

## VALIDATION OF MODEL TRAINING COURSES

### Comments on Validation of Model Training Courses

#### Submitted by the International Shipping Federation (ISF)

#### SUMMARY

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| <i>Executive summary:</i>   | This paper comments on Documents STW 44/3/1, STW 44/3/2, STW 44/3/3, STW 44/3/4 and STW 44/3/5 and draws the attention of the sub-committee to concerns of the International Shipping Federation with regard to the development of Model Training Courses. |
| <i>Strategic direction:</i> | 5.2  |
| <i>High-level action:</i>   | 5.2.2  |
| <i>Planned output:</i>      | 5.2.2.5  |
| <i>Action to be taken:</i>  | Paragraph 8  |
| <i>Related documents:</i>   | STW 44/3/1;STW 44/3/2;STW 44/3/3;STW 44/3/4<br>STW 44/3/5  |

#### Introduction

1. This submission is in accordance with document MSC MEPC.1/Circ.4/Rev 2 and the provisions of paragraph 6.12.5 of the Guidelines. This document comments on documents STW 44/3/21, STW 44/3/2, STW 44/3/3, STW 44/3/4 and STW 44/3/5 and draws the attention of the subcommittee to the last Maritime Safety Committee report item regarding future provision of Model Courses.
2. ISF recognises that in order for the STCW Convention to be effective it is essential for Parties to the Convention to have the necessary tools to provide meaningful practical training in Maritime Academies and Training Schools.

#### IMO Model Course Development Process

3. MSC 90/28 section 16.3 advises that MSC 91 agreed there was a need to overhaul the current IMO model course development process and that the STW sub-committee would address this task during the next biennium (2014) . In addition, the Committee also agreed that there was an urgent need to publish the model courses in support of the 2010 amendments to the STCW Convention.

4. ISF understands that the model course review planned for STW 44 will follow the existing model course development process bearing in mind the instructions provided to the course developers by STW 43.
5. ISF are aware of the importance that some flag States and training providers place on Model Courses. ISF are disappointed that despite being reassured at STW 43 that the Industry would be actively encouraged to participate in the drafting group the courses were submitted to IMO without such consultation.
6. Members of IAMI at their 2013 Conference expressed substantial concerns regarding the quality of model courses and their ability to adequately cover Convention requirements and subsequent revisions. ISF believes that some of these concerns may not have arisen had the Industry been invited to participate earlier.
7. ISF suggests that the Industry is in future actively involved in the design and development of future courses to avoid unnecessary duplication of effort and to reach earlier consensus thereby ensuring they are fit for purpose.
8. ISF recognises that It is likely that the new process for developing model courses will not be implemented until after STW 45 where the sub-committee will decide whether or not there is a need to re-write the existing model courses.

#### **Action Requested of the Committee**

9. The Sub-Committee is invited to note the concerns expressed above and to encourage active involvement of all stakeholders in the design and development of all future model courses.