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SUB-COMMITTEE ON STANDARDS OF
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COMPREHENSIVE REVIEW OF THE STCW CONVENTION AND STCW CODE

Submitted by InterManager

SUMMARY

<i>Executive summary:</i>	This spotlights the key issues to be considered in the review and updating of the STCW Convention
<i>Action to be taken:</i>	Paragraph 16
<i>Related documents:</i>	MSC 81/25 and STW 38/INF.2

Basic training - Marine environment awareness

1 The recognition of the importance of the human factor combined with awareness of the effects of the operational or accidental pollution of the marine environment has gained widespread recognition in recent years. It is logical that the marine environment can be better protected if seafarers in their basic training are better educated in the need to protect it and the dangers of abuse.

2 The aims and objectives of basic training need review in light of the collective experience of managers since 1997.

Certificates and endorsements

3 Certificate fraud undermines the quality of seafaring as a profession and places an added risk to safety of life at sea and the marine environment. InterManager is pleased to support the new EU multi-national initiative described in paper STW 38/INF.2 to further highlight these problems and to find better ways to control fraudulent activities with certificates of competency. Various studies have shown that fraudulent practices associated with such certificates are widespread in certain areas. The new study commissioned by the EU under the Leonardo da Vinci program will determine what is best to be done to tackle this issue. It is essential to enhance prevention of such practices to combat malpractice.

4 One possible avenue to attaining these goals may be achieved by including in the Convention a provision requiring that certificates are issued exclusively by the Administration. An issuing Administration would ensure that certificates of competency are issued only after verification of the authenticity and validity of documentary proof. In this respect, the

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incorporation of a proper definition of certificates of competency should also be considered in order to distinguish such certificates from the ones issued concerning emergency, occupational safety, medical care and survival functions under provisions of Chapter VI. This will have the benefit of reducing the certificate paper-chase and the attendant industry that it creates.

Revalidation of Certificates of Competency

5 The interval between periods of revalidation of Certificates of Competency is common, being five years. However, the process of revalidation followed by Flag States is not agreed. Given that the purpose of revalidation is to ensure continuing competence, some agreed format for refresher or update training is needed.

6 The competency in electrical and electronic engineering to support advances in modern technology as noted below could be addressed under this process.

Medical fitness standards

7 Today there is no common international medical standard for seafarers. What is acceptable under one administration is not so to another. This situation may be detrimental to safety and obstruct the process of recognition of certificates. It is important therefore to consider, in line with Resolution 9 of the STCW Convention, the development of international standards of medical fitness for all seafarers, associated with their responsibilities on board, as well as the development of a standard on a common medical certificate.

Fitness for duty

8 The human element is well recognized as a critical factor in maritime accidents and identified as a root cause in incidents jeopardizing safety at sea. Fatigue is perceived as one of the main contributing factors to the occurrence of maritime accidents especially in collisions and groundings. The consequences of fatigue are impaired performance and reduced alertness, abilities that are vital, for example, in busy traffic lanes. The position is not helped when calling at a port or jetty, for example, all crew members are increasingly occupied with many kinds of new duties (ISPS, PSC, MOC Vetting, Classification, etc.). The number of items on the checklists of USCG, PSC, Classification or SIRE to be attended to is constantly increasing. On the other hand, ports and jetties try to keep berthing time as short as possible.

9 A renewed effort to harmonize demands from crew during port stays needs to be undertaken. Success in this area may make it possible for watchkeepers to comply with the minimum rest hour requirements. It is clear that a streamlining of the different checklists and avoidance of duplicate inspections will help seafarers to reduce administrative workload in ports.

Competency in electrical and electronic engineering

10 The increasing widespread use of computers and electronics – in control and monitoring – in the operation of ships and the rapid technological developments calls for new specific knowledge and abilities. In order to attain a consistent level of training to the required minimum standards of competency across the industry, it is necessary to ensure that the relevant education and training, including training on board, is delivered to support the needs of modern technology. How this is integrated into existing training and certification schemes needs careful consideration.

11 The use and pitfalls of AIS need to be included in training.

Low levels of Competence in Watchkeeping Officers

12 Experience since 1997 suggests that the period of seagoing service that junior officers require before certification for the next rank is not sufficient to become competent to a professional standard. This period of seagoing service should be increased.

13 At a time when the industry is expanding and facing shortages of certificated officers there are obvious pressures to reduce seagoing service, and not increase it. One way to compensate for this is to increase the number of officers in training. If there was a common requirement for each vessel in international trade to carry two or more trainee officers – deck, engine or electrical as needed in the area – then the foundations would be laid to tackle both the lack of experience in junior officers and provide for a larger pool of competent officers.

Standards of competence for tankers

14 In regulation V/1 there is a need to reappraise the training in competencies for officers and ratings on tankers (oil, chemical, LPG and LNG) in order that they are in line with current practices, technology and experience.

15 As currently documented in regulation V/1 the STCW certification is based not on competence, but on classroom knowledge. To be effective, the assessment of competence must provide evidence of the candidate's performance under a representative range of conditions, in the workplace or a simulated workplace. Assessment of knowledge, whether by multiple choice questions, other written or oral methods, can be a useful supplement to this, but cannot replace it.

Action requested of the Sub-Committee

16 The Sub-Committee is invited to note the observations and information provided and take action as appropriate.
