

KPI Information Update IU-31-2013 **(The outcome of IMO STW Sub-Committee →44th session)**

The IMO Sub-Committee on Standards of Training and Watch-keeping held its 44th session from Monday 29 April through Friday 3 May 2013 under the Chairmanship of Mr Bradley Groves (AUSTRALIA); the Vice-Chairperson Mrs Mayte Medina (USA) was also present.

Working and drafting groups (WG / DG) were formed and chaired as follows, noting that DG1 and DG2 split the task and worked in parallel:

- ✓ WG1 Training matters, chaired by Captain Sibrand Hassing (NETHERLANDS)
- ✓ WG2 Role of the Human Element, chaired by Captain Moises de Gracia (PANAMA)
- ✓ DG1 Validations of Model Training Courses, chaired by Captain Kersi Deboo (INDIA)
- ✓ DG2 Validation of Model Training Courses, chaired by Captain George Edenfield (USA)

Salient points from the meeting of most interest are as follows:

1-VALIDATION OF MODEL TRAINING COURSES:

DGI was instructed to carry out a gap analysis review to compare the scope of the provisions in the STCW Code related to training of Electro-Technical Officer, Leadership and Teamwork, Basic training for Oil and Chemical Tanker Cargo Operations, Basic Training for Liquefied Gas Tanker Cargo Operations, and the contents of each respective draft model course as presented, with a view to validation by the Sub-Committee. The group agreed that the content of the model courses should be aligned with the STCW Convention and Code, to reflect the 2010 Manila Amendments, also noting that such courses are just a guidance tool allowing Administrations to apply flexibility where applicable. With regard to the 'New model course on Leadership and Teamwork', the group expressed concerns at its duration of 20 hours and prepared amendments to the draft text, splitting the topics into 4 days duration instead of 5, whilst also taking cognisance of the fact that such training may form an integral part of the overall training plan and be complementary to other studies.

In considering the new model course on Electro-Technical Officer, the group recommended that entrants who had not reached the required standard in Maths and physical Science would need to undergo a preparatory course to bring them up to the desired level prior to commencing the model course and accordingly, added an appendix on Basic Electricity and Electronics.

Turning to the revised model course on Basic Training for Oil and Chemical Tanker Cargo Operations, Advanced Training for Oil Tanker Cargo Operations and Basic Training for Liquefied Gas Tanker Cargo Operations, the group was unable to complete the revision, having run out of time. Accordingly, the courses were referred back to the course coordinators for further revision prior to STW 45 validation based on the following principles:

- I. Maintain consistency between all the Tanker Cargo Operation model courses;
- II. Ensure the course syllabi meet the knowledge, understanding and proficiency in the STCW Code, section A-V/1 competency tables; and
- III. Align the basic and advanced level courses to provide a structured progression of knowledge, skills and proficiency required at the support / operational level and the management level.

In the interim, an informal [correspondence] group was formed, open to all meeting participants and co-ordinated by Captain Deboo (INDIA)

DG2 meanwhile had a slightly more straightforward task revising draft model training courses on:

- 1) Officer in Charge of a Navigational Watch;
- 2) Officer in Charge of an Engineering Watch;
- 3) Master and Chief Officer; and
- 4) Chief Engineer Officer and Second Engineer Officer.

Their comprehensive revision of all 4 model courses took into account:

- a) the content of the revised model courses as presented, reflect the knowledge, understanding and proficiency in the tables of competency in the STCW Code;
- b) the scope of the provisions in the STCW Code related to training of Master and Chief Officer, Chief Engineer Officer, Officer in charge of a Navigational watch and Officer in charge of an Engineering watch and the content of the draft model courses as presented, should be compared for consistency;
- c) in the light of the development of specialised training for tankers, the content of tanker training in these courses should be reviewed;
- d) the relationship between tanker training requirements in chapter II and chapter V should be reviewed with a view to retaining only basic tanker requirements in the revised model courses 7.01 and 7.03; and
- e) the draft model courses should be subject to review and modification in accordance with the principles agreed at STW 43 (STW 43/WP.7).

2-UNLAWFUL PRACTICES ASSOCIATED WITH CERTIFICATES OF COMPETENCY (COC):

Details of fraudulent certificates found on board ships during inspections or reportedly being used were provided by the IMO Secretariat. To check the proliferation of such certificates, THE PHILLIPINES espoused the view that Administrations should provide online certificate verification facilities which prevent [false] holders from obtaining a berth on board and, in the long run, deter seafarers from resorting to obtaining fraudulent certificates for employment purposes. A further measure being undertaken by THE PHILLIPINES is through the printing of certificates only by government printing office, using paper with security features, notably detection of forgery or tampering through the use of UV light. In response to a question regarding any follow-up action as a consequence of information provided by Parties relating to fraudulent certificates, the Secretariat

confirmed that so far, no such analysis has been conducted, pointing out that:

- I. It is difficult to obtain information for verification in time;
- II. Contacting relevant personnel is difficult because the information for focal points of certificate verification are rarely up to date; and
- III. Online certificate verification facilities are not yet widely provided by Administrations.

The obligation on Parties to the 2010 Manila Amendments to the STCW Convention to establish electronic databases is 1 January 2017 but early implementation would clearly be advantageous. The Secretariat stated that the certification verification facility through the IMO website had been used 11,371 times during the year 2012.

3-DEVELOPMENT OF AN E-NAVIGATION STRATEGY IMPLEMENTATION PLAN:

NORWAY provided the report of the CG on e-navigation containing information related to the progress made with cost-benefit and risk analysis, the review of the HEAP (Human Element Analysing Process) and the development of draft Guidelines for a usability framework for navigational equipment and its harmonisation with the HEAP. Five potential main e-navigation solutions will be the basis of the risk and cost / benefit analyses for presentation to NAV 59. Following an intervention by AUSTRALIA, it was agreed that HEAP would benefit from a general review to ensure that it will be fit for wider use and interested Member Governments were invited to submit a proposal for reviewing HEAP as an unplanned output to MSC 93.

4-DEVELOPMENT OF GUIDANCE FOR THE IMPLEMENTATION OF THE 2010 MANILA AMENDMENTS:

DENMARK and BIMCO reported the response to an ECDIS survey, part of which addressed training, wherein a number of questions about ECDIS anomalies were raised. It revealed that difficulties were faced by seafarers and ship-owners during port State control inspections, particularly with regard to the inability of seafarers to provide evidence of completion of the ECDIS model course, while being holders of valid certificates of competency and this will be brought to the attention of the FSI Sub-Committee for appropriate action. Following further consideration, the Sub-Committee endorsed WG1's opinion that no more guidance to port State control officers on ECDIS training is needed and decided to refer the issue to FSI 22 so that it can be decided if further action to different PSC/MOUs/ Agreement is advisable.

5-DEVELOPMENT OF AN MSC-MEPC CIRCULAR ON GUIDELINES FOR THE REACTIVATION OF THE SAFETY MANAGEMENT CERTIFICATE FOLLOWING AN OPERATIONAL INTERRUPTION OF THE SMS DUE TO LAY-UP OVER A CERTAIN PERIOD:

WG2 prepared the draft MSC-MEPC circular as directed and which was subsequently endorsed by the Sub-Committee. It took into account that:

- I. Distinction between Hot lay-up (full manning) and Cold lay-up (reduced manning) was not necessary;
- II. The section relating to "Lay-up requirements" should be deleted as it is out with the scope of the terms of reference
- III. Additional verification may be required if the interruption period of the SMS on board the ship is > 3 months but < 6 months; and

- IV. The Company should request an interim verification if the interruption period of the SMS on boards the ship is > 6 months.

6-DEVELOPMENT OF AN MSC-MEPC CIRCULAR ON GUIDANCE ON SAFETY WHEN TRANSFERRING PERSONS AT SEA:

WG2 reviewed the annex to document MSC89/24/1 (DENMARK) and prepared a circular which was endorsed and will be forwarded to MEPC and MSC for approval. *Note that 'guidance' is used in preference to 'guidelines'.*

7-REVISION OF ISM CODE TO INCLUDE TRANSFER OF SHIP MAINTENANCE AND FAILURE RECORDS:

CANADA and the Republic of KOREA proposed amendments to the International Safety Management (ISM) Code to include the transfer of the ship's maintenance and failure records for safety critical equipment at the change of the company ownership with a view to enhancing the efficiency and user-friendliness of the ISM Code. Before sending the matter to WG2, a number of telling points were made in Plenary, viz:

- I. That the concerns related to operation, commercial and legal implications discussed at FSI 18 should not be forgotten;
- II. Identification of critical equipment should be part of the risk analysis of each Company within its safety management system;
- III. The requirement to retain records for a period for 10 years is beyond normal record-keeping practice; and
- IV. This matter could result in disputes between Companies.

In its deliberations, WG2 identified a further large number of reasons as to why, although the proposal seemed to be interesting at first glance, it would pose a great many practical difficulties, in particular, those related to implementation. It was also pointed out that failure records are reported to recognised organisations and that these records are available to new owners. Taking all these concerns into account, the group recommended not to further progress the development of the proposed amendment.

8-EVALUATION OF FATIGUE AND FATIGUE MITIGATION PRACTICES:

The UK provided a summary of Project HORIZON, the first study on seafarer fatigue to use empirical evidence and provide scientifically robust understanding of the effect of different watch-keeping patterns on seafarer cognitive performance. Following discussion, interested Member Governments were invited to submit proposals to MSC 93 for an unplanned output on a holistic review of issues related to fatigue, for consideration.

9-DEVELOPMENT OF GUIDANCE FOR PERSONNEL INVOLVED WITH TUG-BARGE OPERATIONS:

WG1 recognised the need for such guidance but due to the wide split of opinions, was unable to agree on draft text of an STW circular. However, it recommended further deliberation and action between interested participants with the aim of presenting a more detailed and comprehensive proposal to STW 45.

10-REVISION OF THE RECOMMENDATIONS ON TRAINING OF PERSONNEL ON MOBILE OFFSHORE UNITS (MOU):

Having noted changes in industry practice and taking into account the 2010 Manila Amendments to the STCW Convention

and Code, LIBERIA, IADC and IMCA proposed a revision to resolution A.891 (21). Following discussion in WG1, this will be forwarded to MSC 92 for approval with a view to adoption by Assembly at A28.

11-DEVELOPMENT OF A MANDATORY CODE FOR SHIPS OPERATING IN POLAR WATERS:

After an in-depth discussion in Plenary followed by equally vigorous examination of the issues in WG1, the Sub-Committee:

- I. Endorsed the conclusion that the appropriate instrument in which to include the training and certification provisions for the Polar Code is chapter V of the STCW Convention and Code, subject to MSC 92 approval and informing DE58;
- II. Endorsed the proposed reference in chapter 13 to the Polar Code to the appropriate provisions of the STCW Convention and Code, informing DE accordingly;
- III. Endorsed the recommendation that the STCW Code, section B-V/g, Guidance regarding training of masters and officers for ships operating in polar waters, may be used as interim provisions; and
- IV. Noted the opinion of WG1 that the process of developing training and certification requirements to the STCW Convention and Code for ships operating in polar waters can start immediately once the draft Polar Code is mature enough or finalised.

12-REVIEW OF GENERAL CARGO SHIP SAFETY:

Three Risk Control Options (RCO) relating to training were discussed, viz:

- I. RCO26, ECDIS training of all officers of watch for which IMO has promulgated ECDIS training guidance (STCW.7/Circ 18) and published model course 1.27;
- II. RCO23, training requirements in chapter 11 of the STCW Convention and Code include provisions on simulator training to address increasing situational awareness; and
- III. RCO8, chapter V111 of the STCW Code includes provisions for the exchange of information between the master and pilot in the context of improving preparation and handling of ship for manoeuvring in restricted waters.

It was then agreed that the STCW Convention and Code adequately covers training requirements relating to these RCOs, entailing no further action.

13-CODE FOR THE IMPLEMENTATION OF MANDATORY IMO INSTRUMENTS:

The Sub-Committee approved draft amendments to the STCW Code to make the III Code and IMO Member States and Audit Scheme mandatory, forwarding it to MSC for approval.

14-INTERNATIONAL CODE OF SAFETY FOR SHIPS USING GAS OR OTHER LOW-FLASHPOINT FUELS WITH PROPERTIES SIMILAR TO LIQUEFIED NATURAL GAS (IGF CODE):

Following an extensive discussion in Plenary, WG1 was tasked to undertake an analysis of the advantages and disadvantages in terms of providing training requirements in chapter 18 of the draft IGF Code or, alternatively, in chapter V of the STCW Convention and Code. It concluded that chapter V of the STCW Convention and Code was the more appropriate repository together with a

reference in chapter 18 of the IGF Code to the appropriate provisions of the STCW Convention and Code. Subject to approval by MSC 92, a correspondence group for training and certification requirements for seafarers manning ships using gases or other low flashpoint fuels will be set-up and co-ordinated by the USA. The current title of chapter V of the STCW Convention and Code may need to be amended in future to reflect the likely introduction of new Polar and IGF Codes for training and certification.

15-REQUIREMENTS FOR PERIODIC SERVICING AND MAINTENANCE OF LIFEBOATS AND RESCUE BOATS:

In its consideration of the draft MSC resolution on requirements for periodic servicing and maintenance of lifeboats and rescue boats, launching appliances and release gear (DE 57/6, Annex 1), DE57 agreed to retain paragraph 8.2.1.7 concerning education and training for certification of personnel, requesting STW to consider the matter. WG1 examined document DE 57/6, Annex 1 (JAPAN) but concluded that shore-based personnel who perform periodic servicing and maintenance on board do not come under the scope of the STCW Convention.

16-MANDATORY CARRIAGE OF APPROPRIATE ATMOSPHERE TESTING INSTRUMENTS ON BOARD SHIPS:

During Plenary discussion, views were expressed that testing only for oxygen in an enclosed space was not necessarily sufficient and that testing instruments for non-cargo enclosed spaces (e.g. oil bunker and sewage tanks) are needed. Multi-meters are widely available and IACS Members already provide such meters to their surveyors. In light of these and other comments, the Sub-Committee agreed that multi-meters should be required to be carried on board, and that ship crews be properly trained in the use of calibrated meters to ensure safe atmosphere within enclosed spaces, forwarding such opinion to DSC 18.

17-PROPOSED AMENDMENT TO THE STCW CODE'S VISION REQUIREMENTS:

CANADA and the USA proposed amendments to the STCW Code's colour vision requirements to assist development of an alternative standard for colour vision testing that is both cost-effective and widely available. ISF expressed concern, recognising that for STCW to be effective, Parties must have the tools necessary to conduct appropriate pre-deployment medicals. Medical advice from doctors actively involved in the recent IMO / ILO revision process for Medical Examinations is that it would be better to maintain the current standards and wait until a screen-based test is available, the optimal solution. Also, alternative methods accepted by issuing Administrations could undermine future mutual recognition of medical certificates by Parties. WG1 prepared an STCW Circular giving interim guidance on colour vision testing which was subsequently endorsed by the Sub-Committee for approval by MSC 92. In it, Administrations are recommended to use their existing methods as far as feasible for confirmatory colour vision testing but not to introduce new ones on a permanent basis until amendments to the mandatory requirements in Section A - 1 / 9 have been agreed.