



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

STW 39/7/42
2 January 2008
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COMPREHENSIVE REVIEW OF THE STCW CONVENTION AND THE STCW CODE

Review of chapter III of the STCW Convention and the STCW Code

Submitted by India

SUMMARY

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| <i>Executive summary:</i> | India has reviewed the proposal submitted by Austria <i>et al</i> (STW 39/7/10) and after careful consideration wish to re-emphasize the need to retain “a minimum approved education and training of <u>at least 30 months</u> which includes on-board training documented in an approved training record book” in STCW regulation III/1, paragraph 2.3 |
| <i>Action to be taken:</i> | Paragraph 13 |
| <i>Related documents:</i> | STW 39/7/10; MSC 81/25; STW 38/17 and STW 39/7/4 |

Background

- 1 This document comments on the STW 39/7/10 in accordance to MSC-MEPC.1/Circ.1.
- 2 The Sub-Committee, at its thirty-eighth session endorsed the principles to be followed during the review and the list of areas in the STCW Convention and the Code identified for the comprehensive review as specified in annex 11 of STW 38/17 as follows:
 - .1 retain the structure and goals of the 1995 revision;
 - .2 not to down scale existing standards;
 - .3 not to amend the articles of the Convention;
 - .4 address inconsistencies, interpretations, MSC instructions, clarifications already issued, outdated requirements and technological advances;
 - .5 address requirements for effective communication;
 - .6 provide for flexibility in terms of compliance and for required levels of training and certification and watchkeeping arrangements due to innovation in technology;
 - .7 address the special character and circumstances of short sea shipping and the offshore industry; and
 - .8 address security-related issues.

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Comments

3 The STCW Convention and the STCW Code review is to maintain standard and technology competency of seafarers required for the shipping industry, as such all other objective should be seen as subordinate to this objective.

4 STW 39/7/10, paragraph 4 states “The co-sponsors welcome ---- Convention and Code, which they consider above all as a good opportunity to upgrade seafarer’s competencies to adapt them to the prerequisites of modern technologies and the needs of the shipping industry.” However, it is seen that there is an attempt to dilute the total training period prescribed in regulation III/I.

5 Technology is progressing at a fast pace, and engine room machinery is getting more sophisticated. For engineers to be able to operate, maintain and repair machinery, electronics and control systems, greater amount of under-pinning knowledge in mechanical engineering, electrical engineering, electronics, pneumatics and hydraulics and control systems should be possessed by the engineers.

6 While document STW 39/7/10, paragraph 2.2 states “....12 months combined workshop skills training and seagoing service of which not less than 6 months will be seagoing service in the engine department as part of an approved training which meets the requirements of section A-III/I of the STCW code”, it does not state anywhere the minimum duration of the ‘*approved training programme*’ or of the education a candidate must receive before he/she joins 12 months training.

7 Examination of Column 3 of the Competency tables shows that assessment of competency is to be done by one or more methods, viz. Approved training; approved experience; tests; simulator or laboratory; examination and assessment of evidence. These methods, for uniformity of competence, must necessarily require reference to duration of training to gain requisite underpinning knowledge.

8 STW 38 agreed not to scale down existing standards. This was endorsed by MSC 83 i.e., “no dilution of current standards”. We believe the proposal in STW 39/10 just does that.

9 It may be noted that IMO Model courses, for gaining competency, do give guidance on duration of training in months and hours showing importance of said duration.

10 “Approved training” has not yet been defined in the Convention and therefore proposal STW 39/10 may lead to subjectivity in the “term”.

11 It is not understood as to why the minimum duration of approved education and training of 30 months is sought deleted when in fact proper education and training in engineering requires 3 to 4 years after leaving school. The subject and depth of knowledge requires several hours of class room lectures and tutorials.

12 Furthermore, we believe regulation I/9 on issue of certificates, there is now need to prescribe minimum school leaving and beyond criterion as a pre-requisite as per national provisions for obtaining first certificate of competency as officer/engineer.

Action requested of the Sub-Committee

13 The Sub-Committee is invited to note the above information and retain the existing in STCW regulation III/1, paragraph 2.3.
