



SUB-COMMITTEE ON STANDARDS OF
TRAINING AND WATCHKEEPING
35th session
Agenda item 9

STW 35/9/2
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MEASURES TO ENHANCE MARITIME SECURITY

Training of Ship Security Officers

Submitted by the International Shipping Federation (ISF)

SUMMARY

- Executive summary:*** ISF believes the draft competence table produced by the United States provides a useful basis for discussion. However, account should be taken of Model Course 3.19, and the need to allow for means of demonstrating competence, such as evidence of in-service training and experience. ISF also wishes to raise other issues, such as the need to distinguish between seafarers already serving as SSOs and new candidates for STCW certification.
- Action to be taken:*** Paragraph 10
- Related documents:*** STW 35/9/1, STW 34/14

1 This paper comments on STW 35/9/1 and is submitted in accordance with the provisions of paragraph 46.5 of the Guidelines of the Organization and Method of Work.

2 ISF supports the development of competence standards for SSOs for inclusion in the STCW Convention, provided that any new burdens placed on employers, and the seafarers they employ, can be demonstrated to bring genuine improvements to security.

3 In view of the short time available for comment, and the attention being given to meeting the July 2004 deadline for compliance with the ISPS Code itself, maritime employers are still considering their detailed position with regard to the best means of incorporating training requirements for SSOs in STCW. But the competence table produced by the United States provides a useful basis for discussion.

4 However, it will also be important to take account of the competences indicated by the IMO Model Course 3.19 that has already been developed for SSOs on the basis of the course outline developed by STW 34. A number of detailed refinements may need to be made to column 2. For example, Crowd Management Control (which is only a Part B requirement in ISPS) would not seem to be appropriate for SSOs on cargo ships as opposed to passenger ships.

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5 Another issue, which needs to be addressed, is the required method for demonstrating competence in column 3 of any competence table. The IMO Model Course, reflecting discussions at STW 34, provides for a number of flexible alternatives in delivery, such as "in-service training, distance learning, computer-based training, or combinations of these methods". This approach, which is consistent with other competence tables included in the STCW Convention, does not seem to be clearly reflected in column 3 of the table developed by the United States, although this could be a matter of drafting rather than substance.

6 It should be borne in mind that prior to the July 2004 deadline, approximately 100,000 SSOs will need to be trained worldwide. Although implementation of the ISPS Code is fully supported, the training of SSOs involves considerable financial cost to the industry. To a large extent competence in the duties required by the ISPS Code will be achieved through practical implementation of the Ship Security Plan in addition to methods mentioned above, although shore-based training is also being undertaken, often based on Model Course 3.19. Flag States, or their Recognized Security Organizations, are already required to confirm that training has been delivered that enables SSOs to perform their duties as stipulated by the ISPS Code.

7 It would therefore seem unreasonable - as well as impractical given the large numbers involved - to expect that serving SSOs, with practical in-service experience of their duties under ISPS, should be required to attend further approved training courses after any STCW requirements are adopted. It would thus seem appropriate to distinguish between seafarers that already hold STCW certificates, and are serving as SSOs immediately after July 2004, and new candidates for STCW certification, for whom it might be appropriate to include a module addressing the competences required by an SSO, as part of their approved training leading to the issue of an STCW certificate.

8 Other issues which need to be addressed are how competence in the duties of an SSO should be documented, and whether it would be better to draft the competence table for SSOs as a self standing requirement in Chapter VI, or whether to incorporate it with, for example, the requirements in Chapter II, or possibly a combination of both.

9 Finally, ISF suggests that no firm decisions are taken until some time after the July 2004 ISPS Code deadline, so that full account can be taken of experience gained through the implementation of the Code, and so that administrations, shipping companies and seafarers are not distracted from the immediate challenge of complying with all the other ISPS requirements in the short time still available.

Action requested of the Sub-Committee

10 The Sub-Committee is requested to take the above into account, when considering the development of competences for SSOs.