relative to rectifying observed safety issues;
    - B. Uses emergency status codes that are only available to the observer and observer programme.
  8. **Mental health** - Provide options for mental health counselling, including crisis intervention and drug and alcohol counselling, independent of observer programme or observer employer that allow observers to freely address psychological stresses of the job.
  9. **Provided safety equipment** - Provide (or compensate observer for) safety equipment appropriate to the assignment which may include the following: wearable PFD, immersion suits, personal locator beacon, hearing protection, hard hat, foul weather gear, work boots and satellite phone.

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- Transport Canada. 2008. Training Standards for Marine First Aid and Marine Medical Care (Rev.3). TP 13008E, Marine Personnel Standards and Pilotage, Ottawa, Ontario.
- van Helvoort, G., 1986 Observer program operations manual. FAO Fish.Tech.Pap. 275: 207 pp.

**Box 1: SAMPLE CHECKLIST FOR VESSELS (Ajango et al. 2004, ICCAT 2007, AMSEA 2011)**

- a. U.S. Coast Guard Exam Sticker valid two years from month issued in U.S. fisheries. For all other vessels, a current and valid Safety Certificate that does not expire for a period of at least four months from the date of embarkation of the observer;
- b. Orientation tour of monitored entity provided within 8 hours of embarking or arriving;
- c. Station bill placard of emergency assignments for all on board including the observer - location, emergency instructions and assembly locations (muster station);
- d. Life raft/survival craft - type, location, capacity including observer, service date valid, hydrostatic release date not expired, raft assignment;
- e. Immersion suits, lifejackets (PFDs) for all personnel on board - types, stowage location, accessibility in an emergency, proper size, light;
- f. Life rings or man overboard recovery device(s) – location;
- g. Flares - types, location, expiration dates;
- h. EPIRB(s) - location, battery expiration date, and hydrostatic release expiration date;
- i. Fire extinguishers - which types, location, last service date;
- j. First aid materials/medicine chest - location, first aid texts, trained crew;
- k. Radio - types, location, monitor distress channel, instructed how to use;
- l. Electronic position fixing devices: function, how to find position;
- m. Radar - Operational and alarm options;
- n. Stability report or guidance on board and current within 5 years;
- o. Presence of vessel hazards: Do hatches open/close? Do watertight doors properly seal? Are rails open or potentially unsafe? Location of overhead or sharp objects;
- p. Personal risk management plan; Personal escape route clear; Find route in dark; Personal survival equipment available and accessible at all times;
- q. [small vessels] Instructions to turn engine on/off and how to steer in case observer is only one remaining on board.

**Box 2: MINIMUM SAFETY REQUIREMENTS – Vessels >24m LOA**

The observer shall check the following items as part of the “Pre-deployment Inspection” which shall be considered as the minimum compulsory requirements. In the event a vessel does not meet these requirements, the observer shall not board the vessel for deployment. Regulatory authorities have not yet established standards for vessels <24m LOA. However, stakeholders may consider the following standards applicable for vessels <24m LOA.

**Safety Certificate (Safety Management Certificate)**

- a. The vessel shall maintain onboard a current and valid safety certificate that does not expire for a period of at least four months from the date of embarkation of the observer.
- b. Check that the full complement including the observer onboard does not exceed the limit for the number shown on the safety certificate.

**Life Rafts**

- a. The life rafts shall have the capacity to accommodate the full crew complement including the observer.
- b. Life rafts shall be within their serviceable date, which shall cover the expected maximum duration of observer deployment.
- c. All life rafts shall be fitted with a properly attached Hydrostatic Release mechanism.
- d. Life rafts shall be mounted in a float free location and be free of extraneous tie-downs.

**Life Jackets**

- a. There shall be a total number of life jackets onboard, readily available at the emergency muster stations to accommodate each of the complement onboard the vessel.
- b. All life jackets shall comply with IMO – SOLAS LSA standards.

**Immersion Suits**

- a. There shall be a total number of immersion suits onboard, readily available at the emergency muster stations to accommodate each of the complement onboard the vessel.
- b. All immersion suits shall comply with IMO – SOLAS LSA standards.

**GMDSS Requirements**

- a. The vessel shall be GMDSS compliant in accordance to its tonnage and its area of operation.
- b. Any component of the GMDSS requirement that is out of date or unserviceable will render the vessel as NOT being GMDSS compliant

Minimum safety requirements shall apply to all vessels onto which an observer is embarked; including any vessels used to transfer observers from land to transshipment vessels. It is noted however, that a pre-deployment inspection will not be possible in the case of observers not embarked in port. For this reason, the observer programme requires all carrier vessels embarking an observer for the first time to do so in port. Subsequent observer changeovers may take place without the carrier vessel returning to port.