

KPI Information Update IU-63-2014
(The outcome of the IMO Sub-Committee on Human Element,
Training and Watch-keeping)

The IMO Sub-Committee on Human Element, Training and Watch-keeping held its 1st session (HTW1) from Monday 17 through Friday 21 February 2014.

This Sub-Committee, acronym HTW, has assumed responsibility for matters formerly dealt with by STW (Standards of Training and Watch-keeping) following this year rationalisation of the IMO Sub Committee structure.

Three working groups (WG) were formed and chaired as follows:

1. WG1 Training Matters (Manila Amendments), Mrs M Angsell (SWEDEN)
2. WG2 Training Matters (Polar waters/ Passenger Ship Safety Training), Mr N Makar (MARSHALL ISLANDS)
3. WG3 Other Issues (Including carriage of dangerous goods in packaged form), Captain M de Gracia (PANAMA)

Also, two drafting groups (DG) were formed and chaired as follows:

1. DG1 Validation of model courses, Item 3 (part), Captain G Edenfield (USA)
2. DG2 Validation of model courses, Item 3 (remainder), Captain M Yadav (INDIA)

► Highlights emerging from the meeting:

1-Validation of Model Training Courses:

Prior to the formation of DG1 and DG2, discussion in Plenary established:

- ✓ The importance of ensuring that the revised model courses reflect the content of the STCW Code;
- ✓ The content aligns with the knowledge, understanding and proficiency (KUP) related to STCW competence;
- ✓ The scope of the provisions in the STCW Code should be compared with the content of the model courses;
- ✓ No extraneous material should be added to model course content; and
- ✓ The advanced courses reflect the supervisory nature of the KUPs in Part A.

DG1 subsequently revised the draft model courses on:

- ✓ Basic training for Oil and Chemical Tanker Cargo Operations;
- ✓ Basic Training for Liquefied Gas Tanker Cargo Operations.

Both Basic courses were then validated by the Sub-Committee and in addition, a correspondence group established to finalise advanced versions of the above model courses.

DG2 were given similar endorsement for their revision of draft model courses on:

- ✓ General Operator's Certificate for GMDSS ; and
- ✓ Restricted Operator's Certificate for GMDSS.

The Sub-Committee also accepted an offer by the International Maritime Lecturers Association (IMLA) to revise model course 3.17 on Maritime English to

meet the requirements following the 2010 Manila Amendments.

2-Fraudulent Certificates:

Member Governments were urged to report details of fraudulent certificates of competency detected in the revised reporting format (STCW 38/17, annex 1). Noting the large number of fraudulent certificates reported, Member States and International Organisations were invited to submit proposals for consideration at the next session of HTW. Worthy of note, the certification verification facility through the IMO website was used 10,722 times during 2013.

3-Development of Guidance for the implementation of the 2010 Manila Amendments: In consideration of such guidance, WG1 listed a large number of requested action items for approval by the Sub-Committee. Most notable amongst these were:

- I. To use GISIS for fulfilling reporting requirements of the STCW Convention and Code;
- II. Approve an STCW .7 circular on advice of action to be taken (by PSC Officers, recognised organisations and recognised security organisations) in cases where seafarers do not carry certification on security related training in accordance with regulations VI/6 of the STCW Convention and section A-VI/6, paragraphs 4 and 6 of the STCW Code after 1 January 2014.
- III. Approve a similar STCW .7 circular on advice of training and certification requirements for ship security officers (highest level) and seafarers with designated security duties. The third (and lowest) level of training is that of

security-awareness. Training requirements for the 3 levels are drafted such that the higher levels include the competencies of the lower level and this the draft Circular seeks to clarify (explanation for PSC benefit).

- IV. Extension of the target completion date on guidance for implementation of the 2010 Manila Amendment from 2014 to 2017, a recommendation to MSC.
- V. A revised list of IMO model courses and priorities on the basis of those already completed; those under development and priorities for pending courses.
- VI. Revision of guidance for model course development, updating and validation processes for discussion at HTW2.
- VII. Request MSC to inform CCC1 that the draft amendments to STCW do not include requirements on emergency exercises and drills when considering part D of the IGF Code.
- VIII. Endorse interim guidance (provided by the USA-led CG) on training for seafarers using gases or other low flashpoint fuels.

► Fatigue Risk Management System:

The Australian delegation tabled an Information Paper relating to fatigue risk, a human element strategic plan they are developing.

► The Polar Code:

WG2 successfully developed a draft Chapter 13 of the Polar Code which will be forwarded to MSC for approval. Noting the progress related to draft amendments of Chapter V of the STCW Convention and Code related to training requirement

for officers and crew on board ships operating in polar waters, member Governments and international organisations were invited to submit comments and proposals for consideration at HTW2.

► Proposed Review of STCW Passenger Ship Specific Safety Training:

Owing to time constraints, WG2 was unable to give due consideration to proposed amendments to the STCW Convention and Code. However agreement by the Sub-Committee was given to the establishment of a Correspondence Group on Development of draft amendments to the Convention and Code related to revised training requirements for passenger ships, under the coordination of the USA.

► Carriage of Dangerous Goods in Packaged Form by Sea:

There was a general view that problems related to the carriage of dangerous goods by sea in packaged form, stem more from land-based issues rather than those on board ships and that this is already addressed adequately in the STCW Convention and Code, the IMDG Code, other IMO instruments and in Model Course 1.10. The Sub-Committee felt it premature to forward anything to the CCC Sub-Committee but invited submissions for consideration at HTW2.

► Guidelines on Safety during Abandon Ship Drills Using Lifeboats:

Recalling that MSC92 approved, in principle, a draft MSC circular on "Guidelines on safety during abandon ship drills using lifeboats" for final approval at MSC 93 (plus Resolution), it was decided that:

- I. There is no need to standardise drills;
- II. There is no need to make the guidelines mandatory; and
- III. Submissions to MSC 93 of an unplanned output for the consolidation and harmonisation of all relevant guidance would be invited.

► Development of an e- Navigation Strategy Implementation Plan:

Norway reported on the work of the e-navigation Correspondence Group (CG) related to human element, also training issues and implications of same. It was agreed that:

- I. Trainers in maritime universities and institutions should be familiar with training requirements;
- II. Administrations keep their training providers updated;
- III. It is too early to develop an e-navigation module; and
- IV. Whilst HCD (human centred design) may produce positive results, such effects would need evaluation.

In the light of all this, it was agreed that it is too premature at this stage to consider training requirements of any sort pending finalisation of the e-navigation Strategy Implementation Plan.

Following discussion of WG1 report to the Sub-Committee, ICS made a spirited intervention on the subject of Security Training. Wherein ICS pointed out that the likely problem associated with the issuance of certificates of proficiency for security awareness training had been brought to the attention of the world's port state control (PSC) MOUs late last year and for which pragmatism was requested of PSC Officers.

However, earlier this week, the Paris MOU responded that, notwithstanding the ICS request, its Member State PSC authorities will issue deficiencies in the absence of the Certificate of Proficiency for security awareness training, totally ignoring the fact that such a situation is not one of the ship-owners' making. It is particularly galling that a deficiency is threatened for the lack of a certificate, even where the training has been undertaken and the documentary evidence can be provided.

Indeed, as a result, the port State control record of the ship, the Company and the Flag State will be adversely annotated by the failure of a certificate issuing authority to comply with certification requirement. In recognition that the Convention cannot permit a suggested "enforcement grace period", the STCW .7 Circular recommends that Administrations should nevertheless inform their port State control authorities that, until 1 July 2015, even if a seafarer's certification with regard to security training under regulation VI/6 of the STCW Convention as amended and section A-VI/6 paragraphs 4 and 6 of the STCW Code is not in accordance with the STCW Convention as amended; it would be sufficient to accept compliance with section 13 of the International Ship and Port Facility Security (ISPS) Code.

Similarly, Administrations should also inform recognised organisations and recognised security organisations issuing ISM Code and ISPS Code certification under SOLAS, as amended, that, until 1 July 2015, if a seafarer's certification is not in accordance with the amended Convention and Code (under regulation VI/6 etc.), it would again be sufficient to accept compliance with section 13 of the ISPS Code.

Further; the Sub-Committee approved an STCW circular on Advice for port State control officers, recognized organizations and recognized security organizations on action to be taken in cases where seafarers do not carry certification required in accordance with regulation VI/6 of the STCW Convention and section A-VI/6, paragraphs 4 and 6 of the STCW Code after 1 January 2014.

It also approved an STCW circular on Advice for port State control officers, recognized organizations and recognized security organizations clarifying training and certification requirements for ship security officers and seafarers with designated security duties, which agrees that ship security officer (SSO) training encompasses the competence requirements of the STCW Code (section A-VI/6). Therefore, holders of SSO certificates should not be required to undergo further training and obtain certification.