



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

STW 38/12/13
17 November 2006
Original: ENGLISH

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

Submitted by the International Council of Cruise Lines (ICCL)

SUMMARY

<i>Executive summary:</i>	This document notes the proliferation of requirements for training, exercises and drills required of seafarers and suggests consideration that a review of required training and exercise requirements be undertaken in a risk based holistic manner and that new requirements be co-ordinated appropriately through the STW Sub-Committee
<i>Action to be taken:</i>	Paragraph 6
<i>Related document:</i>	MSC 73/4/1

1 ICCL notes and is fully supportive of the Organization's decision to undertake a comprehensive review of the STCW Convention and the STCW Code. We also note the recent decision by the International Labour Organization (ILO) which agreed that all matters regarding seafarer training should fall under the purview of the IMO.

2 Previously, ICCL submitted paper MSC 73/4/1 in which we stated in paragraph 5 of annex 2 that we believe, as a result of our cruise ship safety study, that a general review of training for crew members on cruise ships may be desirable. That paper further went on to state:

“... For instance: SOLAS requires monthly fire and abandon ship drills that go into considerable detail for all crew members on survival at sea, all shipboard fire-fighting systems, etc.

- a. Are there too many drills and are they the right drills for everyone?
- b. Should these requirements be evaluated to address the holistic issue of crew training?
- c. Is the right training being done?
- d. Should training requirements be rewritten to emphasize emergency duties with lesser emphasis on every crew member being equally trained in lowering lifeboats and survival at sea?

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- e. Is sufficient emphasis being placed on training with regards to assisting children, disabled persons and injured persons?
- f. Should training use simulation for emergency shipboard conditions of smoke, list, action with emergency lighting only, etc.? ”

3 As it now stands, it appears that each Sub-Committee or Committee of the Organization is able to draft requirements for subject specific training and drills without consideration of the overall impact to the time demands on seafarers and associated human element impact beyond the specific instance being addressed. ICCL therefore, due to the critical nature of training and exercises, recommends that the Sub-Committee consider reviewing all shipboard training and drill/exercise requirements from a risk based holistic point of view.

4 Lloyd's Register, an ICCL Associate member, has conducted a database search of training and exercises/drills referred to in SOLAS and other IMO instruments. They have also looked at risk based training. We hope to be able to schedule a presentation of the results of this research at the Sub-Committee meeting in January 2007 and will co-ordinate with the Secretariat toward that end.

5 Pending such a presentation, the following elements of risk-based training may be worth considering for purposes of discussion of this agenda item at the thirty-eighth session if the Sub-Committee so agrees.

- .1 Reliance on humans to maintain a safe system:
 - .1 Crew must be adequately trained to perform their job correctly to minimize the potential for error
- .2 Striking the right balance in training. Many organizations fall into the traps of:
 - .1 Inadequate training for high priority tasks
 - .2 A surplus of training for low priority tasks
- .3 Understanding the tasks performed in a role and understanding the risks associated with “getting it wrong”
- .4 Those tasks with the highest likelihood or consequence of “going wrong” should be prioritized in an organization's training approach.

Action requested of the Sub-Committee

6 The Sub-Committee is invited to note the above information and decide as appropriate.