



IMO

**E**

SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
39th session  
Agenda item 7

STW 39/7/25  
17 December 2007  
Original: ENGLISH

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

### Increased linkage between chapters II, III and VI of the STCW Code

Submitted by the International Shipping Federation (ISF)

#### SUMMARY

**Executive summary:** This document proposes to provide the linkage between chapters II, III and VI to clarify and to produce a more coherent and transparent Code

**Action to be taken:** Paragraph 8

**Related document:** STW 38/17

#### Introduction

1 This document is submitted in accordance with principle 4, paragraph 3 of annex 11 of STW 38/17 that the Comprehensive review of the STCW Convention should address inconsistencies, interpretations, outdated provisions, MSC instructions, clarifications already issued and technological advances. The document comments on how the linkage between chapters II, III and VI could be clarified to produce a more coherent and transparent Code.

#### Guidance for port State control officers on issues relating to certificates of competency

2 At MSC 78, the Committee noted that, during inspections, some port State control officers were requiring documentary evidence of successful completion of short-course training meeting requirements in regulations VI/1, VI/2, VI.3 and VI.4 from seafarers holding certificates of competency issued under regulations II/1, II/2, II/3, III/1, III/2, III/3 and VII/2 of the STCW Convention and Code, even though the Convention includes this training as a prerequisite for the issue of these certificates of competency.

3 With this in mind, MSC/Circ.1030 was issued noting that certificates of competency issued in compliance with regulations II/1, II/2, II/3, III/1, III/2, III/3 and VII/2 of the STCW Convention and Code also included the competency requirements in chapter VI of the Convention relating to proficiency in survival craft and rescue boats other than fast rescue boats (regulation VI/2, paragraph 1), training in advance fire fighting (regulation VI/3), and medical first aid (regulation VI/4, paragraph 1). It was further stated that it was not necessary for holders of certificates of competency to carry additional documentary evidence in respect of those competences of chapter VI as listed above.

4 However, day-to-day practice would suggest that some port State control authorities are, at times, having difficulties in recognizing the link between chapters II, III and VI. As a result, a valid certificate of competency under issued under chapters II and III is not always seen as sufficient documentary evidence that the holder is in compliance with the competency requirements under regulation VI/2, VI/3 and VI/4.

5 ISF feels that these difficulties may be caused by the fact that the tables in section A-II/1 and A-III/1 only refer to chapter VI in the *third* column (methods for demonstrating competence).

### **Consistency**

6 In order to try and increase transparency within the Convention and Code, ISF would like to suggest that additional references to chapter VI be added to the first and second columns (Competence and Knowledge, understanding and proficiency) of the tables in sections A-II/1 and A-III/1 wherever references to section A-VI/1 are made under the third column (Methods for demonstrating competence).

7 Furthermore, the current text of chapter VI does not refer to the link between itself and chapters II and III as discussed above. To make this link clearer, and to assist readers of chapter VI, ISF would also like to suggest the insertion of cross references to chapters II and III of Part A of the Code into section A-VI/1.

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

8 The Sub-Committee is asked to note the information provided above and take action as appropriate.

---