



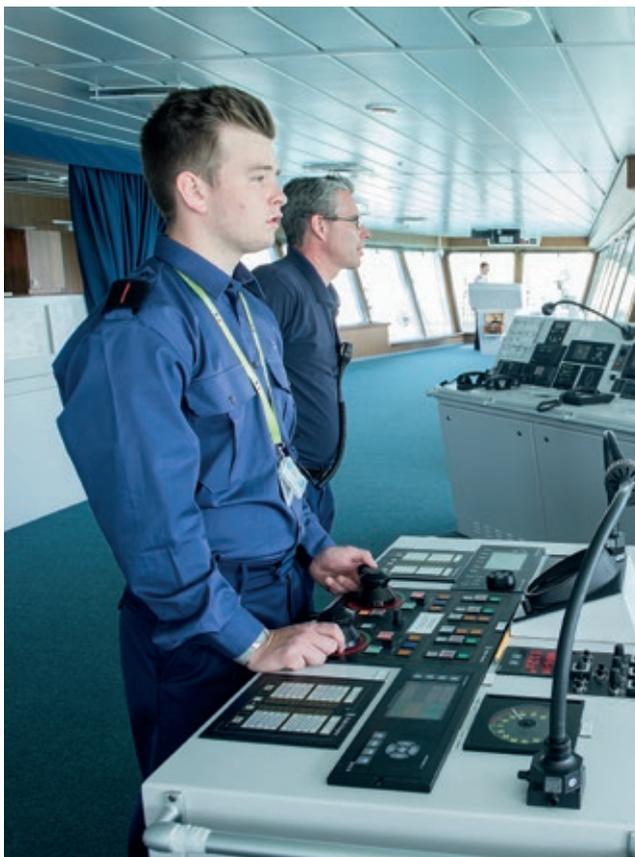
Key Issues

Keeping the STCW Training Regime Fit for Purpose

ICS wants IMO to undertake a comprehensive review of the STCW Convention governing seafarers' training standards.

Shipping is a global industry and therefore requires a global regime for governing the competence standards and certification requirements for the 1.6 million seafarers employed throughout the world merchant fleet. This is because the majority of seafarers serve on ships with a flag state that is different to the country responsible for overseeing their training and issuing certificates of competence. This global regime is provided by the IMO Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) which has now been in place for over 40 years.

In November 2018, at a major crewing conference in Manila (the Philippines being one of the largest providers of seafarers), the ICS Chairman raised some penetrating questions about whether the current IMO STCW regime can remain truly fit for purpose as we approach the third decade of the 21st Century. His speech received an overwhelmingly positive response from maritime employers around the world.



In February 2019, the ICS Board endorsed a recommendation by the ICS Manning and Training Sub-Committee that ICS should request IMO to conduct a comprehensive review of the STCW regime. This is something which has not been undertaken since the early 1990s prior to the radical rewrite of the STCW Convention that was adopted by IMO Member States in 1995.

The STCW Convention and its accompanying STCW Code were most recently reviewed prior to the adoption of the 'Manila Amendments' in 2010, with the transitional period for implementation of the many adjustments agreed by governments coming to an end in 2017. However, while the piecemeal changes agreed in 2010 were extensive, they fell somewhat short of a comprehensive revision, being more akin to a wide ranging 'tidying up' exercise.

In summary, ICS members have concluded that a fully revised STCW regime would allow the industry to adapt much more effectively to fast moving technological developments, including increased automation. A revised Convention could provide a structure with sufficient flexibility to meet the demands of a rapidly evolving world fleet, and could permit a far more modular approach to competency accumulation and certification than possible under the current regime. The arrival of new technology, with respect to navigation, engineering and propulsion systems (including the use of alternative fuels) is already changing the functions that seafarers perform on board ship and the competencies and training which they now require.

Most importantly, ICS believes that a comprehensive revision of the STCW Convention and Code should seek to improve transparency and the robustness of implementation oversight with regard to the obligations of IMO Member States that are responsible for the quality of their national training and certification systems. In particular this includes ensuring strict adherence by individual training institutes to delivering IMO competence standards, and a tightening of the approval process by governments of training colleges, especially those engaged in operational level ships' officer training.

Unfortunately, it is now all too commonplace for employers to need to provide additional training and assessments prior to the deployment of many officers that have been issued with STCW certification by Parties to the STCW Convention, which indeed raises questions as to whether the Convention, as currently drafted, can continue to meet the requirements of the industry in the 2020s.



For example, the so called STCW 'white list' of IMO Member States that have communicated information to the IMO Maritime Safety Committee about measures taken to effect compliance with the Convention and Code now appears to serve little real purpose as it includes virtually every IMO Member State. In particular, the 'white list' takes little account of whether or not governments have subsequently submitted periodic quality standards reports (an interrelated requirement of the STCW Convention) whose great importance seems to have been overlooked since these oversight provisions were adopted almost 25 years ago.

Increasing concerns about the 'white list' have been acknowledged by the IMO secretariat which, in early 2019, made interesting suggestions for its updating which, if ever taken forward, would potentially have the effect of reducing the number of states currently on the list by half.

Unsurprisingly, these ideas proved controversial among IMO Member States when they were given consideration in April 2019. They nevertheless illustrate industry concerns about the need for a full review of the STCW Convention's requirements. ICS would not wish to tear up the 'white list' without a suitable replacement, but there has to be a more transparent and robust monitoring system of national implementation to ensure that STCW continues to deliver competent and quality seafarers in the interests of maritime safety and pollution prevention.

In April 2019, ICS presented a detailed paper to the IMO Sub Committee on Human Element, Training and Watchkeeping (HTW) setting out the concerns of maritime employers with regard to the current STCW regime. This submission was well received by many Member States and will be followed by further discussions with governments and other stakeholders, including seafarers' trade unions, throughout 2019. ICS then intends to make a formal request to the IMO Maritime Safety Committee in 2020 that it should indeed embark on a fundamental review and rewrite of the STCW Convention during the early 2020s.

In the early 1990s, IMO responded positively to industry requests to address serious concerns about training standards in many of the newly emerging seafarer supply countries, many of which now have world class training institutions. With the involvement of all industry stakeholders, ICS believes that the time is now right to consider the next comprehensive revision of STCW, similar in scale and ambition to that completed by IMO Member States back in 1995.

