

SUB-COMMITTEE ON HUMAN ELEMENT,
TRAINING AND WATCHKEEPING
4th session
Agenda item 5

HTW 4/5/8
9 December 2016
Original: ENGLISH

GUIDANCE FOR THE IMPLEMENTATION OF THE 2010 MANILA AMENDMENTS

Comments on Issues identified during implementation of the 2010 Manila Amendments to the STCW Convention and Code

Submitted by the International Chamber of Shipping (ICS)

SUMMARY

Executive summary: This document comments on document HTW 4/5/4 (United States) on clarification of the training requirement for Electronic Chart Display and Information Systems (ECDIS) equipment, and proposes editorial amendments to MSC.1/Circ.1503 (*ECDIS – Guidance for good practice*) to address the potential for misinterpretation of training requirements under the STCW Convention

Strategic direction: 5.2

High-level action: 5.2.2

Output: 5.2.2.1

Action to be taken: Paragraph 8

Related documents: HTW 4/5/4; MSC.1/Circ.1503 and MSC.1/Circ.1503/Corr.1

Introduction

1 This document comments on document HTW 4/5/4 which provides a proposal to clarify the training requirements for Electronic Chart Display and Information Systems (ECDIS). It is submitted in accordance with the provisions of paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.4).

Discussion

2 ICS supports the proposal in document HTW 4/5/4 (United States) that the HTW Sub-Committee should develop a STCW.7 circular to provide the necessary guidance on the training requirements for ECDIS required under the STCW Convention, in order to address potential inconsistency in the interpretation of the Convention.

3 ICS recalls that both STCW Convention regulation I/14, paragraph 1.5 and ISM Code, section 6.3, refer to the requirement for "familiarization" and not "familiarization training". Training and assessment for the Master and deck department in the use of ECDIS is dealt with in Chapter II of the STCW Convention.

4 Consequently, ICS has identified a further source of possible confusion in the requirements for ECDIS training and familiarization in MSC.1/Circ.1503 (*ECDIS – Guidance for good practice*), specifically in section E on "ECDIS training". Section E includes paragraphs 27.5 and 27.7, which refer to "familiarization training" that conflates two distinct aspects of achieving competence for the effective operation of ECDIS, an issue highlighted in the analysis provided in paragraphs 3 to 5 of document HTW 4/5/4.

5 ICS considers that the reference to "familiarization training" in the guidance is often interpreted by stakeholders as meaning that ECDIS *type-specific training* is the only acceptable means of complying with the familiarization requirements under the STCW Convention and ISM Code. Hence, paragraphs 27.5 and 27.7 of MSC.1/Circ.1503 (*ECDIS – Guidance for good practice*) is a further source of potential confusion regarding the existing training and familiarization requirements in the STCW Convention.

Proposal

6 Taking into account paragraphs 2 to 5 above, ICS proposes to the HTW Sub-Committee to consider minor amendments to MSC.1/Circ.1503, paragraphs 27.5 and 27.7 to address the conflation of training and familiarization. The proposed amendments are as follows:

".5 STCW Convention regulation I/14, paragraph 1.5, as well as sections 6.3 and 6.5 of the International Safety Management (ISM) Code, require companies to ensure seafarers are provided with familiarization ~~training~~. A ship safety management system should include familiarization with the ECDIS equipment fitted, including its backup arrangements, sensors and related peripherals. ECDIS manufacturers are encouraged to provide training resources including type-specific materials. These resources may form part of the ECDIS familiarization ~~training~~;"

".7 companies should also maintain evidence of the familiarization ~~training~~ in compliance with STCW Convention regulation I/14, paragraph 1.5;"

7 ICS considers that the proposed minor amendments:

- .1 would not alter the meaning of the guidance, or amend any ECDIS training or familiarization requirements, but would further assist in addressing issues of interpretation highlighted in HTW 4/5/4 (United States); and
- .2 could be made by the Secretariat and forwarded to MSC 98 for approval.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the information and comments provided, and, in particular, the proposal in paragraph 6, and take action as appropriate.