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SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
38th session  
Agenda item 12

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## **COMPREHENSIVE REVIEW OF THE STCW CONVENTION AND THE STCW CODE**

### **Comments and suggestions of areas to be considered in the review**

#### **Submitted by the International Shipping Federation (ISF)**

#### **SUMMARY**

|                                   |                                                                                                                                                              |
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| <b><i>Executive summary:</i></b>  | This document makes suggestions as to areas that may be worthy of discussion in the context of the comprehensive review of the STCW Convention and STCW Code |
| <b><i>Action to be taken:</i></b> | Paragraph 8                                                                                                                                                  |
| <b><i>Related document:</i></b>   | STW 38/12                                                                                                                                                    |

1 The International Shipping Federation (ISF) and its member national shipowners' associations welcome the decision of the Maritime Safety Committee at its eighty-first session (10-19 May 2006) to endorse a comprehensive review of the STCW Convention and the STCW Code. As it is almost ten years since the implementation date of the Convention, such a review will be timely. However, the Sub-Committee must allow itself a comfortable time frame in which to conduct the review.

2 Since MSC 81, members of ISF have discussed the approach that the Sub-Committee might adopt when reviewing both the Convention and the Code, along with some of the broad topic areas that might merit discussion. ISF respectfully suggests that the Sub-Committee confirms that it will be working in conformity with the principles adopted for the conduct of the comprehensive review in the early 1990's which led to the adoption of the 1995 amendments.

3 ISF believes that it is important to preserve the flexibility in terms of compliance with the standards, afforded by the current version of STCW and that a functional approach should be adopted when undertaking the review. Furthermore, the current STCW Convention and Code are generally based on the way deep sea ships operate. Nowadays many short sea ships and other ships involved in activities related to the off shore industry are operated in a different way to traditional deep sea ships, receiving structural short-based support, which in particular applies to the technical maintenance on board. We therefore believe that the special character and circumstances of short sea shipping and off shore industry related shipping should be taken into

account when reviewing STCW. The current standards of STCW on training and certification (Chapters II and III) and watchkeeping (Chapter VIII) are based on the traditional way of operating and managing ships. Innovation in technology and the way ships are operated and managed ask for some flexibility with regard to the required level of training and certification and required watchkeeping arrangements. To stimulate and reward innovation, STCW – and in particular chapters II, III and VIII – should be reviewed to see if areas can be identified where flexibility can and should be introduced.

4 ISF has identified a number of subject areas that the Sub-Committee might wish to include in the review, without committing itself at this stage as to whether amendments are necessary. These areas are listed below in the order in which they appear in the Convention:

Chapter I *Standards regarding general provisions*

- Regulation I/6 Training & Assessment.
- Regulation I/7 Communication of information.
- Regulation I/9 Medical Standards – Issue and registration of certificates.
- Regulation I/10 Recognition of certificates.

Also any consequential amendments necessitated by amendments to other STCW Chapters including Chapter VIII.

Chapter II *Standards regarding the master and deck department*

Chapter III *Standards regarding the engine department*

- Review the requirements specified for in these chapters to take account of any recent or future changes in equipment, technology, terminology and management such as:
  - The use of AIS
  - Ballast water equipment
- Take into account any standards contained in the ILO Convention on Able Seafarers (No. 74) not already covered in the 1995 Amendments (which took account of IMO/ILO Joint Guidance on Training).
- Review some areas of the Convention where emphasis needs to be added, such as, environmental awareness and in particular the use of oily water separators.
- Ensure security standards are in line with ISPS requirements.

Chapter V *Standards regarding special training requirements for personnel on certain types of ships*

- Existing stipulations with regard to service on tankers is appropriate and no further sub-divisions are necessary.

Chapter VI *Standards regarding emergency, occupational safety, medical care and survival functions*

- Clarification of revalidation requirements.

#### Chapter VII *Standards regarding alternative certification*

- Review of the existing functional approach and Chapter VIII requirements on standards relating to watchkeeping with a view to improving ship board organisation, career development and efficient use of training requirements.

#### Chapter VIII *Standards regarding watchkeeping*

- Review watchkeeping standards to take account of changes in technology and day to day ship management.
- Examine standards on the prevention of fatigue to take account of ILO 180, the putative ILO Maritime Labour Convention, and current IMO reviews of safe manning requirements.

### **Control Mechanisms**

5 The 1995 amendments have had a significant impact on training and competence standards of the world's seafarers. However, ISF members have anecdotal evidence to suggest that, in some State parties to the Convention, some training institutes that do not train in accordance with the standards of the Convention are still being approved by their Administrations. Meanwhile, some Administrations are issuing STCW certificates to seafarers who are not believed to be truly competent to perform their duties as specified in the Convention. This suggests that there is room for further improvement with regard to the full achievement of the primary objective of the Convention which was to establish confidence in the validity of seafarer's certificates regardless of place of issue.

6 ISF therefore believes that regulation I/8 (quality standards) and I/6 (approval of training institutes and courses) should be assessed during the revision, the aim being to review current databases in use to determine if modifications can be made.

7 ISF hopes that these initial comments and suggestions add value to the debate and we look forward to contributing positively to the review as it progresses.

### **Action requested of the Sub-Committee**

8 The Sub-Committee is requested to consider the suggestions outlined in paragraphs 3 and 4 when reviewing the STCW Convention and the STCW Code and take action as appropriate.

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