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SUB-COMMITTEE ON STANDARDS OF
TRAINING AND WATCHKEEPING
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Agenda item 12

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REVALIDATION OF GMDSS OPERATOR'S CERTIFICATE

Revalidation of GOC and ROC after 5 years of service

Submitted by Norway

SUMMARY

Executive summary: Radio surveys performed by Norwegian surveyors has revealed that navigators holding a radio operator's certificate in the GMDSS are, in many cases, not familiar with the technical and operational distress and safety procedures on the radio equipment on board the ship on which they are serving. This document attempts to analyse what needs to be done to eliminate such problems.

Action to be taken: Paragraph 15

Related documents: COMSAR 9/WP.6, STW 31/3 annex item 3.12, STW 33/5/3, STW 34/3/1, STW 36/16/2, STW 37/12, ITU RR Article 47.25 table 47-1, SOLAS regulation IV/16, STCW 95 Section A-I/11, STCW 95 Section A-I/8, STCW 95 Section A-VIII/2 part 3-3 Principles to be observed in keeping a radio watch, IMO resolution 814(19)

Introduction

1 In response to the recommendations of COMSAR 9, MSC 80 decided to change the title of one of the existing work programme items of the STW Sub-Committee to read as follows: "Revalidation of GMDSS operator's certificate." MSC 80 also decided that this item should be given high priority and that the target completion date should be 2007.

2 For many years, Norwegian radio surveyors have performed radio surveys on Norwegian ships and on a number of ships flying various other flags. Approximately 2,500 radio surveys are now being performed per year by our radio surveyors. During surveys, a certificated radio operator on each ship is normally co-operating with the radio surveyor during the process of verifying that all parts of the radio installation are functioning properly. Thus, these surveys will also give clear indications of the competence of the certificated radio operators in relation to operation of all types of GMDSS radio equipment. Radio surveys carried out as mentioned above have in many cases revealed that navigators holding a GMDSS radio operator's certificate are not sufficiently familiar with the technical and operational distress and safety procedures for the radio equipment on board the ship they are serving. Our experience also indicates that the maintenance of the reserve sources of energy has in many cases not been conducted properly, thus resulting in inadequate performance of this important part of the radio installation. Furthermore, many operators lack knowledge on how to avoid transmitting false distress alerts.

3 Norwegian radio inspectors from Telenor Maritime Radio conducted recently a systematic investigation of the competency of navigators holding a GMDSS radio operator's certificate, by a random selection of ships being subject to radio surveys. Between January and October 2005, 159 ships of various nationalities were included in this investigation. In summary, the results were as follows:

- .1 Adequate competency to operate the radio installation correctly: 61 operators (38%)
- .2 Inadequate competency to operate the radio installation correctly: 98 operators (62%)

4 The figures above are somewhat better – or more correctly, “less bad” – than what was reported during STW 36, which was based on general experience from a period of more than four years. However, the figures still give serious reason for concern. If a distress situation should occur to a ship whose radio operators are within the group classified as having “inadequate competency”, such operators would probably not be able to perform distress radio communication properly and with minimum delay in accordance with valid procedures. The radio operator's lack of competence may, therefore, have serious negative consequences for safety of life at sea.

5 In relation to the operators being regarded as having “inadequate GMDSS competency”, it was the impression of the radio inspectors that they did not have a proper attitude towards the significance of the GMDSS radio installation in relation to safety of the ship and its crew. In some of the ships being investigated, vital parts of the GMDSS installation were not functioning at all, without the radio operator being aware of this fact.

Discussion

6 The apparently widespread lack of adequate competence among GMDSS radio operators has been discussed at various sessions of COMSAR and STW. So far, serious concern has been expressed from various parties, but no specific actions have yet been agreed within IMO attempting to eliminate these problems.

7 During previous discussions, one group of parties has argued in favour of a mandatory test of each GMDSS radio operators every fifth year in order to check that each radio operator has adequate competence. However, another group has repeatedly referred to the following facts as an argument for no specific actions. The present provisions of section A-I/11 in the STCW Code lists a number of different options for establishing that a given person has adequate “continued professional competence” as a radio operator, and one of these options is “passing an approved test”. Therefore – in line with these arguments – any Administration is free to require a test, if the Administration is of the opinion that such a test is needed. However, in our view there is a need for carefully looking into the following question: *is it realistic to be able to establish that a person really has “continued professional competence” as a GMDSS radio operator without requiring each operator to be subject to a test?* This question is discussed in the following.

8 It is certainly correct that the provisions of section A-I/11 in the STCW Code lists a number of different options for establishing that a given person has “continued professional competence” as a radio operator holding a certificate issued under chapter IV of the Convention (as well as for other positions). However, in our view, these provisions can not be interpreted to imply that *all types of competence* relevant for a radio operator can necessarily be established by *any single item* of the options listed in section A-I/11.

9 Details on the various types of competence needed for a GMDSS radio operator are listed in table A-IV/2 in Chapter IV of the STCW Code. It should be noted that some of these items relate to search and rescue radio communications as well as radio communications in emergencies. Most radio operators will have gained absolutely no - or very limited - experience with *those* types of radio communications through their work as a radio operator on board a ship during the 5-year validity period of the certificate. Therefore, in our view, *some* of the options listed in section A-I/11 of the STCW Code can, in general, not – on its own – be sufficient to establish adequate competence regarding search and rescue radio communications and radio communications in emergencies. In our view, in general, this will apply to the following options in section A-I/11:

- 1.1 approved seagoing service ...
- 1.2 having performed functions considered equivalent to sea going service ..., and
- 3.3 having completed seagoing service performing functions appropriate to ...

10 This only leaves two of the options listed in section A-I/11 as suitable for establishing competence regarding search-and-rescue radio communications and radio communications in emergencies; i.e:

- 3.1 passing an approved test, or
- 3.2 successfully completing an approved course ...

11 For option 3.2 in section A-I/11, it is strongly recommended that the approved course leads up to a test verifying that the operator has indeed succeeded in gaining the competence intended. In view of this, the simplest and most effective way of establishing that a radio operator has adequate competence regarding *all* relevant types of radio communication therefore seems to be arranging a limited test. Such a test may be performed on board under the supervision of a competent person; e.g., an experienced radio surveyor holding a GMDSS radio certificate.

12 The issue of apparent inadequate competence for a number of GMDSS radio operators not only relates to the requirements of the STCW Convention and Code, but also to the ISM Code. According to paragraph 6.2 of the Code, the Company is required to ensure that the manning of each ship includes radio operators being adequately qualified. Furthermore, according to paragraph 6.5 of the ISM Code, the Company is also required to provide training if this is necessary for adequate competence. Adequate radio competence is also needed to comply with the requirement in section 8 “Emergency Preparedness” in the ISM Code.

13 In their document STW 37/12, ISF also refers to the ISM Code (in paragraph 4), and expresses viewpoints on training which are rather similar to our summary in paragraph 12 above.

14 In paragraph 5 of the same document, ISF refers to “mandatory refresher training”, but it should be noted that Norway does not argue in favour of such mandatory training. In paragraph 5, ISF also expresses the following views: “ISF believes that ongoing training through normal use and drills on board is the best way to ensure competency is maintained.” We have already commented in detail on the limitations of “normal use on board” in relation to search and rescue radio communications, as well as radio communications in emergencies. Training and drills may certainly be of value in relation to such communications. However, it is essential that each radio operator is able to operate the equipment correctly and in accordance with relevant procedures. For this reason we maintain the opinion that each radio operator should be subject to an approved test each fifth year, to verify that this is the case.

Actions requested of the Sub-Committee

15 As noted in paragraph 1 of this document, MSC 80 decided that the STW Sub-Committee should discuss and advise MSC on the following question: “Revalidation of GMDSS operator’s certificate.” In relation to this request, Norway recommends that the arguments presented in this document are carefully considered by STW when deciding what advice to give to MSC on this important issue.
