

Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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MARINE SAFETY ADVISORY No. 27-18

To: Owners/Operators, Masters, Nautical Inspectors, Recognized Organizations

Subject: CADET WORKING HOURS

Date: 17 October 2018

Port State Control (PSC) deficiencies are being issued, mostly in Belgium, over cadet working hours. Cadets are seafarers and, therefore, must be covered under a seafarers' employment agreement (SEA) or a training agreement in lieu of a SEA. (See Republic of the Marshall Islands (RMI) Marine Notice [2-011-33](#), Administrator's Determinations.)

Most training agreements provide for a monthly lumpsum payment, a stipend. The agreements do not include overtime as do standard SEAs. Thus, it is understood that the cadets are to work normal hours. Normal working hours in port and at sea mean eight (8) hours per day. (See RMI Maritime Regulations ([MI-108](#)), §7.51.5(1)).

The RMI Maritime Administrator (the "Administrator") has observed during flag State inspections that cadets are often working excessive overtime hours. This fact is also being picked up by PSC who are issuing Code 17s and requiring that outstanding accumulated overtime is paid.

The Administrator advises that cadets must either be covered under a SEA that includes overtime or adhere to normal working hours under a training agreement where overtime is not specified. Onboard records and documentation must also reflect this.

This MSA expires one (1) year after its issuance, unless otherwise noted, extended, superseded, or revoked.